From: Jean Mendoza
To: jean.mendoza@zimbracloud.com
Subject: Environmental Justice in Washington
Date: Saturday, December 16, 2023 2:57:00 AM
Attachments: EJ in Washington.pdf

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Environmental Justice In Washington State: Is it Real, Or Does Washington EJ Just Look Good On Paper?

A Statement from Friends of Toppenish Creek, December 15, 2023

Environmental justice (EJ)
is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

Fair treatment
means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Meaningful involvement
means:

- People have an opportunity to participate in decisions about activities that may affect their environment and/or health;
- The public's contribution can influence the regulatory agency's decision;
- Community concerns will be considered in the decision making process; and
- Decision makers will seek out and facilitate the involvement of those potentially affected. [1]

* * * * * * * * *

Certain elements of Environmental Justice have been incorporated into WA State law by the Climate Commitment Act and the Healthy Environment for All (HEAL) Act. Environmental Justice has been codified in Washington under RCW 70A.02.

The Washington State Dept. of Ecology [2] and the Washington State Dept. of Commerce [3] have developed agency policies that proclaim adherence to the principles of Environmental Justice.

And yet . . . . In Sunnyside WA one of the largest manure methane bio-digesters in the U.S. [4] has been planned for over two years and the people of Sunnyside are largely unaware. South Yakima
County is classified as an underserved community with a population that is over 80% Latino [5]
and a median household income of $49,134. [6]

The Friends of Toppenish Creek have asked the Yakima County Commissioners, the Yakima Regional Clean Air Agency, and the WA State Dept. of Ecology to hold informational meetings regarding the proposed digester. The agencies have so far ignored the request.

On November 30, 2023, at considerable expense, FOTC partnered with Empowering Latinas in Leadership and Action (ELLA) and convened a meeting to inform the public. Prior to the meeting ELLA canvased Sunnyside neighborhoods near the site and contacted nearly 250 households. Only five of the households had even heard of the digester.

Meanwhile permits are in process and contracts are being signed. The Port of Sunnyside sold property for the digester to project sponsors, Pacific Ag, in 2022. The City of Sunnyside has agreed to make million dollar improvements to nearby roads to accommodate the 140 truck trips per day that would bring manure from outlying farms to the city and the digester. The WA State Department of Commerce has allocated $500,000 for the project.

Already, in June of 2023, the City of Sunnyside has issued a mitigated determination of non-significance (MDNS) for the proposal under the WA State Environmental Policy Act (SEPA). The City of Sunnyside is the Lead Agency for SEPA evaluation of the project. Environmental and EJ advocates believe that the City of Sunnyside should have completed an Environmental Impact Statement (EIS) before issuing the MDNS. An Environmental Impact Statement means looking at all aspects of the project in depth rather than basing a decision on short answers to an Environmental Checklist completed by the proponents.

FOTC asks, “How can anyone construct a bio-digester that produces 850,000 MMBTU’s of natural gas per year that does not have an impact on the environment?” [7] and “How can the WA State Department of Commerce and the WA State Department of Ecology endorse and support a project that tramples the principles of Environmental Justice, by excluding this underserved community from decision making?”

Here are a few of the questions that require answers before breaking ground:

· What are the emergency plans in case of a tank explosion at this project?

· What is the expected life of a digester tank? Of pipes that transport methane, manure, and digestate?

· Will SS RNG truck drivers possess Commercial Drivers Licenses (CDLs) or will the SS RNG use the agricultural exemption for drivers who transport agriculture goods?

· Which air emissions will be monitored and where? Ammonia? Hydrogen sulfide? Methane? Carbon dioxide? Particulate matter? Other?

· How much will dairies be paid per ton of manure?

· How long will the digesters operate in the mesophilic range? How long will the digesters operate in the thermophilic range? This makes a difference in how many pathogens are destroyed by digestion. [8]

· Are there any requirements in place to ensure that digestate, the material left over after harvesting methane, will be applied to fields at agronomic rates?

· Will the proposed RNG facility digest the carcasses of unwanted farm animals?

· Who opposes completion of an EIS and why?

Sincerely,

Friends of Toppenish Creek

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[1] U.S. Environmental Protection Agency. Learn About Environmental Justice. https://www.epa.gov/environmentaljustice/learn-about-environmental-justice

[2] WA State Dept. of Ecology. Environmental Justice. https://ecology.wa.gov/About-us/Who-we-are/Environmental-Justice

[3] WA State Dept. of Commerce. Environmental Justice. https://www.commerce.wa.gov/program-index/environmentaljustice/

[4] Renewable Natural Gas Project Introduction to the Port of Sunnyside September 6, 2022

[5] About 70% of the Latino families in South Yakima County speak Spanish at home. About 25% of the population does not speak English well according to the U.S. Census for 2022

[6] The median household income in Yakima County is $64,910. The median household income in Washington State is $90,325, according to the U.S. Census for 2022.

[7] Risks include increased emissions of hazardous air pollutants and greenhouse gasses, increased traffic, potential leaching to the underlying aquifer that is already contaminated, fires, and explosions.

[8] Mesophilic means digestion at 86 to 115 degrees Fahrenheit. Thermophilic means digestion at 115 to 140 degrees Fahrenheit. Water boils at 212 degrees Fahrenheit.

From:	Jean Mendoza
To:	Trevor Martin
Subject:	SS RNG Comments
Date:	Tuesday, December 5, 2023 3:54:16 PM
Attachments:	Comments re Addendum to Sunnyside Renewable Natural Gas II.pdf

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Dear Mr. Martin,

Please see the attached comments from Friends of Toppenish Creek regarding the Sunnyside RNG project. I will send supporting documents in a second email.

Thank you.

Jean Mendoza

Friends of Toppenish Creek

From:	Jean Mendoza
To:	Trevor Martin
Cc:	Batavia, Chelsea (ECY); Terada, Derrick (he/him/his); Tebb, G. Thomas (ECY); Roberts, Damon (ECY); Bitalac, Emily; Edmondson, Lucy; norma.chavez@commerce.gov; Grove, Jennifer (COM); larry.mattson@commerce.gov; Furze, Michael (COM); luke.martland@ecy.wa.gov; Piazza, Millie (ECY)
Subject:	SS RNG MDNS comments from FOTC
Date:	Tuesday, December 19, 2023 11:59:08 AM
Attachments:	SS RNG Dear City of Sunnyside Comments re Amendment.pdf SS RNG Dear City of Sunnyside Comments re Amendment.pdf

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Dear Mr. Martin,

Please accept the attached second set of comments from the Friends of Toppenish Creek regarding the proposed Sunnyside RNG manure methane plant.

Thanks for you help.

Jean Mendoza

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Already, in June of 2023, the City of Sunnyside has issued a mitigated determination of non-significance (MDNS) for the proposal under the WA State Environmental Policy Act (SEPA). The City of Sunnyside is the Lead Agency for SEPA evaluation of the project.

Environmental and EJ advocates believe that the City of Sunnyside should have completed an Environmental Impact Statement (EIS) before issuing the MDNS. An Environmental Impact Statement means looking at all aspects of the project in depth rather than basing a decision on short answers to an Environmental Checklist completed by the proponents.

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[4] Renewable Natural Gas Project Introduction to the Port of Sunnyside September 6, 2022

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- What are the emergency plans in case of a tank explosion at this project?
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- Will the proposed RNG facility digest the carcasses of unwanted farm animals?
- Who opposes completion of an EIS and why?

Sincerely,

Friends of Toppenish Creek

3142 Signal Peak Road
White Swan, WA 98952

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Comments re Addendum to Sunnyside Renewable Natural Gas (SS RNG) SEPA document

Friends of Toppenish Creek is a 501 C (3) non profit group incorporated under the laws of Washington State and located in Yakima County. FOTC submits the following comments regarding an addendum submittal to a June 2023 SEPA review and mitigated determination of non-significance (MDNS) for a proposed Renewable Natural Gas (RNG) bio-digester at the Port of Sunnyside. The City of Sunnyside Notice of SEPA Addendum asked commenters to reference SEPA 2022.0200. We are not sure whether this is correct, or whether SEPA 2022.0200 exists.[1] The correct file number may be SEPA 2023.0200.

It is difficult to comment intelligently on this addendum submittal because the notice omits so much content. For example, the addendum includes a February 2023 New Source Review (NSR) application from Sunnyside RNG to the Yakima Regional Clean Air Agency (YRCAA) but omits the response from the YRCAA that rejected the application and requested more information.

FOTC believes that an MDNS should not have been issued until the City of Sunnyside and the public had the opportunity to review information on air emissions and traffic impacts. The MDNS was issued on June 22, 2023, but a Traffic Impact Analysis (TIA), that is part of the November 23, 2023 addendum letter, is dated July 10, 2023.

The Yakima Regional Clean Air Agency, as the agency with expertise on air, failed to comment on the May 2023 SEPA Review, as required by RCW 43.21C and WAC 197-11, and especially WAC 197-11-030, WAC 197-11-060(4), and WAC 197-11-502(2).

The City of Sunnyside did not have sufficient information to conclude no environmental impacts, and the public did not have sufficient information to comment intelligently on the May 2023 Environmental Review. The resulting MDNS is invalid due to withheld and/or insufficient information. See WAC 197-11-335, WAC 197-11-340(3), WAC 197-11-080.

* * * * * *

[1] FOTC does not find SEPA 2022.0200 in Ecology's State Environmental Policy Act (SEPA) Register at https://apps.ecology.wa.gov/separ/Main/SEPA/Search.aspx?SearchText=City%20of%20Sunnyside&SearchFields=All&County=YAKIMA&PageSize=10&SortColumn=LeadAgencyAscending&Page=17

According to a presentation by Pacific AG to the Port of Sunnyside[2] on September 6, 2022, the Sunnyside RNG facility could be "one of the largest ag waste anaerobic digesters in the nation."[3]

Realistically, how can "one of the largest waste anaerobic digesters in the nation" not have an impact on the environment?

The SS RNG project would:

- Produce between 800,000 & 950,000 MMBTUs of Renewable Natural Gas a year
- Produce and store methane, a flammable and explosive gas, in tanks with membrane covers
- Transfer the natural gas to a major pipeline
- Move 140 truckloads of manure every day from dairies to the digester
- Store digestate in stacks at the digester site and on farms
- Store liquid effluent from the digester in lagoons
- Spread digestate onto crop fields. There is insufficient information to determine the composition of the digestate and potential impacts on soil health and greenhouse gas emissions.

* * * * * * *

Manure bio-digesters are known to experience spills and explosions.[4] These adverse impacts are not expected to occur, but when they do occur the impacts are grave. Washington law accounts for this in WAC 197-11-794 (2).

FOTC has requested more information regarding fires and spills from Pacific AG, Sunnyside RNG, and Yakima County Emergency Services. The City of Sunnyside should not take further action on the SS RNG MDNS until this information arrives, and answers satisfy potentially impacted people.

* * * * * * *

FOTC believes the City of Sunnyside violated many sections of Washington SEPA law when the city issued the June 22, 2023 MDNS. These alleged violations are listed below. FOTC believes that the MDNS should be rescinded pursuant to WAC 197-11-340(3), a determination of non-significance (DNS) should be issued, and an Environmental Impact Statement (EIS) completed. Conducting a thorough EIS is the only way to adequately determine the environmental consequences of constructing such a large digester.

[2] See Attachment 1

[3] Harrison Pettit from Pacific Ag said this was not true at a public meeting in Sunnyside on November 30, 2023.

[4] See Attachment 2

WAC 197-11-030

Policy.

(1) The policies and goals set forth in SEPA are supplementary to existing agency authority.

(2) Agencies shall to the fullest extent possible:

(a) Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.

(b) Find ways to make the SEPA process more useful to decision makers and the public; promote certainty regarding the requirements of the act; reduce paperwork and the accumulation of extraneous background data; and emphasize important environmental impacts and alternatives.

(c) Prepare environmental documents that are concise, clear, and to the point, and are supported by evidence that the necessary environmental analyses have been made.

(d) Initiate the SEPA process early in conjunction with other agency operations to avoid delay and duplication.

(e) Integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.

(f) Encourage public involvement in decisions that significantly affect environmental quality.

(g) Identify, evaluate, and require or implement, where required by the act and these rules, reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.

The City of Sunnyside did not, to the fullest extent possible, *Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.* Sunnyside did not compel the Yakima Regional Clean Air Agency to provide comments on air impacts from:

- Potential leaks at the digester site
- Transport of manure and digestate
- Leaks in pipes that transport natural gas
- 140 round trip truck trips per day
- Storage of manure and digestate in stacks and lagoons
- Spreading and spraying digestate on crop fields

The City of Sunnyside did not *promote certainty regarding the requirements of the act*. Sunnyside sent conflicting messages to the public by telling the public that an appeal was authorized, improperly stating the appeal would be a closed appeal, scheduling an appeal, and then canceling the appeal. Sunnyside did not respond to reasonable questions regarding the proposed RNG project.[5]

[5] See Attachment 3 FOTC Request for the City of Sunnyside to reconsider an MDNS for the Sunnyside RNG project. The City did not answer our questions.

The City of Sunnyside did not *emphasize important environmental impacts and alternatives.* Sunnyside did not explore or list alternatives to the project or citing of the project. Sunnyside did not describe potential air impacts or potential impacts to ground and/or surface waters at the Port of Sunnyside where monitoring wells have high levels of nitrate[6] and the Sulphur Creek Wasteway traverses the area. The City of Sunnyside did not address the potential for fires and explosions.

There were no analyses to prove statements by the project proponent, Pacific Ag/Sunnyside RNG, that the project would generate millions in tax dollars. There was no analysis of costs to tax payers in the form of subsidies, wear and tear on roadways, and decreased property values.

The City of Sunnyside did not *integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.* Instead Sunnyside issued an MDNS and then told FOTC that we could not appeal the MDNS until a later time after Pacific Ag applied for a permit.

The City of Sunnyside did not *encourage public involvement.* Instead, the city made it difficult for the public to be involved by not posting notices in newspapers, by not translating notices into Spanish, by only notifying about 20 neighbors of the SEPA review, by posting signs in a corn field, by not providing informational paperwork, by refusing to answer questions about the project, and by failure to attend a public meeting regarding the digester on November 30, 2023.

The City of Sunnyside did not *identify reasonable alternatives*, such as on-farm digesters, a more remote location, limitations on hours for manure transport, different methods of manure management and disposal, or the "no-action" alternative.

WAC 197-11-055
Timing of the SEPA Process

*(b) Agencies shall identify the times at which the environmental review shall be conducted either in their procedures or on a case-by-case basis. Agencies may also organize environmental review in phases, as specified in WAC **197-11-060**(5).*

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[6] See Monitoring Wells LYV-PS-031, LYV-PS-032, and LYV-PS-033 on Ecology's Environmental Information Monitoring Data Base at https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearchResults.aspx?ResultType=GroundwaterWellTab&StudyUserIds=MRED&StudyUserIdSearchType=Contains&LocationCounties=Yakima&HasGroundwaterData=True

The City of Sunnyside did not state that the environmental review for the Sunnyside RNG project would be organized in phases.

*(c) Appropriate consideration of environmental information shall be completed before an agency commits to a particular course of action (WAC **197-11-070**).*

The Port of Sunnyside committed to the Sunnyside RNG project by proposing the sale of property to Pacific AG in November 2022.[7] The City of Sunnyside issued a determination of non-significance for that sale on December 6, 2022.[8] Sale of real estate for a designated purpose is a commitment to a course of action.

Notice of the sale was not properly advertised. Public comments regarding the sale have not been posted. The City of Sunnyside approved an MDNS for the Sunnyside RNG project on June 22, 2023, six months after sale approval.

*(4) **Applicant review at conceptual stage.** In general, agencies should adopt procedures for environmental review and for preparation of EISs on private proposals at the conceptual stage rather than the final detailed design stage.*[9]

(a) If an agency's only action is a decision on a building permit or other license that requires detailed project plans and specifications, agencies shall provide applicants with the opportunity for environmental review under SEPA prior to requiring applicants to submit such detailed project plans and specifications.

*(b) Agencies may specify the amount of detail needed from applicants for such early environmental review, consistent with WAC **197-11-100** and **197-11-335**, in their SEPA or permit procedures.*

(c) This subsection does not preclude agencies or applicants from preliminary discussions or exploration of ideas and options prior to commencing formal environmental review.

On November 30, 2023, Harrison Pettit from Pacific AG told attendees at a public meeting regarding the Sunnyside RNG project that conversations regarding the project have been ongoing for two years. The fact that the Port of Sunnyside sold property to Pacific Ag for the project indicates a commitment on the part of the Port of Sunnyside and the City of Sunnyside to the biodigester project.

There is no documentation of alternatives as addressed in RCW 43.21C.030(2)(c)(iii), RCW 43.21C.030(2)(e), WAC 197-11-030(2), WAC 197-11-060 (1), WAC 197-11-060

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[7] Port of Sunnyside Property Sale. http://www.friendsoftoppenishcreek.org/cabinet/data/AVS%203%20SS%20RNG%20Property%20Sale%20Notice.pdf

[8] DNS for Property Sale. http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG%20DNS_SEPA-2022.0046.pdf

[9] FOTC assumed in July of 2023 that the Sunnyside RNG project is a public and private partnership, based on statements in the June 22, 2023, MDNS. However, at a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag stated several times that this is a private project.

(2), WAC 197-11-060 (3), WAC 197-11-080(1), WAC 197-11-400 (2), WAC 197-11-402(1), WAC 197-11-402(9), WAC 197-11-408(2), WAC 197-11-440(4), WAC 197-11-440(5), WAC 197-11-655(3). According to WAC 197-11-440(5)(b)(ii) *The "no-action" alternative shall be evaluated and compared to other alternatives.*

*(5) An overall decision to proceed with a course of action may involve a series of actions or decisions by one or more agencies. If several agencies have jurisdiction over a proposal, they should coordinate their SEPA processes wherever possible. The agencies shall comply with lead agency determination requirements in WAC **197-11-050** and **197-11-922**.*

(6) To meet the requirement to insure that environmental values and amenities are given appropriate consideration along with economic and technical considerations, environmental documents and analyses shall be circulated and reviewed with other planning documents to the fullest extent possible.

Selected environmental documents for the Sunnyside RNG project were first shared with the public on May 23, 2023. A Traffic Impact Analysis was not published until July of 2023. There is still no approved air study. Questions regarding increased pollution related to the production of manure to feed the digester, and emissions from the digestate produced by the digester have not been answered.

WAC 197-11-060 (4) Impacts.

*(a) SEPA's procedural provisions require the consideration of "environmental" impacts (see definition of "environment" in WAC **197-11-740** and of "impacts" in WAC **197-11-752**), with attention to impacts that are likely, not merely speculative. (See definition of "probable" in WAC **197-11-782** and **197-11-080** on incomplete or unavailable information.)*

*(b) In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC **197-11-330**(3) also).*

(c) Agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.

(d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas.

*(e) The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC **197-11-792**) may be wider than the impacts for which mitigation measures are required of applicants (WAC **197-11-660**). This will depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant's proposal, and the capability of applicants or agencies to control the impacts in each situation.*

This is a large project. This bio-digester may be one of the largest in the United States. Impacts will extend beyond the Sunnyside City Limits.

- There will be increased traffic on Yakima County roads to haul manure and crop residues to the digester, to haul digestate from the digester, to haul composted digestate to markets. Increased traffic brings increased pollution of the air with nitrogen oxides and particulate matter. Increased traffic brings increased wear and tear on county roads and costs to tax payers across the county. FOTC submitted an evaluation of the Sunnyside RNG TIA to Yakima County and the Port of Sunnyside on August 28, 2023.[10] We await responses.
- If dairies receive up to $200 per year per cow for manure, there is an incentive to increase the number of cows in each herd. More cows mean increased leaching to the aquifers, and increased air emissions. More cows mean more land taken out of production of fruits and vegetables and more land devoted to dairies and cattle feed. Corn and alfalfa, the major crops for cattle feed, require large amounts of water. Corn is hard on the land, requires large amounts of fertilizer and introduces a wide range of plant pathogens.
- FOTC does not believe it is possible to test for and screen out all the possible contaminants in digestate. There is a significant risk of spreading pathogens to a large number of farming operations when digestate is spread as fertilizer or used as animal bedding. For example, cryptosporidium is a common and wide spread zoonotic parasite that attacks young calves and is more common on dairies with intense confinement and moist conditions.[11] If there is cryptosporidium in manure used as feedstock, the parasite may proliferate in the digesters, live in the digestate, and infect soils for miles around where farmers spread digestate. Cryptosporidium could infect large numbers of animals housed in facilities that use the digestate for bedding.
- If dairies receive up to $200 per year per cow for manure, the up to 25 LYV dairies that participate in this project have a serious economic advantage over the 15 or more dairies that do not. If a dairy has 1,000 milk cows and receives $200 per year per cow, that dairy will increase annual income by $200,000. This makes a difference in which dairies survive and which do not.
- Sunnyside RNG has not described contracts with dairies. FOTC believes there is a potential for this project to squeeze out non-participating dairies and to create dairy dependence on the digester for economic survival. If dependence occurs, then LYV dairies are at the mercy of digester operators who can raise or lower the rates of payment for manure. There is a troubled dairy digester in Iowa where

[10] See Attachment 4

[11] Oregon State University. The cryptosporidium parasite and its effect on calves and humans. https://extension.oregonstate.edu/animals-livestock/beef/cryptosporidium-parasite-its-effect-calves-humans *Cryptosporidium is* most infectious when the parasite is passed in feces and then ingested. Infected calves can have crypto in their feces for weeks after they are no longer sick.
Crypto eggs have a tough outer shell and are resistant to disinfectants, even chlorine bleach. They can survive outside the body and in the environment for long periods. The eggs can be killed by generous applications of a 3% hydrogen peroxide solution as well as exposure to high temperatures in excess of 160° F, which is hotter than most domestic tap water.

economic benefits do not pencil out. A recent newspaper article[12] about the Waunakee Digester in Wisconsin stated:

Many of the assumptions the company made at the start were wrong. In the future, the business model will have to be tweaked, and farmers sending manure to comparable operations may need to pay the plant to accept it.

- Regarding global warming: To our knowledge no one has calculated how much diesel fuel would be burned to transport manure and digestate for this project.
- Regarding global warming: Dairies produce at least one metric ton of CO_2 equivalents via enteric fermentation for every metric ton of methane produced in anaerobic manure lagoons. Consider a hypothetical community that produces 0.5 MMT CO_2 equivalents of methane via enteric fermentation, and 0.5 MMT CO_2 equivalents of methane from manure lagoons. This equals 1 MMT CO_2 equivalents of methane total. Suppose the community can process all the methane from manure lagoons into renewable natural gas. The total is now 0.5 MMT CO_2 equivalents of methane. Because the operation is profitable the community doubles the number of cows. All the methane from manure lagoons is captured, but the community now produces 1 MMT CO_2 equivalents of methane from enteric fermentation – back to the starting point. Plus the emission of other air pollutants has doubled & emissions from manure transport has doubled, etc.
- We do not see an accounting of how much income for the proposed digester comes from the Washington Cap and Trade program, and from tax payers. The Cap and Trade program does not last forever. Can the Sunnyside RNG digester continue to profit if subsidies decline?
- According to the EPA AgStar program[13] there are many ways to reduce methane emissions from livestock manure management. Some methods are:
    - *Anaerobic digesters – 50% reduction*
    - *Daily spread – 45% reduction*
    - *Pasture based management – 45% reduction*
    - *Composting – 45% reduction*
    - *Solid storage – 45% reduction*
    - *Manure drying practices – 45% reduction*
    - *Semi-permeable covers – 40% reduction*
    - *Decreased manure storage time – 40% reduction*
    - *Composted bedded pack barns – 30% reduction*
    - *Solid separation of manure solids prior to entry to wet/anaerobic environment – 20% reduction*

  But anaerobic digesters cost so much more than the other methods.

[12] State-financed manure digester plagued by spills, explosions. 2015. https://archive.jsonline.com/news/statepolitics/state-financed-manure-digester-plagued-by-spills-explosion-b99435123z1-290263421.html

[13] EPA AgStar. (2023) Practices to Reduce Methane Emissions from Livestock Manure Management. https://www.epa.gov/agstar/practices-reduce-methane-emissions-livestock-manure-management

- The Sunnyside RNG New Source Review (NSR) application requires more information and does not quantify the amount of air pollutants currently in the LYV ambient air. It does not estimate the percentage of air pollution attributable to the proposed Sunnyside RNG digester if it becomes reality. Would Sunnyside residents be forced to stop using wood stoves to compensate for digester emissions to keep Yakima County in compliance with U.S. criteria air standards?
- There are significant increases in morbidity and mortality associated with fine particulate air pollution.[14] One study found a decrease of 10 $\mu g/m^3$ of fine particulate concentration was associated with an estimated increase in life expectancy equal to 0.77 years.[15] By how much would fine particulate matter levels increase in the LYV if the Sunnyside RNG digester were built? What is the cost of human health and life?

WAC 197-11-060 Content of Environmental Review

(5) ***Phased review.***

(a) Lead agencies shall determine the appropriate scope and level of detail of environmental review to coincide with meaningful points in their planning and decision-making processes. (See WAC ***197-11-055*** *on timing of environmental review.)*

(b) Environmental review may be phased. If used, phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. Broader environmental documents may be followed by narrower documents, for example, that incorporate prior general

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[14] Xie, W., Li, G., Zhao, D., Xie, X., Wei, Z., Wang, W., ... & Liu, J. (2015). Relationship between fine particulate air pollution and ischaemic heart disease morbidity and mortality. *Heart*, *101*(4), 257-263. https://kd.nsfc.gov.cn/paperDownload/1000008959735.pdf
Samet, J. M., Dominici, F., Curriero, F. C., Coursac, I., & Zeger, S. L. (2000). Fine particulate air pollution and mortality in 20 US cities, 1987–1994. *New England journal of medicine*, *343*(24), 1742-1749. https://www.nejm.org/doi/full/10.1056/NEJM200012143432401

Zanobetti, A., & Schwartz, J. (2009). The effect of fine and coarse particulate air pollution on mortality: a national analysis. *Environmental health perspectives*, *117*(6), 898-903. https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.0800108?url_ver=Z39.88-2003&rfr_id=ori:rid:crossref.org&rfr_dat=cr_pub%20%200pubmed

Pope III, C. A., & Dockery, D. W. (2006). Health effects of fine particulate air pollution: lines that connect. *Journal of the air & waste management association*, *56*(6), 709-742. https://www.nejm.org/doi/full/10.1056/NEJMsa0805646

Pope III, C. A., Turner, M. C., Burnett, R. T., Jerrett, M., Gapstur, S. M., Diver, W. R., ... & Brook, R. D. (2015). Relationships between fine particulate air pollution, cardiometabolic disorders, and cardiovascular mortality. *Circulation research*, *116*(1), 108-115. https://www.ahajournals.org/doi/full/10.1161/circresaha.116.305060

[15] Pope CA 3rd, Ezzati M, Dockery DW. Fine-particulate air pollution and life expectancy in the United States. N Engl J Med. 2009 Jan 22;360(4):376-86. doi: 10.1056/NEJMsa0805646. PMID: 19164188; PMCID: PMC3382057. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3382057/

discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

(c) Phased review is appropriate when:

*(i) The sequence is from a nonproject document to a document of narrower scope such as a site specific analysis (see, for example, WAC **197-11-443**); or*

(ii) The sequence is from an environmental document on a specific proposal at an early stage (such as need and site selection) to a subsequent environmental document at a later stage (such as sensitive design impacts).

(d) Phased review is not appropriate when:

(i) The sequence is from a narrow project document to a broad policy document;

(ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or

*(iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060 (3)(b) or **197-11-305**(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.*

(e) When a lead agency knows it is using phased review, it shall so state in its environmental document.

(f) Agencies shall use the environmental checklist, scoping process, nonproject EISs, incorporation by reference, adoption, and supplemental EISs, and addenda, as appropriate, to avoid duplication and excess paperwork.

*(g) Where proposals are related to a large existing or planned network, such as highways, streets, pipelines, or utility lines or systems, the lead agency may analyze in detail the overall network as the present proposal or may select some of the future elements for present detailed consideration. Any phased review shall be logical in relation to the design of the overall system or network, and shall be consistent with this section and WAC **197-11-070**.*

The City of Sunnyside did not state that the city would use a phased review. FOTC believes the City of Sunnyside should have gathered information sooner and presented all relevant environmental information with the initial SEPA review. Because the process now involves addressing a SEPA Review and then addressing Addenda to the SEPA review, the amount of study and paperwork has doubled, at least for FOTC.

WAC 197-11-080

Incomplete or unavailable information.

(1) If information on significant adverse impacts essential to a reasoned choice among alternatives is not known, and the costs of obtaining it are not exorbitant, agencies shall obtain and include the information in their environmental documents.

(2) When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists.

(3) Agencies may proceed in the absence of vital information as follows:

(a) If information relevant to adverse impacts is essential to a reasoned choice among alternatives, but is not known, and the costs of obtaining it are exorbitant; or

(b) If information relevant to adverse impacts is important to the decision and the means to obtain it are speculative or not known;

Then the agency shall weigh the need for the action with the severity of possible adverse impacts which would occur if the agency were to decide to proceed in the face of uncertainty. If the agency proceeds, it shall generally indicate in the appropriate environmental documents its worst case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed.

*(4) Agencies may rely upon applicants to provide information as allowed in WAC **197-11-100**.*

The City of Sunnyside did not document incomplete information, as required in the rule. FOTC believes that significant information is missing, and this should have been documented. See the concerns described on pages 6 to 9 above. We are especially concerned about costs to tax payers, impact on non-participating dairies and other farms, spreading disease, unknown increases in LYV air pollution, wear and tear on county roads, increases in traffic accidents, dangers to school children, and risks of fire and explosions.

Although the chances of fires and explosions are not great, damage when such incidents occur may be high and could include death.[16] A quality SEPA review must acknowledge this risk and address it. See WAC 197-11-794 (2).

The Sunnyside RNG SEPA Check list says:

Anaerobic-digestor-based renewable natural gas facilities produce biogas composed of methane (CH4) which is a flammable gas (under limited circumstances), hydrogen sulfide (H2S) which is both a flammable and toxic gas, along with CO2 and vocs. These components will be contained in anaerobic tanks with membrane roofs and in the downstream raw biogas piping systems designed in compliance with industry standards for sour gas facilities.

Methane (CH4) and Hydrogen Sulfide (H2S) are products of the anaerobic digestion process and both are considered hazardous with H2S also considered toxic. Both components will be present in the facility tanks and piping. Their hazardous and/or toxic characteristics along with response measures, should either be released to the atmosphere, can be found in Safety Data Sheets (SDS). Process chemicals such as solvents, oils, lubricants, antifreeze, ferric chloride and natural gas injection calibration gases such as Nitrogen, Propane, Helium, and potentially odorant will be used in limited quantities.

Standard emergency and fire services, as well as potentially confined space rescue. Other special health and safety planning is underway and will be confirmed with emergency

[16] See Attachment 2

services and County Health Department. Standard emergency services equipment includes self-contained breathing apparatus (SCBA) appropriate for potential exposure.

The following measures may be implemented to reduce or control environmental health hazards: A health and safety plan would be followed during construction to address worker safety and to minimize exposure to potential environmental health hazards. To help detect potential leaks quickly, an odorant may be added to the gas . Pressure and flow at the facilities will be monitored to ensure proper operation and reduce potential risk for fire and explosion. The centralized gas cleaning unit would be designed with internal shutoff valves that will switch automatically if the system detects a malfunction. The centralized gas cleaning unit would be outfitted with control technology to ensure that emissions are below the acceptable source impact level for air pollutants associated with project operation. The extremely limited areas where toxic/ hazardous materials are utilized will have impermeable surfaces and curbing to contain any potential spills.

Every methane producing facility with spills, leaks, fires, and explosions said the same things when they convinced communities to permit operations. Nothing in this statement is enforceable.[17]

The checklist says, *The following measures <u>may be implemented</u> to reduce or control environmental health hazards.*

If there is an accident and victims argue for compensation, Sunnyside RNG insurance companies can simply say, 'W never promised to do those things. We said those measures *may be implemented*.'

A useful SEPA check list would tell the reader, among other things:

- Where on the facility would alarms and monitors be located?
- What would be the pressure and flow danger signs?
- Would monitoring be automated or by trained personnel?
- What would the alarms detect?
- Frequency of alarm checks to make sure they function properly?
- How would the facility check for corrosion in the piping system, in the tank floors and walls?
- How often would piping be checked for leaks?
- When would equipment be replaced as the facility ages?
- Required safety training for staff – content, how often?
- Evacuation routes?
- What are protocols for rescuing trapped and endangered workers?
- Would there be monitoring for release of pathogens in effluent and air?
- Would there be fenceline monitoring?

[17] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

- What are proposed protocols for notifying neighbors of leaks and dangers?
- Describe a worst case scenario for fires and explosions

WAC 197-11-158 SEPA/GMA project review—Reliance on existing plans, laws, and regulations.

*(1) In reviewing the environmental impacts of a project and making a threshold determination, a GMA county/city may, at its option, determine that the requirements for environmental analysis, protection, and mitigation measures in the GMA county/city's development regulations and comprehensive plan adopted under chapter **36.70A** RCW, and in other applicable local, state, or federal laws or rules, provide adequate analysis of and mitigation for some or all of the specific adverse environmental impacts of the project.*

(2) In making the determination under subsection (1) of this section, the GMA county/city shall:

*(d) Place the following statement in the threshold determination if all of a project's impacts are addressed by other applicable laws and no conditions will be required under SEPA: "The lead agency has determined that the requirements for environmental analysis, protection, and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter **36.70A** RCW, and in other applicable local, state, or federal laws or rules, as provided by RCW **43.21C.240** and WAC 197-11-158. Our agency will not require any additional mitigation measures under SEPA."*

The City of Sunnyside did not select this option.

WAC 197-11-164 Planned actions—Definition and criteria.

*(1) Under RCW **43.21C.440**, GMA counties/cities may designate a planned action.*

FOTC interpretation is that the Sunnyside RNG project is not a planned action.

WAC 197-11-330 Threshold determination process.

*(3) In determining an impact's significance (WAC **197-11-794**), the responsible official shall take into account the following, that:*

(a) The same proposal may have a significant adverse impact in one location but not in another location;

(b) The absolute quantitative effects of a proposal are also important, and may result in a significant adverse impact regardless of the nature of the existing environment;

(c) Several marginal impacts when considered together may result in a significant adverse impact;

(d) For some proposals, it may be impossible to forecast the environmental impacts with precision, often because some variables cannot be predicted or values cannot be quantified.

(e) A proposal may to a significant degree:

(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;

(ii) Adversely affect endangered or threatened species or their habitat;

(iii) Conflict with local, state, or federal laws or requirements for the protection of the environment; and

(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.

*(4) If after following WAC **197-11-080** and **197-11-335** the lead agency reasonably believes that a proposal may have a significant adverse impact, an EIS is required.*

(5) A threshold determination shall not balance whether the beneficial aspects of a proposal outweigh its adverse impacts, but rather, shall consider whether a proposal has any probable significant adverse environmental impacts under the rules stated in this section. For example, proposals designed to improve the environment, such as sewage treatment plants or pollution control requirements, may also have significant adverse environmental impacts.

Many people believe that the SS RNG digester should be located away from the City of Sunnyside, in a more remote area.

People note that the proposed digester will be situated near the Windmill Mushroom Farms that already sends odorous emissions into the ambient air, and the Nutrien Fertilizer Plant with a history of a fire that required evacuation of neighbors, and the Sunnyside wastewater treatment plant that sprays odorous effluent onto nearby fields.

The proposed digester would be near the area where the poorer people of Sunnyside live and farther from more affluent areas. A previous site, near more affluent areas, and near the Williams natural gas pipeline, was rejected. No one is stating the reason.

Soil at this site, Quincy loamy fine sand, is “excessively drained” according to the Natural Resources Conservation Service. Nearby monitoring wells at the Port of Sunnyside show high levels of nitrates in the underlying aquifer. Sunnyside RNG has not stated what kind of liner will be used for digester lagoons. It is reasonable to expect that spills on the digester site would quickly leach to the aquifer.

Approval of this project without an Environmental Impact Statement would demonstrate to the public that Washington laws to protect people in marginalized neighborhoods mean nothing.

197-11-335 Additional information.

*The lead agency shall make its threshold determination based upon information reasonably sufficient to evaluate the environmental impact of a proposal (WAC **197-11-055**(2) and **197-11-060**(3)). The lead agency may take one or more of the following actions if, after reviewing the checklist, the agency concludes that there is insufficient information to make its threshold determination:*

(1) Require an applicant to submit more information on subjects in the checklist;

(2) Make its own further study, including physical investigations on a proposed site;

*(3) Consult with other agencies, requesting information on the proposal's potential impacts which lie within the other agencies' jurisdiction or expertise (agencies shall respond in accordance with WAC **197-11-550**); or*

*(4) Decide that all or part of the action or its impacts are not sufficiently definite to allow environmental analysis and commit to timely, subsequent environmental analysis, consistent with WAC **197-11-055** through **197-11-070**.*

There is insufficient information in the Sunnyside RNG checklist to evaluate the environmental impact of the proposed digester.

- Only vague speculation about project expansion
- A Geotechnical Report and Phase I ESA are referenced but not available for review
- There is no air permit. The application posted on the City of Sunnyside web site that appears to have been accepted by the Yakima Regional Clean Air Agency was not in fact accepted. The YRCAA returned it to Sunnyside RNG for more information
- Could the answers be any vaguer? How about this: "Best management practices will be used to reduce and control erosion. Local and state laws will be followed. Silt fence, construction entrance, an inlet protection are planned."[18]
- The Environmental Checklist assures the public that emissions from the proposed digester will not exceed:
    - CO - 100 tons per year (tpy)
    - NOX - 40 tons per year (tpy)
    - SO2 - 40 tons per year (tpy)
    - PM - 25 tons per year (tpy)
    - PM10-15tpy
    - PM25 -10 tpy

[18] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

Suppose the SS RNG digester only emits 5 tons per year of PM 2.5, fine particulate matter, and Windmill Mushroom Farms only emits 5 tons per year of fine particulate matter, and Nutrien Solutions only emits 5 tons per year of fine particulate matter, and the City of Sunnyside Waste Water Treatment Plant only emits 5 tons per year of fine particulate matter. The Total is 20 tons per year. What does this mean for South Sunnyside air quality? Wouldn't it be better to study this problem before ground is broken, rather than trying to protect human health with home air filters and breathing treatments afterwards?

- *Stormwater runoff will be retained on site and infiltrated into the ground at various locations including a potential stormwater pond. This water will not flow into other waters.* This means that stormwater will wash spilled manure and digestate from the site into the ground. Who will monitor for onsite spills? Is groundwater monitoring appropriate here?
- *Natural gas used for heat (the boilers) is accounted for in the air emissions as well as avoided methane calculations.* This natural gas should not be counted in avoided methane calculations.
- *Thermal energy will be recaptured from the amine re boiler for heating other site processes. Where appropriate variable rate pumps will be used.* There is insufficient information to quantify these proposed savings. There is insufficient information for the average reader, including City of Sunnyside Officials, to understand the nature of an amine boiler.
- *To help detect potential leaks quickly, an odorant may be added to the gas*. An odorant "may" be added. You "may" win the lottery
- *Noise is not anticipated to be a problem*. Please tell us why not.
- FOTC's table top calculation, using data from the SS RNG Traffic Impact Analysis estimates there will be an additional 1,500 miles of truck traffic per day mostly on Yakima County Roads. Heavy duty trucks inflict about 2,500 times more wear and tear on roads than private cars. There is no estimate of cost to maintain the impacted county roads.

WAC 197-11-340 Determination of nonsignificance (DNS).

(2)(c) Any person, affected tribe, or agency may submit comments to the lead agency within fourteen days of the date of issuance of the DNS.
(2)(f) The responsible official shall reconsider the DNS based on timely comments and may retain or modify the DNS or, if the responsible official determines that significant adverse impacts are likely, withdraw the DNS or supporting documents. When a DNS is modified, the lead agency shall send the modified DNS to agencies with jurisdiction.
(3)(a) The lead agency shall withdraw a DNS if:

(i) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts;

(ii) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts; or

(iii) The DNS was procured by misrepresentation or lack of material disclosure; if such DNS resulted from the actions of an applicant, any subsequent environmental

checklist on the proposal shall be prepared directly by the lead agency or its consultant at the expense of the applicant.

(b) Subsection (3)(a)(ii) shall not apply when a nonexempt license has been issued on a private project.

*(c) If the lead agency withdraws a DNS, the agency shall make a new threshold determination and notify other agencies with jurisdiction of the withdrawal and new threshold determination. If a DS is issued, each agency with jurisdiction shall commence action to suspend, modify, or revoke any approvals until the necessary environmental review has occurred (see also WAC **197-11-070**).*

The City of Sunnyside issued a mitigated determination of non-significance (MDNS) of the SS RNG project on June 22, 2023.

The Friends of Toppenish Creek submitted an appeal of the MDNS on July 6, 2023.[19]

There is no evidence that the responsible official reconsidered the MDNS based on FOTC's lengthy comments, as required by WAC 197-11-340(2)(f).

FOTC maintains there was a lack of material disclosure due to the absence of data regarding air quality, risks for fires and explosion, and traffic impacts. The agency with expertise for air, the YRCAA, did not comment. A Traffic Impact Analysis (TIA) was not available for review prior to our July 6, 2023 appeal.

WAC 197-11-350 Mitigated DNS.

The purpose of this section is to allow clarifications or changes to a proposal prior to making the threshold determination.

(1) In making threshold determinations, an agency may consider mitigation measures that the agency or applicant will implement.

(2) After submission of an environmental checklist and prior to the lead agency's threshold determination on a proposal, an applicant may ask the lead agency to indicate whether it is considering a DS. If the lead agency indicates a DS is likely, the applicant may clarify or change features of the proposal to mitigate the impacts which led the agency to consider a DS likely. The applicant shall revise the environmental checklist as may be necessary to describe the clarifications or changes. The lead agency shall make its threshold determination based upon the changed or clarified proposal. If a proposal continues to have a probable significant adverse environmental impact, even with mitigation measures, an EIS shall be prepared.

(3) Whether or not an applicant requests early notice under subsection (2), if the lead agency specifies mitigation measures on an applicant's proposal that would allow it to issue a DNS, and the proposal is clarified, changed, or conditioned to include those measures, the lead agency shall issue a DNS.

[19] See Attachment 2

(4) Environmental documents need not be revised and resubmitted if the clarifications or changes are stated in writing in documents that are attachments to, or incorporate by reference, the documents previously submitted. An addendum may be used, see Part Six.

The June 22, 2023 MDNS for the SS RNG project stated the following mitigation measures:

Mitigation Measure: An Inadvertent Discovery Plan shall be created and submitted to the City of Sunnyside as part of the building permit package for the prosed development.

Mitigating Measures: a stormwater management plan is required to be submitted for review and approval by City of Sunnyside public works department prior to construction. The plan must meet the following design standards:

a) Stormwater retention or detention shall be provided. A professional engineer registered in the state of Washington shall design all drainage facilities and components. Drainage plans using best management practices and design requirements must be submitted to and approved by City of Sunnyside prior to grading or development.
b) Post development stormwater flow rates and volumes shall not exceed predevelopment conditions. The standard of full retention of the 25-year storm event generally meets the goal.
c) The depth to groundwater should be determined prior to planning the layout of stormwater facilities. If a stormwater infiltration facility will be used for the disposal of runoff, a permeability test should be conducted initially at the site to determine existing infiltration rates prior to the design stage.

Mitigation Measure: Dust a. A dust control plan must be filed with the Yakima Regional Clean Air Authority.

Documentation for most of these mitigation measures is still missing, namely there is no:

- Inadvertent Discovery Plan, although the addendum letter from SS RNG claims one exists
- NPDES Construction Stormwater permit, although the addendum letter from SS RNG claims one exists
- Stormwater Pollution Prevention Plan, although the addendum letter from SS RNG claims one exists
- Consultation with the WA State Dept. of Ecology and the Yakima Health District regarding a Notice of Intent to operate under terms and conditions of a solid waste permit
- Depth to groundwater and permeability tests

On December 4, 2023, FOTC submitted a public records request to Yakima County Emergency Services for information re conversations with Sunnyside RNG regarding possible fires and explosions. On December 5, 2023, Yakima County Emergency

Services informed FOTC that they have no records of conversations with Pacific Ag/Sunnyside RNG regarding the proposed manure bio-digester.

FOTC interprets this to mean that project proponents have not adequately prepared for possible fires and explosions at the site. There is abundant information demonstrating the possibility of fires and explosions related to methane production facilities.

WAC 197-11-355 Optional DNS process.

In the City of Sunnyside's May 23, 2023 Notice of Environmental Review the city stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

However the City of Sunnyside has not incorporated WAC 197-11-355 by reference. See City of Sunnyside Municipal Code, Chapter 18.04 available at https://www.codepublishing.com/WA/Sunnyside/#!/Sunnyside18/Sunnyside1804.html#18.04.020

18.04.080 Categorical exemptions and threshold determinations, provisions adopted by reference.

Regarding the rules for deciding whether a proposal has a "probable significant adverse environmental impact" requiring an EIS to be prepared, and the rules for evaluating the impacts of proposals not requiring an EIS, the City adopts the following sections of Chapter 197-11 WAC by reference:

WAC

197-11-300 Purpose
197-11-305 Categorical Exemptions
197-11-310 Threshold Determination Required
197-11-315 Environmental Checklist
197-11-330 Threshold Determination Process
197-11-335 Additional Information
197-11-340 Determination of Non-Significance

197-11-350 Mitigated Determinations of Non-Significance

197-11-360 Determinations of Significance/Initiation of Scoping

197-11-390 Effects of Threshold Determination

[Ord. 1475 § 2, 1984.]

FOTC questions whether the city can invoke a rule that the city has not approved. The city did not respond when FOTC brought this fact to the city's attention.

WAC 197-11-400 Purpose of EIS.

(1) The primary purpose of an environmental impact statement is to ensure that SEPA's policies are an integral part of the ongoing programs and actions of state and local government.

(2) An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.

(3) Environmental impact statements shall be concise, clear, and to the point, and shall be supported by the necessary environmental analysis. The purpose of an EIS is best served by short documents containing summaries of, or reference to, technical data and by avoiding excessively detailed and overly technical information. The volume of an EIS does not bear on its adequacy. Larger documents may even hinder the decision making process.

(4) The EIS process enables government agencies and interested citizens to review and comment on proposed government actions, including government approval of private projects and their environmental effects. This process is intended to assist the agencies and applicants to improve their plans and decisions, and to encourage the resolution of potential concerns or problems prior to issuing a final statement. An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions.

An Environmental Impact Statement, as described in WAC 197-11-400 is essential for quality decision making. A project as large as the Sunnyside RNG digester should not proceed without study of environmental information at this level

WAC 197-11-500 Purpose of this part.

This part provides rules for:

(1) Notice and public availability of environmental documents, especially environmental impact statements;

(2) Consultation and comment by agencies and members of the public on environmental documents;

(3) Public hearings and meetings; and

(4) Lead agency response to comments and preparation of final environmental impact statements. Review, comment, and responsiveness to comments on a draft EIS are the focal point of the act's commenting process because the DEIS is developed as a result of scoping and serves as the basis for the final statement.

This section especially addresses public notice for Environmental Impact Statements, but it is not limited to EIS. FOTC believes that this section also addresses Environmental Review in sections that do not limit discussion to EIS.

WAC 197-11-502 Inviting comment.

(1) Agency efforts to involve other agencies and the public in the SEPA process should be commensurate with the type and scope of the environmental document.

*(2) Consulted agencies have a responsibility to respond in a timely and specific manner to requests for comments (WAC **197-11-545**, **197-11-550**, and **197-11-724**).*

The Yakima Regional Clean Air Agency, the agency tasked with enforcing the Clean Air Act in Yakima County, did not respond to the City of Sunnyside's request for comments on the May 2023 Notice of Environmental Review. Consequently the MDNS did not contain sufficient analysis of related air impacts. If there were an adequate analysis of air impacts the City of Sunnyside might have issued a Determination of Significance that would have changed the course of these actions.

*(3) **Threshold determinations.***

*(a) Agencies shall send DNSs to other agencies with jurisdiction, if any, as required by WAC **197-11-340**(2) and **197-11-355**.*

The City of Sunnyside has never incorporated WAC 197-11-355 by reference.

*(b) For DNSs issued under WAC **197-11-340**(2), agencies shall provide public notice under WAC **197-11-510** and receive comments on the DNS for fourteen days.*

The City of Sunnyside provided public notice of the MDNS on June 22, 2023, and stated

Appeal Period: This MDNS is issued under WAC 197-11-340(2). The Lead Agency will not act on this proposal for 14 days from the date of issuance. Appeals may be submitted on this proposal to the address below.

However the May 2023 Notice of Environmental Review stated

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

FOTC did appeal the MDNS on July 6, 2023. The City of Sunnyside scheduled a hearing date for August 23, 2023. The City of Sunnyside cancelled the hearing on August 16, 2023. The city did not put the cancellation in an official document, but relied instead on an email that said:

After consultation with the City's legal team, it has been discovered that the Mitigated Determination of Nonsignificance (MDNS) issued on June 22, 2023, cannot at this time be appealed. The reason the MDNS cannot be appeal is because the MDNS only serves as an advisory statement on behalf of the City. In order to process an appeal, the MDNS is required to be tied to a development permits, such as a land use review, engineering permit, or building permit. None of those items have been issued for the site at this time, therefore the City cannot process a standalone MDNS appeal. See - Ellensburg Cement Products, Inc. v. Kittitas County, 179 Wn.2d 737 (2014).

FOTC disputed the cancellation to no avail. The City of Sunnyside did not cite rules that allow an unelected official to cancel a legally authorized hearing. In fact, the city did not point to any places in WAC 197-11 that might support the cancellation. It is inappropriate for the city to cite case law as though issuing a ruling from the bench.

FOTC disagrees with the statement *the MDNS only serves as an advisory statement on behalf of the City.* FOTC contends that environmental review means *Deciding whether a proposal has a probable significant adverse impact and thus requires an EIS (the threshold determination)* WAC 197-11-300(2)

(6) ***Public hearings and meetings.***

(a) Public hearings or meetings may be held (WAC ***197-11-535****). Notice of such public hearings shall be given under WAC* ***197-11-510*** *and may be combined with other agency notice.*

(b) In conjunction with the requirements of WAC ***197-11-510****, notice of public hearings shall be published no later than ten days before the hearing. For nonproject proposals, notice of the public hearing shall be published in a newspaper of general circulation in the general area where the lead agency has its principal offices. For nonproject proposals having a regional or statewide applicability, copies of the notice shall be given to the Olympia bureaus of the Associated Press and United Press International.*

The City of Sunnyside refused to conduct public hearings on this project. As noted, the city cancelled a public hearing of the FOTC appeal. There was no opportunity for the community to learn about risks and benefits related to the SS RNG bio-digester, thus a thwarting of the intent of the law.

WAC 197-11-510 Public notice.

(1) When these rules require notice to be given under this section, the lead agency must use reasonable methods to inform the public and other agencies that an

environmental document is being prepared or is available and that public hearing(s), if any, will be held. The agency may use its existing notice procedures.

Examples of reasonable methods to inform the public are:

(a) Posting the property, for site-specific proposals;

(b) Publishing notice in a newspaper of general circulation in the county, city, or general area where the proposal is located;

(c) Notifying public or private groups with known interest in a certain proposal or in the type of proposal being considered;

(d) Notifying the news media;

(e) Placing notices in appropriate regional, neighborhood, ethnic, or trade journals;

(f) Publishing notice in agency newsletters and/or sending notice to agency mailing lists (either general lists or lists for specific proposals or subject areas); and/or

(g) Mailing or emailing notice to any person, group or agency who has requested notice.

*(2) Each agency shall specify its method of public notice in its SEPA procedures, WAC **197-11-904** and **197-11-906**. If an agency does not specify its method of public notice or does not adopt SEPA procedures, the agency shall use methods (a) and (b) in subsection (1).*

(3) Documents which are required to be sent to the department of ecology under these rules will be published in the SEPA register, which will also constitute a form of public notice. However, publication in the SEPA register shall not, in itself, meet compliance with this section.

FOTC only became aware of the SS RNG MDNS as a result of a public records request. FOTC paid particular attention to public notices in the Yakima Herald Republic because we heard rumors about the proposed digester. We found zero notices in the Yakima Herald Republic or in the Spanish media.

To the best of our knowledge notices were sent to about twenty residences near the proposed site. Many of the recipients only speak Spanish, yet the notices were only in English. This project, if completed will have long lasting impacts on the entire county, yet most people in the county are still unaware.

The City of Sunnyside or the Port of Sunnyside placed a sign in a cornfield at the proposed site next to a highway with a 55 mph speed limit. Public notice was minimal and inadequate.

WAC 197-11-535 Public hearings and meetings.

(1) If a public hearing on the proposal is held under some other requirement of law, such hearing shall be open to consideration of the environmental impact of the proposal, together with any environmental document that is available. This does not require extension of the comment periods for environmental documents.

(2) In all other cases a public hearing on the environmental impact of a proposal shall be held whenever one or more of the following situations occur:

(a) The lead agency determines, in its sole discretion, that a public hearing would assist it in meeting its responsibility to implement the purposes and policies of SEPA and these rules; or

(b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS; or

(c) When two or more agencies with jurisdiction over a proposal make written request to the lead agency within thirty days of the issuance of the draft EIS.

*(3) Whenever a public hearing is held under subsection (2) of this section, it shall occur no earlier than fifteen days from the date the draft EIS is issued, nor later than fifty days from its issuance. Notice shall be given under WAC **197-11-502**(6) and **197-11-510** and may be combined with other agency notice.*

(4) If a public hearing is required under this chapter, it shall be open to discussion of all environmental documents and any written comments that have been received by the lead agency prior to the hearing. A copy of the environmental document shall be available at the public hearing.

*(5) Comments at public hearings should be as specific as possible (see WAC **197-11-550**).*

(6) Agencies and their designees may hold informal public meetings or workshops. Such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings.

*(7) Public meetings held by local governments under chapter **36.70B** RCW may be used to meet SEPA public hearing requirements as long as the requirements for public hearing in this section are met. A public hearing under this section need not be an open record hearing as defined in RCW **36.70B.020**(3).*

Based on WAC 197-11-535(2) & (3) FOTC concludes that this section primarily applies to Environmental Impact Statements. However, the City of Sunnyside could have conducted public meetings or workshops to inform residents about the risks and benefits of this proposed project. Such an action would have demonstrated confidence in the intelligence and civic interest of members of the public. Absence of such meetings indicates a propensity to keep the public in the dark.

WAC 197-11-545 Effect of no comment.

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*(1) **Consulted agencies.** If a consulted agency does not respond with written comments within the time periods for commenting on environmental documents, the lead agency may assume that the consulted agency has no information relating to the potential impact of the proposal as it relates to the consulted agency's jurisdiction or special expertise. Any consulted agency that fails to submit substantive information to the lead agency in response to a draft EIS is thereafter barred from alleging any defects in the lead agency's compliance with Part Four of these rules.*

*(2) **Other agencies and the public.** Lack of comment by other agencies or members of the public on environmental documents, within the time periods specified by*

*these rules, shall be construed as lack of objection to the environmental analysis, if the requirements of WAC **197-11-510** are met.*

It is extremely disturbing that the Yakima Regional Clean Air Agency and the Yakima Health District did not comment on the SS RNG Environmental Review. This failure to comment borders on failure to fulfill these agencies' mandated duties.

It is impossible to construct a manure methane bio-digester that produces between 800,000 and 950,000 MMBtu's of renewable natural gas per year without an impact on air quality or human health.

WAC 197-11-600 When to use existing environmental documents.

(1) This section contains criteria for determining whether an environmental document must be used unchanged and describes when existing documents may be used to meet all or part of an agency's responsibilities under SEPA.

(2) An agency may use environmental documents that have previously been prepared in order to evaluate proposed actions, alternatives, or environmental impacts. The proposals may be the same as, or different than, those analyzed in the existing documents.

Pacific Ag/Sunnyside RNG acknowledges that the company must acquire an air quality permit prior to commencing construction. When the YRACC evaluates such an application the YRCAA may incorporate the City of Sunnyside's MDNS, even though the YRCAA failed to comment on air impacts. FOTC would interpret such an action as an attempt to circumvent SEPA laws, and permit a polluting operation.

(3) Any agency acting on the same proposal shall use an environmental document unchanged, except in the following cases:

*(a) For DNSs, an agency with jurisdiction is dissatisfied with the DNS, in which case it may assume lead agency status (WAC **197-11-340** (2)(e) and **197-11-948**).*

(b) For DNSs and EISs, preparation of a new threshold determination or supplemental EIS is required if there are:

(i) Substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts (or lack of significant adverse impacts, if a DS is being withdrawn); or

(ii) New information indicating a proposal's probable significant adverse environmental impacts. (This includes discovery of misrepresentation or lack of material disclosure.) A new threshold determination or SEIS is not required if probable significant adverse environmental impacts are covered by the range of alternatives and impacts analyzed in the existing environmental documents.

FOTC has introduced new evidence of potential adverse impacts in the forms of 1. an Evaluation of the Sunnyside RNG Traffic Impact Analysis, 2. Documentation of fires and explosions on other manure bio-digesters, 3. Reference to groundwater issues at the Port of Sunnyside, 4. Data supporting likelihood of cumulative impacts, and 5. Demographic data that demonstrates Environmental Justice concerns.

(c) For EISs, the agency concludes that its written comments on the DEIS warrant additional discussion for purposes of its action than that found in the lead agency's FEIS (in which case the agency may prepare a supplemental EIS at its own expense).

(4) Existing documents may be used for a proposal by employing one or more of the following methods:

(a) "Adoption," where an agency may use all or part of an existing environmental document to meet its responsibilities under SEPA. Agencies acting on the same proposal for which an environmental document was prepared are not required to adopt the document; or

(b) "Incorporation by reference," where an agency preparing an environmental document includes all or part of an existing document by reference.

(c) An addendum, that adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document.

(d) Preparation of a SEIS if there are:

(i) Substantial changes so that the proposal is likely to have significant adverse environmental impacts; or

(ii) New information indicating a proposal's probable significant adverse environmental impacts.

New information provided by FOTC, and others strongly indicates significant adverse environmental impacts from the SS RNG project. These impacts may be direct, indirect, short term, long term, widespread and cumulative. An EIS is warranted.

(e) If a proposal is substantially similar to one covered in an existing EIS, that EIS may be adopted; additional information may be provided in an addendum or SEIS (see (c) and (d) of this subsection).

WAC 197-11-655 Implementation.

*(1) See RCW **43.21C.020**, **43.21C.030**(1), **43.21C.060**, **43.21C.075**, and **43.21C.080**.*

(2) Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

(3) When a decision maker considers a final decision on a proposal:

(a) The alternatives in the relevant environmental documents shall be considered.

(b) The range of alternative courses of action considered by decision makers shall be within the range of alternatives discussed in the relevant environmental documents. However, mitigation measures adopted need not be identical to those discussed in the environmental document.

(c) If information about alternatives is contained in another decision document which accompanies the relevant environmental documents to the decision maker, agencies are encouraged to make that information available to the public before the decision is made.

Since the City of Sunnyside did not evaluate alternatives to the SS RNG proposal, the city cannot comply with WAC 197-11-655

WAC 197-11-680 Appeals.

(1) ***Introduction.*** *Appeals provisions in SEPA are found in RCW* ***43.21C.060****,* ***43.21C.075*** *and* ***43.21C.080****. These rules attempt to construe and interpret the statutory provisions. In the event a court determines that these rules are inconsistent with statutory provisions, or with the framework and policy of SEPA, the statute will control. Persons considering either administrative or judicial appeal of any decision which involves SEPA at all are advised to read the statutory sections cited above.*

(2) ***Appeal to local legislative body.*** *RCW* ***43.21C.060*** *allows an appeal to a local legislative body of any decision by a local nonelected official conditioning or denying a proposal under authority of SEPA. Agencies may establish procedures for such an appeal, or may eliminate such appeals altogether, by rule, ordinance or resolution. Such appeals are subject to the restrictions in RCW* ***36.70B.050*** *and* ***36.70B.060*** *that local governments provide no more than one open record hearing and one closed record appeal for permit decisions.*

FOTC has appealed to the Sunnyside City Council three times under WAC 197-11-680(2). The first appeal was on September 22, 2023, likely beyond the short 20 day window prescribed in the Sunnyside Municipal Code section 2.72

(3) ***Agency administrative appeal procedures.***

(a) Agencies may provide for an administrative appeal of determinations relating to SEPA in their agency SEPA procedures. If so, the procedures must comply with the following:

(i) The agency must specify by rule, ordinance, or resolution that the appeals procedure is available.

(ii) Appeal of the intermediate steps under SEPA (e.g., lead agency determination, scoping, draft EIS adequacy) shall not be allowed.

(iii) Appeals on SEPA procedures shall be limited to review of a final threshold determination and final EIS. These appeals may occur prior to an agency's final decision on a proposed action.

The June 22, 2023 MDNS was a final threshold determination. Pacific Ag/Sunnyside RNG supplemented their environmental checklist with addenda on October 8, 2023. The City of Sunnyside posted a signed Notice of Addendum on November 28, 2023, with a deadline for comments of December 5, 2023.

Frankly, FOTC is confused regarding timelines for appeals, but we submit comments today to make sure we do not miss deadlines. This results in excess paperwork and excess documentation.

(iv) An agency shall provide for only one administrative appeal of a threshold determination or of the adequacy of an EIS; successive administrative appeals on these issues within the same agency are not allowed. This limitation does not apply to administrative appeals before another agency.

(v) Except as provided in (a)(vi) of this subsection, the appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body. The hearing or appeal shall be one at which the hearing officer or body will consider either the agency's decision or a recommendation on the proposed underlying governmental action. For example, an appeal of the adequacy of an EIS must be consolidated with a hearing or appeal on the agency's decision or recommendation on the proposed action, if both proceedings are allowed in agency procedures. If an agency does not provide for a hearing or appeal on the underlying governmental action (either a hearing on the agency's recommendation or an agency appeal hearing after the decision is made), the agency may not hold a SEPA administrative appeal, except as allowed under (a)(vi) of this subsection.

This section says, *appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body*. It does not say that appeals must be made to Superior Court as the City of Sunnyside advises.

(vi) The following appeals of SEPA procedural or substantive determinations need not be consolidated with a hearing or appeal on the underlying governmental action:

(A) An appeal of a determination of significance;

(B) An appeal of a procedural determination made by an agency when the agency is a project proponent, or is funding a project, and chooses to conduct its review under SEPA, including any appeals of its procedural determinations, prior to submitting an application for a project permit. Subsequent appeals of substantive determinations by an agency with jurisdiction over the proposed project shall be allowed under the SEPA appeal procedures of the agency with jurisdiction;

FOTC's July 6, 2023 appeal of the June 22, 2023 MDNS was mostly procedural. We believe that the City of Sunnyside and the Port of Sunnyside are project proponents based on the two years of meetings with Pacific Ag, the sale of property to Sunnyside RNG, and the extreme efforts the city and the port have exerted to move the SS RNG project forward. Based on WAC 197-11-680 (3)(a)(vi)(B) the City of Sunnyside should not have cancelled the August 23, 2023 appeal hearing.

(C) An appeal of a procedural determination made by an agency on a nonproject action; and

*(D) An appeal to the local legislative authority under RCW **43.21C.060** or other applicable state statutes.*

*(vii) If a county/city to which RCW **36.70B.110** applies provides for an administrative appeal, any such appeal of a procedural or substantive determination under SEPA issued at the same time as the decision on a project action shall be filed within fourteen days after a notice of decision under RCW **36.70B.130** or after other notice that the decision has been made and is appealable. In order to allow public comment on a DNS prior to requiring an administrative appeal to be filed, this appeal period shall be extended for an additional seven days if the appeal is of a DNS for which public comment is required under this chapter or under county/city rules adopted under SEPA. For threshold determinations issued prior to a decision on a project action, any administrative appeal allowed by a county/city shall be filed within fourteen days after notice that the determination has been made and is appealable. Nothing in this subsection alters the requirements of (a)(v) and (vi) of this subsection.*

(viii) Agencies shall provide that procedural determinations made by the responsible official shall be entitled to substantial weight.

*(b) Agencies providing for administrative appeals shall provide for a record as required by RCW **43.21C.075** (3)(c).*

(c) If an agency provides an administrative appeal procedure, that procedure must be used before anyone may initiate judicial review of any SEPA issue that could have been reviewed under the agency procedures.

The City of Sunnyside provides an administrative appeal procedure under Sunnyside Municipal Code Section 2.46 and 2.72. FOTC believes the City of Sunnyside erred by cancelling our August 23, 2023, appeal and telling us that our only option was to appeal permit decisions in Superior Court. WAC 197-11-680 (3)(c) says differently.

(4) Judicial appeals.

(a) SEPA authorizes judicial appeals of both procedural and substantive compliance with SEPA.

*(b) When SEPA applies to a decision, any judicial appeal of that decision potentially involves both those issues pertaining to SEPA (SEPA issues) and those which do not (non-SEPA issues). RCW **43.21C.075** establishes time limits for raising SEPA issues, but says that existing statutes of limitations control the appeal of non-SEPA issues. The statute contemplates a single lawsuit.*

(c) If there is a time limit established by statute or ordinance for appealing the underlying governmental action, then appeals (or portions thereof) raising SEPA issues must be filed within such time period.

The Sunnyside City Code states:

2.72.010 Appeal period.

Any appeal from any action of the City Council, City Commission or City Board, or City official or employee, whose decisions are not directly appealable to the City Council, must be brought within 20 days from the date of the effective date of the action appealed from. [Ord. 1313 § 1, 1981.]

The City of Sunnyside issued an MDNS for the SS RNG project. FOTC timely appealed. The city cancelled the appeal. After the threshold determination, SS RNG submitted changes to the environmental checklist that will affect the MDNS. FOTC may comment, but there is apparently no pathway for an appeal, according to the Sunnyside Municipal Code.

The City of Sunnyside may have designed a trap in which appeals were postponed and then prohibited due to postponement.

*(d) The notice of action procedures of RCW **43.21C.080** may still be used. If this procedure is used, then the time limits for judicial appeal specified in RCW **43.21C.080** shall apply, unless there is a time limit established by statute or ordinance for appealing the underlying governmental action. If so, the time limit for appeal of SEPA issues shall be the time limit in the statute or ordinance for the underlying governmental action. If the proposal requires more than one governmental decision that will be supported by the same SEPA documents, then RCW **43.21C.080** still only allows one judicial appeal of procedural compliance with SEPA, which must be commenced within the applicable time to appeal the first governmental decision.*

*(e) If the time limit established by statute or ordinance for appealing the underlying governmental action is less than fifteen days, then the notice of action in RCW **43.21C.080**(1) may be given by publishing once within that shorter time period, in a newspaper of general circulation in the area where the property that is the subject of the action is located, and meeting the other requirements of RCW **43.21C.080**.*

(f) If there is no time limit established by statute or ordinance for appeal, and the notice of action provisions are not used, then SEPA provides no time limit for judicial appeals. Appeal times may still be limited, however, by general statutes of limitation or the common law.

*(g) For the purposes of this subsection, "a time limit established by statute or ordinance" does not include time limits established by the general statutes of limitation in chapter **4.16** RCW.*

*(5) **Official notice of the date and place for commencing a judicial appeal.***

(a) Official notice of the date and place for commencing an appeal must be given if there is a time limit established by statute or ordinance for commencing an appeal of the underlying governmental action. The notice shall include:

(i) The time limit for commencing appeal of the underlying governmental action and SEPA issues, and the statute or ordinance establishing the time limit; and

(ii) Where an appeal may be filed.

(b) Notice is given by:

(i) Delivery of written notice to the applicant, all parties to any administrative appeal, and all persons who have requested notice of decisions with respect to the particular proposal in question; and

(ii) Following the agency's normal methods of notice for the type of governmental action taken.

(c) Written notice containing the information required by subsection (5)(a) of this section may be appended to the permit, decision documents, or SEPA compliance documents or may be printed separately.

(d) Official notices required by this subparagraph shall not be given prior to final agency action.

As noted above, FOTC is not certain of the intent of the City of Sunnyside's Notice of SEPA Addendum. FOTC could engage better if we knew whether these addenda would result in changes to the MDNS and consequently in final agency action.

The Notice of SEPA Addendum provides a window for public comments, but does not describe an appeal procedure. We understand that the lead agency has an obligation to evaluate and respond to our comments. See WAC 197-11-340 (2)(f)

WAC 197-11-910 Designation of responsible official.

*Agency SEPA procedures shall designate or provide a method of designating the responsible official with speed and certainty (WAC **197-11-906** (1)(d)). This designation may vary depending upon the nature of the proposal. The responsible official shall carry out the duties and functions of the agency when it is acting as the lead agency under these guidelines. Since it is possible under these rules for an agency to be acting as a lead agency prior to actually receiving an application for a license to undertake a private project, designation of the first department within the agency to receive an application as the responsible official will not be sufficient.*

It is FOTC's understanding that Trevor Martin from the City of Sunnyside is the responsible official for this SEPA determination.

WAC 197-11-924 Determining the lead agency.

*(1) The first agency receiving an application for or initiating a nonexempt proposal shall determine the lead agency for that proposal, unless the lead agency has been previously determined, or the agency receiving the proposal is aware that another agency is determining the lead agency. The lead agency shall be determined by using the criteria in WAC **197-11-926** through **197-11-944**.*

*(2) If an agency determines that another agency is the lead agency, it shall mail to such lead agency a copy of the application it received, together with its determination of lead agency and an explanation. If the agency receiving this determination agrees that it is the lead agency, it shall notify the other agencies with jurisdiction. If it does not agree, and the dispute cannot be resolved by agreement, the agencies shall immediately petition the department of ecology for a lead agency determination under WAC **197-11-946**.*

(3) Any agency receiving a lead agency determination to which it objects shall either resolve the dispute, withdraw its objection, or petition the department for a lead agency determination within fifteen days of receiving the determination.

*(4) An applicant may also petition the department to resolve the lead agency dispute under WAC **197-11-946**.*

*(5) To make the lead agency determination, an agency must determine to the best of its ability the range of proposed actions for the proposal (WAC **197-11-060**) and the other agencies with jurisdiction over some or all of the proposal. This can be done by:*

(a) Describing or requiring an applicant to describe the main features of the proposal;

(b) Reviewing the list of agencies with expertise;

(c) Contacting potential agencies with jurisdiction either orally or in writing.

It is FOTC's understanding that Pacific Ag/Sunnyside RNG may have approached Yakima County with this proposal prior to contacting the City and Port of Sunnyside.

WAC 197-11-92 Lead agency for governmental proposals.

(1) When an agency initiates a proposal, it is the lead agency for that proposal. If two or more agencies share in the implementation of a proposal, the agencies shall by agreement determine which agency will be the lead agency. For the purposes of this section, a proposal by an agency does not include proposals to license private activity.

(2) Whenever possible, agency people carrying out SEPA procedures should be different from agency people making the proposal.

WAC 197-11-928 Lead agency for public and private proposals.

*When the proposal involves both private and public activities, it shall be characterized as either a private or a public project for the purposes of lead agency designation, depending upon whether the primary sponsor or initiator of the project is an agency or from the private sector. Any project in which agency and private interests are too intertwined to make this characterization shall be considered a public project. The lead agency for all public projects shall be determined under WAC **197-11-926**.*

The City of Sunnyside's May 17, 2023 Notice of Environmental Review stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

Because this notice cited WAC 197-11-928, FOTC assumed this to be a public and private proposal. FOTC asked the City of Sunnyside several times whether it is a public and private project or a private project. The city did not answer. At a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag assured us several times that it is a private project. If this is so, then the City of Sunnyside was incorrect in

assuming the lead agency role, at least under WAC 197-11-928. FOTC asserts that the City of Sunnyside has an obligation to provide the public with accurate information.

WAC 197-11-930 Lead agency for private projects with one agency with jurisdiction.

For proposed private projects for which there is only one agency with jurisdiction, the lead agency shall be the agency with jurisdiction.

FOTC has asked the City of Sunnyside to list agencies with jurisdiction for the SS RNG project. The city has not answered.

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There are errors in the documents posted for this project:

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

But the City of Sunnyside has not incorporated WAC 197-11-355 by reference.

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project.

But WAC 197-11-928 refers to public and private projects. Sunnyside RNG claims this is a private project.

- Tax Parcel Numbers are listed as:

    - Notice of Environmental Review TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Mitigated Determination of Non-Significance Parcel Number(s): 220901-13001, -44401, & -41404
    - Notice of Appeal Cancellation TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Notice of SEPA Addendum TAX PARCEL NUMBER(S): 22090-141405 & 220901-41406 (Previously 220901-13001, -44401, - 41404)

- When did these changes occur? FOTC asks because we have spent many, many hours trying to make sense of the property location and zoning.

- Many related documents list two different File Numbers: SEPA-2022.0200 & SEPA 2023.0200 for the same project

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references File Number 2022.0200

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references Exhibit B, *A Cultural Resources Survey for the Sunnyside RNG project*. This document has not been posted for public view.

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside also identifies Exhibit B as a *Traffic Impact Analysis*

- The signature date for this letter is November 8, 2023, while the heading date for the letter is October 8, 2023

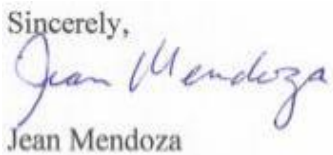
- The November 28, 2023 Notice of SEPA Addendum says:

  There is a 14-day comment period for this review. This may be your only opportunity to comment. All written comments received by 5:00 p.m. on December 5, 2023. Please reference file numbers (SEPA-2022.0200) and applicant's name (Sunnyside RNG) in any correspondence you submit.

  We are not sure this is the correct File Number.

The Friends of Toppenish Creek appreciate this opportunity to comment on SEPA review for the SS RNG project. We request clarification on next steps, specifically the appeal process as interpreted by the Lead Agency, the City of Sunnyside.

Sincerely,



Jean Mendoza

Executive Director, Friends of Toppenish Creek
3142 Signal Peak Road
White Swan, WA 98952



Comments re Addendum to Sunnyside Renewable Natural Gas (SS RNG) SEPA document

Friends of Toppenish Creek is a 501 C (3) non profit group incorporated under the laws of Washington State and located in Yakima County. FOTC submits the following comments regarding an addendum submittal to a June 2023 SEPA review and mitigated determination of non-significance (MDNS) for a proposed Renewable Natural Gas (RNG) bio-digester at the Port of Sunnyside. The City of Sunnyside Notice of SEPA Addendum asked commenters to reference SEPA 2022.0200. We are not sure whether this is correct, or whether SEPA 2022.0200 exists.[1] The correct file number may be SEPA 2023.0200.

It is difficult to comment intelligently on this addendum submittal because the notice omits so much content. For example, the addendum includes a February 2023 New Source Review (NSR) application from Sunnyside RNG to the Yakima Regional Clean Air Agency (YRCAA) but omits the response from the YRCAA that rejected the application and requested more information.

FOTC believes that an MDNS should not have been issued until the City of Sunnyside and the public had the opportunity to review information on air emissions and traffic impacts. The MDNS was issued on June 22, 2023, but a Traffic Impact Analysis (TIA), that is part of the November 23, 2023 addendum letter, is dated July 10, 2023.

The Yakima Regional Clean Air Agency, as the agency with expertise on air, failed to comment on the May 2023 SEPA Review, as required by RCW 43.21C and WAC 197-11, and especially WAC 197-11-030, WAC 197-11-060(4), and WAC 197-11-502(2).

The City of Sunnyside did not have sufficient information to conclude no environmental impacts, and the public did not have sufficient information to comment intelligently on the May 2023 Environmental Review. The resulting MDNS is invalid due to withheld and/or insufficient information. See WAC 197-11-335, WAC 197-11-340(3), WAC 197-11-080.

* * * * * *

[1] FOTC does not find SEPA 2022.0200 in Ecology's State Environmental Policy Act (SEPA) Register at https://apps.ecology.wa.gov/separ/Main/SEPA/Search.aspx?SearchText=City%20of%20Sunnyside&SearchFields=All&County=YAKIMA&PageSize=10&SortColumn=LeadAgencyAscending&Page=17

According to a presentation by Pacific AG to the Port of Sunnyside[2] on September 6, 2022, the Sunnyside RNG facility could be "one of the largest ag waste anaerobic digesters in the nation."[3]

Realistically, how can "one of the largest waste anaerobic digesters in the nation" not have an impact on the environment?

The SS RNG project would:

- Produce between 800,000 & 950,000 MMBTUs of Renewable Natural Gas a year
- Produce and store methane, a flammable and explosive gas, in tanks with membrane covers
- Transfer the natural gas to a major pipeline
- Move 140 truckloads of manure every day from dairies to the digester
- Store digestate in stacks at the digester site and on farms
- Store liquid effluent from the digester in lagoons
- Spread digestate onto crop fields. There is insufficient information to determine the composition of the digestate and potential impacts on soil health and greenhouse gas emissions.

* * * * * * *

Manure bio-digesters are known to experience spills and explosions.[4] These adverse impacts are not expected to occur, but when they do occur the impacts are grave. Washington law accounts for this in WAC 197-11-794 (2).

FOTC has requested more information regarding fires and spills from Pacific AG, Sunnyside RNG, and Yakima County Emergency Services. The City of Sunnyside should not take further action on the SS RNG MDNS until this information arrives, and answers satisfy potentially impacted people.

* * * * * * *

FOTC believes the City of Sunnyside violated many sections of Washington SEPA law when the city issued the June 22, 2023 MDNS. These alleged violations are listed below. FOTC believes that the MDNS should be rescinded pursuant to WAC 197-11-340(3), a determination of non-significance (DNS) should be issued, and an Environmental Impact Statement (EIS) completed. Conducting a thorough EIS is the only way to adequately determine the environmental consequences of constructing such a large digester.

[2] See Attachment 1

[3] Harrison Pettit from Pacific Ag said this was not true at a public meeting in Sunnyside on November 30, 2023.

[4] See Attachment 2

WAC 197-11-030

Policy.

(1) The policies and goals set forth in SEPA are supplementary to existing agency authority.

(2) Agencies shall to the fullest extent possible:

(a) Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.

(b) Find ways to make the SEPA process more useful to decision makers and the public; promote certainty regarding the requirements of the act; reduce paperwork and the accumulation of extraneous background data; and emphasize important environmental impacts and alternatives.

(c) Prepare environmental documents that are concise, clear, and to the point, and are supported by evidence that the necessary environmental analyses have been made.

(d) Initiate the SEPA process early in conjunction with other agency operations to avoid delay and duplication.

(e) Integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.

(f) Encourage public involvement in decisions that significantly affect environmental quality.

(g) Identify, evaluate, and require or implement, where required by the act and these rules, reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.

The City of Sunnyside did not, to the fullest extent possible, *Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.* Sunnyside did not compel the Yakima Regional Clean Air Agency to provide comments on air impacts from:

- Potential leaks at the digester site
- Transport of manure and digestate
- Leaks in pipes that transport natural gas
- 140 round trip truck trips per day
- Storage of manure and digestate in stacks and lagoons
- Spreading and spraying digestate on crop fields

The City of Sunnyside did not *promote certainty regarding the requirements of the act*. Sunnyside sent conflicting messages to the public by telling the public that an appeal was authorized, improperly stating the appeal would be a closed appeal, scheduling an appeal, and then canceling the appeal. Sunnyside did not respond to reasonable questions regarding the proposed RNG project.[5]

[5] See Attachment 3 FOTC Request for the City of Sunnyside to reconsider an MDNS for the Sunnyside RNG project. The City did not answer our questions.

The City of Sunnyside did not *emphasize important environmental impacts and alternatives.* Sunnyside did not explore or list alternatives to the project or citing of the project. Sunnyside did not describe potential air impacts or potential impacts to ground and/or surface waters at the Port of Sunnyside where monitoring wells have high levels of nitrate[6] and the Sulphur Creek Wasteway traverses the area. The City of Sunnyside did not address the potential for fires and explosions.

There were no analyses to prove statements by the project proponent, Pacific Ag/Sunnyside RNG, that the project would generate millions in tax dollars. There was no analysis of costs to tax payers in the form of subsidies, wear and tear on roadways, and decreased property values.

The City of Sunnyside did not *integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.* Instead Sunnyside issued an MDNS and then told FOTC that we could not appeal the MDNS until a later time after Pacific Ag applied for a permit.

The City of Sunnyside did not *encourage public involvement.* Instead, the city made it difficult for the public to be involved by not posting notices in newspapers, by not translating notices into Spanish, by only notifying about 20 neighbors of the SEPA review, by posting signs in a corn field, by not providing informational paperwork, by refusing to answer questions about the project, and by failure to attend a public meeting regarding the digester on November 30, 2023.

The City of Sunnyside did not *identify reasonable alternatives*, such as on-farm digesters, a more remote location, limitations on hours for manure transport, different methods of manure management and disposal, or the "no-action" alternative.

WAC 197-11-055
Timing of the SEPA Process

*(b) Agencies shall identify the times at which the environmental review shall be conducted either in their procedures or on a case-by-case basis. Agencies may also organize environmental review in phases, as specified in WAC **197-11-060**(5).*

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[6] See Monitoring Wells LYV-PS-031, LYV-PS-032, and LYV-PS-033 on Ecology's Environmental Information Monitoring Data Base at https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearchResults.aspx?ResultType=GroundwaterWellTab&StudyUserIds=MRED&StudyUserIdSearchType=Contains&LocationCounties=Yakima&HasGroundwaterData=True

The City of Sunnyside did not state that the environmental review for the Sunnyside RNG project would be organized in phases.

*(c) Appropriate consideration of environmental information shall be completed before an agency commits to a particular course of action (WAC **197-11-070**).*

The Port of Sunnyside committed to the Sunnyside RNG project by proposing the sale of property to Pacific AG in November 2022.[7] The City of Sunnyside issued a determination of non-significance for that sale on December 6, 2022.[8] Sale of real estate for a designated purpose is a commitment to a course of action.

Notice of the sale was not properly advertised. Public comments regarding the sale have not been posted. The City of Sunnyside approved an MDNS for the Sunnyside RNG project on June 22, 2023, six months after sale approval.

*(4) **Applicant review at conceptual stage.** In general, agencies should adopt procedures for environmental review and for preparation of EISs on private proposals at the conceptual stage rather than the final detailed design stage.*[9]

(a) If an agency's only action is a decision on a building permit or other license that requires detailed project plans and specifications, agencies shall provide applicants with the opportunity for environmental review under SEPA prior to requiring applicants to submit such detailed project plans and specifications.

*(b) Agencies may specify the amount of detail needed from applicants for such early environmental review, consistent with WAC **197-11-100** and **197-11-335**, in their SEPA or permit procedures.*

(c) This subsection does not preclude agencies or applicants from preliminary discussions or exploration of ideas and options prior to commencing formal environmental review.

On November 30, 2023, Harrison Pettit from Pacific AG told attendees at a public meeting regarding the Sunnyside RNG project that conversations regarding the project have been ongoing for two years. The fact that the Port of Sunnyside sold property to Pacific Ag for the project indicates a commitment on the part of the Port of Sunnyside and the City of Sunnyside to the biodigester project.

There is no documentation of alternatives as addressed in RCW 43.21C.030(2)(c)(iii), RCW 43.21C.030(2)(e), WAC 197-11-030(2), WAC 197-11-060 (1), WAC 197-11-060

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[7] Port of Sunnyside Property Sale. http://www.friendsoftoppenishcreek.org/cabinet/data/AVS%203%20SS%20RNG%20Property%20Sale%20Notice.pdf

[8] DNS for Property Sale. http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG%20DNS_SEPA-2022.0046.pdf

[9] FOTC assumed in July of 2023 that the Sunnyside RNG project is a public and private partnership, based on statements in the June 22, 2023, MDNS. However, at a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag stated several times that this is a private project.

(2), WAC 197-11-060 (3), WAC 197-11-080(1), WAC 197-11-400 (2), WAC 197-11-402(1), WAC 197-11-402(9), WAC 197-11-408(2), WAC 197-11-440(4), WAC 197-11-440(5), WAC 197-11-655(3). According to WAC 197-11-440(5)(b)(ii) *The "no-action" alternative shall be evaluated and compared to other alternatives.*

*(5) An overall decision to proceed with a course of action may involve a series of actions or decisions by one or more agencies. If several agencies have jurisdiction over a proposal, they should coordinate their SEPA processes wherever possible. The agencies shall comply with lead agency determination requirements in WAC **197-11-050** and **197-11-922**.*

(6) To meet the requirement to insure that environmental values and amenities are given appropriate consideration along with economic and technical considerations, environmental documents and analyses shall be circulated and reviewed with other planning documents to the fullest extent possible.

Selected environmental documents for the Sunnyside RNG project were first shared with the public on May 23, 2023. A Traffic Impact Analysis was not published until July of 2023. There is still no approved air study. Questions regarding increased pollution related to the production of manure to feed the digester, and emissions from the digestate produced by the digester have not been answered.

WAC 197-11-060 (4) Impacts.

*(a) SEPA's procedural provisions require the consideration of "environmental" impacts (see definition of "environment" in WAC **197-11-740** and of "impacts" in WAC **197-11-752**), with attention to impacts that are likely, not merely speculative. (See definition of "probable" in WAC **197-11-782** and **197-11-080** on incomplete or unavailable information.)*

*(b) In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC **197-11-330**(3) also).*

(c) Agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.

(d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas.

*(e) The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC **197-11-792**) may be wider than the impacts for which mitigation measures are required of applicants (WAC **197-11-660**). This will depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant's proposal, and the capability of applicants or agencies to control the impacts in each situation.*

This is a large project. This bio-digester may be one of the largest in the United States. Impacts will extend beyond the Sunnyside City Limits.

- There will be increased traffic on Yakima County roads to haul manure and crop residues to the digester, to haul digestate from the digester, to haul composted digestate to markets. Increased traffic brings increased pollution of the air with nitrogen oxides and particulate matter. Increased traffic brings increased wear and tear on county roads and costs to tax payers across the county. FOTC submitted an evaluation of the Sunnyside RNG TIA to Yakima County and the Port of Sunnyside on August 28, 2023.[10] We await responses.
- If dairies receive up to $200 per year per cow for manure, there is an incentive to increase the number of cows in each herd. More cows mean increased leaching to the aquifers, and increased air emissions. More cows mean more land taken out of production of fruits and vegetables and more land devoted to dairies and cattle feed. Corn and alfalfa, the major crops for cattle feed, require large amounts of water. Corn is hard on the land, requires large amounts of fertilizer and introduces a wide range of plant pathogens.
- FOTC does not believe it is possible to test for and screen out all the possible contaminants in digestate. There is a significant risk of spreading pathogens to a large number of farming operations when digestate is spread as fertilizer or used as animal bedding. For example, cryptosporidium is a common and wide spread zoonotic parasite that attacks young calves and is more common on dairies with intense confinement and moist conditions.[11] If there is cryptosporidium in manure used as feedstock, the parasite may proliferate in the digesters, live in the digestate, and infect soils for miles around where farmers spread digestate. Cryptosporidium could infect large numbers of animals housed in facilities that use the digestate for bedding.
- If dairies receive up to $200 per year per cow for manure, the up to 25 LYV dairies that participate in this project have a serious economic advantage over the 15 or more dairies that do not. If a dairy has 1,000 milk cows and receives $200 per year per cow, that dairy will increase annual income by $200,000. This makes a difference in which dairies survive and which do not.
- Sunnyside RNG has not described contracts with dairies. FOTC believes there is a potential for this project to squeeze out non-participating dairies and to create dairy dependence on the digester for economic survival. If dependence occurs, then LYV dairies are at the mercy of digester operators who can raise or lower the rates of payment for manure. There is a troubled dairy digester in Iowa where

[10] See Attachment 4

[11] Oregon State University. The cryptosporidium parasite and its effect on calves and humans. https://extension.oregonstate.edu/animals-livestock/beef/cryptosporidium-parasite-its-effect-calves-humans *Cryptosporidium is* most infectious when the parasite is passed in feces and then ingested. Infected calves can have crypto in their feces for weeks after they are no longer sick.
Crypto eggs have a tough outer shell and are resistant to disinfectants, even chlorine bleach. They can survive outside the body and in the environment for long periods. The eggs can be killed by generous applications of a 3% hydrogen peroxide solution as well as exposure to high temperatures in excess of 160° F, which is hotter than most domestic tap water.

economic benefits do not pencil out. A recent newspaper article[12] about the Waunakee Digester in Wisconsin stated:

Many of the assumptions the company made at the start were wrong. In the future, the business model will have to be tweaked, and farmers sending manure to comparable operations may need to pay the plant to accept it.

- Regarding global warming: To our knowledge no one has calculated how much diesel fuel would be burned to transport manure and digestate for this project.
- Regarding global warming: Dairies produce at least one metric ton of CO_2 equivalents via enteric fermentation for every metric ton of methane produced in anaerobic manure lagoons. Consider a hypothetical community that produces 0.5 MMT CO_2 equivalents of methane via enteric fermentation, and 0.5 MMT CO_2 equivalents of methane from manure lagoons. This equals 1 MMT CO_2 equivalents of methane total. Suppose the community can process all the methane from manure lagoons into renewable natural gas. The total is now 0.5 MMT CO_2 equivalents of methane. Because the operation is profitable the community doubles the number of cows. All the methane from manure lagoons is captured, but the community now produces 1 MMT CO_2 equivalents of methane from enteric fermentation – back to the starting point. Plus the emission of other air pollutants has doubled & emissions from manure transport has doubled, etc.
- We do not see an accounting of how much income for the proposed digester comes from the Washington Cap and Trade program, and from tax payers. The Cap and Trade program does not last forever. Can the Sunnyside RNG digester continue to profit if subsidies decline?
- According to the EPA AgStar program[13] there are many ways to reduce methane emissions from livestock manure management. Some methods are:
    - *Anaerobic digesters – 50% reduction*
    - *Daily spread – 45% reduction*
    - *Pasture based management – 45% reduction*
    - *Composting – 45% reduction*
    - *Solid storage – 45% reduction*
    - *Manure drying practices – 45% reduction*
    - *Semi-permeable covers – 40% reduction*
    - *Decreased manure storage time – 40% reduction*
    - *Composted bedded pack barns – 30% reduction*
    - *Solid separation of manure solids prior to entry to wet/anaerobic environment – 20% reduction*

  But anaerobic digesters cost so much more than the other methods.

[12] State-financed manure digester plagued by spills, explosions. 2015. https://archive.jsonline.com/news/statepolitics/state-financed-manure-digester-plagued-by-spills-explosion-b99435123z1-290263421.html

[13] EPA AgStar. (2023) Practices to Reduce Methane Emissions from Livestock Manure Management. https://www.epa.gov/agstar/practices-reduce-methane-emissions-livestock-manure-management

- The Sunnyside RNG New Source Review (NSR) application requires more information and does not quantify the amount of air pollutants currently in the LYV ambient air. It does not estimate the percentage of air pollution attributable to the proposed Sunnyside RNG digester if it becomes reality. Would Sunnyside residents be forced to stop using wood stoves to compensate for digester emissions to keep Yakima County in compliance with U.S. criteria air standards?
- There are significant increases in morbidity and mortality associated with fine particulate air pollution.[14] One study found a decrease of 10 $\mu g/m^3$ of fine particulate concentration was associated with an estimated increase in life expectancy equal to 0.77 years.[15] By how much would fine particulate matter levels increase in the LYV if the Sunnyside RNG digester were built? What is the cost of human health and life?

WAC 197-11-060 Content of Environmental Review

(5) ***Phased review.***

(a) Lead agencies shall determine the appropriate scope and level of detail of environmental review to coincide with meaningful points in their planning and decision-making processes. (See WAC ***197-11-055*** *on timing of environmental review.)*

(b) Environmental review may be phased. If used, phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. Broader environmental documents may be followed by narrower documents, for example, that incorporate prior general

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[14] Xie, W., Li, G., Zhao, D., Xie, X., Wei, Z., Wang, W., ... & Liu, J. (2015). Relationship between fine particulate air pollution and ischaemic heart disease morbidity and mortality. *Heart*, *101*(4), 257-263. https://kd.nsfc.gov.cn/paperDownload/1000008959735.pdf
Samet, J. M., Dominici, F., Curriero, F. C., Coursac, I., & Zeger, S. L. (2000). Fine particulate air pollution and mortality in 20 US cities, 1987–1994. *New England journal of medicine*, *343*(24), 1742-1749. https://www.nejm.org/doi/full/10.1056/NEJM200012143432401

Zanobetti, A., & Schwartz, J. (2009). The effect of fine and coarse particulate air pollution on mortality: a national analysis. *Environmental health perspectives*, *117*(6), 898-903. https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.0800108?url_ver=Z39.88-2003&rfr_id=ori:rid:crossref.org&rfr_dat=cr_pub%20%200pubmed

Pope III, C. A., & Dockery, D. W. (2006). Health effects of fine particulate air pollution: lines that connect. *Journal of the air & waste management association*, *56*(6), 709-742. https://www.nejm.org/doi/full/10.1056/NEJMsa0805646

Pope III, C. A., Turner, M. C., Burnett, R. T., Jerrett, M., Gapstur, S. M., Diver, W. R., ... & Brook, R. D. (2015). Relationships between fine particulate air pollution, cardiometabolic disorders, and cardiovascular mortality. *Circulation research*, *116*(1), 108-115. https://www.ahajournals.org/doi/full/10.1161/circresaha.116.305060

[15] Pope CA 3rd, Ezzati M, Dockery DW. Fine-particulate air pollution and life expectancy in the United States. N Engl J Med. 2009 Jan 22;360(4):376-86. doi: 10.1056/NEJMsa0805646. PMID: 19164188; PMCID: PMC3382057. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3382057/

discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

(c) Phased review is appropriate when:

*(i) The sequence is from a nonproject document to a document of narrower scope such as a site specific analysis (see, for example, WAC **197-11-443**); or*

(ii) The sequence is from an environmental document on a specific proposal at an early stage (such as need and site selection) to a subsequent environmental document at a later stage (such as sensitive design impacts).

(d) Phased review is not appropriate when:

(i) The sequence is from a narrow project document to a broad policy document;

(ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or

*(iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060 (3)(b) or **197-11-305**(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.*

(e) When a lead agency knows it is using phased review, it shall so state in its environmental document.

(f) Agencies shall use the environmental checklist, scoping process, nonproject EISs, incorporation by reference, adoption, and supplemental EISs, and addenda, as appropriate, to avoid duplication and excess paperwork.

*(g) Where proposals are related to a large existing or planned network, such as highways, streets, pipelines, or utility lines or systems, the lead agency may analyze in detail the overall network as the present proposal or may select some of the future elements for present detailed consideration. Any phased review shall be logical in relation to the design of the overall system or network, and shall be consistent with this section and WAC **197-11-070**.*

The City of Sunnyside did not state that the city would use a phased review. FOTC believes the City of Sunnyside should have gathered information sooner and presented all relevant environmental information with the initial SEPA review. Because the process now involves addressing a SEPA Review and then addressing Addenda to the SEPA review, the amount of study and paperwork has doubled, at least for FOTC.

WAC 197-11-080

Incomplete or unavailable information.

(1) If information on significant adverse impacts essential to a reasoned choice among alternatives is not known, and the costs of obtaining it are not exorbitant, agencies shall obtain and include the information in their environmental documents.

(2) When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists.

(3) Agencies may proceed in the absence of vital information as follows:

(a) If information relevant to adverse impacts is essential to a reasoned choice among alternatives, but is not known, and the costs of obtaining it are exorbitant; or

(b) If information relevant to adverse impacts is important to the decision and the means to obtain it are speculative or not known;

Then the agency shall weigh the need for the action with the severity of possible adverse impacts which would occur if the agency were to decide to proceed in the face of uncertainty. If the agency proceeds, it shall generally indicate in the appropriate environmental documents its worst case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed.

*(4) Agencies may rely upon applicants to provide information as allowed in WAC **197-11-100**.*

The City of Sunnyside did not document incomplete information, as required in the rule. FOTC believes that significant information is missing, and this should have been documented. See the concerns described on pages 6 to 9 above. We are especially concerned about costs to tax payers, impact on non-participating dairies and other farms, spreading disease, unknown increases in LYV air pollution, wear and tear on county roads, increases in traffic accidents, dangers to school children, and risks of fire and explosions.

Although the chances of fires and explosions are not great, damage when such incidents occur may be high and could include death.[16] A quality SEPA review must acknowledge this risk and address it. See WAC 197-11-794 (2).

The Sunnyside RNG SEPA Check list says:

Anaerobic-digestor-based renewable natural gas facilities produce biogas composed of methane (CH4) which is a flammable gas (under limited circumstances), hydrogen sulfide (H2S) which is both a flammable and toxic gas, along with CO2 and vocs. These components will be contained in anaerobic tanks with membrane roofs and in the downstream raw biogas piping systems designed in compliance with industry standards for sour gas facilities.

Methane (CH4) and Hydrogen Sulfide (H2S) are products of the anaerobic digestion process and both are considered hazardous with H2S also considered toxic. Both components will be present in the facility tanks and piping. Their hazardous and/or toxic characteristics along with response measures, should either be released to the atmosphere, can be found in Safety Data Sheets (SDS). Process chemicals such as solvents, oils, lubricants, antifreeze, ferric chloride and natural gas injection calibration gases such as Nitrogen, Propane, Helium, and potentially odorant will be used in limited quantities.

Standard emergency and fire services, as well as potentially confined space rescue. Other special health and safety planning is underway and will be confirmed with emergency

[16] See Attachment 2

services and County Health Department. Standard emergency services equipment includes self-contained breathing apparatus (SCBA) appropriate for potential exposure.

The following measures may be implemented to reduce or control environmental health hazards: A health and safety plan would be followed during construction to address worker safety and to minimize exposure to potential environmental health hazards. To help detect potential leaks quickly, an odorant may be added to the gas . Pressure and flow at the facilities will be monitored to ensure proper operation and reduce potential risk for fire and explosion. The centralized gas cleaning unit would be designed with internal shutoff valves that will switch automatically if the system detects a malfunction. The centralized gas cleaning unit would be outfitted with control technology to ensure that emissions are below the acceptable source impact level for air pollutants associated with project operation. The extremely limited areas where toxic/ hazardous materials are utilized will have impermeable surfaces and curbing to contain any potential spills.

Every methane producing facility with spills, leaks, fires, and explosions said the same things when they convinced communities to permit operations. Nothing in this statement is enforceable.[17]

The checklist says, *The following measures <u>may be implemented</u> to reduce or control environmental health hazards.*

If there is an accident and victims argue for compensation, Sunnyside RNG insurance companies can simply say, 'W never promised to do those things. We said those measures *may be implemented*.'

A useful SEPA check list would tell the reader, among other things:

- Where on the facility would alarms and monitors be located?
- What would be the pressure and flow danger signs?
- Would monitoring be automated or by trained personnel?
- What would the alarms detect?
- Frequency of alarm checks to make sure they function properly?
- How would the facility check for corrosion in the piping system, in the tank floors and walls?
- How often would piping be checked for leaks?
- When would equipment be replaced as the facility ages?
- Required safety training for staff – content, how often?
- Evacuation routes?
- What are protocols for rescuing trapped and endangered workers?
- Would there be monitoring for release of pathogens in effluent and air?
- Would there be fenceline monitoring?

[17] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

- What are proposed protocols for notifying neighbors of leaks and dangers?
- Describe a worst case scenario for fires and explosions

WAC 197-11-158 SEPA/GMA project review—Reliance on existing plans, laws, and regulations.

*(1) In reviewing the environmental impacts of a project and making a threshold determination, a GMA county/city may, at its option, determine that the requirements for environmental analysis, protection, and mitigation measures in the GMA county/city's development regulations and comprehensive plan adopted under chapter **36.70A** RCW, and in other applicable local, state, or federal laws or rules, provide adequate analysis of and mitigation for some or all of the specific adverse environmental impacts of the project.*

(2) In making the determination under subsection (1) of this section, the GMA county/city shall:

*(d) Place the following statement in the threshold determination if all of a project's impacts are addressed by other applicable laws and no conditions will be required under SEPA: "The lead agency has determined that the requirements for environmental analysis, protection, and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter **36.70A** RCW, and in other applicable local, state, or federal laws or rules, as provided by RCW **43.21C.240** and WAC 197-11-158. Our agency will not require any additional mitigation measures under SEPA."*

The City of Sunnyside did not select this option.

WAC 197-11-164 Planned actions—Definition and criteria.

*(1) Under RCW **43.21C.440**, GMA counties/cities may designate a planned action.*

FOTC interpretation is that the Sunnyside RNG project is not a planned action.

WAC 197-11-330 Threshold determination process.

*(3) In determining an impact's significance (WAC **197-11-794**), the responsible official shall take into account the following, that:*

(a) The same proposal may have a significant adverse impact in one location but not in another location;

(b) The absolute quantitative effects of a proposal are also important, and may result in a significant adverse impact regardless of the nature of the existing environment;

(c) Several marginal impacts when considered together may result in a significant adverse impact;

(d) For some proposals, it may be impossible to forecast the environmental impacts with precision, often because some variables cannot be predicted or values cannot be quantified.

(e) A proposal may to a significant degree:

(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;

(ii) Adversely affect endangered or threatened species or their habitat;

(iii) Conflict with local, state, or federal laws or requirements for the protection of the environment; and

(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.

*(4) If after following WAC **197-11-080** and **197-11-335** the lead agency reasonably believes that a proposal may have a significant adverse impact, an EIS is required.*

(5) A threshold determination shall not balance whether the beneficial aspects of a proposal outweigh its adverse impacts, but rather, shall consider whether a proposal has any probable significant adverse environmental impacts under the rules stated in this section. For example, proposals designed to improve the environment, such as sewage treatment plants or pollution control requirements, may also have significant adverse environmental impacts.

Many people believe that the SS RNG digester should be located away from the City of Sunnyside, in a more remote area.

People note that the proposed digester will be situated near the Windmill Mushroom Farms that already sends odorous emissions into the ambient air, and the Nutrien Fertilizer Plant with a history of a fire that required evacuation of neighbors, and the Sunnyside wastewater treatment plant that sprays odorous effluent onto nearby fields.

The proposed digester would be near the area where the poorer people of Sunnyside live and farther from more affluent areas. A previous site, near more affluent areas, and near the Williams natural gas pipeline, was rejected. No one is stating the reason.

Soil at this site, Quincy loamy fine sand, is “excessively drained” according to the Natural Resources Conservation Service. Nearby monitoring wells at the Port of Sunnyside show high levels of nitrates in the underlying aquifer. Sunnyside RNG has not stated what kind of liner will be used for digester lagoons. It is reasonable to expect that spills on the digester site would quickly leach to the aquifer.

Approval of this project without an Environmental Impact Statement would demonstrate to the public that Washington laws to protect people in marginalized neighborhoods mean nothing.

197-11-335 Additional information.

*The lead agency shall make its threshold determination based upon information reasonably sufficient to evaluate the environmental impact of a proposal (WAC **197-11-055**(2) and **197-11-060**(3)). The lead agency may take one or more of the following actions if, after reviewing the checklist, the agency concludes that there is insufficient information to make its threshold determination:*

(1) Require an applicant to submit more information on subjects in the checklist;

(2) Make its own further study, including physical investigations on a proposed site;

*(3) Consult with other agencies, requesting information on the proposal's potential impacts which lie within the other agencies' jurisdiction or expertise (agencies shall respond in accordance with WAC **197-11-550**); or*

*(4) Decide that all or part of the action or its impacts are not sufficiently definite to allow environmental analysis and commit to timely, subsequent environmental analysis, consistent with WAC **197-11-055** through **197-11-070**.*

There is insufficient information in the Sunnyside RNG checklist to evaluate the environmental impact of the proposed digester.

- Only vague speculation about project expansion
- A Geotechnical Report and Phase I ESA are referenced but not available for review
- There is no air permit. The application posted on the City of Sunnyside web site that appears to have been accepted by the Yakima Regional Clean Air Agency was not in fact accepted. The YRCAA returned it to Sunnyside RNG for more information
- Could the answers be any vaguer? How about this: "Best management practices will be used to reduce and control erosion. Local and state laws will be followed. Silt fence, construction entrance, an inlet protection are planned."[18]
- The Environmental Checklist assures the public that emissions from the proposed digester will not exceed:
    - CO - 100 tons per year (tpy)
    - NOX - 40 tons per year (tpy)
    - SO2 - 40 tons per year (tpy)
    - PM - 25 tons per year (tpy)
    - PM10-15tpy
    - PM25 -10 tpy

[18] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

Suppose the SS RNG digester only emits 5 tons per year of PM 2.5, fine particulate matter, and Windmill Mushroom Farms only emits 5 tons per year of fine particulate matter, and Nutrien Solutions only emits 5 tons per year of fine particulate matter, and the City of Sunnyside Waste Water Treatment Plant only emits 5 tons per year of fine particulate matter. The Total is 20 tons per year. What does this mean for South Sunnyside air quality? Wouldn't it be better to study this problem before ground is broken, rather than trying to protect human health with home air filters and breathing treatments afterwards?

- *Stormwater runoff will be retained on site and infiltrated into the ground at various locations including a potential stormwater pond. This water will not flow into other waters.* This means that stormwater will wash spilled manure and digestate from the site into the ground. Who will monitor for onsite spills? Is groundwater monitoring appropriate here?
- *Natural gas used for heat (the boilers) is accounted for in the air emissions as well as avoided methane calculations.* This natural gas should not be counted in avoided methane calculations.
- *Thermal energy will be recaptured from the amine re boiler for heating other site processes. Where appropriate variable rate pumps will be used.* There is insufficient information to quantify these proposed savings. There is insufficient information for the average reader, including City of Sunnyside Officials, to understand the nature of an amine boiler.
- *To help detect potential leaks quickly, an odorant may be added to the gas*. An odorant "may" be added. You "may" win the lottery
- *Noise is not anticipated to be a problem*. Please tell us why not.
- FOTC's table top calculation, using data from the SS RNG Traffic Impact Analysis estimates there will be an additional 1,500 miles of truck traffic per day mostly on Yakima County Roads. Heavy duty trucks inflict about 2,500 times more wear and tear on roads than private cars. There is no estimate of cost to maintain the impacted county roads.

WAC 197-11-340 Determination of nonsignificance (DNS).

(2)(c) Any person, affected tribe, or agency may submit comments to the lead agency within fourteen days of the date of issuance of the DNS.
(2)(f) The responsible official shall reconsider the DNS based on timely comments and may retain or modify the DNS or, if the responsible official determines that significant adverse impacts are likely, withdraw the DNS or supporting documents. When a DNS is modified, the lead agency shall send the modified DNS to agencies with jurisdiction.
(3)(a) The lead agency shall withdraw a DNS if:

(i) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts;

(ii) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts; or

(iii) The DNS was procured by misrepresentation or lack of material disclosure; if such DNS resulted from the actions of an applicant, any subsequent environmental

checklist on the proposal shall be prepared directly by the lead agency or its consultant at the expense of the applicant.

(b) Subsection (3)(a)(ii) shall not apply when a nonexempt license has been issued on a private project.

*(c) If the lead agency withdraws a DNS, the agency shall make a new threshold determination and notify other agencies with jurisdiction of the withdrawal and new threshold determination. If a DS is issued, each agency with jurisdiction shall commence action to suspend, modify, or revoke any approvals until the necessary environmental review has occurred (see also WAC **197-11-070**).*

The City of Sunnyside issued a mitigated determination of non-significance (MDNS) of the SS RNG project on June 22, 2023.

The Friends of Toppenish Creek submitted an appeal of the MDNS on July 6, 2023.[19]

There is no evidence that the responsible official reconsidered the MDNS based on FOTC's lengthy comments, as required by WAC 197-11-340(2)(f).

FOTC maintains there was a lack of material disclosure due to the absence of data regarding air quality, risks for fires and explosion, and traffic impacts. The agency with expertise for air, the YRCAA, did not comment. A Traffic Impact Analysis (TIA) was not available for review prior to our July 6, 2023 appeal.

WAC 197-11-350 Mitigated DNS.

The purpose of this section is to allow clarifications or changes to a proposal prior to making the threshold determination.

(1) In making threshold determinations, an agency may consider mitigation measures that the agency or applicant will implement.

(2) After submission of an environmental checklist and prior to the lead agency's threshold determination on a proposal, an applicant may ask the lead agency to indicate whether it is considering a DS. If the lead agency indicates a DS is likely, the applicant may clarify or change features of the proposal to mitigate the impacts which led the agency to consider a DS likely. The applicant shall revise the environmental checklist as may be necessary to describe the clarifications or changes. The lead agency shall make its threshold determination based upon the changed or clarified proposal. If a proposal continues to have a probable significant adverse environmental impact, even with mitigation measures, an EIS shall be prepared.

(3) Whether or not an applicant requests early notice under subsection (2), if the lead agency specifies mitigation measures on an applicant's proposal that would allow it to issue a DNS, and the proposal is clarified, changed, or conditioned to include those measures, the lead agency shall issue a DNS.

[19] See Attachment 2

(4) Environmental documents need not be revised and resubmitted if the clarifications or changes are stated in writing in documents that are attachments to, or incorporate by reference, the documents previously submitted. An addendum may be used, see Part Six.

The June 22, 2023 MDNS for the SS RNG project stated the following mitigation measures:

Mitigation Measure: An Inadvertent Discovery Plan shall be created and submitted to the City of Sunnyside as part of the building permit package for the prosed development.

Mitigating Measures: a stormwater management plan is required to be submitted for review and approval by City of Sunnyside public works department prior to construction. The plan must meet the following design standards:

a) Stormwater retention or detention shall be provided. A professional engineer registered in the state of Washington shall design all drainage facilities and components. Drainage plans using best management practices and design requirements must be submitted to and approved by City of Sunnyside prior to grading or development.
b) Post development stormwater flow rates and volumes shall not exceed predevelopment conditions. The standard of full retention of the 25-year storm event generally meets the goal.
c) The depth to groundwater should be determined prior to planning the layout of stormwater facilities. If a stormwater infiltration facility will be used for the disposal of runoff, a permeability test should be conducted initially at the site to determine existing infiltration rates prior to the design stage.

Mitigation Measure: Dust a. A dust control plan must be filed with the Yakima Regional Clean Air Authority.

Documentation for most of these mitigation measures is still missing, namely there is no:

- Inadvertent Discovery Plan, although the addendum letter from SS RNG claims one exists
- NPDES Construction Stormwater permit, although the addendum letter from SS RNG claims one exists
- Stormwater Pollution Prevention Plan, although the addendum letter from SS RNG claims one exists
- Consultation with the WA State Dept. of Ecology and the Yakima Health District regarding a Notice of Intent to operate under terms and conditions of a solid waste permit
- Depth to groundwater and permeability tests

On December 4, 2023, FOTC submitted a public records request to Yakima County Emergency Services for information re conversations with Sunnyside RNG regarding possible fires and explosions. On December 5, 2023, Yakima County Emergency

Services informed FOTC that they have no records of conversations with Pacific Ag/Sunnyside RNG regarding the proposed manure bio-digester.

FOTC interprets this to mean that project proponents have not adequately prepared for possible fires and explosions at the site. There is abundant information demonstrating the possibility of fires and explosions related to methane production facilities.

WAC 197-11-355 Optional DNS process.

In the City of Sunnyside's May 23, 2023 Notice of Environmental Review the city stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

However the City of Sunnyside has not incorporated WAC 197-11-355 by reference. See City of Sunnyside Municipal Code, Chapter 18.04 available at https://www.codepublishing.com/WA/Sunnyside/#!/Sunnyside18/Sunnyside1804.html#18.04.020

18.04.080 Categorical exemptions and threshold determinations, provisions adopted by reference.

Regarding the rules for deciding whether a proposal has a "probable significant adverse environmental impact" requiring an EIS to be prepared, and the rules for evaluating the impacts of proposals not requiring an EIS, the City adopts the following sections of Chapter 197-11 WAC by reference:

WAC

197-11-300 Purpose
197-11-305 Categorical Exemptions
197-11-310 Threshold Determination Required
197-11-315 Environmental Checklist
197-11-330 Threshold Determination Process
197-11-335 Additional Information
197-11-340 Determination of Non-Significance

197-11-350 Mitigated Determinations of Non-Significance

197-11-360 Determinations of Significance/Initiation of Scoping

197-11-390 Effects of Threshold Determination

[Ord. 1475 § 2, 1984.]

FOTC questions whether the city can invoke a rule that the city has not approved. The city did not respond when FOTC brought this fact to the city's attention.

WAC 197-11-400 Purpose of EIS.

(1) The primary purpose of an environmental impact statement is to ensure that SEPA's policies are an integral part of the ongoing programs and actions of state and local government.

(2) An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.

(3) Environmental impact statements shall be concise, clear, and to the point, and shall be supported by the necessary environmental analysis. The purpose of an EIS is best served by short documents containing summaries of, or reference to, technical data and by avoiding excessively detailed and overly technical information. The volume of an EIS does not bear on its adequacy. Larger documents may even hinder the decision making process.

(4) The EIS process enables government agencies and interested citizens to review and comment on proposed government actions, including government approval of private projects and their environmental effects. This process is intended to assist the agencies and applicants to improve their plans and decisions, and to encourage the resolution of potential concerns or problems prior to issuing a final statement. An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions.

An Environmental Impact Statement, as described in WAC 197-11-400 is essential for quality decision making. A project as large as the Sunnyside RNG digester should not proceed without study of environmental information at this level

WAC 197-11-500 Purpose of this part.

This part provides rules for:

(1) Notice and public availability of environmental documents, especially environmental impact statements;

(2) Consultation and comment by agencies and members of the public on environmental documents;

(3) Public hearings and meetings; and

(4) Lead agency response to comments and preparation of final environmental impact statements. Review, comment, and responsiveness to comments on a draft EIS are the focal point of the act's commenting process because the DEIS is developed as a result of scoping and serves as the basis for the final statement.

This section especially addresses public notice for Environmental Impact Statements, but it is not limited to EIS. FOTC believes that this section also addresses Environmental Review in sections that do not limit discussion to EIS.

WAC 197-11-502 Inviting comment.

(1) Agency efforts to involve other agencies and the public in the SEPA process should be commensurate with the type and scope of the environmental document.

*(2) Consulted agencies have a responsibility to respond in a timely and specific manner to requests for comments (WAC **197-11-545**, **197-11-550**, and **197-11-724**).*

The Yakima Regional Clean Air Agency, the agency tasked with enforcing the Clean Air Act in Yakima County, did not respond to the City of Sunnyside's request for comments on the May 2023 Notice of Environmental Review. Consequently the MDNS did not contain sufficient analysis of related air impacts. If there were an adequate analysis of air impacts the City of Sunnyside might have issued a Determination of Significance that would have changed the course of these actions.

*(3) **Threshold determinations.***

*(a) Agencies shall send DNSs to other agencies with jurisdiction, if any, as required by WAC **197-11-340**(2) and **197-11-355**.*

The City of Sunnyside has never incorporated WAC 197-11-355 by reference.

*(b) For DNSs issued under WAC **197-11-340**(2), agencies shall provide public notice under WAC **197-11-510** and receive comments on the DNS for fourteen days.*

The City of Sunnyside provided public notice of the MDNS on June 22, 2023, and stated

Appeal Period: This MDNS is issued under WAC 197-11-340(2). The Lead Agency will not act on this proposal for 14 days from the date of issuance. Appeals may be submitted on this proposal to the address below.

However the May 2023 Notice of Environmental Review stated

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

FOTC did appeal the MDNS on July 6, 2023. The City of Sunnyside scheduled a hearing date for August 23, 2023. The City of Sunnyside cancelled the hearing on August 16, 2023. The city did not put the cancellation in an official document, but relied instead on an email that said:

After consultation with the City's legal team, it has been discovered that the Mitigated Determination of Nonsignificance (MDNS) issued on June 22, 2023, cannot at this time be appealed. The reason the MDNS cannot be appeal is because the MDNS only serves as an advisory statement on behalf of the City. In order to process an appeal, the MDNS is required to be tied to a development permits, such as a land use review, engineering permit, or building permit. None of those items have been issued for the site at this time, therefore the City cannot process a standalone MDNS appeal. See - Ellensburg Cement Products, Inc. v. Kittitas County, 179 Wn.2d 737 (2014).

FOTC disputed the cancellation to no avail. The City of Sunnyside did not cite rules that allow an unelected official to cancel a legally authorized hearing. In fact, the city did not point to any places in WAC 197-11 that might support the cancellation. It is inappropriate for the city to cite case law as though issuing a ruling from the bench.

FOTC disagrees with the statement *the MDNS only serves as an advisory statement on behalf of the City.* FOTC contends that environmental review means *Deciding whether a proposal has a probable significant adverse impact and thus requires an EIS (the threshold determination)* WAC 197-11-300(2)

(6) ***Public hearings and meetings.***

(a) Public hearings or meetings may be held (WAC ***197-11-535****). Notice of such public hearings shall be given under WAC* ***197-11-510*** *and may be combined with other agency notice.*

(b) In conjunction with the requirements of WAC ***197-11-510****, notice of public hearings shall be published no later than ten days before the hearing. For nonproject proposals, notice of the public hearing shall be published in a newspaper of general circulation in the general area where the lead agency has its principal offices. For nonproject proposals having a regional or statewide applicability, copies of the notice shall be given to the Olympia bureaus of the Associated Press and United Press International.*

The City of Sunnyside refused to conduct public hearings on this project. As noted, the city cancelled a public hearing of the FOTC appeal. There was no opportunity for the community to learn about risks and benefits related to the SS RNG bio-digester, thus a thwarting of the intent of the law.

WAC 197-11-510 Public notice.

(1) When these rules require notice to be given under this section, the lead agency must use reasonable methods to inform the public and other agencies that an

environmental document is being prepared or is available and that public hearing(s), if any, will be held. The agency may use its existing notice procedures.

Examples of reasonable methods to inform the public are:

(a) Posting the property, for site-specific proposals;

(b) Publishing notice in a newspaper of general circulation in the county, city, or general area where the proposal is located;

(c) Notifying public or private groups with known interest in a certain proposal or in the type of proposal being considered;

(d) Notifying the news media;

(e) Placing notices in appropriate regional, neighborhood, ethnic, or trade journals;

(f) Publishing notice in agency newsletters and/or sending notice to agency mailing lists (either general lists or lists for specific proposals or subject areas); and/or

(g) Mailing or emailing notice to any person, group or agency who has requested notice.

*(2) Each agency shall specify its method of public notice in its SEPA procedures, WAC **197-11-904** and **197-11-906**. If an agency does not specify its method of public notice or does not adopt SEPA procedures, the agency shall use methods (a) and (b) in subsection (1).*

(3) Documents which are required to be sent to the department of ecology under these rules will be published in the SEPA register, which will also constitute a form of public notice. However, publication in the SEPA register shall not, in itself, meet compliance with this section.

FOTC only became aware of the SS RNG MDNS as a result of a public records request. FOTC paid particular attention to public notices in the Yakima Herald Republic because we heard rumors about the proposed digester. We found zero notices in the Yakima Herald Republic or in the Spanish media.

To the best of our knowledge notices were sent to about twenty residences near the proposed site. Many of the recipients only speak Spanish, yet the notices were only in English. This project, if completed will have long lasting impacts on the entire county, yet most people in the county are still unaware.

The City of Sunnyside or the Port of Sunnyside placed a sign in a cornfield at the proposed site next to a highway with a 55 mph speed limit. Public notice was minimal and inadequate.

WAC 197-11-535 Public hearings and meetings.

(1) If a public hearing on the proposal is held under some other requirement of law, such hearing shall be open to consideration of the environmental impact of the proposal, together with any environmental document that is available. This does not require extension of the comment periods for environmental documents.

(2) In all other cases a public hearing on the environmental impact of a proposal shall be held whenever one or more of the following situations occur:

(a) The lead agency determines, in its sole discretion, that a public hearing would assist it in meeting its responsibility to implement the purposes and policies of SEPA and these rules; or

(b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS; or

(c) When two or more agencies with jurisdiction over a proposal make written request to the lead agency within thirty days of the issuance of the draft EIS.

*(3) Whenever a public hearing is held under subsection (2) of this section, it shall occur no earlier than fifteen days from the date the draft EIS is issued, nor later than fifty days from its issuance. Notice shall be given under WAC **197-11-502**(6) and **197-11-510** and may be combined with other agency notice.*

(4) If a public hearing is required under this chapter, it shall be open to discussion of all environmental documents and any written comments that have been received by the lead agency prior to the hearing. A copy of the environmental document shall be available at the public hearing.

*(5) Comments at public hearings should be as specific as possible (see WAC **197-11-550**).*

(6) Agencies and their designees may hold informal public meetings or workshops. Such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings.

*(7) Public meetings held by local governments under chapter **36.70B** RCW may be used to meet SEPA public hearing requirements as long as the requirements for public hearing in this section are met. A public hearing under this section need not be an open record hearing as defined in RCW **36.70B.020**(3).*

Based on WAC 197-11-535(2) & (3) FOTC concludes that this section primarily applies to Environmental Impact Statements. However, the City of Sunnyside could have conducted public meetings or workshops to inform residents about the risks and benefits of this proposed project. Such an action would have demonstrated confidence in the intelligence and civic interest of members of the public. Absence of such meetings indicates a propensity to keep the public in the dark.

WAC 197-11-545 Effect of no comment.

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*(1) **Consulted agencies.** If a consulted agency does not respond with written comments within the time periods for commenting on environmental documents, the lead agency may assume that the consulted agency has no information relating to the potential impact of the proposal as it relates to the consulted agency's jurisdiction or special expertise. Any consulted agency that fails to submit substantive information to the lead agency in response to a draft EIS is thereafter barred from alleging any defects in the lead agency's compliance with Part Four of these rules.*

*(2) **Other agencies and the public.** Lack of comment by other agencies or members of the public on environmental documents, within the time periods specified by*

*these rules, shall be construed as lack of objection to the environmental analysis, if the requirements of WAC **197-11-510** are met.*

It is extremely disturbing that the Yakima Regional Clean Air Agency and the Yakima Health District did not comment on the SS RNG Environmental Review. This failure to comment borders on failure to fulfill these agencies' mandated duties.

It is impossible to construct a manure methane bio-digester that produces between 800,000 and 950,000 MMBtu's of renewable natural gas per year without an impact on air quality or human health.

WAC 197-11-600 When to use existing environmental documents.

(1) This section contains criteria for determining whether an environmental document must be used unchanged and describes when existing documents may be used to meet all or part of an agency's responsibilities under SEPA.

(2) An agency may use environmental documents that have previously been prepared in order to evaluate proposed actions, alternatives, or environmental impacts. The proposals may be the same as, or different than, those analyzed in the existing documents.

Pacific Ag/Sunnyside RNG acknowledges that the company must acquire an air quality permit prior to commencing construction. When the YRACC evaluates such an application the YRCAA may incorporate the City of Sunnyside's MDNS, even though the YRCAA failed to comment on air impacts. FOTC would interpret such an action as an attempt to circumvent SEPA laws, and permit a polluting operation.

(3) Any agency acting on the same proposal shall use an environmental document unchanged, except in the following cases:

*(a) For DNSs, an agency with jurisdiction is dissatisfied with the DNS, in which case it may assume lead agency status (WAC **197-11-340** (2)(e) and **197-11-948**).*

(b) For DNSs and EISs, preparation of a new threshold determination or supplemental EIS is required if there are:

(i) Substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts (or lack of significant adverse impacts, if a DS is being withdrawn); or

(ii) New information indicating a proposal's probable significant adverse environmental impacts. (This includes discovery of misrepresentation or lack of material disclosure.) A new threshold determination or SEIS is not required if probable significant adverse environmental impacts are covered by the range of alternatives and impacts analyzed in the existing environmental documents.

FOTC has introduced new evidence of potential adverse impacts in the forms of 1. an Evaluation of the Sunnyside RNG Traffic Impact Analysis, 2. Documentation of fires and explosions on other manure bio-digesters, 3. Reference to groundwater issues at the Port of Sunnyside, 4. Data supporting likelihood of cumulative impacts, and 5. Demographic data that demonstrates Environmental Justice concerns.

(c) For EISs, the agency concludes that its written comments on the DEIS warrant additional discussion for purposes of its action than that found in the lead agency's FEIS (in which case the agency may prepare a supplemental EIS at its own expense).

(4) Existing documents may be used for a proposal by employing one or more of the following methods:

(a) "Adoption," where an agency may use all or part of an existing environmental document to meet its responsibilities under SEPA. Agencies acting on the same proposal for which an environmental document was prepared are not required to adopt the document; or

(b) "Incorporation by reference," where an agency preparing an environmental document includes all or part of an existing document by reference.

(c) An addendum, that adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document.

(d) Preparation of a SEIS if there are:

(i) Substantial changes so that the proposal is likely to have significant adverse environmental impacts; or

(ii) New information indicating a proposal's probable significant adverse environmental impacts.

New information provided by FOTC, and others strongly indicates significant adverse environmental impacts from the SS RNG project. These impacts may be direct, indirect, short term, long term, widespread and cumulative. An EIS is warranted.

(e) If a proposal is substantially similar to one covered in an existing EIS, that EIS may be adopted; additional information may be provided in an addendum or SEIS (see (c) and (d) of this subsection).

WAC 197-11-655 Implementation.

*(1) See RCW **43.21C.020**, **43.21C.030**(1), **43.21C.060**, **43.21C.075**, and **43.21C.080**.*

(2) Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

(3) When a decision maker considers a final decision on a proposal:

(a) The alternatives in the relevant environmental documents shall be considered.

(b) The range of alternative courses of action considered by decision makers shall be within the range of alternatives discussed in the relevant environmental documents. However, mitigation measures adopted need not be identical to those discussed in the environmental document.

(c) If information about alternatives is contained in another decision document which accompanies the relevant environmental documents to the decision maker, agencies are encouraged to make that information available to the public before the decision is made.

Since the City of Sunnyside did not evaluate alternatives to the SS RNG proposal, the city cannot comply with WAC 197-11-655

WAC 197-11-680 Appeals.

(1) ***Introduction.*** *Appeals provisions in SEPA are found in RCW* ***43.21C.060****,* ***43.21C.075*** *and* ***43.21C.080****. These rules attempt to construe and interpret the statutory provisions. In the event a court determines that these rules are inconsistent with statutory provisions, or with the framework and policy of SEPA, the statute will control. Persons considering either administrative or judicial appeal of any decision which involves SEPA at all are advised to read the statutory sections cited above.*

(2) ***Appeal to local legislative body.*** *RCW* ***43.21C.060*** *allows an appeal to a local legislative body of any decision by a local nonelected official conditioning or denying a proposal under authority of SEPA. Agencies may establish procedures for such an appeal, or may eliminate such appeals altogether, by rule, ordinance or resolution. Such appeals are subject to the restrictions in RCW* ***36.70B.050*** *and* ***36.70B.060*** *that local governments provide no more than one open record hearing and one closed record appeal for permit decisions.*

FOTC has appealed to the Sunnyside City Council three times under WAC 197-11-680(2). The first appeal was on September 22, 2023, likely beyond the short 20 day window prescribed in the Sunnyside Municipal Code section 2.72

(3) ***Agency administrative appeal procedures.***

(a) Agencies may provide for an administrative appeal of determinations relating to SEPA in their agency SEPA procedures. If so, the procedures must comply with the following:

(i) The agency must specify by rule, ordinance, or resolution that the appeals procedure is available.

(ii) Appeal of the intermediate steps under SEPA (e.g., lead agency determination, scoping, draft EIS adequacy) shall not be allowed.

(iii) Appeals on SEPA procedures shall be limited to review of a final threshold determination and final EIS. These appeals may occur prior to an agency's final decision on a proposed action.

The June 22, 2023 MDNS was a final threshold determination. Pacific Ag/Sunnyside RNG supplemented their environmental checklist with addenda on October 8, 2023. The City of Sunnyside posted a signed Notice of Addendum on November 28, 2023, with a deadline for comments of December 5, 2023.

Frankly, FOTC is confused regarding timelines for appeals, but we submit comments today to make sure we do not miss deadlines. This results in excess paperwork and excess documentation.

(iv) An agency shall provide for only one administrative appeal of a threshold determination or of the adequacy of an EIS; successive administrative appeals on these issues within the same agency are not allowed. This limitation does not apply to administrative appeals before another agency.

(v) Except as provided in (a)(vi) of this subsection, the appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body. The hearing or appeal shall be one at which the hearing officer or body will consider either the agency's decision or a recommendation on the proposed underlying governmental action. For example, an appeal of the adequacy of an EIS must be consolidated with a hearing or appeal on the agency's decision or recommendation on the proposed action, if both proceedings are allowed in agency procedures. If an agency does not provide for a hearing or appeal on the underlying governmental action (either a hearing on the agency's recommendation or an agency appeal hearing after the decision is made), the agency may not hold a SEPA administrative appeal, except as allowed under (a)(vi) of this subsection.

This section says, *appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body*. It does not say that appeals must be made to Superior Court as the City of Sunnyside advises.

(vi) The following appeals of SEPA procedural or substantive determinations need not be consolidated with a hearing or appeal on the underlying governmental action:

(A) An appeal of a determination of significance;

(B) An appeal of a procedural determination made by an agency when the agency is a project proponent, or is funding a project, and chooses to conduct its review under SEPA, including any appeals of its procedural determinations, prior to submitting an application for a project permit. Subsequent appeals of substantive determinations by an agency with jurisdiction over the proposed project shall be allowed under the SEPA appeal procedures of the agency with jurisdiction;

FOTC's July 6, 2023 appeal of the June 22, 2023 MDNS was mostly procedural. We believe that the City of Sunnyside and the Port of Sunnyside are project proponents based on the two years of meetings with Pacific Ag, the sale of property to Sunnyside RNG, and the extreme efforts the city and the port have exerted to move the SS RNG project forward. Based on WAC 197-11-680 (3)(a)(vi)(B) the City of Sunnyside should not have cancelled the August 23, 2023 appeal hearing.

(C) An appeal of a procedural determination made by an agency on a nonproject action; and

*(D) An appeal to the local legislative authority under RCW **43.21C.060** or other applicable state statutes.*

*(vii) If a county/city to which RCW **36.70B.110** applies provides for an administrative appeal, any such appeal of a procedural or substantive determination under SEPA issued at the same time as the decision on a project action shall be filed within fourteen days after a notice of decision under RCW **36.70B.130** or after other notice that the decision has been made and is appealable. In order to allow public comment on a DNS prior to requiring an administrative appeal to be filed, this appeal period shall be extended for an additional seven days if the appeal is of a DNS for which public comment is required under this chapter or under county/city rules adopted under SEPA. For threshold determinations issued prior to a decision on a project action, any administrative appeal allowed by a county/city shall be filed within fourteen days after notice that the determination has been made and is appealable. Nothing in this subsection alters the requirements of (a)(v) and (vi) of this subsection.*

(viii) Agencies shall provide that procedural determinations made by the responsible official shall be entitled to substantial weight.

*(b) Agencies providing for administrative appeals shall provide for a record as required by RCW **43.21C.075** (3)(c).*

(c) If an agency provides an administrative appeal procedure, that procedure must be used before anyone may initiate judicial review of any SEPA issue that could have been reviewed under the agency procedures.

The City of Sunnyside provides an administrative appeal procedure under Sunnyside Municipal Code Section 2.46 and 2.72. FOTC believes the City of Sunnyside erred by cancelling our August 23, 2023, appeal and telling us that our only option was to appeal permit decisions in Superior Court. WAC 197-11-680 (3)(c) says differently.

(4) Judicial appeals.

(a) SEPA authorizes judicial appeals of both procedural and substantive compliance with SEPA.

*(b) When SEPA applies to a decision, any judicial appeal of that decision potentially involves both those issues pertaining to SEPA (SEPA issues) and those which do not (non-SEPA issues). RCW **43.21C.075** establishes time limits for raising SEPA issues, but says that existing statutes of limitations control the appeal of non-SEPA issues. The statute contemplates a single lawsuit.*

(c) If there is a time limit established by statute or ordinance for appealing the underlying governmental action, then appeals (or portions thereof) raising SEPA issues must be filed within such time period.

The Sunnyside City Code states:

2.72.010 Appeal period.

Any appeal from any action of the City Council, City Commission or City Board, or City official or employee, whose decisions are not directly appealable to the City Council, must be brought within 20 days from the date of the effective date of the action appealed from. [Ord. 1313 § 1, 1981.]

The City of Sunnyside issued an MDNS for the SS RNG project. FOTC timely appealed. The city cancelled the appeal. After the threshold determination, SS RNG submitted changes to the environmental checklist that will affect the MDNS. FOTC may comment, but there is apparently no pathway for an appeal, according to the Sunnyside Municipal Code.

The City of Sunnyside may have designed a trap in which appeals were postponed and then prohibited due to postponement.

*(d) The notice of action procedures of RCW **43.21C.080** may still be used. If this procedure is used, then the time limits for judicial appeal specified in RCW **43.21C.080** shall apply, unless there is a time limit established by statute or ordinance for appealing the underlying governmental action. If so, the time limit for appeal of SEPA issues shall be the time limit in the statute or ordinance for the underlying governmental action. If the proposal requires more than one governmental decision that will be supported by the same SEPA documents, then RCW **43.21C.080** still only allows one judicial appeal of procedural compliance with SEPA, which must be commenced within the applicable time to appeal the first governmental decision.*

*(e) If the time limit established by statute or ordinance for appealing the underlying governmental action is less than fifteen days, then the notice of action in RCW **43.21C.080**(1) may be given by publishing once within that shorter time period, in a newspaper of general circulation in the area where the property that is the subject of the action is located, and meeting the other requirements of RCW **43.21C.080**.*

(f) If there is no time limit established by statute or ordinance for appeal, and the notice of action provisions are not used, then SEPA provides no time limit for judicial appeals. Appeal times may still be limited, however, by general statutes of limitation or the common law.

*(g) For the purposes of this subsection, "a time limit established by statute or ordinance" does not include time limits established by the general statutes of limitation in chapter **4.16** RCW.*

*(5) **Official notice of the date and place for commencing a judicial appeal.***

(a) Official notice of the date and place for commencing an appeal must be given if there is a time limit established by statute or ordinance for commencing an appeal of the underlying governmental action. The notice shall include:

(i) The time limit for commencing appeal of the underlying governmental action and SEPA issues, and the statute or ordinance establishing the time limit; and

(ii) Where an appeal may be filed.

(b) Notice is given by:

(i) Delivery of written notice to the applicant, all parties to any administrative appeal, and all persons who have requested notice of decisions with respect to the particular proposal in question; and

(ii) Following the agency's normal methods of notice for the type of governmental action taken.

(c) Written notice containing the information required by subsection (5)(a) of this section may be appended to the permit, decision documents, or SEPA compliance documents or may be printed separately.

(d) Official notices required by this subparagraph shall not be given prior to final agency action.

As noted above, FOTC is not certain of the intent of the City of Sunnyside's Notice of SEPA Addendum. FOTC could engage better if we knew whether these addenda would result in changes to the MDNS and consequently in final agency action.

The Notice of SEPA Addendum provides a window for public comments, but does not describe an appeal procedure. We understand that the lead agency has an obligation to evaluate and respond to our comments. See WAC 197-11-340 (2)(f)

WAC 197-11-910 Designation of responsible official.

*Agency SEPA procedures shall designate or provide a method of designating the responsible official with speed and certainty (WAC **197-11-906** (1)(d)). This designation may vary depending upon the nature of the proposal. The responsible official shall carry out the duties and functions of the agency when it is acting as the lead agency under these guidelines. Since it is possible under these rules for an agency to be acting as a lead agency prior to actually receiving an application for a license to undertake a private project, designation of the first department within the agency to receive an application as the responsible official will not be sufficient.*

It is FOTC's understanding that Trevor Martin from the City of Sunnyside is the responsible official for this SEPA determination.

WAC 197-11-924 Determining the lead agency.

*(1) The first agency receiving an application for or initiating a nonexempt proposal shall determine the lead agency for that proposal, unless the lead agency has been previously determined, or the agency receiving the proposal is aware that another agency is determining the lead agency. The lead agency shall be determined by using the criteria in WAC **197-11-926** through **197-11-944**.*

*(2) If an agency determines that another agency is the lead agency, it shall mail to such lead agency a copy of the application it received, together with its determination of lead agency and an explanation. If the agency receiving this determination agrees that it is the lead agency, it shall notify the other agencies with jurisdiction. If it does not agree, and the dispute cannot be resolved by agreement, the agencies shall immediately petition the department of ecology for a lead agency determination under WAC **197-11-946**.*

(3) Any agency receiving a lead agency determination to which it objects shall either resolve the dispute, withdraw its objection, or petition the department for a lead agency determination within fifteen days of receiving the determination.

*(4) An applicant may also petition the department to resolve the lead agency dispute under WAC **197-11-946**.*

*(5) To make the lead agency determination, an agency must determine to the best of its ability the range of proposed actions for the proposal (WAC **197-11-060**) and the other agencies with jurisdiction over some or all of the proposal. This can be done by:*

(a) Describing or requiring an applicant to describe the main features of the proposal;

(b) Reviewing the list of agencies with expertise;

(c) Contacting potential agencies with jurisdiction either orally or in writing.

It is FOTC's understanding that Pacific Ag/Sunnyside RNG may have approached Yakima County with this proposal prior to contacting the City and Port of Sunnyside.

WAC 197-11-92 Lead agency for governmental proposals.

(1) When an agency initiates a proposal, it is the lead agency for that proposal. If two or more agencies share in the implementation of a proposal, the agencies shall by agreement determine which agency will be the lead agency. For the purposes of this section, a proposal by an agency does not include proposals to license private activity.

(2) Whenever possible, agency people carrying out SEPA procedures should be different from agency people making the proposal.

WAC 197-11-928 Lead agency for public and private proposals.

*When the proposal involves both private and public activities, it shall be characterized as either a private or a public project for the purposes of lead agency designation, depending upon whether the primary sponsor or initiator of the project is an agency or from the private sector. Any project in which agency and private interests are too intertwined to make this characterization shall be considered a public project. The lead agency for all public projects shall be determined under WAC **197-11-926**.*

The City of Sunnyside's May 17, 2023 Notice of Environmental Review stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

Because this notice cited WAC 197-11-928, FOTC assumed this to be a public and private proposal. FOTC asked the City of Sunnyside several times whether it is a public and private project or a private project. The city did not answer. At a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag assured us several times that it is a private project. If this is so, then the City of Sunnyside was incorrect in

assuming the lead agency role, at least under WAC 197-11-928. FOTC asserts that the City of Sunnyside has an obligation to provide the public with accurate information.

WAC 197-11-930 Lead agency for private projects with one agency with jurisdiction.

For proposed private projects for which there is only one agency with jurisdiction, the lead agency shall be the agency with jurisdiction.

FOTC has asked the City of Sunnyside to list agencies with jurisdiction for the SS RNG project. The city has not answered.

* * * * * * * *

There are errors in the documents posted for this project:

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

But the City of Sunnyside has not incorporated WAC 197-11-355 by reference.

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project.

But WAC 197-11-928 refers to public and private projects. Sunnyside RNG claims this is a private project.

- Tax Parcel Numbers are listed as:

    - Notice of Environmental Review TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Mitigated Determination of Non-Significance Parcel Number(s): 220901-13001, -44401, & -41404
    - Notice of Appeal Cancellation TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Notice of SEPA Addendum TAX PARCEL NUMBER(S): 22090-141405 & 220901-41406 (Previously 220901-13001, -44401, - 41404)

- When did these changes occur? FOTC asks because we have spent many, many hours trying to make sense of the property location and zoning.

- Many related documents list two different File Numbers: SEPA-2022.0200 & SEPA 2023.0200 for the same project

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references File Number 2022.0200

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references Exhibit B, *A Cultural Resources Survey for the Sunnyside RNG project*. This document has not been posted for public view.

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside also identifies Exhibit B as a *Traffic Impact Analysis*

- The signature date for this letter is November 8, 2023, while the heading date for the letter is October 8, 2023

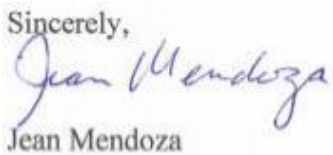
- The November 28, 2023 Notice of SEPA Addendum says:

  There is a 14-day comment period for this review. This may be your only opportunity to comment. All written comments received by 5:00 p.m. on December 5, 2023. Please reference file numbers (SEPA-2022.0200) and applicant's name (Sunnyside RNG) in any correspondence you submit.

  We are not sure this is the correct File Number.

The Friends of Toppenish Creek appreciate this opportunity to comment on SEPA review for the SS RNG project. We request clarification on next steps, specifically the appeal process as interpreted by the Lead Agency, the City of Sunnyside.

Sincerely,



Jean Mendoza

Executive Director, Friends of Toppenish Creek
3142 Signal Peak Road
White Swan, WA 98952

FOTC Comments regarding the Sunnyside RNG Traffic Impact Analysis
August 28, 2023

These comments are based on a reading of a document entitled Sunnyside RNG Traffic Impact Analysis[1] that Friends of Toppenish Creek received on August 24, 2023, through a public records request.

When the City of Sunnyside issued a mitigated determination of non-significance (MDNS) for the Sunnyside Renewable Natural Gas (RNG) project, on June 22, 2023, that determination stated, "A traffic report is on file with the City of Sunnyside and has been reviewed by WSDOT" and "This information (including all environmental documentation and a traffic study) is available to the public upon request and can be examined at our office during regular business hours."[2]

But the date of publication for the Sunnyside RNG Traffic Impact Analysis is July 10, 2023.

The City of Sunnyside posted a Notice of Environmental Review for SEPA analysis of the SS RNG project on May 17, 2023. Sunnyside posted the mitigated determination of nonsignificance (MDNS) on June 22, 2023. The Traffic Impact Analysis was not published until July 10, 2023, and was not shared with FOTC until August 24, 2023. It is almost impossible to form conclusions about a project within the time frames for comment and appeal without adequate data.

This document only looks at intersections within the City of Sunnyside. It does not address potential traffic issues in Yakima County. According to FOTC calculations, based on Figure 4 in the Traffic Impact Analysis, there would be 36 truck trips per day from the south on the Mabton Sunnyside Road. There is no discussion of the impact from this truck traffic.

Most of the manure that would be trucked to the SS RNG facility would be transported on Yakima County roads. Based on measurements from Figure 4 in the Traffic Impact Analysis there would be over 1,500 miles of truck traffic every day, and most would be on county roads.

Currently 17.6% of Yakima County property taxes apply to county roads. According to the 2023 Budget for Yakima County, the year began with a fund balance of $5,000,000 and will end with a fund balance of $1,302,797. Expected revenues are $43,850,841, while expected expenditures are $47,548,040.[3]

The WA State Association of Counties says.[4]

> *The unsustainable reality is: County transportation budgets are going backward. Counties' transportation dollars, when adjusted for inflation, are fewer than they were twenty years ago. Existing limitations on counties' ability to keep pace with growing obligations have created an annual transportation funding gap of at least $1 billion.*

Road and traffic experts tell us that wear and tear on roadways is over 2,500 greater for an eight axle truck compared to a two axle automobile.[5, 6]

Calculating the emissions from large trucks traveling 1,500 miles per day is beyond FOTC expertise. But we know that traffic emissions contribute to air pollution. In our opinion the Yakima Regional Clean Air Agency was obligated to comment after receiving the SS RNG Notice of Environmental Review – See RCW 43.21C.030(2)(d) which says, "Prior to making any detailed statement, the responsible official shall consult with and obtain the comments of any public agency which has jurisdiction by law or special expertise with respect to any environmental impact involved."

Thank you for reading.

Friends of Toppenish Creek

3142 Signal Peak Road
White Swan, WA 98952

[1] Sunnyside RNG Traffic Impact Analysis. 2023.
http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG_TIA7-10-23r.pdf

[2] SS RNG Mitigated Determination of Non-Significance. 2023.
http://www.friendsoftoppenishcreek.org/cabinet/data/AVS%206%20SS%20RNG%20Pacific%20Ag%202023-0200%20MDNS.pdf

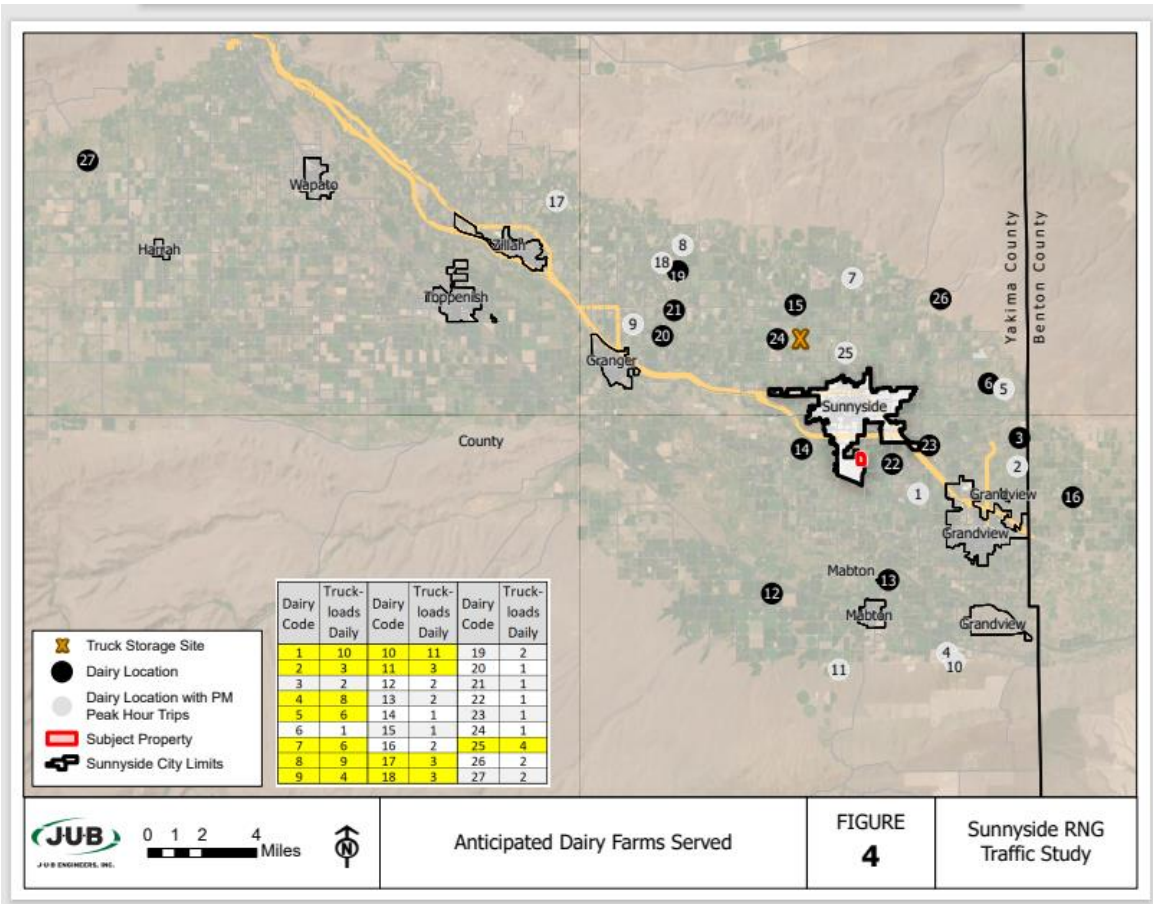
[3] Yakima County Budget for 2023.
https://www.yakimacounty.us/ArchiveCenter/ViewFile/Item/1198

[4] WA State Association of Counties. County Transportation Study. 2020.
https://wsac.org/countyroads/

[5] Inside Science. How Much Damage Do Heavy Trucks Do To Our Roads? 2020.
https://www.insidescience.org/news/how-much-damage-do-heavy-trucks-do-our-roads

[6] U.S. General Accounting Office. Truck Weight and Its Effect on Highways. 1979.
https://www.gao.gov/products/109954

Attachment 1. SS RNG Traffic Impact Analysis, Figure 4.
http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG_TIA7-10-23r.pdf



Attachment 2. Estimate Truck Miles Traveled per Day – Based on Figure 4 from the SS RNG Traffic Impact Analysis

Work Sheet SS RNG Dairy Trips				
Dairy	# Trips	Distance	One Way Miles	Roundtrip Miles
1	10	2	20	40
2	3	6	18	36
3	2	6	12	24
4	8	10	80	160
5	6	6	36	72
6	1	6	6	12
7	6	6	36	72
8	9	11	99	198
9	4	10	40	80
10	11	10	110	220
11	3	8	24	48
12	2	8	16	32
13	2	5	10	20
14	1	2	2	4
15	1	9	9	18
16	2	8	16	32
17	3	16	48	96
18	3	12	36	72
19	2	12	24	48
20	1	10	10	20
21	1	11	11	22
22	1	1	1	2
23	1	2	2	4
24	1	6	6	12
25	4	4	16	32
26	2	8	16	32
27	2	34	68	136
Total			772	1544

Attachment 2. Yakima County Budget, Page xii

YAKIMA COUNTY, WASHINGTON

Commissioner's Final 2023 Budget

December 13, 2022

Fund	2023 Beginning Fund Balance	2023 Revenue Budget	2023 Expenditure Budget	2023 Ending Fund Balance
District Court Probation	95,593	1,514,302	1,454,531	155,364
Municipal Courts	269,651	674,174	736,482	207,343
Pretrial	36,934	325,000	361,934	0
Special Operations	270,000	209,010	209,010	270,000
Dist Crt Dispute Resol Cntr	17,358	56,475	48,083	25,750
Family Court	107,570	181,900	289,470	0
Department of Corrections	1,835,945	28,297,059	28,297,059	1,835,945
Noxious Weed	685,188	404,884	566,747	523,325
Horticulture	132,237	184,000	199,918	116,319
Law Library	100,245	74,100	110,310	64,035
Criminal Justice Sales Tax	3,682,195	9,250,000	10,816,041	2,116,154
Parks & Recreation	64,870	100,000	154,223	10,647
County Road	5,000,000	43,850,841	47,548,044	1,302,797
Topp/Simcoe West Railroad	135,000	12,000	28,516	118,484
Yakima Rail Line	75,000	8,000	27,814	55,186
Flood Control	2,307,000	9,750,484	10,052,255	2,005,229
Storm Water Utility	2,434,952	1,074,469	1,642,382	1,867,039
Code Enforcement	607,641	1,039,859	862,191	785,309
Affordable & Supportive Housing Tax	1,090,342	351,656	0	1,441,998
Records Services	205,579	227,000	330,237	102,342
Motel/Hotel	40,000	773,200	758,550	54,650
WSU Extention	38,576	5,130	13,198	30,508
Emergency Medical Serv	354,213	611,350	569,250	396,313
911	454,960	2,626,921	2,734,668	347,213
ARPA Fund	51,073,582	2,516,447	27,590,029	26,000,000
Veterans Relief	466,980	265,000	303,022	428,958
Community Services	2,062,286	467,200	854,634	1,674,852
Mental Health Sales Tax	5,785,000	5,610,000	267,073	11,127,927
Treasurer's Revolving	125,500	272,488	307,988	90,000
Treasurer's Investment Pool	263,590	194,995	258,585	200,000
REET Electronic Technology	235,000	40,000	125,000	150,000
Supp Invest In Econ Dversif	25,535,860	6,575,000	12,362,591	19,748,269
Community Development	0	150,000	150,000	0
Affordable Housing	1,155,390	1,180,000	1,325,396	1,009,994
Title III PILT	157,034	10,000	6,066	160,968
Homeless Services	21,400,822	11,450,000	11,370,822	21,480,000
2008 GO Bond Redemption (214)	41,885	0	41,885	0
2010B Bond Redemption (218)	1,774,808	267,334	121,500	1,920,642
2014 LTGO Bond Redemption (201)	0	436,313	436,313	0
2020 GO Bond Redemption(225)	0	758,250	758,250	0
2020B GO Bond Redemption(226)	0	555,125	555,125	0
General Capital Projects (TS)	50,870	500	51,370	0
Fairgrounds Capital Projects	192,421	1,000	193,421	0
Public Works Capital Projects	0	450,000	450,000	0
2020 GO Bond Capital Projects	2,789,898	15,000	2,804,898	0
Ascend Royalties	104,000	1,200	50,000	55,200
RE Excise Cap Proj	1,121,364	1,370,000	980,100	1,511,264

Attachment 3. Yakima County Budget, County Roads, Pages 82-83



County Road

Expenditures	Actuals 2020	Actuals 2021	Budget 2022	Budget 2023
Wages	5,014,870	5,242,032	4,777,573	5,184,203
Benefits	1,888,218	2,134,485	2,552,793	2,887,157
Supply Items	3,664,679	3,881,321	0	0
Service Items	8,156,854	8,660,367	8,546,442	10,601,923
Capital Expense	3,965,996	7,506,662	21,050,200	28,719,600
Debt	548,548	162,346	160,000	0
Operating Transfers Out	156,962	158,465	158,961	155,161
Total Expenses	23,396,127	27,745,678	37,245,969	47,548,044
Ending Fund Balance	6,956,899	3,264,596	2,823,847	1,302,797
Total Budget	30,353,026	31,010,274	40,069,816	48,850,841

Program Description:

The County Road Division of the Public Services Department is responsible for the Maintenance, Preservation and Improvement of 1,633 miles of roads, 308 federally inventoried bridges and 267 short-span bridges. The County Road Division is also responsible for the administration, accounting and right-of-way management to support these primary activities.

Major Objectives:

- Maintain and Preserve the County's road and bridge inventory is a condition that meets the transportation demands places on it.
- Sustain a Safety Improvement Program, including enhanced traffic law enforcement, in order to ensure the safety of persons traveling on Yakima County roads.
- Plan, Design and Construct those vital transportation improvements identified in the adopted annual road program and Six Year Transportation Improvement Program.
- Aggressively pursue grants, loans and other innovative financing opportunities required to sustain the road and bridge improvements necessary to support the continued economic vitality of the region.
- Sustain a Maintenance Management system in order to ensure the long term, economical and efficient maintenance of County roads.
- Implement organizational and operational programs including: providing adequate levels of staff, developing employee training opportunities, and streamlining development review processes.
- Maintain and update countywide transportation plan.

Revenue/Expenditure Comment:

Major sources of revenue for the County Roads includes: up to $2.25 per $1,000 of assessed value property tax in the unincorporated areas of Yakima County. For 2022, the Maximum Lawful Road levy is estimated to be $16,115,000. For the Preliminary Budget, a Levy Shift of $2,200,000 is assumed, lowering the Road Levy to $13,967,000, with a resulting Levy Rate of $1.65 per $1,000 of assessed valuation. Other major fund sources are: direct allocation of the County's share of the State Gas Tax, and funds from State and Federal Transportation Grants.

County Road (cont.)

County Road spending priorities are: Maintaining and preserving the existing system, providing targeted improvements calculated to improve the safety of County roads, enhancing the economic viability of the region through focused investment in transportation improvements, and provide for enhanced quality of life for Yakima County citizens.

The County Road fund also focuses on traffic Safety by funding the cost of three and one-half Sheriff's Deputies under an annual contract between the County Sheriff and Board of County Commissioners. Four Deputies are assigned to a Traffic Enforcement Squad but are available to answer higher priority criminal and life safety calls. Implementation of the contract and performance measurements are identified in a Memorandum of Understanding between the County Engineer and the County Sheriff. For budget purposes a 2022 County Road expenditure amount of $535,387 for traffic policing is included in the Budget.

December 19, 2023

Trevor Martin, AICP
Community & Economic Development Director, City of Sunnyside
Community and Economic Development Department
818 E. Edison Ave.
Sunnyside, WA 98944

Dear Mr. Martin:

Please accept these additional comments from the Friends of Toppenish Creek regarding amendments to the City of Sunnyside mitigated determination of non-significance (MDNS) for the proposed Sunnyside Renewable Natural Gas (SS RNG) digester project - SEPA 2022-0200 or SEPA 2023.0200. We submit these comments to further support our position that the SS RNG project needs an Environmental Impact Statement (EIS).

FOTC believes that the Environmental Checklist submitted to the City of Sunnyside in December 2022 is outdated, incomplete, and insufficient to justify an MDNS for the following reasons:

Page 3/13

The proposed project is located on 50 acres of land just South of the City of Sunnyside within the Port of Sunnyside Midvale Industrial Park, and adjacent to the Sunnyside Mabton Hwy# 241.

Comment: To our understanding the Port of Sunnyside is within the Sunnyside City limits. Thus, the proposed manure methane plant would be located within the Sunnyside City limits.

Digestate and other residues produced at the plant will be carefully managed

Comment: This statement is not sufficiently specific to allow any kind of analysis.

The subject properties are identified as Parcel# 220901-41404, # 220901- 14007 and the eastern half of# 220901-13001.

Comment: The June 22, 2023 MDNS listed the Parcel Numbers as Parcel Number(s): 220901-13001, -44401, & -41404 which are not exactly the same. The City of Sunnyside has since revised the parcel numbers on the MDNS to read 22090-141405 & 220901-41406.

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Digestate NH3 emissions are modeled under the daily limit, and are additionally exempt from regulation pursuant to RCW 70A.15.4540.

RCW 70A.15.4540 reads:

The department shall not regulate ammonia emissions resulting from the storage, distribution, transport, or application of ammonia for use as an agricultural or silviculture fertilizer.

Comment: SS RNG states that some of the digestate will be used as animal bedding and compost. Thus RCW 70A.15.4540 does not apply.

Comment: Proposed modeling under a daily limit has not been provided in this Environmental Checklist.

Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. ***Background concentrations will be accounted for in the Air Permit.***

Comment: Pacific Ag failed to document emissions from Windmill Mushrooms, Nutrien Solutions, and the City of Sunnyside Waste Water Treatment Plant, all of which would contribute to cumulative air pollution in the area. Are emissions from these sources considered background?

b. Ground Water:

2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals . .. ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. ***No waste will be discharged to the ground.***

c. Water runoff (including stormwater): 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Stormwater runoff will be retained on site and infiltrated into the ground at various locations including a potential stormwater pond. This water will not flow into other waters.

Comment: If stormwater is infiltrated into the ground, then any waste in the stormwater that is *infiltrated into the ground* will reach the aquifer. Any spilled manure on site would contaminate stormwater. Flow from groundwater to surface waters, such as the already contaminated Sulphur Creek Wasteway is well documented. Pacific Ag has not described lining for ponds and lagoons at the site.

Page 8/13

Describe special emergency services that might be required. Standard emergency and fire services, as well as potentially confined space rescue. ***Other special health and safety planning is underway and will be confirmed with emergency services and County Health Department. Standard emergency services equipment includes self-contained breathing apparatus (SCBA) appropriate for potential exposure.***

Comment: FOTC submitted a public records request to Yakima Emergency Management Services in November 2023, asking for information about conversations between Pacific Ag and SS RNG regarding preparations for potential explosions and fires. Yakima EMS replied that there have not been any such conversations.

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1) *Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:* ***No, the proposal is consistent with uses in the surrounding area.***

Comment: FOTC disagrees.

In September 2022 Pacific Ag told the Port of Sunnyside that SS RNG would: *Produce an organic digestate that can be used as fertilizer, livestock bedding and compost*.

And: *Recycles manure and kills odors and pathogens while producing a renewable fuel and soil products.*

1. FOTC maintains that mesophilic and even thermophilic process are insufficient to kill pathogens in the digestate. Pacific Ag has not described any other mechanism for killing pathogens.

2. Digestate would presumably be applied to cropland in South Yakima County. This digestate would likely contain pesticides, herbicides, and veterinary pharmaceuticals from manure and crop residues. Research from John Hopkins University[1] tells us that anaerobic digesters do not always degrade these chemicals.

The John Hopkins team studied 20 chemicals after anaerobic digestions, namely:

Fungicides: boscalid, carbendazim, difenoconazole, pyraclostrobin, & tebuconazole

Insecticides: carbaryl, chlorpyrifos, diflubenzuron, & malathion

[1] Brueck, Christopher L., et al. "Assessing the fate of antibiotics and agrochemicals during anaerobic digestion of animal manure." *Science of the Total Environment* 856 (2023): 159156. https://www.sciencedirect.com/science/article/am/pii/S0048969722062556

Herbicides: dicamba, imazapyr, & triclopyr

Antibiotics: ceftiofur, erythromycin, lincomycin, monensin[2], sulfamethazine, sulfamethoxazole, trimethoprim

Feed Additive: ractopamine.

Nine of the twenty - boscalid, carbendazim, difenoconazole, imazapyr, lincomycin, monensin,[2] ractopamine, sulfamethazine, and tebuconazole - did not degrade during digestion.

The study did not evaluate toxicity of the transformation products. The study suggested the possibility of development of pesticide and antibiotic resistance during anaerobic digestion.[3,4]

While this work fills previous knowledge gaps, it also emphasizes that additional work is needed to evaluate the fate of AD-derived TPs (transformation products) as they pass through manure management systems and after field application where they are exposed to alternate microbial and redox environments. It is unclear whether these TPs will retain the antibiotic or pesticidal properties from their parent compounds, potentially contributing to the development of pesticide and antibiotic resistances.

3. Studies describe negative impacts on earthworm populations when anaerobic digestate is applied as fertilizer.[5,6] At a minimum, farmers who might accept and use digestate, farming neighbors, the public, and potential compost customers should be informed of this potentiality.

The issues are complicated. With no disrespect, FOTC states that the Sunnyside Department of Commerce and Economic Development lacks the expertise to evaluate the many potential impacts from one of the largest manure methane plants in the nation on the small City of Sunnyside and the surrounding area. An Environmental Impact Statement is necessary.

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[2] The 2013 EPA Study Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley found monensin in water wells downgradient from LYV dairies. https://www.epa.gov/sites/default/files/2017-12/documents/lower-yakima-valley-groundwater-report-2013.pdf

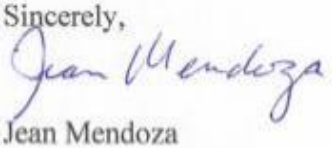
[3] Center for Disease Control. Where Resistance Spreads: Water, Soil, & the Environment. https://www.cdc.gov/drugresistance/environment.html

[4] U.S. Environmental Protection Agency. 2023. Feedback Requested on Structure and Scope for Proposed Framework to Strengthen Assessment of Antimicrobial-resistance Risks Associated with Pesticide Use. https://www.epa.gov/pesticides/feedback-requested-structure-and-scope-proposed-framework-strengthen-assessment

[5] Rollett, Alison J., et al. "The effect of field application of food-based anaerobic digestate on earthworm populations." *Soil Use and Management* 37.3 (2021): 648-657. https://bsssjournals.onlinelibrary.wiley.com/doi/abs/10.1111/sum.12615

[6] van Midden, Christina, et al. "The impact of anaerobic digestate on soil life: a review." *Applied Soil Ecology* 191 (2023): 105066. https://centaur.reading.ac.uk/112674/1/van%20Midden%20et%20al%20ASE%202023.pdf

Sincerely,



Jean Mendoza

Executive Director, Friends of Toppenish Creek
3142 Signal Peak Road
White Swan, WA 98952

July 6, 2023

Planning & Community Development
818 East Edison Avenue
Sunnyside, Washington 98944

Dear City of Sunnyside:

This is an appeal of the City of Sunnyside's Mitigated Determination of Non-Significance (MDNS) for a proposed manure bio-digester to be located in the vicinity of 2711 and 334 Sunnyside Mabton Highway. The SEPA Number is SEPA-2022.0200 and the applicant is Sunnyside Renewable Natural Gas (RNG). If this letter is not sufficient, please provide instructions with the proper format and pathway so we can submit our appeal in the prescribed manner.

Friends of Toppenish Creek (FOTC) is a 501 C (3) non-profit group located in Yakima County, mailing address 3142 Signal Peak Road, White Swan, WA. We make this appeal because the proposed SS RNG project will:

1. Increase public expenditures to:
    a. upgrade and maintain state and county roadways used to transport materials to and from the proposed operation.
    b. Incentivize one form of manure management that is arguably more costly than alternative methods.[1, 2]
2. Inflict manure spills on residents who live near the roads traveled by vehicles that transport manure to the proposed operation. Manure spills on public roadways, even on areas where children wait for school busses, are well known to the people who live near concentrated animal feeding operations (CAFOs).
3. Increase air pollution in South Yakima County by potentially increasing the number of milk cows in the area, by increasing air emissions from vehicles that transport materials to and from the proposed operation, by increasing emissions of toxic air pollutants[3] from the proposed operation.
4. Increase risk of explosions and fires at the Port of Sunnyside without ensuring adequate safety precautions. Assurances in the documents we have reviewed are vague and unenforceable. Methane leaks from improperly maintained operations are commonplace and risks increase as time passes and equipment ages.[4] Although the chances of explosions are low, the consequences of explosions when they occur can be deadly.

5. Increase groundwater pollution at the Port of Sunnyside. A LYV GWMA monitoring wells with one of the highest LYV nitrate concentrations is on the Port of Sunnyside.[5] There are insufficient guarantees that stormwater and wastewater from the facility will not leach into the already contaminated aquifer.

The MDNS is premature and incomplete because:

1. Interested parties, such as FOTC, did not receive notice of the proposed SEPA review through public notices in the media, or by notification from agencies that are aware of our concerns.
2. Interested parties, such as FOTC, have not received and have not been able to review relevant documents cited in the MDNS.
3. There is no documentation of conversations with the Yakima Health District, the agency tasked with protection of public health in Yakima County. Without this input it is not possible to know how this project will:
    a. Impact those who live in the immediate vicinity through increases in toxic air pollutants such as ammonia and hydrogen sulfide at the fenceline, and exposure to manure pathogens.
    b. Impact those who live distant from the proposed facility through increases in greenhouse gasses including nitrous oxide, increases in criteria air pollutants including fine particulate matter and ozone, and increases in toxic air pollutants including ammonia and hydrogen sulfide.
4. The SEPA checklist states on page 3/13, "Digestate and other residues produced at the plant will be carefully managed, along with strict wastewater management, emissions management, odor control and other state-of-the art practices." This statement provides insufficient information for the public to evaluate adequacy of the "state-of-the art practices." Those proposed practices must be identified so citizens can evaluate whether all Reasonable Available Control Technology (RACT) will be achieved.[6, 7, 8, 9]
5. The SEPA checklist does not estimate the cumulative impacts when a manure bio-digester is located next to a mushroom factory with known air emissions and odor problems that the Yakima Regional Clean Air Agency (YRCAA) refuses to address.[10]
6. The SEPA checklist states that the digestate lagoon will be lined. The checklist does not state whether this will be a clay liner or a synthetic liner. The checklist does not provide permeability criteria for proposed lagoon liners.
7. The SEPA checklist does not provide parameters for a "gas tight" cover for the digestate lagoon. How much gas will escape from the proposed cover?
8. The SEPA Checklist asks: "What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known?" The application answers this question for construction. What about operation and maintenance? Manure bio-digesters increase conversion of organic nitrogen to ammonia as part of routine

operations.[11] This information is available to the applicants and should have been answered in the SEPA checklist.

9. The SEPA checklist does not quantify the amount of ammonia, hydrogen sulfide, volatile organic compounds, and particulate matter that will be released into the atmosphere during on farm production of the manure that will be processed to extract RNG.
10. The SEPA checklist does not quantify the amount of nitrogen oxides (NOx) that will be released into the atmosphere during transport of manure to the facility and transport of digestate from the facility.
11. The SEPA checklist does not quantify the amount of ammonia, hydrogen sulfide, volatile organic compounds, and particulate matter released into the atmosphere by digestate from the operation, both at the site and after transport offsite.
12. Regarding air emissions the SEPA checklist states: "Background concentrations will be accounted for in the Air Permit." The area surrounding the Port of Sunnyside already has problems with air emissions and odor. Using the current air quality as a baseline is not the same as defining a baseline with healthy air. Adding emissions from a manure bio-digester could push air quality at the fenceline above standards for human health.
13. The SEPA checklist states on page 4, "These emissions quantities are being refined currently as part of the Clean Air Permit Application with Yakima County." This is likely incorrect. To the best of our knowledge an application for an air quality permit has been withdrawn and has not been resubmitted. The public cannot form an opinion about air quality risks without the information in an up to date air quality permit application.
14. There are many unanswered questions, such as:
    a. Will manure transported to the digester be covered or open to the air?
    b. What size and type of trucks will transport cellulosic materials and manure?
    c. What is the anticipated weight of each incoming truckload?
    d. Will the SS RNG ask for an overweight exemption?
    e. Will truck drivers possess Commercial Drivers Licenses (CDLs) or will the SS RNG use the agricultural exemption for drivers who transport agriculture goods?
    f. What air monitoring will be installed?
    g. Which air emissions will be monitored?
    h. What is the predicted composition of the tail gas that is vented to the atmosphere?
    i. Will there be fenceline monitoring to provide early warning if leaks pose a danger to neighbors?
    j. What system will be in place to detect significant methane leaks within the plant at the earliest moments?
    k. Why is there only one flare, as opposed to five flares in earlier plans?
    l. What emergency management and firefighting protocols will be in place? [12, 13]
    m. What equipment, training, alarms, will be used to address potentially dangerous levels of methane, hydrogen sulfide, and other air contaminants on the site?

n. How long will the digesters operate in the mesophilic range? How long will the digesters operate in the thermophilic range? This makes a difference in how many pathogens are destroyed by digestion.
o. How will settled solids be removed from the digesters, and what is the planned process?
p. How much digestate will be stored on site at any given time?
q. How will the solid fraction of digestate be stored prior to transport?
r. How will liquid digestate be transported off site?
s. Which rules, regulations and permitting apply to the proposed lagoon?
t. What are the anticipated emissions from the solid fraction of digestate and how will they be managed?
u. Will liquid and solid digestate transported away from the project be covered or open to air?
v. How will dairies store digestate during winter months when they cannot apply it to fields as fertilizer?
w. Are there any requirements in place that ensure digestate will be applied to fields at agronomic rates?
x. Will the facility have sufficient insurance to compensate the families of workers who might be injured or die in a fire or explosion on the facility?
y. What protocols will be in place to ensure proper maintenance as the equipment ages?[14]
z. Will the proposed RNG facility digest the carcasses of unwanted farm animals?
aa. Who will monitor the facility to ensure that daily operations are conducted in a safe manner, and how will they do this?
bb. Will this SEPA review be used when the Yakima Regional Clean Air Agency decides whether to issue an air quality permit? If so, the early determination of mitigated non-significance makes it difficult to meet the requirements for public involvement for issuing an air permit.
cc. Each of these questions must be answered before the public has enough information to provide input. Therefore an Environmental Impact Statement is needed.

15. The SEPA Checklist states on page 9, "The project will generate direct and indirect tax revenue of approximately $6 million annually to support schools and other community services." But there is no detail. Meanwhile, this project is eligible for tax exemptions under RCW 82.34, RCW and RCW 82.08. The public needs better information.

Here are important facts related to risks and benefits from the proposed Sunnyside Renewable Natural Gas bio-digester.

1. According to the EPA[15] manure management is responsible for 8% of U.S. methane production and enteric fermentation is responsible for 25%. This means that for every ton

of methane processed by anaerobic digestion, three tons are emitted into the atmosphere by the animals and escape capture.

   a. Addition of a few thousand cows to the approximately 90,000 already in the area will likely increase methane emissions by enteric fermentation to a point where increased enteric emissions cancel out any proposed benefits from manure digestion.
   b. Reduction in methane emissions equal to those touted for manure digesters could be achieved at lower cost by not storing cow manure in lagoons, by promoting alternative methods of manure management.

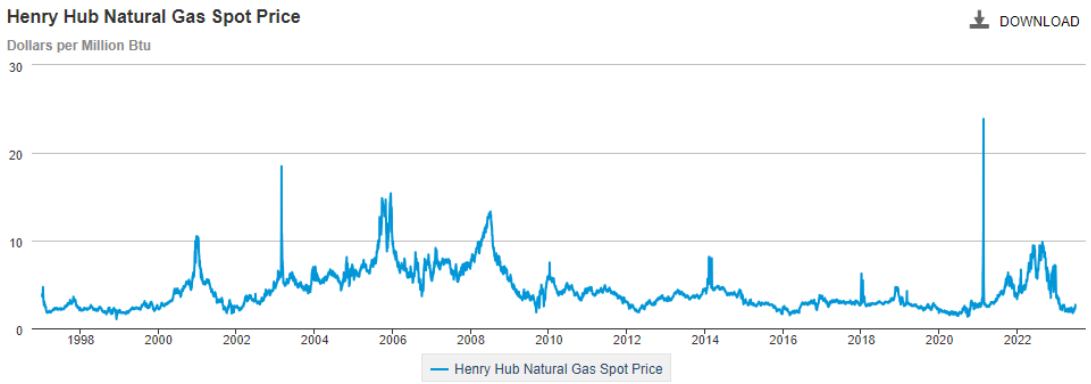
2. Some experts point out that farmers may enjoy more profits from processing manure methane than from the sale of milk. Hoards Dairyman [16] says:

   a. *The profit generated by manure and energy is a new dynamic for dairy farms. A common arrangement is for a third party to invest in the digester and form an agreement with one or more dairy farms for a supply of manure. These contracts can be for 10 to 15 years or longer and pay $80 to $100 per cow per year or more. For a 3,500-cow dairy, that means $350,000 per year or 40 cents per hundredweight based on an 80 pound per day tank average*.
   b. This may be good for some (but not all) dairies, but officials should conduct a comprehensive Environmental Impact Statement to evaluate associated costs in water pollution and air pollution and human health when the number of cows increases.

3. Manure bio-digesters increase emission of some air pollutants. Manure bio-digesters produce and release carbon dioxide, a greenhouse gas. Manure bio-digesters convert organic nitrogen into ammonia and release it into the ambient air.[1, 2]
4. Proponents of alternative manure management argue that, compared to anaerobic digestion, manure solids separation provides a larger reduction in greenhouse gas emissions at lower costs. California research[1] says:

   > *While digestate left after anaerobic digestion is more stable than the original manure feedstock, it can still produce methane and other gaseous emissions from the biological decomposition of residual nutrients. Holly et al. reported that mesophilic anaerobic digestion reduces the emissions of CH_4 but increases the emissions of both NH_3 and N_2O during the storage of digestate. They found that solid–liquid separation, using a screw press, was more effective in reducing the emissions of methane than anaerobic digestion due to the low performance of the digester. Compared with storing raw manure, the reduction of methane emissions from storage was 25%, 46%, and 68% for the anaerobic digestion alone, solid separation alone, and anaerobic digestion followed by solid–liquid separation.*

5. Almost all LYV dairies already have some form of manure solids separation. The SS RNG proposal does not describe changes that must occur on LYV dairies to produce the slurry required to feed the proposed digester.
6. The plan calls for up to 140 round trips per day by heavy duty trucks hauling manure and cellulosic material to the facility and trucking digestate back to the farms. To understand the total impact of an RNG operation officials must conduct an Environmental Impact Statement that calculates the amount of diesel fuel burned by the trucks and the amount of NOx and other emissions produced by transport. NOx combines with volatile organic compounds to produce ozone, a criteria pollutant that is not mentioned in the SS RNG SEPA checklist.
7. In the spring of 2022 Monitoring Well PS-MW-9, LYV-PS-031, located on the Port of Sunnyside property, had nitrate levels at 84 mg/L according to Ecology's Environmental Information Management Data Base.[5]
8. By FOTC calculations it takes 21,855,360 m^3 of methane to produce 800,000 MMBTU of RNG.[17] And it takes about 50,000 milk cows to produce this much manure methane if each cow produces 125 lbs of manure a day.[18] It takes over 59,000 milk cows to achieve 950,000 MMBTU of RNG.
9. Economic data provided in the SEPA checklist only looks at current numbers. But the price of natural gas fluctuates widely over time.[19]
    a. Between 1994 and 2023 the spot price for natural gas ranged from $1.44 per MMBTU (Dec. 7, 1998) to $23,86 per MMBTU (Feb. 16, 2021).
    b. Between 2000 and 2023 the spot price for natural gas ranged from $1.74 per MMBTU (March 2, 2020) to $23,86 per MMBTU (Feb. 16, 2021).



10. What are the implications for the Port of Sunnyside if profits from natural gas decline and the operation is no longer viable?
11. Under Washington's Climate Commitment Act, "Offset projects include things such as reforestation, planting trees in urban areas, and capturing methane on dairy farms. And because greenhouse gas emissions affect the entire atmosphere, even projects in another country can help us fight climate change here in Washington." [20] Profits from selling

offset credits will decline over time. Offsets are not a reliable source of income for bio-manure RNG facilities in the long term.

12. Mismanagement of biogas facilities happens.[21]

    The U.S. Environmental Protection Agency (EPA) and Nebraska Department of Environment and Energy conducted multiple inspections of the Big Ox Energy facility in 2017 and 2018. The agencies found that the facility was releasing hazardous amounts of biomass and biogas. On at least 16 occasions between 2017 and 2019, biomass released from the digesters went over the sides of the facility's roof and onto the ground where it mixed with stormwater, resulting in discharges to adjacent properties and into nearby water bodies. In 2018, a facility malfunction resulted in 80,000 gallons of biomass overflowing from the digesters. These discharges resulted in emissions of biogas, an extremely hazardous substance. Air monitoring conducted by EPA determined that the facility was emitting methane at levels that were flammable and hydrogen sulfide in amounts that could result in injury or death from inhalation.

    Violations included:

    - *Failure to design and maintain a safe facility*
    - *Improper maintenance of digesters*
    - *Failure to control accidental releases of extremely hazardous substances*
    - *Violations of air emission standards*
    - *Causing the Sioux City wastewater treatment plant to exceed water quality limits*
    - *Failure to comply with EPA- and state-issued compliance orders*
    - *Unauthorized discharges into local water bodies*
    - *Failure to comply with air and water permits*

The Friends of Toppenish Creek ask officials not to rush to approval of this project that would change the landscape of South Yakima County for years to come. Please be careful and thoughtful when making these decisions.

Thank you for considering our concerns.



Executive Director
Friends of Toppenish Creek

3142 Signal Peak Road
White Swan, WA 98952

[1] El Mashad, Hamed M., et al. "Anaerobic Digestion and Alternative Manure Management Technologies for Methane Emissions Mitigation on Californian Dairies." *Atmosphere* 14.1 (2023): 120. https://www.mdpi.com/2073-4433/14/1/120

[2] Holly, Michael A., et al. "Greenhouse gas and ammonia emissions from digested and separated dairy manure during storage and after land application." *Agriculture, Ecosystems & Environment* 239 (2017): 410-419. https://www.sciencedirect.com/science/article/pii/S0167880917300701

[3] WAC 173-460

[4] U.S. Public Interest Research Group, 2022. Methane Gas Leaks at https://pirg.org/resources/methane-gas-leaks/

A gas pipeline incident occurs somewhere in the U.S. approximately every 40 hours. From 2010 through nearly the end of 2021, almost 2,600 pipeline incidents related to the release of gas occurred in the United States that were serious enough to be reported to the federal government, 328 of which resulted in explosions. Those explosions and fires killed 122 people and injured 603.

[5] WA Ecology. Environmental Information Management Data Base. Study ID – MRED0005 https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearch.aspx?SearchType=Groundwater&State=newsearch&Section=all

[6] Since the Yakima Regional Clean Air Agency does not regulate emissions from dairies it is difficult to imagine a scenario in which Reasonable Available Control Technology (RACT) is required for digestate management.

[7] See RCW 70A.15.1005

[8] See RCW 70A.15.1070

[9] See RCW 70A.15.2230

[10] From a citizen complaint to YRCAA on July 22, 2021:

Description alleged violation: CP says that Ostrom Mushroom facility is causing extremely bad "rotting" odors.

Findings: I parked in the parking lot for about 10 minutes and did not smell any "rotting odors". Odor level 1 – no odors present.

Actions Taken: RL-4 Ostrom Mushrooms is an agricultural entity and thus is exempt from odor and dust complaints as stated in RCW 70A.15.4530

[11] Livestock and Poultry Environmental Learning Community. Transformation and Agronomic Use of Nutrients From Digester Effluent. 2019. https://lpelc.org/transformation-and-agronomic-use-of-nutrients-from-digester-effluent/

[12] National Library of Medicine. Methane. https://www.ncbi.nlm.nih.gov/books/NBK208285/ Methane is flammable and explosive at concentrations between 5% and 15% at room temperature in the presence of oxygen.

[13] Frontier. Methane Gas Leaks. 2022. https://frontiergroup.org/resources/methane-gas-leaks/#:~:text=From%202010%20through%20nearly%20the,122%20people%20and%20injured%20603

[14] The Detroit News. An old problem: Aging pipes lead to deadly explosions. 2018. https://www.detroitnews.com/story/news/nation/2018/09/14/old-problem-aging-pipes-lead-deadly-explosions/37821387/

[15] U.S. Environmental Protection Agency. Overview of Greenhouse Gasses. https://www.epa.gov/ghgemissions/overview-greenhouse-gases#methane

[16] Hoards Dairyman. Energy revenue could be a game changer for dairy farms. 2021.

[17] Learn Metrics. Natural Gas MMBTU to m^3 and m^3 to MMBTU Calculator at https://learnmetrics.com/mmbtu-to-m3-m3-to-mmbtu/

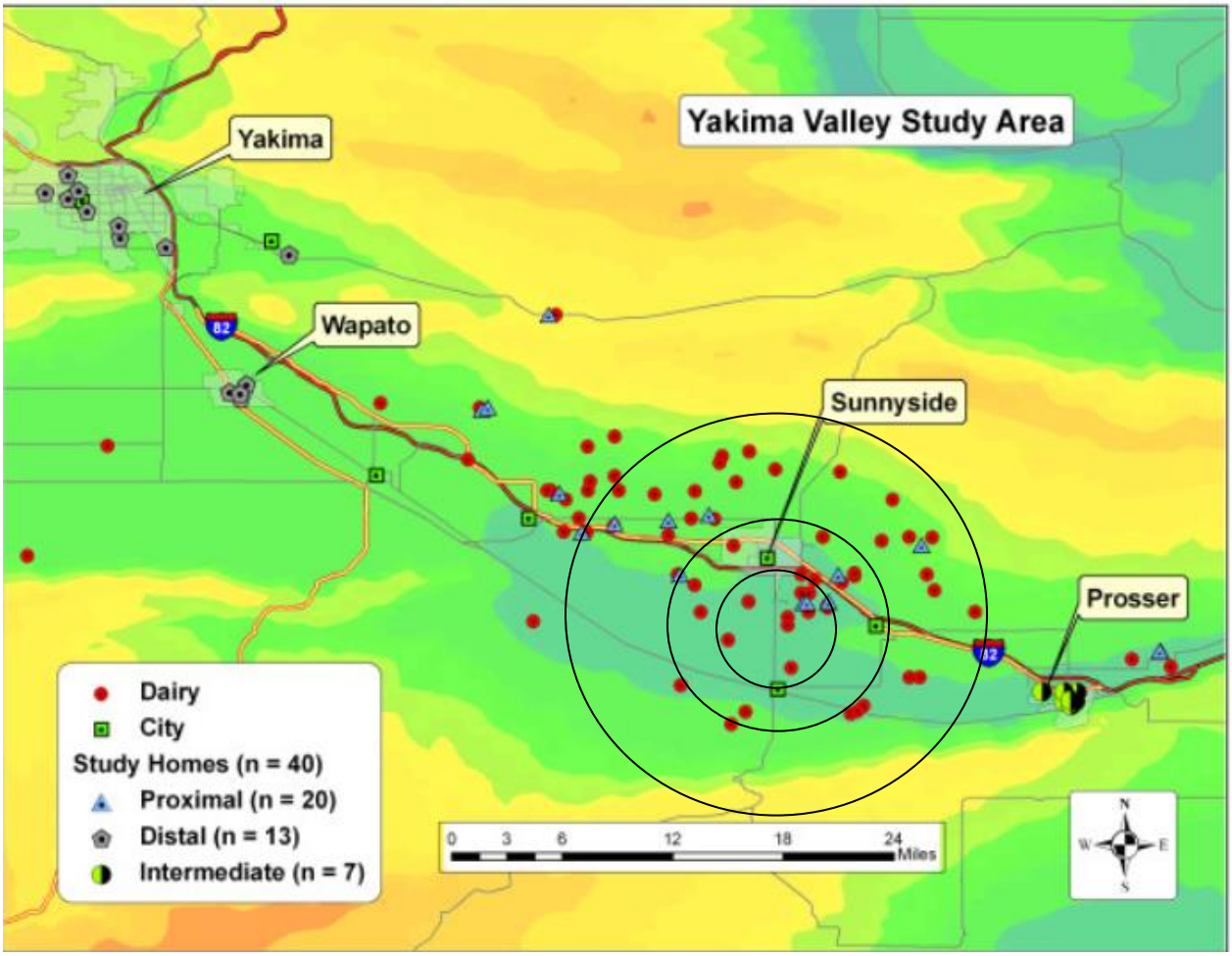
[18] Pennsylvania State University. Biogas from Manure. 2023. https://extension.psu.edu/biogas-from-manure

[19] U.S. Energy Information Administration. Natural Gas. 2023. https://www.eia.gov/dnav/ng/hist/rngwhhdd.htm

[20] WA State Dept. of Ecology. Cap and Invest Offsets. 2023. https://ecology.wa.gov/Air-Climate/Climate-Commitment-Act/Cap-and-invest/Offsets

[21] U.S. Environmental Protection Agency. Federal government, State of Nebraska Fine Big Ox Energy and NLC Energy Venture 30 LLC $1.1 Million for Violations of Multiple Environmental Laws. 2021. https://www.epa.gov/newsreleases/federal-government-state-nebraska-fine-big-ox-energy-and-nlc-energy-venture-30-llc-11

Appendix 1



8 Dairies within 6 miles of the facility

11 Dairies between 6 and 12 miles from the facility

24 Dairies between 12 and 24 miles from the facility



Comments re Addendum to Sunnyside Renewable Natural Gas (SS RNG) SEPA document

Friends of Toppenish Creek is a 501 C (3) non profit group incorporated under the laws of Washington State and located in Yakima County. FOTC submits the following comments regarding an addendum submittal to a June 2023 SEPA review and mitigated determination of non-significance (MDNS) for a proposed Renewable Natural Gas (RNG) bio-digester at the Port of Sunnyside. The City of Sunnyside Notice of SEPA Addendum asked commenters to reference SEPA 2022.0200. We are not sure whether this is correct, or whether SEPA 2022.0200 exists.[1] The correct file number may be SEPA 2023.0200.

It is difficult to comment intelligently on this addendum submittal because the notice omits so much content. For example, the addendum includes a February 2023 New Source Review (NSR) application from Sunnyside RNG to the Yakima Regional Clean Air Agency (YRCAA) but omits the response from the YRCAA that rejected the application and requested more information.

FOTC believes that an MDNS should not have been issued until the City of Sunnyside and the public had the opportunity to review information on air emissions and traffic impacts. The MDNS was issued on June 22, 2023, but a Traffic Impact Analysis (TIA), that is part of the November 23, 2023 addendum letter, is dated July 10, 2023.

The Yakima Regional Clean Air Agency, as the agency with expertise on air, failed to comment on the May 2023 SEPA Review, as required by RCW 43.21C and WAC 197-11, and especially WAC 197-11-030, WAC 197-11-060(4), and WAC 197-11-502(2).

The City of Sunnyside did not have sufficient information to conclude no environmental impacts, and the public did not have sufficient information to comment intelligently on the May 2023 Environmental Review. The resulting MDNS is invalid due to withheld and/or insufficient information. See WAC 197-11-335, WAC 197-11-340(3), WAC 197-11-080.

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[1] FOTC does not find SEPA 2022.0200 in Ecology's State Environmental Policy Act (SEPA) Register at https://apps.ecology.wa.gov/separ/Main/SEPA/Search.aspx?SearchText=City%20of%20Sunnyside&SearchFields=All&County=YAKIMA&PageSize=10&SortColumn=LeadAgencyAscending&Page=17

According to a presentation by Pacific AG to the Port of Sunnyside[2] on September 6, 2022, the Sunnyside RNG facility could be "one of the largest ag waste anaerobic digesters in the nation."[3]

Realistically, how can "one of the largest waste anaerobic digesters in the nation" not have an impact on the environment?

The SS RNG project would:

- Produce between 800,000 & 950,000 MMBTUs of Renewable Natural Gas a year
- Produce and store methane, a flammable and explosive gas, in tanks with membrane covers
- Transfer the natural gas to a major pipeline
- Move 140 truckloads of manure every day from dairies to the digester
- Store digestate in stacks at the digester site and on farms
- Store liquid effluent from the digester in lagoons
- Spread digestate onto crop fields. There is insufficient information to determine the composition of the digestate and potential impacts on soil health and greenhouse gas emissions.

* * * * * * *

Manure bio-digesters are known to experience spills and explosions.[4] These adverse impacts are not expected to occur, but when they do occur the impacts are grave. Washington law accounts for this in WAC 197-11-794 (2).

FOTC has requested more information regarding fires and spills from Pacific AG, Sunnyside RNG, and Yakima County Emergency Services. The City of Sunnyside should not take further action on the SS RNG MDNS until this information arrives, and answers satisfy potentially impacted people.

* * * * * * *

FOTC believes the City of Sunnyside violated many sections of Washington SEPA law when the city issued the June 22, 2023 MDNS. These alleged violations are listed below. FOTC believes that the MDNS should be rescinded pursuant to WAC 197-11-340(3), a determination of non-significance (DNS) should be issued, and an Environmental Impact Statement (EIS) completed. Conducting a thorough EIS is the only way to adequately determine the environmental consequences of constructing such a large digester.

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[2] See Attachment 1

[3] Harrison Pettit from Pacific Ag said this was not true at a public meeting in Sunnyside on November 30, 2023.

[4] See Attachment 2

WAC 197-11-030

Policy.

(1) The policies and goals set forth in SEPA are supplementary to existing agency authority.

(2) Agencies shall to the fullest extent possible:

(a) Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.

(b) Find ways to make the SEPA process more useful to decision makers and the public; promote certainty regarding the requirements of the act; reduce paperwork and the accumulation of extraneous background data; and emphasize important environmental impacts and alternatives.

(c) Prepare environmental documents that are concise, clear, and to the point, and are supported by evidence that the necessary environmental analyses have been made.

(d) Initiate the SEPA process early in conjunction with other agency operations to avoid delay and duplication.

(e) Integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.

(f) Encourage public involvement in decisions that significantly affect environmental quality.

(g) Identify, evaluate, and require or implement, where required by the act and these rules, reasonable alternatives that would mitigate adverse effects of proposed actions on the environment.

The City of Sunnyside did not, to the fullest extent possible, *Interpret and administer the policies, regulations, and laws of the state of Washington in accordance with the policies set forth in SEPA and these rules.* Sunnyside did not compel the Yakima Regional Clean Air Agency to provide comments on air impacts from:

- Potential leaks at the digester site
- Transport of manure and digestate
- Leaks in pipes that transport natural gas
- 140 round trip truck trips per day
- Storage of manure and digestate in stacks and lagoons
- Spreading and spraying digestate on crop fields

The City of Sunnyside did not *promote certainty regarding the requirements of the act.* Sunnyside sent conflicting messages to the public by telling the public that an appeal was authorized, improperly stating the appeal would be a closed appeal, scheduling an appeal, and then canceling the appeal. Sunnyside did not respond to reasonable questions regarding the proposed RNG project.[5]

[5] See Attachment 3 FOTC Request for the City of Sunnyside to reconsider an MDNS for the Sunnyside RNG project. The City did not answer our questions.

The City of Sunnyside did not *emphasize important environmental impacts and alternatives.* Sunnyside did not explore or list alternatives to the project or citing of the project. Sunnyside did not describe potential air impacts or potential impacts to ground and/or surface waters at the Port of Sunnyside where monitoring wells have high levels of nitrate[6] and the Sulphur Creek Wasteway traverses the area. The City of Sunnyside did not address the potential for fires and explosions.

There were no analyses to prove statements by the project proponent, Pacific Ag/Sunnyside RNG, that the project would generate millions in tax dollars. There was no analysis of costs to tax payers in the form of subsidies, wear and tear on roadways, and decreased property values.

The City of Sunnyside did not *integrate the requirements of SEPA with existing agency planning and licensing procedures and practices, so that such procedures run concurrently rather than consecutively.* Instead Sunnyside issued an MDNS and then told FOTC that we could not appeal the MDNS until a later time after Pacific Ag applied for a permit.

The City of Sunnyside did not *encourage public involvement.* Instead, the city made it difficult for the public to be involved by not posting notices in newspapers, by not translating notices into Spanish, by only notifying about 20 neighbors of the SEPA review, by posting signs in a corn field, by not providing informational paperwork, by refusing to answer questions about the project, and by failure to attend a public meeting regarding the digester on November 30, 2023.

The City of Sunnyside did not *identify reasonable alternatives,* such as on-farm digesters, a more remote location, limitations on hours for manure transport, different methods of manure management and disposal, or the "no-action" alternative.

WAC 197-11-055
Timing of the SEPA Process

(b) Agencies shall identify the times at which the environmental review shall be conducted either in their procedures or on a case-by-case basis. Agencies may also organize environmental review in phases, as specified in WAC 197-11-060(5).

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[6] See Monitoring Wells LYV-PS-031, LYV-PS-032, and LYV-PS-033 on Ecology's Environmental Information Monitoring Data Base at https://apps.ecology.wa.gov/eim/search/Groundwater/GWSearchResults.aspx?ResultType=GroundwaterWellTab&StudyUserIds=MRED&StudyUserIdSearchType=Contains&LocationCounties=Yakima&HasGroundwaterData=True

The City of Sunnyside did not state that the environmental review for the Sunnyside RNG project would be organized in phases.

(c) Appropriate consideration of environmental information shall be completed before an agency commits to a particular course of action (WAC 197-11-070).

The Port of Sunnyside committed to the Sunnyside RNG project by proposing the sale of property to Pacific AG in November 2022.[7] The City of Sunnyside issued a determination of non-significance for that sale on December 6, 2022.[8] Sale of real estate for a designated purpose is a commitment to a course of action.

Notice of the sale was not properly advertised. Public comments regarding the sale have not been posted. The City of Sunnyside approved an MDNS for the Sunnyside RNG project on June 22, 2023, six months after sale approval.

*(4) **Applicant review at conceptual stage.** In general, agencies should adopt procedures for environmental review and for preparation of EISs on private proposals at the conceptual stage rather than the final detailed design stage.[9]*

(a) If an agency's only action is a decision on a building permit or other license that requires detailed project plans and specifications, agencies shall provide applicants with the opportunity for environmental review under SEPA prior to requiring applicants to submit such detailed project plans and specifications.

(b) Agencies may specify the amount of detail needed from applicants for such early environmental review, consistent with WAC 197-11-100 and 197-11-335, in their SEPA or permit procedures.

(c) This subsection does not preclude agencies or applicants from preliminary discussions or exploration of ideas and options prior to commencing formal environmental review.

On November 30, 2023, Harrison Pettit from Pacific AG told attendees at a public meeting regarding the Sunnyside RNG project that conversations regarding the project have been ongoing for two years. The fact that the Port of Sunnyside sold property to Pacific Ag for the project indicates a commitment on the part of the Port of Sunnyside and the City of Sunnyside to the biodigester project.

There is no documentation of alternatives as addressed in RCW 43.21C.030(2)(c)(iii), RCW 43.21C.030(2)(e), WAC 197-11-030(2), WAC 197-11-060 (1), WAC 197-11-060

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[7] Port of Sunnyside Property Sale.
http://www.friendsoftoppenishcreek.org/cabinet/data/AVS%203%20SS%20RNG%20Property%20Sale%20Notice.pdf

[8] DNS for Property Sale.
http://www.friendsoftoppenishcreek.org/cabinet/data/SS%20RNG%20DNS_SEPA-2022.0046.pdf

[9] FOTC assumed in July of 2023 that the Sunnyside RNG project is a public and private partnership, based on statements in the June 22, 2023, MDNS. However, at a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag stated several times that this is a private project.

(2), WAC 197-11-060 (3), WAC 197-11-080(1), WAC 197-11-400 (2), WAC 197-11-402(1), WAC 197-11-402(9), WAC 197-11-408(2), WAC 197-11-440(4), WAC 197-11-440(5), WAC 197-11-655(3). According to WAC 197-11-440(5)(b)(ii) *The "no-action" alternative shall be evaluated and compared to other alternatives.*

(5) An overall decision to proceed with a course of action may involve a series of actions or decisions by one or more agencies. If several agencies have jurisdiction over a proposal, they should coordinate their SEPA processes wherever possible. The agencies shall comply with lead agency determination requirements in WAC 197-11-050 and 197-11-922.

(6) To meet the requirement to insure that environmental values and amenities are given appropriate consideration along with economic and technical considerations, environmental documents and analyses shall be circulated and reviewed with other planning documents to the fullest extent possible.

Selected environmental documents for the Sunnyside RNG project were first shared with the public on May 23, 2023. A Traffic Impact Analysis was not published until July of 2023. There is still no approved air study. Questions regarding increased pollution related to the production of manure to feed the digester, and emissions from the digestate produced by the digester have not been answered.

WAC 197-11-060 (4) Impacts.

(a) SEPA's procedural provisions require the consideration of "environmental" impacts (see definition of "environment" in WAC 197-11-740 and of "impacts" in WAC 197-11-752), with attention to impacts that are likely, not merely speculative. (See definition of "probable" in WAC 197-11-782 and 197-11-080 on incomplete or unavailable information.)

(b) In assessing the significance of an impact, a lead agency shall not limit its consideration of a proposal's impacts only to those aspects within its jurisdiction, including local or state boundaries (see WAC 197-11-330(3) also).

(c) Agencies shall carefully consider the range of probable impacts, including short-term and long-term effects. Impacts shall include those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer.

(d) A proposal's effects include direct and indirect impacts caused by a proposal. Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects or extension of sewer lines would tend to encourage development in previously unsewered areas.

(e) The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants (WAC 197-11-660). This will depend upon the specific impacts, the extent to which the adverse impacts are attributable to the applicant's proposal, and the capability of applicants or agencies to control the impacts in each situation.

This is a large project. This bio-digester may be one of the largest in the United States. Impacts will extend beyond the Sunnyside City Limits.

- There will be increased traffic on Yakima County roads to haul manure and crop residues to the digester, to haul digestate from the digester, to haul composted digestate to markets. Increased traffic brings increased pollution of the air with nitrogen oxides and particulate matter. Increased traffic brings increased wear and tear on county roads and costs to tax payers across the county. FOTC submitted an evaluation of the Sunnyside RNG TIA to Yakima County and the Port of Sunnyside on August 28, 2023.[10] We await responses.
- If dairies receive up to $200 per year per cow for manure, there is an incentive to increase the number of cows in each herd. More cows mean increased leaching to the aquifers, and increased air emissions. More cows mean more land taken out of production of fruits and vegetables and more land devoted to dairies and cattle feed. Corn and alfalfa, the major crops for cattle feed, require large amounts of water. Corn is hard on the land, requires large amounts of fertilizer and introduces a wide range of plant pathogens.
- FOTC does not believe it is possible to test for and screen out all the possible contaminants in digestate. There is a significant risk of spreading pathogens to a large number of farming operations when digestate is spread as fertilizer or used as animal bedding. For example, cryptosporidium is a common and wide spread zoonotic parasite that attacks young calves and is more common on dairies with intense confinement and moist conditions.[11] If there is cryptosporidium in manure used as feedstock, the parasite may proliferate in the digesters, live in the digestate, and infect soils for miles around where farmers spread digestate. Cryptosporidium could infect large numbers of animals housed in facilities that use the digestate for bedding.
- If dairies receive up to $200 per year per cow for manure, the up to 25 LYV dairies that participate in this project have a serious economic advantage over the 15 or more dairies that do not. If a dairy has 1,000 milk cows and receives $200 per year per cow, that dairy will increase annual income by $200,000. This makes a difference in which dairies survive and which do not.
- Sunnyside RNG has not described contracts with dairies. FOTC believes there is a potential for this project to squeeze out non-participating dairies and to create dairy dependence on the digester for economic survival. If dependence occurs, then LYV dairies are at the mercy of digester operators who can raise or lower the rates of payment for manure. There is a troubled dairy digester in Iowa where

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[10] See Attachment 4

[11] Oregon State University. The cryptosporidium parasite and its effect on calves and humans. https://extension.oregonstate.edu/animals-livestock/beef/cryptosporidium-parasite-its-effect-calves-humans *Cryptosporidium is* most infectious when the parasite is passed in feces and then ingested. Infected calves can have crypto in their feces for weeks after they are no longer sick.
Crypto eggs have a tough outer shell and are resistant to disinfectants, even chlorine bleach. They can survive outside the body and in the environment for long periods. The eggs can be killed by generous applications of a 3% hydrogen peroxide solution as well as exposure to high temperatures in excess of 160° F, which is hotter than most domestic tap water.

economic benefits do not pencil out. A recent newspaper article[12] about the Waunakee Digester in Wisconsin stated:

Many of the assumptions the company made at the start were wrong. In the future, the business model will have to be tweaked, and farmers sending manure to comparable operations may need to pay the plant to accept it.

- Regarding global warming: To our knowledge no one has calculated how much diesel fuel would be burned to transport manure and digestate for this project.
- Regarding global warming: Dairies produce at least one metric ton of CO_2 equivalents via enteric fermentation for every metric ton of methane produced in anaerobic manure lagoons. Consider a hypothetical community that produces 0.5 MMT CO_2 equivalents of methane via enteric fermentation, and 0.5 MMT CO_2 equivalents of methane from manure lagoons. This equals 1 MMT CO_2 equivalents of methane total. Suppose the community can process all the methane from manure lagoons into renewable natural gas. The total is now 0.5 MMT CO_2 equivalents of methane. Because the operation is profitable the community doubles the number of cows. All the methane from manure lagoons is captured, but the community now produces 1 MMT CO_2 equivalents of methane from enteric fermentation – back to the starting point. Plus the emission of other air pollutants has doubled & emissions from manure transport has doubled, etc.
- We do not see an accounting of how much income for the proposed digester comes from the Washington Cap and Trade program, and from tax payers. The Cap and Trade program does not last forever. Can the Sunnyside RNG digester continue to profit if subsidies decline?
- According to the EPA AgStar program[13] there are many ways to reduce methane emissions from livestock manure management. Some methods are:
    - *Anaerobic digesters – 50% reduction*
    - *Daily spread – 45% reduction*
    - *Pasture based management – 45% reduction*
    - *Composting – 45% reduction*
    - *Solid storage – 45% reduction*
    - *Manure drying practices – 45% reduction*
    - *Semi-permeable covers – 40% reduction*
    - *Decreased manure storage time – 40% reduction*
    - *Composted bedded pack barns – 30% reduction*
    - *Solid separation of manure solids prior to entry to wet/anaerobic environment – 20% reduction*

  But anaerobic digesters cost so much more than the other methods.

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[12] State-financed manure digester plagued by spills, explosions. 2015. https://archive.jsonline.com/news/statepolitics/state-financed-manure-digester-plagued-by-spills-explosion-b99435123z1-290263421.html

[13] EPA AgStar. (2023) Practices to Reduce Methane Emissions from Livestock Manure Management. https://www.epa.gov/agstar/practices-reduce-methane-emissions-livestock-manure-management

- The Sunnyside RNG New Source Review (NSR) application requires more information and does not quantify the amount of air pollutants currently in the LYV ambient air. It does not estimate the percentage of air pollution attributable to the proposed Sunnyside RNG digester if it becomes reality. Would Sunnyside residents be forced to stop using wood stoves to compensate for digester emissions to keep Yakima County in compliance with U.S. criteria air standards?
- There are significant increases in morbidity and mortality associated with fine particulate air pollution.[14] One study found a decrease of 10 $\mu g/m^3$ of fine particulate concentration was associated with an estimated increase in life expectancy equal to 0.77 years.[15] By how much would fine particulate matter levels increase in the LYV if the Sunnyside RNG digester were built? What is the cost of human health and life?

WAC 197-11-060 Content of Environmental Review

*(5) **Phased review.***

(a) Lead agencies shall determine the appropriate scope and level of detail of environmental review to coincide with meaningful points in their planning and decision-making processes. (See WAC 197-11-055 on timing of environmental review.)

(b) Environmental review may be phased. If used, phased review assists agencies and the public to focus on issues that are ready for decision and exclude from consideration issues already decided or not yet ready. Broader environmental documents may be followed by narrower documents, for example, that incorporate prior general

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[14] Xie, W., Li, G., Zhao, D., Xie, X., Wei, Z., Wang, W., ... & Liu, J. (2015). Relationship between fine particulate air pollution and ischaemic heart disease morbidity and mortality. *Heart*, *101*(4), 257-263. https://kd.nsfc.gov.cn/paperDownload/1000008959735.pdf
Samet, J. M., Dominici, F., Curriero, F. C., Coursac, I., & Zeger, S. L. (2000). Fine particulate air pollution and mortality in 20 US cities, 1987–1994. *New England journal of medicine*, *343*(24), 1742-1749. https://www.nejm.org/doi/full/10.1056/NEJM200012143432401

Zanobetti, A., & Schwartz, J. (2009). The effect of fine and coarse particulate air pollution on mortality: a national analysis. *Environmental health perspectives*, *117*(6), 898-903. https://ehp.niehs.nih.gov/doi/full/10.1289/ehp.0800108?url_ver=Z39.88-2003&rfr_id=ori:rid:crossref.org&rfr_dat=cr_pub%20%200pubmed

Pope III, C. A., & Dockery, D. W. (2006). Health effects of fine particulate air pollution: lines that connect. *Journal of the air & waste management association*, *56*(6), 709-742. https://www.nejm.org/doi/full/10.1056/NEJMsa0805646

Pope III, C. A., Turner, M. C., Burnett, R. T., Jerrett, M., Gapstur, S. M., Diver, W. R., ... & Brook, R. D. (2015). Relationships between fine particulate air pollution, cardiometabolic disorders, and cardiovascular mortality. *Circulation research*, *116*(1), 108-115. https://www.ahajournals.org/doi/full/10.1161/circresaha.116.305060

[15] Pope CA 3rd, Ezzati M, Dockery DW. Fine-particulate air pollution and life expectancy in the United States. N Engl J Med. 2009 Jan 22;360(4):376-86. doi: 10.1056/NEJMsa0805646. PMID: 19164188; PMCID: PMC3382057. https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3382057/

discussion by reference and concentrate solely on the issues specific to that phase of the proposal.

(c) Phased review is appropriate when:

(i) The sequence is from a nonproject document to a document of narrower scope such as a site specific analysis (see, for example, WAC 197-11-443); or

(ii) The sequence is from an environmental document on a specific proposal at an early stage (such as need and site selection) to a subsequent environmental document at a later stage (such as sensitive design impacts).

(d) Phased review is not appropriate when:

(i) The sequence is from a narrow project document to a broad policy document;

(ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or

(iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060 (3)(b) or 197-11-305(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.

(e) When a lead agency knows it is using phased review, it shall so state in its environmental document.

(f) Agencies shall use the environmental checklist, scoping process, nonproject EISs, incorporation by reference, adoption, and supplemental EISs, and addenda, as appropriate, to avoid duplication and excess paperwork.

(g) Where proposals are related to a large existing or planned network, such as highways, streets, pipelines, or utility lines or systems, the lead agency may analyze in detail the overall network as the present proposal or may select some of the future elements for present detailed consideration. Any phased review shall be logical in relation to the design of the overall system or network, and shall be consistent with this section and WAC 197-11-070.

The City of Sunnyside did not state that the city would use a phased review. FOTC believes the City of Sunnyside should have gathered information sooner and presented all relevant environmental information with the initial SEPA review. Because the process now involves addressing a SEPA Review and then addressing Addenda to the SEPA review, the amount of study and paperwork has doubled, at least for FOTC.

WAC 197-11-080

Incomplete or unavailable information.

(1) If information on significant adverse impacts essential to a reasoned choice among alternatives is not known, and the costs of obtaining it are not exorbitant, agencies shall obtain and include the information in their environmental documents.

(2) When there are gaps in relevant information or scientific uncertainty concerning significant impacts, agencies shall make clear that such information is lacking or that substantial uncertainty exists.

(3) Agencies may proceed in the absence of vital information as follows:

(a) If information relevant to adverse impacts is essential to a reasoned choice among alternatives, but is not known, and the costs of obtaining it are exorbitant; or

(b) If information relevant to adverse impacts is important to the decision and the means to obtain it are speculative or not known;

Then the agency shall weigh the need for the action with the severity of possible adverse impacts which would occur if the agency were to decide to proceed in the face of uncertainty. If the agency proceeds, it shall generally indicate in the appropriate environmental documents its worst case analysis and the likelihood of occurrence, to the extent this information can reasonably be developed.

(4) Agencies may rely upon applicants to provide information as allowed in WAC 197-11-100.

The City of Sunnyside did not document incomplete information, as required in the rule. FOTC believes that significant information is missing, and this should have been documented. See the concerns described on pages 6 to 9 above. We are especially concerned about costs to tax payers, impact on non-participating dairies and other farms, spreading disease, unknown increases in LYV air pollution, wear and tear on county roads, increases in traffic accidents, dangers to school children, and risks of fire and explosions.

Although the chances of fires and explosions are not great, damage when such incidents occur may be high and could include death.[16] A quality SEPA review must acknowledge this risk and address it. See WAC 197-11-794 (2).

The Sunnyside RNG SEPA Check list says:

Anaerobic-digestor-based renewable natural gas facilities produce biogas composed of methane (CH4) which is a flammable gas (under limited circumstances), hydrogen sulfide (H2S) which is both a flammable and toxic gas, along with CO2 and vocs. These components will be contained in anaerobic tanks with membrane roofs and in the downstream raw biogas piping systems designed in compliance with industry standards for sour gas facilities.

Methane (CH4) and Hydrogen Sulfide (H2S) are products of the anaerobic digestion process and both are considered hazardous with H2S also considered toxic. Both components will be present in the facility tanks and piping. Their hazardous and/or toxic characteristics along with response measures, should either be released to the atmosphere, can be found in Safety Data Sheets (SDS). Process chemicals such as solvents, oils, lubricants, antifreeze, ferric chloride and natural gas injection calibration gases such as Nitrogen, Propane, Helium, and potentially odorant will be used in limited quantities.

Standard emergency and fire services, as well as potentially confined space rescue. Other special health and safety planning is underway and will be confirmed with emergency

[16] See Attachment 2

services and County Health Department. Standard emergency services equipment includes self-contained breathing apparatus (SCBA) appropriate for potential exposure.

The following measures may be implemented to reduce or control environmental health hazards: A health and safety plan would be followed during construction to address worker safety and to minimize exposure to potential environmental health hazards. To help detect potential leaks quickly, an odorant may be added to the gas . Pressure and flow at the facilities will be monitored to ensure proper operation and reduce potential risk for fire and explosion. The centralized gas cleaning unit would be designed with internal shutoff valves that will switch automatically if the system detects a malfunction. The centralized gas cleaning unit would be outfitted with control technology to ensure that emissions are below the acceptable source impact level for air pollutants associated with project operation. The extremely limited areas where toxic/ hazardous materials are utilized will have impermeable surfaces and curbing to contain any potential spills.

Every methane producing facility with spills, leaks, fires, and explosions said the same things when they convinced communities to permit operations. Nothing in this statement is enforceable.[17]

The checklist says, *The following measures may be implemented to reduce or control environmental health hazards.*

If there is an accident and victims argue for compensation, Sunnyside RNG insurance companies can simply say, 'W never promised to do those things. We said those measures *may be implemented.*'

A useful SEPA check list would tell the reader, among other things:

- Where on the facility would alarms and monitors be located?
- What would be the pressure and flow danger signs?
- Would monitoring be automated or by trained personnel?
- What would the alarms detect?
- Frequency of alarm checks to make sure they function properly?
- How would the facility check for corrosion in the piping system, in the tank floors and walls?
- How often would piping be checked for leaks?
- When would equipment be replaced as the facility ages?
- Required safety training for staff – content, how often?
- Evacuation routes?
- What are protocols for rescuing trapped and endangered workers?
- Would there be monitoring for release of pathogens in effluent and air?
- Would there be fenceline monitoring?

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[17] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

- What are proposed protocols for notifying neighbors of leaks and dangers?
- Describe a worst case scenario for fires and explosions

WAC 197-11-158 SEPA/GMA project review—Reliance on existing plans, laws, and regulations.

(1) In reviewing the environmental impacts of a project and making a threshold determination, a GMA county/city may, at its option, determine that the requirements for environmental analysis, protection, and mitigation measures in the GMA county/city's development regulations and comprehensive plan adopted under chapter 36.70A RCW, and in other applicable local, state, or federal laws or rules, provide adequate analysis of and mitigation for some or all of the specific adverse environmental impacts of the project.

(2) In making the determination under subsection (1) of this section, the GMA county/city shall:

(d) Place the following statement in the threshold determination if all of a project's impacts are addressed by other applicable laws and no conditions will be required under SEPA: "The lead agency has determined that the requirements for environmental analysis, protection, and mitigation measures have been adequately addressed in the development regulations and comprehensive plan adopted under chapter 36.70A RCW, and in other applicable local, state, or federal laws or rules, as provided by RCW 43.21C.240 and WAC 197-11-158. Our agency will not require any additional mitigation measures under SEPA."

The City of Sunnyside did not select this option.

WAC 197-11-164 Planned actions—Definition and criteria.

(1) Under RCW 43.21C.440, GMA counties/cities may designate a planned action.

FOTC interpretation is that the Sunnyside RNG project is not a planned action.

WAC 197-11-330 Threshold determination process.

(3) In determining an impact's significance (WAC 197-11-794), the responsible official shall take into account the following, that:

(a) The same proposal may have a significant adverse impact in one location but not in another location;

(b) The absolute quantitative effects of a proposal are also important, and may result in a significant adverse impact regardless of the nature of the existing environment;

(c) Several marginal impacts when considered together may result in a significant adverse impact;

(d) For some proposals, it may be impossible to forecast the environmental impacts with precision, often because some variables cannot be predicted or values cannot be quantified.

(e) A proposal may to a significant degree:

(i) Adversely affect environmentally sensitive or special areas, such as loss or destruction of historic, scientific, and cultural resources, parks, prime farmlands, wetlands, wild and scenic rivers, or wilderness;

(ii) Adversely affect endangered or threatened species or their habitat;

(iii) Conflict with local, state, or federal laws or requirements for the protection of the environment; and

(iv) Establish a precedent for future actions with significant effects, involves unique and unknown risks to the environment, or may affect public health or safety.

*(4) If after following WAC **197-11-080** and **197-11-335** the lead agency reasonably believes that a proposal may have a significant adverse impact, an EIS is required.*

(5) A threshold determination shall not balance whether the beneficial aspects of a proposal outweigh its adverse impacts, but rather, shall consider whether a proposal has any probable significant adverse environmental impacts under the rules stated in this section. For example, proposals designed to improve the environment, such as sewage treatment plants or pollution control requirements, may also have significant adverse environmental impacts.

Many people believe that the SS RNG digester should be located away from the City of Sunnyside, in a more remote area.

People note that the proposed digester will be situated near the Windmill Mushroom Farms that already sends odorous emissions into the ambient air, and the Nutrien Fertilizer Plant with a history of a fire that required evacuation of neighbors, and the Sunnyside wastewater treatment plant that sprays odorous effluent onto nearby fields.

The proposed digester would be near the area where the poorer people of Sunnyside live and farther from more affluent areas. A previous site, near more affluent areas, and near the Williams natural gas pipeline, was rejected. No one is stating the reason.

Soil at this site, Quincy loamy fine sand, is "excessively drained" according to the Natural Resources Conservation Service. Nearby monitoring wells at the Port of Sunnyside show high levels of nitrates in the underlying aquifer. Sunnyside RNG has not stated what kind of liner will be used for digester lagoons. It is reasonable to expect that spills on the digester site would quickly leach to the aquifer.

Approval of this project without an Environmental Impact Statement would demonstrate to the public that Washington laws to protect people in marginalized neighborhoods mean nothing.

197-11-335 Additional information.

The lead agency shall make its threshold determination based upon information reasonably sufficient to evaluate the environmental impact of a proposal (WAC 197-11-055(2) and 197-11-060(3)). The lead agency may take one or more of the following actions if, after reviewing the checklist, the agency concludes that there is insufficient information to make its threshold determination:

(1) Require an applicant to submit more information on subjects in the checklist;

(2) Make its own further study, including physical investigations on a proposed site;

(3) Consult with other agencies, requesting information on the proposal's potential impacts which lie within the other agencies' jurisdiction or expertise (agencies shall respond in accordance with WAC 197-11-550); or

(4) Decide that all or part of the action or its impacts are not sufficiently definite to allow environmental analysis and commit to timely, subsequent environmental analysis, consistent with WAC 197-11-055 through 197-11-070.

There is insufficient information in the Sunnyside RNG checklist to evaluate the environmental impact of the proposed digester.

- Only vague speculation about project expansion
- A Geotechnical Report and Phase I ESA are referenced but not available for review
- There is no air permit. The application posted on the City of Sunnyside web site that appears to have been accepted by the Yakima Regional Clean Air Agency was not in fact accepted. The YRCAA returned it to Sunnyside RNG for more information
- Could the answers be any vaguer? How about this: "Best management practices will be used to reduce and control erosion. Local and state laws will be followed. Silt fence, construction entrance, an inlet protection are planned."[18]
- The Environmental Checklist assures the public that emissions from the proposed digester will not exceed:
    - CO - 100 tons per year (tpy)
    - NOX - 40 tons per year (tpy)
    - SO2 - 40 tons per year (tpy)
    - PM - 25 tons per year (tpy)
    - PM10-15tpy
    - PM25 -10 tpy

[18] The City of Sunnyside Municipal Code 18.04.120.E.3 states: *The applicant's proposed mitigation measures must be in writing and must be specific. For example, proposals to "control noise" or "prevent storm water runoff" are inadequate, whereas proposals to "muffle machinery to X decibels" or "construction 200-foot storm water retention pond at Y location" are adequate.*

Suppose the SS RNG digester only emits 5 tons per year of PM 2.5, fine particulate matter, and Windmill Mushroom Farms only emits 5 tons per year of fine particulate matter, and Nutrien Solutions only emits 5 tons per year of fine particulate matter, and the City of Sunnyside Waste Water Treatment Plant only emits 5 tons per year of fine particulate matter. The Total is 20 tons per year. What does this mean for South Sunnyside air quality? Wouldn't it be better to study this problem before ground is broken, rather than trying to protect human health with home air filters and breathing treatments afterwards?

- *Stormwater runoff will be retained on site and infiltrated into the ground at various locations including a potential stormwater pond. This water will not flow into other waters.* This means that stormwater will wash spilled manure and digestate from the site into the ground. Who will monitor for onsite spills? Is groundwater monitoring appropriate here?
- *Natural gas used for heat (the boilers) is accounted for in the air emissions as well as avoided methane calculations.* This natural gas should not be counted in avoided methane calculations.
- *Thermal energy will be recaptured from the amine re boiler for heating other site processes. Where appropriate variable rate pumps will be used.* There is insufficient information to quantify these proposed savings. There is insufficient information for the average reader, including City of Sunnyside Officials, to understand the nature of an amine boiler.
- *To help detect potential leaks quickly, an odorant may be added to the gas.* An odorant "may" be added. You "may" win the lottery
- *Noise is not anticipated to be a problem.* Please tell us why not.
- FOTC's table top calculation, using data from the SS RNG Traffic Impact Analysis estimates there will be an additional 1,500 miles of truck traffic per day mostly on Yakima County Roads. Heavy duty trucks inflict about 2,500 times more wear and tear on roads than private cars. There is no estimate of cost to maintain the impacted county roads.

WAC 197-11-340 Determination of nonsignificance (DNS).

(2)(c) Any person, affected tribe, or agency may submit comments to the lead agency within fourteen days of the date of issuance of the DNS.
(2)(f) The responsible official shall reconsider the DNS based on timely comments and may retain or modify the DNS or, if the responsible official determines that significant adverse impacts are likely, withdraw the DNS or supporting documents. When a DNS is modified, the lead agency shall send the modified DNS to agencies with jurisdiction.
(3)(a) The lead agency shall withdraw a DNS if:

(i) There are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts;

(ii) There is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts; or

(iii) The DNS was procured by misrepresentation or lack of material disclosure; if such DNS resulted from the actions of an applicant, any subsequent environmental

checklist on the proposal shall be prepared directly by the lead agency or its consultant at the expense of the applicant.

(b) Subsection (3)(a)(ii) shall not apply when a nonexempt license has been issued on a private project.

(c) If the lead agency withdraws a DNS, the agency shall make a new threshold determination and notify other agencies with jurisdiction of the withdrawal and new threshold determination. If a DS is issued, each agency with jurisdiction shall commence action to suspend, modify, or revoke any approvals until the necessary environmental review has occurred (see also WAC 197-11-070).

The City of Sunnyside issued a mitigated determination of non-significance (MDNS) of the SS RNG project on June 22, 2023.

The Friends of Toppenish Creek submitted an appeal of the MDNS on July 6, 2023.[19]

There is no evidence that the responsible official reconsidered the MDNS based on FOTC's lengthy comments, as required by WAC 197-11-340(2)(f).

FOTC maintains there was a lack of material disclosure due to the absence of data regarding air quality, risks for fires and explosion, and traffic impacts. The agency with expertise for air, the YRCAA, did not comment. A Traffic Impact Analysis (TIA) was not available for review prior to our July 6, 2023 appeal.

WAC 197-11-350 Mitigated DNS.

The purpose of this section is to allow clarifications or changes to a proposal prior to making the threshold determination.

(1) In making threshold determinations, an agency may consider mitigation measures that the agency or applicant will implement.

(2) After submission of an environmental checklist and prior to the lead agency's threshold determination on a proposal, an applicant may ask the lead agency to indicate whether it is considering a DS. If the lead agency indicates a DS is likely, the applicant may clarify or change features of the proposal to mitigate the impacts which led the agency to consider a DS likely. The applicant shall revise the environmental checklist as may be necessary to describe the clarifications or changes. The lead agency shall make its threshold determination based upon the changed or clarified proposal. If a proposal continues to have a probable significant adverse environmental impact, even with mitigation measures, an EIS shall be prepared.

(3) Whether or not an applicant requests early notice under subsection (2), if the lead agency specifies mitigation measures on an applicant's proposal that would allow it to issue a DNS, and the proposal is clarified, changed, or conditioned to include those measures, the lead agency shall issue a DNS.

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[19] See Attachment 2

(4) Environmental documents need not be revised and resubmitted if the clarifications or changes are stated in writing in documents that are attachments to, or incorporate by reference, the documents previously submitted. An addendum may be used, see Part Six.

The June 22, 2023 MDNS for the SS RNG project stated the following mitigation measures:

Mitigation Measure: An Inadvertent Discovery Plan shall be created and submitted to the City of Sunnyside as part of the building permit package for the prosed development.

Mitigating Measures: a stormwater management plan is required to be submitted for review and approval by City of Sunnyside public works department prior to construction. The plan must meet the following design standards:

a) Stormwater retention or detention shall be provided. A professional engineer registered in the state of Washington shall design all drainage facilities and components. Drainage plans using best management practices and design requirements must be submitted to and approved by City of Sunnyside prior to grading or development.
b) Post development stormwater flow rates and volumes shall not exceed predevelopment conditions. The standard of full retention of the 25-year storm event generally meets the goal.
c) The depth to groundwater should be determined prior to planning the layout of stormwater facilities. If a stormwater infiltration facility will be used for the disposal of runoff, a permeability test should be conducted initially at the site to determine existing infiltration rates prior to the design stage.

Mitigation Measure: Dust a. A dust control plan must be filed with the Yakima Regional Clean Air Authority.

Documentation for most of these mitigation measures is still missing, namely there is no:

- Inadvertent Discovery Plan, although the addendum letter from SS RNG claims one exists
- NPDES Construction Stormwater permit, although the addendum letter from SS RNG claims one exists
- Stormwater Pollution Prevention Plan, although the addendum letter from SS RNG claims one exists
- Consultation with the WA State Dept. of Ecology and the Yakima Health District regarding a Notice of Intent to operate under terms and conditions of a solid waste permit
- Depth to groundwater and permeability tests

On December 4, 2023, FOTC submitted a public records request to Yakima County Emergency Services for information re conversations with Sunnyside RNG regarding possible fires and explosions. On December 5, 2023, Yakima County Emergency

Services informed FOTC that they have no records of conversations with Pacific Ag/Sunnyside RNG regarding the proposed manure bio-digester.

FOTC interprets this to mean that project proponents have not adequately prepared for possible fires and explosions at the site. There is abundant information demonstrating the possibility of fires and explosions related to methane production facilities.

WAC 197-11-355 Optional DNS process.

In the City of Sunnyside's May 23, 2023 Notice of Environmental Review the city stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

However the City of Sunnyside has not incorporated WAC 197-11-355 by reference. See City of Sunnyside Municipal Code, Chapter 18.04 available at https://www.codepublishing.com/WA/Sunnyside/#!/Sunnyside18/Sunnyside1804.html#18.04.020

18.04.080 Categorical exemptions and threshold determinations, provisions adopted by reference.

Regarding the rules for deciding whether a proposal has a "probable significant adverse environmental impact" requiring an EIS to be prepared, and the rules for evaluating the impacts of proposals not requiring an EIS, the City adopts the following sections of Chapter 197-11 WAC by reference:

WAC

197-11-300 Purpose
197-11-305 Categorical Exemptions
197-11-310 Threshold Determination Required
197-11-315 Environmental Checklist
197-11-330 Threshold Determination Process
197-11-335 Additional Information
197-11-340 Determination of Non-Significance

197-11-350 Mitigated Determinations of Non-Significance
197-11-360 Determinations of Significance/Initiation of Scoping
197-11-390 Effects of Threshold Determination
[Ord. 1475 § 2, 1984.]

FOTC questions whether the city can invoke a rule that the city has not approved. The city did not respond when FOTC brought this fact to the city's attention.

WAC 197-11-400 Purpose of EIS.

(1) The primary purpose of an environmental impact statement is to ensure that SEPA's policies are an integral part of the ongoing programs and actions of state and local government.

(2) An EIS shall provide impartial discussion of significant environmental impacts and shall inform decision makers and the public of reasonable alternatives, including mitigation measures, that would avoid or minimize adverse impacts or enhance environmental quality.

(3) Environmental impact statements shall be concise, clear, and to the point, and shall be supported by the necessary environmental analysis. The purpose of an EIS is best served by short documents containing summaries of, or reference to, technical data and by avoiding excessively detailed and overly technical information. The volume of an EIS does not bear on its adequacy. Larger documents may even hinder the decision making process.

(4) The EIS process enables government agencies and interested citizens to review and comment on proposed government actions, including government approval of private projects and their environmental effects. This process is intended to assist the agencies and applicants to improve their plans and decisions, and to encourage the resolution of potential concerns or problems prior to issuing a final statement. An environmental impact statement is more than a disclosure document. It shall be used by agency officials in conjunction with other relevant materials and considerations to plan actions and make decisions.

An Environmental Impact Statement, as described in WAC 197-11-400 is essential for quality decision making. A project as large as the Sunnyside RNG digester should not proceed without study of environmental information at this level

WAC 197-11-500 Purpose of this part.

This part provides rules for:

(1) Notice and public availability of environmental documents, especially environmental impact statements;

(2) Consultation and comment by agencies and members of the public on environmental documents;

(3) Public hearings and meetings; and

(4) Lead agency response to comments and preparation of final environmental impact statements. Review, comment, and responsiveness to comments on a draft EIS are the focal point of the act's commenting process because the DEIS is developed as a result of scoping and serves as the basis for the final statement.

This section especially addresses public notice for Environmental Impact Statements, but it is not limited to EIS. FOTC believes that this section also addresses Environmental Review in sections that do not limit discussion to EIS.

WAC 197-11-502 Inviting comment.

(1) Agency efforts to involve other agencies and the public in the SEPA process should be commensurate with the type and scope of the environmental document.

(2) Consulted agencies have a responsibility to respond in a timely and specific manner to requests for comments (WAC 197-11-545, 197-11-550, and 197-11-724).

The Yakima Regional Clean Air Agency, the agency tasked with enforcing the Clean Air Act in Yakima County, did not respond to the City of Sunnyside's request for comments on the May 2023 Notice of Environmental Review. Consequently the MDNS did not contain sufficient analysis of related air impacts. If there were an adequate analysis of air impacts the City of Sunnyside might have issued a Determination of Significance that would have changed the course of these actions.

*(3) **Threshold determinations.***

(a) Agencies shall send DNSs to other agencies with jurisdiction, if any, as required by WAC 197-11-340(2) and 197-11-355.

The City of Sunnyside has never incorporated WAC 197-11-355 by reference.

(b) For DNSs issued under WAC 197-11-340(2), agencies shall provide public notice under WAC 197-11-510 and receive comments on the DNS for fourteen days.

The City of Sunnyside provided public notice of the MDNS on June 22, 2023, and stated

Appeal Period: This MDNS is issued under WAC 197-11-340(2). The Lead Agency will not act on this proposal for 14 days from the date of issuance. Appeals may be submitted on this proposal to the address below.

However the May 2023 Notice of Environmental Review stated

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

FOTC did appeal the MDNS on July 6, 2023. The City of Sunnyside scheduled a hearing date for August 23, 2023. The City of Sunnyside cancelled the hearing on August 16, 2023. The city did not put the cancellation in an official document, but relied instead on an email that said:

After consultation with the City's legal team, it has been discovered that the Mitigated Determination of Nonsignificance (MDNS) issued on June 22, 2023, cannot at this time be appealed. The reason the MDNS cannot be appeal is because the MDNS only serves as an advisory statement on behalf of the City. In order to process an appeal, the MDNS is required to be tied to a development permits, such as a land use review, engineering permit, or building permit. None of those items have been issued for the site at this time, therefore the City cannot process a standalone MDNS appeal. See - Ellensburg Cement Products, Inc. v. Kittitas County, 179 Wn.2d 737 (2014).

FOTC disputed the cancellation to no avail. The City of Sunnyside did not cite rules that allow an unelected official to cancel a legally authorized hearing. In fact, the city did not point to any places in WAC 197-11 that might support the cancellation. It is inappropriate for the city to cite case law as though issuing a ruling from the bench.

FOTC disagrees with the statement *the MDNS only serves as an advisory statement on behalf of the City.* FOTC contends that environmental review means *Deciding whether a proposal has a probable significant adverse impact and thus requires an EIS (the threshold determination)* WAC 197-11-300(2)

*(6) **Public hearings and meetings.***

*(a) Public hearings or meetings may be held (WAC **197-11-535**). Notice of such public hearings shall be given under WAC **197-11-510** and may be combined with other agency notice.*

*(b) In conjunction with the requirements of WAC **197-11-510**, notice of public hearings shall be published no later than ten days before the hearing. For nonproject proposals, notice of the public hearing shall be published in a newspaper of general circulation in the general area where the lead agency has its principal offices. For nonproject proposals having a regional or statewide applicability, copies of the notice shall be given to the Olympia bureaus of the Associated Press and United Press International.*

The City of Sunnyside refused to conduct public hearings on this project. As noted, the city cancelled a public hearing of the FOTC appeal. There was no opportunity for the community to learn about risks and benefits related to the SS RNG bio-digester, thus a thwarting of the intent of the law.

WAC 197-11-510 Public notice.

(1) When these rules require notice to be given under this section, the lead agency must use reasonable methods to inform the public and other agencies that an

environmental document is being prepared or is available and that public hearing(s), if any, will be held. The agency may use its existing notice procedures.

Examples of reasonable methods to inform the public are:

(a) Posting the property, for site-specific proposals;

(b) Publishing notice in a newspaper of general circulation in the county, city, or general area where the proposal is located;

(c) Notifying public or private groups with known interest in a certain proposal or in the type of proposal being considered;

(d) Notifying the news media;

(e) Placing notices in appropriate regional, neighborhood, ethnic, or trade journals;

(f) Publishing notice in agency newsletters and/or sending notice to agency mailing lists (either general lists or lists for specific proposals or subject areas); and/or

(g) Mailing or emailing notice to any person, group or agency who has requested notice.

(2) Each agency shall specify its method of public notice in its SEPA procedures, WAC 197-11-904 and 197-11-906. If an agency does not specify its method of public notice or does not adopt SEPA procedures, the agency shall use methods (a) and (b) in subsection (1).

(3) Documents which are required to be sent to the department of ecology under these rules will be published in the SEPA register, which will also constitute a form of public notice. However, publication in the SEPA register shall not, in itself, meet compliance with this section.

FOTC only became aware of the SS RNG MDNS as a result of a public records request. FOTC paid particular attention to public notices in the Yakima Herald Republic because we heard rumors about the proposed digester. We found zero notices in the Yakima Herald Republic or in the Spanish media.

To the best of our knowledge notices were sent to about twenty residences near the proposed site. Many of the recipients only speak Spanish, yet the notices were only in English. This project, if completed will have long lasting impacts on the entire county, yet most people in the county are still unaware.

The City of Sunnyside or the Port of Sunnyside placed a sign in a cornfield at the proposed site next to a highway with a 55 mph speed limit. Public notice was minimal and inadequate.

WAC 197-11-535 Public hearings and meetings.

(1) If a public hearing on the proposal is held under some other requirement of law, such hearing shall be open to consideration of the environmental impact of the proposal, together with any environmental document that is available. This does not require extension of the comment periods for environmental documents.

(2) In all other cases a public hearing on the environmental impact of a proposal shall be held whenever one or more of the following situations occur:

(a) The lead agency determines, in its sole discretion, that a public hearing would assist it in meeting its responsibility to implement the purposes and policies of SEPA and these rules; or

(b) When fifty or more persons residing within the jurisdiction of the lead agency, or who would be adversely affected by the environmental impact of the proposal, make written request to the lead agency within thirty days of issuance of the draft EIS; or

(c) When two or more agencies with jurisdiction over a proposal make written request to the lead agency within thirty days of the issuance of the draft EIS.

(3) Whenever a public hearing is held under subsection (2) of this section, it shall occur no earlier than fifteen days from the date the draft EIS is issued, nor later than fifty days from its issuance. Notice shall be given under WAC 197-11-502(6) and 197-11-510 and may be combined with other agency notice.

(4) If a public hearing is required under this chapter, it shall be open to discussion of all environmental documents and any written comments that have been received by the lead agency prior to the hearing. A copy of the environmental document shall be available at the public hearing.

(5) Comments at public hearings should be as specific as possible (see WAC 197-11-550).

(6) Agencies and their designees may hold informal public meetings or workshops. Such gatherings may be more flexible than public hearings and are not subject to the above notice and similar requirements for public hearings.

(7) Public meetings held by local governments under chapter 36.70B RCW may be used to meet SEPA public hearing requirements as long as the requirements for public hearing in this section are met. A public hearing under this section need not be an open record hearing as defined in RCW 36.70B.020(3).

Based on WAC 197-11-535(2) & (3) FOTC concludes that this section primarily applies to Environmental Impact Statements. However, the City of Sunnyside could have conducted public meetings or workshops to inform residents about the risks and benefits of this proposed project. Such an action would have demonstrated confidence in the intelligence and civic interest of members of the public. Absence of such meetings indicates a propensity to keep the public in the dark.

WAC 197-11-545 Effect of no comment.

*(1) **Consulted agencies.** If a consulted agency does not respond with written comments within the time periods for commenting on environmental documents, the lead agency may assume that the consulted agency has no information relating to the potential impact of the proposal as it relates to the consulted agency's jurisdiction or special expertise. Any consulted agency that fails to submit substantive information to the lead agency in response to a draft EIS is thereafter barred from alleging any defects in the lead agency's compliance with Part Four of these rules.*

*(2) **Other agencies and the public.** Lack of comment by other agencies or members of the public on environmental documents, within the time periods specified by*

these rules, shall be construed as lack of objection to the environmental analysis, if the requirements of WAC 197-11-510 are met.

It is extremely disturbing that the Yakima Regional Clean Air Agency and the Yakima Health District did not comment on the SS RNG Environmental Review. This failure to comment borders on failure to fulfill these agencies' mandated duties.

It is impossible to construct a manure methane bio-digester that produces between 800,000 and 950,000 MMBtu's of renewable natural gas per year without an impact on air quality or human health.

WAC 197-11-600 When to use existing environmental documents.

(1) This section contains criteria for determining whether an environmental document must be used unchanged and describes when existing documents may be used to meet all or part of an agency's responsibilities under SEPA.

(2) An agency may use environmental documents that have previously been prepared in order to evaluate proposed actions, alternatives, or environmental impacts. The proposals may be the same as, or different than, those analyzed in the existing documents.

Pacific Ag/Sunnyside RNG acknowledges that the company must acquire an air quality permit prior to commencing construction. When the YRACC evaluates such an application the YRCAA may incorporate the City of Sunnyside's MDNS, even though the YRCAA failed to comment on air impacts. FOTC would interpret such an action as an attempt to circumvent SEPA laws, and permit a polluting operation.

(3) Any agency acting on the same proposal shall use an environmental document unchanged, except in the following cases:

(a) For DNSs, an agency with jurisdiction is dissatisfied with the DNS, in which case it may assume lead agency status (WAC 197-11-340 (2)(e) and 197-11-948).

(b) For DNSs and EISs, preparation of a new threshold determination or supplemental EIS is required if there are:

(i) Substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts (or lack of significant adverse impacts, if a DS is being withdrawn); or

(ii) New information indicating a proposal's probable significant adverse environmental impacts. (This includes discovery of misrepresentation or lack of material disclosure.) A new threshold determination or SEIS is not required if probable significant adverse environmental impacts are covered by the range of alternatives and impacts analyzed in the existing environmental documents.

FOTC has introduced new evidence of potential adverse impacts in the forms of 1. an Evaluation of the Sunnyside RNG Traffic Impact Analysis, 2. Documentation of fires and explosions on other manure bio-digesters, 3. Reference to groundwater issues at the Port of Sunnyside, 4. Data supporting likelihood of cumulative impacts, and 5. Demographic data that demonstrates Environmental Justice concerns.

(c) For EISs, the agency concludes that its written comments on the DEIS warrant additional discussion for purposes of its action than that found in the lead agency's FEIS (in which case the agency may prepare a supplemental EIS at its own expense).

(4) Existing documents may be used for a proposal by employing one or more of the following methods:

(a) "Adoption," where an agency may use all or part of an existing environmental document to meet its responsibilities under SEPA. Agencies acting on the same proposal for which an environmental document was prepared are not required to adopt the document; or

(b) "Incorporation by reference," where an agency preparing an environmental document includes all or part of an existing document by reference.

(c) An addendum, that adds analyses or information about a proposal but does not substantially change the analysis of significant impacts and alternatives in the existing environmental document.

(d) Preparation of a SEIS if there are:

(i) Substantial changes so that the proposal is likely to have significant adverse environmental impacts; or

(ii) New information indicating a proposal's probable significant adverse environmental impacts.

New information provided by FOTC, and others strongly indicates significant adverse environmental impacts from the SS RNG project. These impacts may be direct, indirect, short term, long term, widespread and cumulative. An EIS is warranted.

(e) If a proposal is substantially similar to one covered in an existing EIS, that EIS may be adopted; additional information may be provided in an addendum or SEIS (see (c) and (d) of this subsection).

WAC 197-11-655 Implementation.

(1) See RCW 43.21C.020, 43.21C.030(1), 43.21C.060, 43.21C.075, and 43.21C.080.

(2) Relevant environmental documents, comments, and responses shall accompany proposals through existing agency review processes, as determined by agency practice and procedure, so that agency officials use them in making decisions.

(3) When a decision maker considers a final decision on a proposal:

(a) The alternatives in the relevant environmental documents shall be considered.

(b) The range of alternative courses of action considered by decision makers shall be within the range of alternatives discussed in the relevant environmental documents. However, mitigation measures adopted need not be identical to those discussed in the environmental document.

(c) If information about alternatives is contained in another decision document which accompanies the relevant environmental documents to the decision maker, agencies are encouraged to make that information available to the public before the decision is made.

Since the City of Sunnyside did not evaluate alternatives to the SS RNG proposal, the city cannot comply with WAC 197-11-655

WAC 197-11-680 Appeals.

*(1) **Introduction.** Appeals provisions in SEPA are found in RCW 43.21C.060, 43.21C.075 and 43.21C.080. These rules attempt to construe and interpret the statutory provisions. In the event a court determines that these rules are inconsistent with statutory provisions, or with the framework and policy of SEPA, the statute will control. Persons considering either administrative or judicial appeal of any decision which involves SEPA at all are advised to read the statutory sections cited above.*

*(2) **Appeal to local legislative body.** RCW 43.21C.060 allows an appeal to a local legislative body of any decision by a local nonelected official conditioning or denying a proposal under authority of SEPA. Agencies may establish procedures for such an appeal, or may eliminate such appeals altogether, by rule, ordinance or resolution. Such appeals are subject to the restrictions in RCW 36.70B.050 and 36.70B.060 that local governments provide no more than one open record hearing and one closed record appeal for permit decisions.*

FOTC has appealed to the Sunnyside City Council three times under WAC 197-11-680(2). The first appeal was on September 22, 2023, likely beyond the short 20 day window prescribed in the Sunnyside Municipal Code section 2.72

*(3) **Agency administrative appeal procedures.***

(a) Agencies may provide for an administrative appeal of determinations relating to SEPA in their agency SEPA procedures. If so, the procedures must comply with the following:

(i) The agency must specify by rule, ordinance, or resolution that the appeals procedure is available.

(ii) Appeal of the intermediate steps under SEPA (e.g., lead agency determination, scoping, draft EIS adequacy) shall not be allowed.

(iii) Appeals on SEPA procedures shall be limited to review of a final threshold determination and final EIS. These appeals may occur prior to an agency's final decision on a proposed action.

The June 22, 2023 MDNS was a final threshold determination. Pacific Ag/Sunnyside RNG supplemented their environmental checklist with addenda on October 8, 2023. The City of Sunnyside posted a signed Notice of Addendum on November 28, 2023, with a deadline for comments of December 5, 2023.

Frankly, FOTC is confused regarding timelines for appeals, but we submit comments today to make sure we do not miss deadlines. This results in excess paperwork and excess documentation.

(iv) An agency shall provide for only one administrative appeal of a threshold determination or of the adequacy of an EIS; successive administrative appeals on these issues within the same agency are not allowed. This limitation does not apply to administrative appeals before another agency.

(v) Except as provided in (a)(vi) of this subsection, the appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body. The hearing or appeal shall be one at which the hearing officer or body will consider either the agency's decision or a recommendation on the proposed underlying governmental action. For example, an appeal of the adequacy of an EIS must be consolidated with a hearing or appeal on the agency's decision or recommendation on the proposed action, if both proceedings are allowed in agency procedures. If an agency does not provide for a hearing or appeal on the underlying governmental action (either a hearing on the agency's recommendation or an agency appeal hearing after the decision is made), the agency may not hold a SEPA administrative appeal, except as allowed under (a)(vi) of this subsection.

This section says, *appeal shall consolidate any allowed appeals of procedural and substantive determinations under SEPA with a hearing or appeal on the underlying governmental action in a single simultaneous hearing before one hearing officer or body.* It does not say that appeals must be made to Superior Court as the City of Sunnyside advises.

(vi) The following appeals of SEPA procedural or substantive determinations need not be consolidated with a hearing or appeal on the underlying governmental action:

(A) An appeal of a determination of significance;

(B) An appeal of a procedural determination made by an agency when the agency is a project proponent, or is funding a project, and chooses to conduct its review under SEPA, including any appeals of its procedural determinations, prior to submitting an application for a project permit. Subsequent appeals of substantive determinations by an agency with jurisdiction over the proposed project shall be allowed under the SEPA appeal procedures of the agency with jurisdiction;

FOTC's July 6, 2023 appeal of the June 22, 2023 MDNS was mostly procedural. We believe that the City of Sunnyside and the Port of Sunnyside are project proponents based on the two years of meetings with Pacific Ag, the sale of property to Sunnyside RNG, and the extreme efforts the city and the port have exerted to move the SS RNG project forward. Based on WAC 197-11-680 (3)(a)(vi)(B) the City of Sunnyside should not have cancelled the August 23, 2023 appeal hearing.

(C) An appeal of a procedural determination made by an agency on a nonproject action; and

(D) An appeal to the local legislative authority under RCW 43.21C.060 or other applicable state statutes.

(vii) If a county/city to which RCW 36.70B.110 applies provides for an administrative appeal, any such appeal of a procedural or substantive determination under SEPA issued at the same time as the decision on a project action shall be filed within fourteen days after a notice of decision under RCW 36.70B.130 or after other notice that the decision has been made and is appealable. In order to allow public comment on a DNS prior to requiring an administrative appeal to be filed, this appeal period shall be extended for an additional seven days if the appeal is of a DNS for which public comment is required under this chapter or under county/city rules adopted under SEPA. For threshold determinations issued prior to a decision on a project action, any administrative appeal allowed by a county/city shall be filed within fourteen days after notice that the determination has been made and is appealable. Nothing in this subsection alters the requirements of (a)(v) and (vi) of this subsection.

(viii) Agencies shall provide that procedural determinations made by the responsible official shall be entitled to substantial weight.

(b) Agencies providing for administrative appeals shall provide for a record as required by RCW 43.21C.075 (3)(c).

(c) If an agency provides an administrative appeal procedure, that procedure must be used before anyone may initiate judicial review of any SEPA issue that could have been reviewed under the agency procedures.

The City of Sunnyside provides an administrative appeal procedure under Sunnyside Municipal Code Section 2.46 and 2.72. FOTC believes the City of Sunnyside erred by cancelling our August 23, 2023, appeal and telling us that our only option was to appeal permit decisions in Superior Court. WAC 197-11-680 (3)(c) says differently.

(4) Judicial appeals.

(a) SEPA authorizes judicial appeals of both procedural and substantive compliance with SEPA.

(b) When SEPA applies to a decision, any judicial appeal of that decision potentially involves both those issues pertaining to SEPA (SEPA issues) and those which do not (non-SEPA issues). RCW 43.21C.075 establishes time limits for raising SEPA issues, but says that existing statutes of limitations control the appeal of non-SEPA issues. The statute contemplates a single lawsuit.

(c) If there is a time limit established by statute or ordinance for appealing the underlying governmental action, then appeals (or portions thereof) raising SEPA issues must be filed within such time period.

The Sunnyside City Code states:

2.72.010 Appeal period.

Any appeal from any action of the City Council, City Commission or City Board, or City official or employee, whose decisions are not directly appealable to the City Council, must be brought within 20 days from the date of the effective date of the action appealed from. [Ord. 1313 § 1, 1981.]

The City of Sunnyside issued an MDNS for the SS RNG project. FOTC timely appealed. The city cancelled the appeal. After the threshold determination, SS RNG submitted changes to the environmental checklist that will affect the MDNS. FOTC may comment, but there is apparently no pathway for an appeal, according to the Sunnyside Municipal Code.

The City of Sunnyside may have designed a trap in which appeals were postponed and then prohibited due to postponement.

(d) The notice of action procedures of RCW 43.21C.080 may still be used. If this procedure is used, then the time limits for judicial appeal specified in RCW 43.21C.080 shall apply, unless there is a time limit established by statute or ordinance for appealing the underlying governmental action. If so, the time limit for appeal of SEPA issues shall be the time limit in the statute or ordinance for the underlying governmental action. If the proposal requires more than one governmental decision that will be supported by the same SEPA documents, then RCW 43.21C.080 still only allows one judicial appeal of procedural compliance with SEPA, which must be commenced within the applicable time to appeal the first governmental decision.

(e) If the time limit established by statute or ordinance for appealing the underlying governmental action is less than fifteen days, then the notice of action in RCW 43.21C.080(1) may be given by publishing once within that shorter time period, in a newspaper of general circulation in the area where the property that is the subject of the action is located, and meeting the other requirements of RCW 43.21C.080.

(f) If there is no time limit established by statute or ordinance for appeal, and the notice of action provisions are not used, then SEPA provides no time limit for judicial appeals. Appeal times may still be limited, however, by general statutes of limitation or the common law.

(g) For the purposes of this subsection, "a time limit established by statute or ordinance" does not include time limits established by the general statutes of limitation in chapter 4.16 RCW.

(5) Official notice of the date and place for commencing a judicial appeal.

(a) Official notice of the date and place for commencing an appeal must be given if there is a time limit established by statute or ordinance for commencing an appeal of the underlying governmental action. The notice shall include:

(i) The time limit for commencing appeal of the underlying governmental action and SEPA issues, and the statute or ordinance establishing the time limit; and

(ii) Where an appeal may be filed.

(b) Notice is given by:

(i) Delivery of written notice to the applicant, all parties to any administrative appeal, and all persons who have requested notice of decisions with respect to the particular proposal in question; and

(ii) Following the agency's normal methods of notice for the type of governmental action taken.

(c) Written notice containing the information required by subsection (5)(a) of this section may be appended to the permit, decision documents, or SEPA compliance documents or may be printed separately.

(d) Official notices required by this subparagraph shall not be given prior to final agency action.

As noted above, FOTC is not certain of the intent of the City of Sunnyside's Notice of SEPA Addendum. FOTC could engage better if we knew whether these addenda would result in changes to the MDNS and consequently in final agency action.

The Notice of SEPA Addendum provides a window for public comments, but does not describe an appeal procedure. We understand that the lead agency has an obligation to evaluate and respond to our comments. See WAC 197-11-340 (2)(f)

WAC 197-11-910 Designation of responsible official.

Agency SEPA procedures shall designate or provide a method of designating the responsible official with speed and certainty (WAC 197-11-906 (1)(d)). This designation may vary depending upon the nature of the proposal. The responsible official shall carry out the duties and functions of the agency when it is acting as the lead agency under these guidelines. Since it is possible under these rules for an agency to be acting as a lead agency prior to actually receiving an application for a license to undertake a private project, designation of the first department within the agency to receive an application as the responsible official will not be sufficient.

It is FOTC's understanding that Trevor Martin from the City of Sunnyside is the responsible official for this SEPA determination.

WAC 197-11-924 Determining the lead agency.

(1) The first agency receiving an application for or initiating a nonexempt proposal shall determine the lead agency for that proposal, unless the lead agency has been previously determined, or the agency receiving the proposal is aware that another agency is determining the lead agency. The lead agency shall be determined by using the criteria in WAC 197-11-926 through 197-11-944.

(2) If an agency determines that another agency is the lead agency, it shall mail to such lead agency a copy of the application it received, together with its determination of lead agency and an explanation. If the agency receiving this determination agrees that it is the lead agency, it shall notify the other agencies with jurisdiction. If it does not agree, and the dispute cannot be resolved by agreement, the agencies shall immediately petition the department of ecology for a lead agency determination under WAC 197-11-946.

(3) Any agency receiving a lead agency determination to which it objects shall either resolve the dispute, withdraw its objection, or petition the department for a lead agency determination within fifteen days of receiving the determination.

(4) An applicant may also petition the department to resolve the lead agency dispute under WAC 197-11-946.

(5) To make the lead agency determination, an agency must determine to the best of its ability the range of proposed actions for the proposal (WAC 197-11-060) and the other agencies with jurisdiction over some or all of the proposal. This can be done by:

(a) Describing or requiring an applicant to describe the main features of the proposal;

(b) Reviewing the list of agencies with expertise;

(c) Contacting potential agencies with jurisdiction either orally or in writing.

It is FOTC's understanding that Pacific Ag/Sunnyside RNG may have approached Yakima County with this proposal prior to contacting the City and Port of Sunnyside.

WAC 197-11-92 Lead agency for governmental proposals.

(1) When an agency initiates a proposal, it is the lead agency for that proposal. If two or more agencies share in the implementation of a proposal, the agencies shall by agreement determine which agency will be the lead agency. For the purposes of this section, a proposal by an agency does not include proposals to license private activity.

(2) Whenever possible, agency people carrying out SEPA procedures should be different from agency people making the proposal.

WAC 197-11-928 Lead agency for public and private proposals.

When the proposal involves both private and public activities, it shall be characterized as either a private or a public project for the purposes of lead agency designation, depending upon whether the primary sponsor or initiator of the project is an agency or from the private sector. Any project in which agency and private interests are too intertwined to make this characterization shall be considered a public project. The lead agency for all public projects shall be determined under WAC 197-11-926.

The City of Sunnyside's May 17, 2023 Notice of Environmental Review stated:

NOTICE OF ENVIRONMENTAL REVIEW This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project. The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355. The proposal may include mitigation measures under applicable codes and the project review process may incorporate or require mitigation measures regardless of whether an EIS is prepared. A copy of the subsequent threshold determination may be obtained by request and may be appealed pursuant to SMC Ch. 18.04.

Because this notice cited WAC 197-11-928, FOTC assumed this to be a public and private proposal. FOTC asked the City of Sunnyside several times whether it is a public and private project or a private project. The city did not answer. At a November 30, 2023 public meeting regarding the project, Harrison Pettit from Pacific Ag assured us several times that it is a private project. If this is so, then the City of Sunnyside was incorrect in

assuming the lead agency role, at least under WAC 197-11-928. FOTC asserts that the City of Sunnyside has an obligation to provide the public with accurate information.

WAC 197-11-930 Lead agency for private projects with one agency with jurisdiction.

For proposed private projects for which there is only one agency with jurisdiction, the lead agency shall be the agency with jurisdiction.

FOTC has asked the City of Sunnyside to list agencies with jurisdiction for the SS RNG project. The city has not answered.

* * * * * * * *

There are errors in the documents posted for this project:

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

The City of Sunnyside has reviewed the proposed project for probable adverse environmental impacts and expects to issue a Determination of Nonsignificance (DNS) per WAC § 197-11-355.

But the City of Sunnyside has not incorporated WAC 197-11-355 by reference.

- In the November 16, 2022, and May 17, 2023 Notice of Environmental Reviews the City of Sunnyside stated:

This is to notify agencies with jurisdiction and environmental expertise and the public that the City of Sunnyside, Planning Division, has been established as the lead agency, under WAC § 197-11-928 for this project.

But WAC 197-11-928 refers to public and private projects. Sunnyside RNG claims this is a private project.

- Tax Parcel Numbers are listed as:
    - Notice of Environmental Review TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Mitigated Determination of Non-Significance Parcel Number(s): 220901-13001, -44401, & -41404
    - Notice of Appeal Cancellation TAX PARCEL NUMBER(S): 220901-13001, -44401, -41404
    - Notice of SEPA Addendum TAX PARCEL NUMBER(S): 22090-141405 & 220901-41406 (Previously 220901-13001, -44401, - 41404)

- When did these changes occur? FOTC asks because we have spent many, many hours trying to make sense of the property location and zoning.

- Many related documents list two different File Numbers: SEPA-2022.0200 & SEPA 2023.0200 for the same project

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references File Number 2022.0200

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside references Exhibit B, *A Cultural Resources Survey for the Sunnyside RNG project*. This document has not been posted for public view.

- The October 8, 2023 Addendum Letter from Sunnyside RNG to the City of Sunnyside also identifies Exhibit B as a *Traffic Impact Analysis*

- The signature date for this letter is November 8, 2023, while the heading date for the letter is October 8, 2023

- The November 28, 2023 Notice of SEPA Addendum says:

  There is a 14-day comment period for this review. This may be your only opportunity to comment. All written comments received by 5:00 p.m. on December 5, 2023. Please reference file numbers (SEPA-2022.0200) and applicant's name (Sunnyside RNG) in any correspondence you submit.

  We are not sure this is the correct File Number.

The Friends of Toppenish Creek appreciate this opportunity to comment on SEPA review for the SS RNG project. We request clarification on next steps, specifically the appeal process as interpreted by the Lead Agency, the City of Sunnyside.

Sincerely,

Jean Mendoza

Jean Mendoza

Executive Director, Friends of Toppenish Creek
3142 Signal Peak Road
White Swan, WA 98952



SUNNYSIDE RNG
Renewable Natural Gas Project
Introduction to the Port of Sunnyside
September 6, 2022

www.pacificag.com

Who We Are

- Sunnyside RNG is owned and will be operated by Pacific Ag Renewables (PAR)
- PAR is a wholly owned subsidiary of Pacific Ag, North America's largest hay and crop residue harvest and supply company with operations in 27 states.
- Pacific Ag was established in 1998 in the Columbia basin with offices in the Tri-Cities, WA and Hermiston, OR.
- Pacific Ag is locally owned with deep roots in the Oregon and Washington farm economy for many generations.
- Pacific Ag brings deep operational expertise in ag processing, materials supply and logistics/trucking
- Sunnyside RNG's financial and technology partners bring decades of experience in the US and Europe with anaerobic digestion and renewable natural gas production.

The Project: Sunnyside RNG

Sunnyside RNG will:

- Turn agricultural waste products into renewable natural gas (RNG), a low-carbon substitute for fossil natural gas to be used as a biofuel in the transportation sector.
- Produce 830K MMBtus per year of RNG – making it one of the largest ag waste anaerobic digesters in the nation.
- Divert dairy manure from the lagoons of 15-20 medium to small dairies that otherwise would produce odors and methane off-gasses, and crop waste that might otherwise be burned or produce CO2 from decomposition.
- Produce an organic digestate that can be used as fertilizer, livestock bedding and compost.

Community Benefits

Economic (as calculated by the Yakima County Development Association)

A Significant Investment in the Sunnyside Community

Plant Cost: $94 - $100 million

Jobs:

- 29 full-time direct plant positions at an average wage of $68,379 (from a $2 million annual payroll)
- 15 direct trucking jobs and an estimated 26 indirect jobs in the community.
- median annual income Yakima County is $39,172 (source: Employment Security Department of Washington State, 2021 data)

Taxes: $6 million annually in direct and indirect taxes to local and state agencies to support schools and other community services.

Community Benefits

Environmental

- Recycles manure and kills odors and pathogens while producing a renewable fuel and soil products.
- Moving manure from open lagoons to an airtight biogas system reduces both odors and GHG emissions.
- Replaces fossil-based diesel with low-carbon, renewable natural gas as a biofuel for CNG fleets.
- Recycling manure creates an opportunity to separate nutrients and keep them out of the waterways.



Sunnyside RNG is fully funded and will begin construction in late 2022 with first RNG production commencing in the 1st quarter of 2024

Anaerobic Digesters and Biogas Safety

https://farm-energy.extension.org/anaerobic-digesters-and-biogas-safety/

When manure is anaerobically digested, the biogas produced is primarily composed of methane and carbon dioxide, with lesser amounts of hydrogen sulfide, ammonia, and other gases. Each of these gases has safety issues. Overall, biogas risks include explosion, asphyxiation, disease, and hydrogen sulfide poisoning.



Image: US Municipal Supply Company.

Extreme caution is necessary when working with biogas. Adequate ventilation, appropriate precautions, good work practices, engineering controls, and adequate personal protective equipment will minimize the dangers associated with biogas. Wherever possible, digester-associated tasks and maintenance should be performed without anyone having to enter confined spaces, including pits. Systems should be initially designed so that confined space entry is not required to perform maintenance.

The information presented here is for reference purposes only. No liability is implied.

Biogas Hazards

Fire/Explosion

Methane, approximately 60% of biogas, forms explosive mixtures in air. If biogas is diluted between 10% and 30% with air, there is an explosion hazard. In 2003, several explosions on Canadian swine farms were thought to have been caused by the methane in biogas exploding (Choinière, 2004). Hydrogen sulfide and ammonia are also potentially explosive.

Because of the explosion hazards, no open flames should ever be used near a digester. Also, equipment such as large engines and electric generators must be suitable to the environment so a

spark will not ignite the gas. Explosion-proof equipment and electrical service, as well as non-sparking tools, should be used around digesters and biogas. There must be no smoking near the digester or related biogas lines and equipment.

Asphyxiation

Asphyxiation from biogas is a concern in an enclosed space where manure is stored. Osbern and Crapo (1981) report one case of three people who died from asphyxiation created by swine manure gas in an enclosed space. Even open-topped manure pits can generate methane at a sufficient rate to push out the air above the manure and render the space oxygen-deficient.

Never enter a facility where manure is stored or where there is a suspected biogas leak as natural ventilation cannot be trusted to dilute the explosion hazard sufficiently. Airing out a facility does not impart safety, as some of the gases produced are heavier than air. If a person is found unconscious in such a facility, do not enter the facility because you may be overcome as well. Contact emergency services so that firefighters wearing self-contained breathing apparatus (SCBA) can safely retrieve the victim.

Disease

Animal manure contains bacteria, viruses and, possibly, parasites. Biogas is generated by the anaerobic digestion of manure, which occurs because of the bacteria present in animal wastes, some of which can produce infection. When handling waste material, exercise appropriate precautions by using personal protective equipment to avoid contact with manure. Washing after working around the digester is recommended. It is particularly recommended to wash hands before eating and drinking and before touching the eyes or other mucous membranes.

Keeping the digester facility clean will reduce disease hazards as well as the spread of odors and fly populations in the digester facility.

Components of Biogas

Biogas consists mainly of 60% methane and 40% carbon dioxide, with low levels of hydrogen sulfide and other gases. Each of these gases can displace oxygen.

Methane

Methane is lighter than air and will collect toward the upper spaces of the building. It is explosive at 5% to 15% concentrations. While methane is not a toxic gas, it displaces air so that, in a confined space, it creates an oxygen-deficient atmosphere. This is how it kills.

Carbon Dioxide

Carbon dioxide is an odorless gas that is heavier than air. In a quiescent space, carbon dioxide can layer near the floor. Slightly elevated levels of carbon dioxide increase heart rate and respiration rate. Higher levels displace oxygen supply in the bloodstream, which can cause unconsciousness and death.

Hydrogen Sulfide

Hydrogen sulfide is a highly toxic gas that is heavier than air. At very low levels, it smells like rotten eggs and can produce eye irritation. At dangerous levels, it destroys the sense of smell and produces respiratory paralysis. Thus, at dangerous and fatal levels, where one can literally drop dead, there is no odor to warn of its presence.

The following table shows the health effects of hydrogen sulfide at different concentrations.

Parts per million (ppm)	Possible health effects
0.01-0.3	Odor is detectable
1-10	Moderate to strong odor Nausea Tears Headaches Sleep loss
10-150	Irritation of the eyes Irritation of the lungs
150-750	Severe health effects Death becomes more likely
>750	Death may occur in minutes

Ammonia

Ammonia is a gas that is lighter than air, has a pungent odor, and can irritate the eyes and respiratory tract. Ammonia can displace oxygen in the bloodstream.

Precautions

Manufacturer Warnings

Failure to heed manufacturer warnings may result in death or serious injury. Contact the manufacturer for maintenance and service requirements and availability of service.

Safety Walk-Throughs

A safety walk-through can help you determine potential hazards and preventative measures. Cornell University developed a comprehensive self-assessment guideline for farmers. It is intended to be used by farm owners and managers or farm staff who are responsible for the operations and/or maintenance of anaerobic digesters and their related processes. It provides guidance for process and job evaluation with suggestions based on typical potential hazards for farm digester systems and their associated preventative measures.

Gas Sensors

Explosion, suffocation, and poisonous gas hazards may be detected using gas sensors. These sensors include both disposable and electronic sensors. Electronic sensors need testing regularly, and these sensors may have a disposable component that needs periodic replacement. Only qualified people should use these sensors to determine if an area is safe.

Personal Protective Equipment

An area where manure is stored should never be entered without the appropriate personal protective equipment, which may include a self-contained breathing apparatus (SCBA). The use of protective equipment such as an SCBA is covered by OSHA regulations, and the operator must be certified in its use with equipment-fit testing and medical clearance.

For More Information

- Self-Assessment Guideline for Farmers; Conducting a Safety Walk-Through on a Farm: Hazards of the Manure Handling System, Anaerobic Digester, and Biogas Handling System.
- Pennsylvania State University: Biogas Safety. This site also has biogas and anaerobic digestion information and links.

- Pennsylvania State University Manure Pit Safety. This site has educational videos that demonstrate manure storage hazards, the importance of monitoring manure gas levels before entry, and recommendations for the design and installation of ventilation of manure storages, emphasizing the importance of a positive pressure system for forcing fresh air into the storage. The site also has fact sheets that address manure storage hazards, monitoring for gases and oxygen, ventilating manure gases, and emergency rescue procedures. Information for accessing ANSI/ASABE S607, *Ventilating Manure*

Storages to Reduce Entry Risk, and ASABE EP 470, *Manure Storage Safety*, are provided.

- Respiratory Protection, Personal Protective Equipment. OSHA Regulation 1910.134 that applies to some anaerobic digester facilities; **all** operators should refer to these standards in an advisory capacity.

- Manure Pit Gas Hazards. National Safety Council.

- Manure Gas Can Be Deadly; and When OSHA Comes Calling: Are You Prepared for an Occupational Safety and Health Administration Inspection? Cornell University Manure Management Program and NYSERDA. Articles were published in Northeast Dairy Business magazine, August 2005.

- Manure Gas Is Dangerous. Farm poster from Cornell University and NYSERDA.

- Ventilation Standard Development for Confined-Space Manure Pits. Poster from NORA Symposium, 2008.

Workers in Iowa failed to investigate leak that poured manure wastewater into creeks

https://www.kcur.org/2022-07-06/workers-in-iowa-failed-to-investigate-a-leak-that-poured-manure-wastewater-into-the-rock-river

KCUR | By Kavahn Mansouri
Published July 6, 2022 at 3:37 PM CDT



Iowa Department Of Natural Resources

Drone photos taken of the confluence of Lizard Creek and Mud Creek after thousands of gallons of manure water leaked from a manure digester upstream.

Workers at a manure digester in northwest Iowa did not act on signs of a potential leak before thousands of gallons of wastewater poured into nearby waterways, according to documents from the state's environmental regulator.

In early February, a manure digester owned and operated by Colorado-based biofuel company Gevo. Inc.leaked approximately 376,000 gallons of manure water into creeks near Winding Meadow Dairy, roughly 60 miles north of Sioux City. The spill caused E. coli readings to spike in nearby streams and Rock River.

Last week the Iowa Department of Natural Resources (DNR) fined Iowa dairy farmer Terry Van Maanen $10,000 for the spill, the maximum amount the department can impose. Gevo Inc. has not been fined for the incident.

Van Maanen owns Winding Meadow Dairy, where the digester is located. At the time of the spill, the digester was operating without permission from the state, due to a lack of construction certifications.

Neither Gevo Inc. nor Van Maanen immediately returned a request for comment.

Manure digesters, or anaerobic digesters, break down cow manure through a process called anaerobic digestion. According to the Environmental Protection Agency, the process creates biogas used for electricity, heat, compressed natural gas and vehicle fuel.

According to an administrative order from DNR, warning signs of a leak were not investigated before the spill. Documents show workers noted the fluid level in the digester dropped by five feet when liquid was first added to the digester.

Without any further investigation into the cause, more liquid was added to the digester, according to the findings.

Van Maanen and Gevo Inc. later discovered that improperly sealed control joints likely caused the leak, according to DNR's findings. The joints have since been repaired.

Devyn Hall, a farming and environmental community organizer with Iowa Citizens for Community Improvement, said DNR's $10,000 maximum isn't enough. Hall said DNR's maximum fine is too low and doesn't do enough to discourage future spills.

"We see this so often with manure spills and factory farms — we have repeat violators, we have massive spills and they don't get the fines that they deserve," Hall said. "Even in this case, $10,000 for the amount spilled doesn't add up."

The amount of manure water spilled from the digester could fill roughly 18 swimming pools.

Iowa Citizens for Community Improvement pressed Iowa Attorney General Tom Miller to pick up the case and levy higher charges against Gevo Inc. and Van Maanen. In certain cases, the attorney general's office can take on cases referred to the office by the DNR to access higher charges and fines than the DNR's maximum amount.

Hall said the group sent 350 emails urging DNR and Miller's office to seek further enforcement.

In the end, Miller's office didn't take the case. Even so, Hall said the fine carries meaning. They said it's a sign that pressuring DNR and the attorney general's office worked.

"Getting that news was inspiring," Hall said. "We had a feeling the fine would be much lower, but it turns out the pressure worked. If we have people pressuring the DNR and the attorney general saying 'Hey, we're watching,' then maybe we can get these small wins."

Gevo Inc. owns three manure digesters in northwest Iowa, including the digester at Winding Meadows Dairy. The company recycles biogas from dairy farms' manure and processes it into renewable natural gas to be sold in California, touting the projects as environmentally friendly.

According to a company filing with the Securities and Exchange Commission in June, two other incidents at Gevo Inc. owned manure digesters in Northwestern Iowa occurred in April. Both incidents resulted in the “accidental discharge of very small amounts of water and manure into the environment.”

The filing states Iowa DNR may file further financial sanctions against Gevo Inc. concerning the spills but notes the fees wouldn't greatly impact the company financially.

Of the 376,000 gallons of manure water leaked into the nearby creeks in early February, DNR reported Gevo contractors removed 48,525 gallons of slurry water, a mixture of sediment and water, from the area deposited into a nearby lagoon.

In the days following the spill, E. coli levels in downstream creeks and the nearby Rock River spiked.

E. coli is a bacteria found in bodies of water exposed to human or animal waste. When ingested, the bacteria can cause mild to life-threatening symptoms in humans.

The investigation found that E. coli levels in Lizard Creek, where most of the manure water leaked into, were roughly nine times higher two days after the leak.

Mud Creek's E. coli readings also increased in the days following the leak, exceeding Iowa DNR's surface water standards. Lizard Creek does not have a listed average, according to the state.

The two creeks feed to Rock River, where E. coli levels steadily increased in the days following the leak but did not exceed surface water standards.

The E. coli levels in all three bodies of water steadily trailed off in the weeks following the leak.

Jacob Simonsen, a wastewater specialist with DNR, said the winter weather and frozen creeks near the digester helped contain some of the waste.

"You never want to see anything like this happen but it wasn't as potent of a release as it could have been," Simonsen said.

This story comes from the Midwest Newsroom, an investigative journalism collaboration including IPR, KCUR 89.3, Nebraska Public Media News, St. Louis Public Radioand NPR.

Company filled massive manure container despite signs of a leak, DNR says

https://iowacapitaldispatch.com/2022/07/06/company-filled-massive-manure-container-despite-signs-of-a-leak-dnr-says/

BY: JARED STRONG **- JULY 6, 2022 5:00 PM**



A manure digester near Rock Valley lies mostly underground and can hold up to 1.5 million gallons of manure. (Photo by Jacob Simonsen/Iowa DNR)

A northwest Iowa facility that captures biogas from cow manure began leaking when it was first filled in January, but its operators ignored indications of the leak and filled it further, according to the Iowa Department of Natural Resources.

An estimated 376,000 gallons of manure mixed with water leaked from a manure digester near Rock Valley. The digester is one of three in that part of the state built by Colorado-based Gevo, which processes the methane it captures from dairy farm manure into renewable natural gas to power low-emissions vehicles in California.

“When the liquid was first added to the digester, it was noted that the level dropped by five feet,” according to a recent DNR order that fined the dairy farm owner for the leak. “No investigation to the cause was done at the time and then more liquid was added to the digester.”

Farm owner Terry Van Maanen was fined $10,000 because he has ultimate responsibility over the facility's operation, the DNR said, regardless of who actually operates it.

Gevo operators initially believed that the drop was caused by foam dissipating at the surface of the water, the order said.

The facility can hold up to about 1.5 million gallons of manure. It leaked into the ground for up to three weeks before someone noted another surface drop of more than two feet and saw manure flowing from an underground tile line into a field and Lizard Creek.

Gevo reported the leak to the DNR on Feb. 7. It's unclear how much of the water flowed into the creek. There was no apparent fish kill, but tests of the water showed elevated levels of bacteria and ammonia.

The facility is located at Winding Meadows Dairy, which has about 2,400 cows, according to DNR data. The digester is a large, mostly underground container that captures the gas released by microorganisms as they feed on the manure. The gas is compressed and transported through a few miles of pipe to another facility, where it is refined and injected into an interstate natural gas pipeline.

To fix the problem, Gevo put a layer of epoxy in areas of the container most likely to leak, said Jacob Simonsen, an environmental specialist for the DNR who investigated the leak. He said the facility is now operational.

Gevo announced last month that it has begun injecting the processed gas into the interstate pipeline. The company said it is producing the gas from the manure of more than 20,000 cows from three dairy farms. The Rock Valley site is the smallest.

“The success that Gevo is achieving in northwest Iowa right now is the result of the team of dedicated people who are working to change the world by converting waste into useful energy, animal bedding, and soil fertilizer,” Gevo President Chris Ryan said in a press release.

State-financed manure digester plagued by spills, explosion

Company not sure if it wants to stick with Dane County project



Nearly 400,000 gallons of manure flowed from a Dane County biodigester after a pipeline broke in 2013. The Waunakee project to generate electricity and remove phosphorus is the first of its kind in Wisconsin, but has fallen short of expectations. Credit: Wisconsin Department of Natural Resources

Jan. 29, 2015

https://archive.jsonline.com/news/statepolitics/state-financed-manure-digester-plagued-by-spills-explosion-b99435123z1-290263421.html

By Lee Bergquist of the Journal Sentinel

An experimental project in Dane County designed to capture livestock waste that pollutes Lake Mendota has been hit by a litany of troubles, including manure spills and a 2014 incident that caused a fire and methane gas explosion.

A state-financed manure digester system near Waunakee is the first of its kind in Wisconsin. It has been touted by supporters, including Dane County

officials, for generating electricity, limiting the spreading of excess cattle manure and reducing emissions of greenhouse gases.

But the $12 million system — financed with $3.3 million in state funds — has fallen far short of expectations.

In three years, pipeline breaks have caused three manure spills, totaling more than 400,000 gallons. In August, an explosion of methane gas knocked the roof off one of the digesters, sending smoke billowing high into the air.

The state Department of Natural Resources started enforcement action against the developer, Milwaukee-based Clear Horizons, for the spills, lax record keeping and violating agreements to remove a key pollutant from the manure. In November, the DNR referred the matter to Justice Department lawyers for prosecution, documents show.
Despite the subsidy, Clear Horizons said that it had lost $2.8 million since the start of the project in late 2010, according to the DNR in a March 25, 2014, document reviewing the company's troubles.

Since September, a Clear Horizons official said the company has spent more than $1 million on repairs and other changes.

Once all problems have been addressed, Norman Doll said this week that his parent company, PPC Partners Inc., might exit the business entirely. Clear Horizons has built one other digester at a farm near Waterloo in Jefferson County.

"No question, there were mistakes made on our part," said Doll, a former president of Pieper Electric, a subsidiary of PPC Partners Inc., who was brought in last year as troubles mounted.

"Any incident by itself wouldn't have looked so bad. But when you couple them together, it's definitely a problem."

A Variety Of Hurdles

Clear Horizons' troubles underscore the financial and operational hurdles that can arise involving projects managing vast amounts of manure.

The operations, located in the Town of Vienna, include three manure digesters that capture methane, a greenhouse gas. The gas is used for combustion to generate electricity, which is sold. Manure, a source of methane, is piped from three neighboring dairy farms.
Wisconsin ranks near the top in states with anaerobic digesters.

The big difference with the Clear Horizons operation is the installation of other equipment to remove phosphorus from the manure.

Manure is agriculture's most basic of fertilizers. But when applied in excess, or improperly, phosphorus and nitrogen can release a bumper crop of nutrients, which have long plagued Madison-area lakes.

The Yahara River watershed violates state water quality standards for phosphorus, and local officials are required by state law to take steps to turn things around in a county with an estimated 50,000 dairy cows.

Amid that backdrop, the administration of former Gov. Jim Doyle, a Democrat, provided county officials $6.6 million in help to finance the start-up of the Waunakee digester, which went into operation in late 2010, and a second, near Middleton.

The digester in the Town of Springfield near Middleton involves Gundersen Health System of La Crosse. The operator of hospitals and clinics is using the digester to reduce energy costs. Like the Clear Horizons operation, the Gundersen plant has also been outfitted with equipment to remove phosphorus.

The Gundersen facility, which started operating last year, isn't experiencing environmental problems, the DNR said.
It's a different story with Clear Horizons.

The company is obligated to remove 60% of the phosphorus from manure in its agreement with county and state officials. That's not happening, the DNR says.

In 2011, the average removal rate was 63%; in 2012 it was 56%; in 2013, it plummeted to 44%, documents from an enforcement conference with the company show. In some weeks this past December, as little as 23% of the phosphorus was being removed, records show.

The phosphorus is removed by using a centrifuge to separate the solids and liquids. The solids, with 60% of the phosphorus, are dried into a product sold for bedding material for cattle outside the watershed, according to Doll.

As for the spills, the biggest occurred in November 2013 when a pipe ruptured, sending an estimated 380,000 gallons of waste into a nearby stream, documents submitted by the company to the DNR show.

Two smaller spills occurred in March and July of last year. The company says the manure never left the site. The spills were caused by faulty pipe design and the pipes have been replaced.

Clear Horizons estimates that little phosphorus ever entered local waterways and that an estimated 80 tons of phosphorus have been kept out of the Dane County waters in the past three years.

Then came the explosion, which knocked off the roof made of a lightweight membrane material. Doll said workers used a fan to inflate the roof after cleaning.

"The assumption was made that since the valves were closed, there would be no methane gas in the tank," Doll said. "That was a bad assumption."

Another mistake: The fan was a type that can produce sparks.

"It blew up and started the roof on fire," Doll said.

Doll, who worked for Pieper for 28 years, took over the project shortly after the explosion and replaced the top managers. The plant now has employees on the job around the clock in the event of other mishaps.

DNR Allegations Disputed

Clear Horizons says it disagrees with the DNR on the extent of the company's failure to cut phosphorus and has explained that a design flaw that recirculates wastewater from one of the farms is making the situation look worse than it is. The DNR disputes this.

There have been numerous meetings with the state and the county as the problems have mounted.

"There is no excuse — there were management missteps," said David Merritt, Dane County's director of policy and program development. "But we firmly believe the facility will be brought into compliance this year."

The experience has soured the company on the business, but Doll envisions a market for disposing manure that Dane County's watershed can't accommodate.

"If someone comes along and says we'll buy it for this amount, and it was a good offer, we would certainly consider it," Doll said.

Many of the assumptions the company made at the start were wrong.

In the future, the business model will have to be tweaked, and farmers sending manure to comparable operations may need to pay the plant to accept it, he said.

Under the existing system, Clear Horizons takes it for free.

Waunakee Manure Digester has second spill in two months; company now says it has a fix

https://agupdate.com/news/local/environment/waunakee-manure-digester-has-second-spill-in-2-months-company-now-says-it-has-a/article_7a89ed83-bc26-581d-9d83-db9ff707413c.html

JEFF GLAZE and STEVE VERBURG | Wisconsin State Journal | |

For the second time in two months, a short section of above-ground pipe burst at a biodigester near Waunakee, discharging thousands of gallons of animal waste.

Meanwhile, the biodigester operators said Wednesday they were told by a consultant last week of a fix that probably would have prevented both releases.

“We were evaluating the engineering proposal and preparing a recommendation to present to the DNR and Dane County,” said Jim Ditter, CEO of PPC Partners, which owns the Clear Horizons biodigester.

About 20,000 gallons spilled onto the ground at about 4 p.m. Monday, said county lakes and watersheds director Kevin Connors, who visited the site Tuesday. Workers stopped the breach within 15 minutes, and the manure flowed into a retention basin without reaching waterways outside of the biodigester property on Cuba Valley Road, Connors said.

“Fortunately they had people on the site this time and we didn’t have as big a mess as we did last time,” said Josh Wescott, chief of staff to Dane County Executive Joe Parisi.

The Clear Horizons facility has been scrutinized since Nov. 24 when 300,000 gallons spilled and at least some flowed a mile away to reach Six Mile Creek, which leads to Lake Mendota.

Biodigesters produce electricity and reduce the nutrients in dairy manure that farmers spread on fields as fertilizer.

Those nutrients make their way into rivers and lakes. In Madison they have contributed to algae blooms, unpleasant odors and bacteria-tainted water that forces beach closings.

Ditter said spills on Nov. 24 and again on Monday appear to have happened the same way — an equipment vibration or shift in the soil fractured a fitting on a short length of curved pipe leading from a pump house to underground lines that feed the digesters.

The Nov. 24 spill was far larger because it happened at 11 p.m. Manure backwashed out of the digester tank for roughly six hours until an employee arrived for work in the morning. Alarms and monitoring devices failed to activate, the plant manager said at the time.

The Clear Horizons facility features three 1.25 million-gallon digester tanks surrounded by protective berms. But both ruptures occurred at a pump house 200 feet outside the berm.

On Wednesday, hours after the county executive's office brought the second spill to light, the company announced it had a fix for the pipe malfunctions.

"Ground settling or slight pipe movement caused susceptible pipes to fail at the elbow," spokesman Leo Maney said in a statement. "Clear Horizons is immediately implementing corrective actions to install flexible connectors at the elbows of these pipes to prevent future failures."

"It cost approximately $650 for each flexible elbow and we have identified 20 elbows that need replacing," Ditter said in an email to the State Journal on Wednesday. "The order was placed today."

The company also is evaluating electronic safety controls and making plans to add monitoring devices that would help isolate ruptures and shut down the system in the event of a problem, Maney's statement said.

Major spills

As livestock operations in Wisconsin continued to grow in 2013, about 1 million gallons of manure was spilled, more than in any year since 2007, state Department of Natural Resources records show. The DNR responds to about 50 spills each year.

The Nov. 24 Clear Horizons spill and another 300,000-gallon discharge on Feb. 5 at the UW-Madison's Arlington Agricultural Research Station were two of the four largest spills in the last 15 years, a DNR database shows.

The State Journal reported in December that there were many similarities between the large spills at the UW-Madison research station and Clear Horizons.

The UW-Madison pipe rupture happened at 3 a.m. when no employees were present. It continued for hours before employees arrived at work in the morning. An unknown amount of manure eventually reached the Yahara River.

The break occurred in a short section of above-ground pipe similar to the rupture point at each of the Clear Horizons incidents. Vibrations from a pump broke a fitting on the pipe.

UW-Madison responded by building a berm to channel any future spill into a lagoon, installing a $3,000 automatic shutoff valve, and

replacing a short length of old chain that broke. For years, it had held the pipe steady when a pump kicked on.

A call for safeguards

“It doesn’t take much runoff to cause a lot of algal growth, so incidents like these suggest that all manure digesters should be required to install measures like automatic shutoff valves that will kick in when a pressure drop is detected and berms to reduce the risk of manure running into nearby streams, rivers and lakes,” said Shahla M. Werner, director of the Sierra Club’s Wisconsin chapter.

The Madison-based Clean Lakes Alliance urged the company and the DNR to ensure proper safeguards.

“We cannot play Russian roulette with our lakes,” the alliance said in a statement. “The gamble is too great.”

Before the Monday incident, Clean Horizons was already scheduled to meet Thursday with county officials to discuss last year’s spill.

Until their statement Wednesday, the digester operators hadn’t answered questions Parisi raised in November about whether they have adequate staffing and equipment, Wescott said.

In a letter sent Tuesday, Parisi requested that Clear Horizons “thoroughly review and modify” its current operational plan, review of staffing levels, procedures, safety features and “most critically — whether the most effective personnel resources and expertise are being utilized.”

Reports on the November spill have been forwarded to DNR enforcement staff, but no determination on any fine or other action has been decided, agency spokesman Bob Manwell said.

No fish kills were reported after that spill. Area farmers and contractors worked for days to pick up the manure and spread it on farm fields, county officials said.

2 Oregon dairy manure digesters cited for air quality violations

https://www.statesmanjournal.com/story/news/2021/12/22/2-oregon-dairy-manure-digesters-cited-air-quality-violations/8985904002/

 Tracy Loew

Salem Statesman Journal

Two Oregon dairy manure digesters, both supported by taxpayers, have been fined a total of $38,201 for violating their air quality permits.

Digesters, which break down manure and other organic material to create energy, are regulated by the Oregon Department of Environmental Quality.

DEQ fined WOF PNW Threemile Project in Boardman $19,500 for exceeding its limit for fine particulate matter emissions.

That happened because the facility was using more natural gas than projected to dry manure for animal bedding.

Fine particulate matter emitted in excess of permit limits can contribute to human health problems including chronic bronchitis, irregular heartbeat, decreased lung function and respiratory distress.

The violation began in June 2019, and continued through September 2020.

WOF PNW leases land from Threemile Canyon Farm and has a manure supply agreement with Columbia River Dairy, which supplies milk to Tillamook Creamery.

It received an Enterprise Zone Tax Abatement which made it exempt from property taxes during construction and for its first seven years of operation. And it received $10 million in tax-exempt financing from Oregon Private Activity Bonds – tax-exempt financing for construction projects that benefit the public.

"Drying manure is an important step in the larger digester project which Threemile Canyon Farms developed to reduce methane discharge and generate a renewable energy source," said Jennifer Maleitzke, director of communications and external affairs for R.D. Offutt Company, which owns Threemile Canyon Farms.

"Threemile takes compliance obligations very seriously. When we were notified in August 2020, we took immediate action and completely fixed the problem by October 2020," she said.



DEQ fined Farm Power Misty Meadow in Tillamook $18,701 for failing to operate a combustion flare, allowing air pollutants including volatile organic compounds and methane to be emitted at uncontrolled rates.

VOCs are ozone precursors that lead to the formation of smog. Methane is a potent greenhouse gas that contributes to climate change.

The violation took place between July 3, 2019 and May 4, 2021. The company also was cited for failing to accurately report flare malfunctions to DEQ, and failing to install a warning signal connected to the flare.

Farm Power operates two digesters, and has a third under construction. In Tillamook County, its digester serves Misty Meadow dairy.

Farm Power received $1 million in cash incentives from Energy Trust of Oregon.

Farm Power Misty Meadow did not respond to interview requests.

The fines were among 18 DEQ levied during October and November, totaling $2.57 million.

Wayne County wetland continues to suffer: Farm with massive hog waste spill nets new violations amid bacteria concerns

https://www.northcarolinahealthnews.org/2023/07/28/wayne-county/

A year after a collapsed digester caused nearly a million gallons of hog waste to escape, investigators found high levels of fecal bacteria in a nearby waterway.



by **Will Atwater**July 28, 2023



This is an aerial photo of White Oak Farm taken by Neuse River Riverkeeper Samantha Krop during a routine surveillance flyover on August 3, 2022. The scene alerted Krop that something was wrong. Credit: Samantha Krop

By Will Atwater

Last August, during a routine surveillance flyover, Samantha Krop spotted something odd at White Oak Farm, a Wayne County biogas and industrial hog farm operation.

“I noticed that the lagoon, which is a covered lagoon, meant to be producing biogas through the anaerobic digestion process, was flattened, and it just looked different,” said Krop, the Sound Rivers Neuse Riverkeeper.

Curious about what she’d seen during the flight, Krop decided to dig through the N.C. Department of Environmental Quality’s records for possible answers.

“We found sort of a treasure trove of documents outlining a major spill that had happened there over Memorial Day weekend,” Krop said.

In May 2022, the owners of White Oak Farm reported to the NCDEQ that nearly a million gallons of hog feces, decomposing hog carcasses and food waste seeped from a failed hog waste “digester” and spread out over surrounding fields. Of the total waste amount, 10,745 gallons also entered the Nahunta Swamp, a “water of the state,” according to an NCDEQ release issued in December of last year.

Accounts differ regarding how much waste flowed from the site into nearby wetlands. In a Sept. 6, 2022 article, the News and Observer reported that a minimum of “37,000 gallons” of hog waste, roughly three times the amount reported by NCDEQ, had reached nearby wetlands.

By the close of 2022, NCDEQ’s Division of Water Resources issued a $34,520 fine to the operators of White Oak Farm “related to a May 2022 waste discharge at an animal operations facility in Wayne County,” according to the agency.

A notice of more infractions

Earlier this month, roughly a year after Krop’s surveillance flyover, NCDEQ sent a letter to B&B Partnership, the owners of White Oak Farm, informing them that the Nahunta wetland is still being affected by runoff from the farm.

Specifically, water sampling tests performed in March and April revealed “high levels of fecal coliform and nutrients in an unnamed tributary to Nahunta Swamp west of the digester at your facility,” according to the letter.

Also spelled out in the letter is that the amount of fecal coliform — the type of bacteria present in feces that can cause illness in humans and

animals — far exceeds the allowed standards during testing that extended over at least a month's time.

'Really terrible science experiment' leads to weeks-long spill from NC hog-waste lagoon

HTTPS://CWFNC.ORG/REALLY-TERRIBLE-SCIENCE-EXPERIMENT-LEADS-TO-WEEKS-LONG-SPILL-FROM-NC-HOG-WASTE-LAGOON-READ-MORE-AT-HTTPS-WWW-NEWSOBSERVER-COM-NEWS-STATE-NORTH-CAROLINA-ARTICLE264779224-HTMLSTOR/



By Adam Wagner, Raleigh News & Observer
September 6, 2022

The state inspector knew immediately there was trouble at White Oak Farms. When she visited the Wayne County farm on Feb. 3, the N.C. Department of Environmental Quality inspector saw a thick layer of hay laden with charcoal-colored foam in a ditch. That foam seemed to have oozed from under a black tarp covering a hog waste lagoon where manure was combined with unusual ingredients like liquified hog carcasses and discarded hot dogs and deli meat in a slurry to generate methane. The farm's owners, including a former member of the National Pork Board, had not reported a spill.

In a notice of violation dated Feb. 18, two weeks after the inspection, David May, a supervisor in DEQ's Washington Regional Office, wrote that the inspector couldn't tell how deep the foam was. But, May wrote, "the inspector stepped in that area sinking at least 4 inches on the edge." White Oak Farms' problems were just beginning.

Four months later, on May 30, the black cover ruptured, sending an estimated three million gallons of the gelatinous gray foam across the farm and toward nearby Nahunta Swamp. By the time the spill ended weeks later, enough foam had spilled to fill more than four Olympic-sized swimming pools. At least 37,000 gallons had reached wetlands.

An anaerobic digester on White Oak Farms in Fremont, N.C., tore on May 30, sending foam across the property. N.C. Department of Environmental Quality Environmental advocates learned about the spill by chance. They are outraged that it happened with minimal public notice, particularly considering that DEQ staff were monitoring the spill even as the department was finalizing a permit making it easier for anaerobic digesters to get environmental approval and easier for farmers to install them.

Riverkeepers argue that DEQ's regulation of White Oak Farms shows the department is not prepared for a potentially exponential increase of digesters on North Carolina's hog farms. They learned about the White Oaks Farms spill on Aug. 3, more than two months after it began, when Sound Rivers' Neuse Riverkeeper Samantha Krop flew over the facility. Krop saw that the black bubble that was supposed to be capturing gas appeared deflated, with water pooled across its surface. Krop also noticed that there was no vegetation around the lagoon and that it looked like dirt had been moved around southeast of the digester, where the property borders Nahunta Swamp.

"It just didn't look right," Krop said. "It didn't look like they were functioning properly."

An anaerobic digester on White Oak Farms in Fremont, N.C., split open in late May, sending foam oozing out for at least three weeks. Shown here on August 3, the farm mixed hog waste with deli meat, hot dogs and liquified pig carcasses to generate methane in the digester.

The Feb. 3 inspection focused on the covered lagoon, a system called an anaerobic digester. Farmers pump manure and other unwanted material into the lagoon, where it decomposes, releasing methane and other gases. Digesters capture those gases, particularly methane, and use them to produce electricity or purified natural gas. In recent years, agricultural groups and environmentalists have debated the use of anaerobic digesters in North Carolina.

These disagreements played out first against the backdrop of the 2021 Farm Act, which ordered the N.C. Department of Environmental Quality to write a general permit allowing most future digesters to move quickly through the environmental approval process. The N.C. Pork Council and other agricultural interests argue that covering waste lagoons reduces odor and prevents emissions of methane, a potent greenhouse gas. They also offer farmers a revenue stream.

In a written statement, Roy Lee Lindsey, the Pork Council's CEO, said, "Digesters are a safe and proven technology that provide significant environmental benefits. While this situation was unfortunate, it is an isolated incident and should not discourage us from continuing to pursue renewable natural gas projects in North Carolina." Environmental groups argue that digesters effectively lock in what they call a primitive waste management system in which hog manure and urine are washed into lagoons before being sprayed across nearby fields.

The White Oak Farms spill demonstrates the risks digesters pose, said Blakely Hildebrand, a senior attorney at the Southern Environmental Law Center. "It goes to show that these digester systems aren't the environmental, climate silver bullet that the hog industry has painted them to be," Hildebrand said. DEQ issued the general permit on June 30 — a week after inspectors concluded the White Oaks spill was continuing. As they finalized the permit, DEQ officials never revealed publicly that staff had been monitoring an active digester spill.

That general permit would not have covered White Oak Farms' digester. It only covers systems that process hog manure and urine, said Anna Gurney, a DEQ spokeswoman, not those that add other things into the slurry like White Oak Farms' liquid pig carcasses, cast-off hot dogs and deli meat. Despite the digester debate, almost nobody knew a North Carolina hog operation was already operating by adding hogs and meat products to the manure under its black plastic balloon.

"We have never heard of this before. We started asking around and nobody else in the environmental advocate world that we're in has heard of this, either," Jill Howell, the Pamlico-Tar riverkeeper, told The News & Observer. Howell continued, "It just all seems very strange and like one really terrible science experiment." A N.C. Department of Environmental Quality inspector holds a handful of the foam that

spilled May 30 from an anaerobic digester on White Oak Farms in Fremont, N.C. The farm was mixing hog manure, slurry made from dead hogs and cast-off deli meat in the digester to generate methane.

'THIS IS THE ULTIMATE RECYCLING'

Deborah and Todd Ballance started hog farming in 1990, first as contract growers. When Coharie Hog Farm folded in 2009, the Ballances bought the pigs on their farm and went independent. "Since the farm was built by my husband's grandfather our family has always strived to look to the future in order to do what is best for our family, our animals, our community, and our environment," Deborah Ballance wrote in an email to The News & Observer.

"We believe strongly in being sustainable and that is why we covered our lagoon and captured the methane for electricity."

The N.C. Pork Report, a N.C. Pork Council trade publication, profiled the Ballance family in 2017, shortly after then-U.S. Agriculture Secretary Sonny Perdue named Deborah Ballance to the National Pork Board. The story says Deborah and Todd met in first grade and farm land passed down by Todd's grandfather. It also discusses the possibilities their efforts to turn manure into energy offer. Deborah Ballance told the Pork Report, "I think we basically reinvent ourselves every three years. You need to keep your ear to the ground and see what you need to be doing next or thinking about next, and that's what we try to do."

The Ballance family had long been exploring how to generate revenue from hog waste, according to decades of permitting documents reviewed by The News & Observer. In 1997, White Oak Farms sought and received a permit for a two-lagoon system that it said would help lower nitrogen levels before the waste was sprayed over nearby fields. The farm planned to keep hog manure from reaching the lagoon and spread it on a field. Evaluations were underway, the permit said, of compacting solid waste and using it as animal feed.

A 1997 application said, "White Oak Farms is very confident that the waste will become suitable animal feed. When it is converted to animal feed it will no longer be land applied." In 2002, the farm said the manure capture system hadn't worked as advertised and the equipment used to move liquid between lagoons had proven noisy and expensive to operate. At that point, the farm was permitted to have 5,500 sows.

They wanted more hogs, but were limited by a moratorium on new or expanded hog operations the N.C. General Assembly made permanent in 2007 — a moratorium rooted in The News & Observer's Pulitzer Prize-winning "Boss Hog" series that showed how a lack of regulation around the industry was leading to environmental threats near some farms. Another 2007 bill offered a solution.

The Renewable Energy and Energy Efficiency Portfolio Standard supported renewable energy in North Carolina. It also required that 0.2% of the state's energy come from swine waste by 2018. In 2013, White Oaks Farms asked DEQ: Could it add 60,000 hogs as long as it added an anaerobic digester, controlling odor, groundwater contamination and other environmental impacts?

"Despite a moratorium in place in North Carolina on new hog farm construction, we found the ideal way to expand with finishing floors. We could build a methane digester and sell power to the power company," the Ballance family wrote in a 2017 USDA loan application. Electricity generated by White Oak Farms could power about 3,000 homes on Duke Energy's grid, according to the application. "We will take our hog waste and mortality and use it as fuel!

This is the ultimate recycling," the Ballances wrote. DEQ approved the permit in October 2013. In later permits, the regulatory agency would require the Ballances to expand in phases, starting with 15,000

hogs Hildebrand questions DEQ's approval, pointing to a rule that any waste management system for a new or expanded hog farm must have a synthetic liner preventing contaminants from seeping into soil or groundwater.

The permit approved by DEQ in 2013 and again in 2017 says the 8.75-million gallon anaerobic digester is "earthen-lined." "It's a very prescriptive standard," Hildebrand said. "These performance standards aren't vague." The digester started operating in April 2019.

Randy Wheeless, a Duke Energy spokesman, said the utility has bought power from White Oak Farms since 2019. Over that period, it has averaged enough electricity to power about 400 homes. Energy generated by hog waste, Wheeless said, is more expensive than energy from solar farms or natural gas. Wheeless said, "It's a premium product because there's just not that many facilities in a position to do that, and you still have a law in place in the state that says utilities shall buy or secure that type of power."

CHANGING SOURCES

In 2020, DEQ approved an updated permit limiting what could go into the digester each day. The farm could add swine waste, up to 20,000 pounds of food waste like hot dogs or deli meat from Smithfield's Kinston plant, and 210,000 pounds of dead pigs. With that approval, the farm started adding the dead pigs in July 2020.

They later reported the pigs caused significantly higher methane production. Around the same time, the COVID-19 pandemic was impacting the farm's operation. Despite having permission to add as many as 15,000 hogs, the farm instead found itself operating with 100 sows at most.

That impacted the digester, too. In a year-end report, the Ballances wrote, "With swine production and processing decreasing industrywide, the facility has experienced a temporary change from a manure dominated digester feed source to primarily a food waste and mortality source." In other words, the farm was putting more dead pigs and cast-off meat into the digester than hog waste, despite its permit explicitly stating that manure should be the main additive.

The trend continued throughout 2021, with the number of hogs dwindling from 81 to 50. Still, the digester was operating well on mostly dead pigs and unwanted meat. In 2021's year-end report, the Ballance family wrote, "From an energy production standpoint, the facility experienced its best period to date."

The farm submitted that report on Jan. 31, 2022. Three days later, the DEQ inspector found signs of the digester's unreported spill. During a February inspection, a N.C. Department of Environmental Quality inspector found signs that a discharge of foam from an anaerobic digester on White Oak Farms had not been reported. Those signs included foam on top of the digester. N.C. Department of Environmental Quality

THE SPILL

The bubble burst in the middle of the night. White Oak Farms' digester ruptured around 3 a.m. on May 30, according to a press release the farm sent to local newspapers. Later, the farm would write that "an unexpectedly severe digester foaming event" started with a fissure on the northern face of the black plastic covering.

That's also where the DEQ inspector identified the previous, unreported spill during her February inspection. A "thick foam" made of hog matter, liquid and gases gurgled out of the digester. According to the farm's accounts, the foam ran across a field and reached a forest that contains wetlands.

The farm maintains none of the foam reached Nahunta Swamp on its southern boundary. DEQ staff conducted several inspections over the ensuing weeks. On June 3, they saw foam on nearby surface water, possibly including Nahunta Swamp. That foam was cleaned up when staff returned on June 7. The spill was still active on June 23, according to a notice of violation DEQ issued in July.

That notice said DEQ staff had detected "objectionable" odors and air quality and saw foam coming out of concrete structures on the digester's western edge. The covering on a Wayne County lagoon broke open in late May, sending more than four swimming pools' of foam across White Oak Farms in Fremont. The damaged anaerobic digester is shown here on August 3. Samantha Krop Sound Rivers What caused the spill is not immediately clear, and the Ballance family did not directly answer an emailed question about why the digester failed.

But an N.C. State professor who studies anaerobic digesters said the dead hogs and cast-off meat could have played a role. Adding materials containing fat, oil and grease to anaerobic digesters can significantly heighten biogas production, Mahmoud Sharara wrote in an email to The News & Observer. But at the same time, long chain fatty acids within the so-called FOG material can cause a layer of foam and crust to develop on top of the slurry. Sharara, an agricultural and biological engineering professor, does not have first-hand knowledge of the White Oak Farms facility.

It is possible, Sharara added, that the higher levels of gas could have been incompatible with existing infrastructure like the generator or motor that processed the gas. Pressure could have built up underneath the cover, he wrote, ultimately causing the rupture and allowing the foam to spill out.

In response to The News & Observer, the Ballance family wrote, "As soon as our cover tore and leaked foam, we called the Department of Environmental Quality and began immediate cleanup. We have repaired our cover and complied with every requirement and suggestion made by DEQ. We will continue to consult with our engineer and scientific consultants to perfect our unique operation." As of June 13, there were no hogs on White Oak Farms.

LINGERING QUESTIONS

After learning of the spill via Krop's flight, riverkeepers dug into the permit record. They were alarmed that they hadn't heard of the spill before and that the public notice requirements allowed White Oak Farms to report the spill without specific details. "There was no reference to what was in the wastewater foam, there was no acknowledgment that it was swine waste or dead hogs or food waste product," Howell said.

"It's like a bare, bare bones public notice."

North Carolina laws require any facility that spills more than 15,000 gallons of animal waste into the state's surface waters or wetlands to issue a press release in both the county where the spill happened and the county immediately downstream. That press release needs to say where and when the spill happened, how much waste was discharged, how long the spill went on and what the facility is doing to prevent further spills.

Hildebrand, of the Southern Environmental Law Center, said White Oak Farms followed the law, but that the law or DEQ should require information about a spill to be spread futher than a public notice in a local newspaper's classified section.

"Especially in this day and age. I think the law could be better, the requirements could and should be better around public notification," Hildebrand said, adding that DEQ is able to issue public notification itself or require operators that have spills to issue more widespread notification.

Advocates also wonder whether DEQ can adequately regulate digesters, particularly considering Dominion Energy and Smithfield's joint $500 million Align RNG initiative that is already forging ahead in Duplin and Sampson counties. With more digesters appearing likely to come online in the coming years, Howell and other advocates are concerned that DEQ field staff have not been specifically trained to inspect them. Gurney, the DEQ spokesman, said the Division of Water Resources "will conduct additional training for regional inspectors as needed as facilities are covered by the Digester General Permit."

The department's field staff noted violations at White Oak Farms and issued notices of violation, including the one in February, but Howell argues that wasn't enough to convince the farm to correct the problems. "DEQ's enforcement was insufficient in all of this," Howell said. On July 5, DEQ issued another notice of violation against White Oak Farms. The department said the Ballance family's improper operation of the digester had resulted in the spill and impacts on nearby surface waters and wetlands.

The state agency said the farm had failed to update its permit to account for operating without hogs for months and had on multiple occasions accepted more than 20,000 pounds of food waste on a given day, exceeding the amounts allowed in its permit. It noted that ammonia levels in wells between the digester and Nahunta Swamp were more than 12 times higher than the allowable concentration. In response to DEQ, the Ballance family said they stopped adding new material to the digester "at least three weeks" before the spill happened.

The Ballance family also mentioned its plans to build another digester. Ideally, they wrote, the manure and meat products that had spilled from the old digester could be pumped into the new one to "seed the digestion process." The new digester would have a synthetic liner to protect groundwater, as well as a berm on its southern side to contain any future spills.

Read the article at News & Observer

Renergy ordered to close biodigester facility in Greene County



https://www.daytondailynews.com/local/renergy-ordered-to-close-waste-treatment-facility-in-greene-county/O6K77YDFH5GNLFALIX4NH7OO54/

LOCAL NEWS

By Kristen Spicker and London Bishop

Updated Sept 20, 2023

X

After years of citizen complaints and EPA violations, the Dovetail biodigester in Greene County will be shut down, potentially bringing an end to a decade-long fight between parent company Renergy and the surrounding community.

Renergy agreed to shut down the digester facility, Ohio Attorney General Dave Yost announced Wednesday.

The shutdown comes at the end of a particularly smelly summer, local residents say.

“It has been so bad,” Gary Goldblatt, who lives nearby, said of the smell Wednesday. “Especially on cool, kind of humid nights we’ve had for the last week or two. Around 9 at night, it hits you like a brick to the face. Last night it was 7:30 we had to close all our windows and literally it has not gone away. It smelled all day today.”

“Renergy’s shutdown will eliminate both the environmental problems in this case and the olfactory nuisance that the site has become,” he said. “I am asking the court to approve our proposed order so Renergy can move swiftly and properly with a safe cleanup.”

ExploreRELATED: Ohio EPA seeks legal action against Dovetail, Renergy over biodigester pollution

The state also requested a final judgement in Greene County Common Pleas Court, asking the court to require Renergy to:

- Stop accepting feedstock and waste by Oct. 1
- Empty the digestate storage tank by Dec. 15
- Empty and clean the digester and other equipment by Jan. 15
- Submit documentation of the emptying and cleaning by Jan. 30
- Request termination of permits and certify that the facility is permanently shut down by Jan. 31

The filing also seeks an additional $25,000 fee in penalties, bringing the total penalty to $100,000.

“We want to make sure the Attorney General holds their feet to the fire,” Goldblatt said.

Jude Eschete, who lives in the Waterford Landing neighborhood, moved into his home with his wife in August of last year, and said he could tell almost immediately something was off. Eschete, a Marine veteran and engineer, moved to Fairborn from Louisiana for work.

“I started posting in our neighborhood group, and I was like ‘What is that? What am I smelling?” he said. “And why, in that entire nine-month period (prior) when we were building our house, were we not told about this?”

With a deadline for the facility shutting down set for the end of January, Eschete said he is looking forward to being able to enjoy his property again.

“We were always sitting on our back porch in Louisiana, and coming up here it was such a shame we couldn’t enjoy our time outside,” he said. “We couldn’t have people over. It was embarrassing.”

The Greene County facility is one of two Renergy digesters in the state. The second facility is in Morrow County. The digesters use bacteria to break down manure and other organic materials, eventually turning them into methane which is sold for electricity production, according to Yost's office.

The state previously sued Renergy on behalf of the Ohio EPA for air and water pollution violations at both digester sites.

Yost said the air pollution violations were addressed, but water pollution violations have continued, along with complaints about the odor.

Manure spill splashes 300,000 gallons near Tillamook Bay

- Updated: Jul. 23, 2019, 6:20 p.m.|
- Published: Jul. 23, 2019, 5:12 p.m.



A cloudy winter day at Tillamook Bay on the Oregon coast. Jamie Hale/The Oregonian
Jamie Hale/The Oregonian

https://www.oregonlive.com/news/2019/07/manure-spill-splashes-300000-gallons-near-tillamook-bay.html

- **Shane Dixon Kavanaugh | The Oregonian/OregonLive**

A massive manure spill at the Port of Tillamook Bay discharged roughly 300,000 gallons of treated liquid excrement into the area, some of it reaching waterways mere miles from the ocean.

Oregon state officials have yet to shut down Tillamook Bay or impose restrictions on commercial and recreational shellfish harvesting, as they've done during prior manure mishaps.
The state's Department of Environmental Quality and Department of Agriculture are analyzing water samples from the bay and from around the spill site, including Anderson Creek, a tributary of the Tillamook River.

They expect to have preliminary results by Wednesday morning, said Lauren Wirtis, a spokeswoman for the environmental agency.

The manure had been held in an anaerobic digester tank, which breaks down dung into biogas that can be used for electricity and fertilizer for farms and agriculture.

The process creates a waste with fewer pathogens. That, in turn, makes it far less harmful than raw sewage, Wirtis said.

It's not yet clear how or when exactly the spill occurred, said Michele Bradley, the Port of Tillamook Bay's general manager. Port workers discovered the spill Monday morning and contacted state authorities, she said.

Some of the waste entered the port's stormwater system, which empties into a section of Anderson Creek about 2 ½ miles from the Tillamook River.

Regenis, a tenant of the port that operates the manure digester, could not be reached for comment.

State officials in 2017 temporarily closed Tillamook Bay after a nearby spill caused more than 190,000 gallons of manure to enter the water.

Tony Silveria Dairy, which operated the faulty manure tanks, was later fined nearly $17,000.

Multiple agencies react to manure spill at Port's digester operation

- Hilary Dorsey headlightreporter@countrymedia.net
- Aug 1, 2019 Updated Aug 13, 2019



A manure release occurred from the Regenisis anaerobic digester, at the Port of Tillamook Bay Monday July 22.
Photo provided by POTB.

https://www.tillamookheadlightherald.com/news_paid/multiple-agencies-react-to-manure-spill-at-port-s-digester-operation/article_be4c4c40-b3b5-11e9-be0f-d3c4f211c14f.html

On Monday, July 22 the Oregon Department of Environmental Quality (DEQ) and the Oregon Department of Agriculture (ODA) received notification from the Oregon Emergency Response System (OERS) that a release occurred from the Regenisis anaerobic digester, at the Port of Tillamook Bay. First Strike Environmental responded and has been on site since noon on July 22.

According to a release from DEQ, upon further investigation, it was discovered that approximately 300,000 gallons of partially digested manure, digestate, was released and travelled from the digester to Anderson Creek. There is a 4-foot berm surrounding the digester with two entrances. According to Andrea Cantu-Schomus, Director of Communications for the ODA, the Port of Tillamook Bay bulldozed the entrances closed to contain the digestate.

According to Michele Bradley, General Manager of the Port of Tillamook Bay (POTB), "the bulk of the manure was contained on the digesters," she told the Headlight Herald. "Manure that was at the digester made it into the system – the POTB does not know how much, but there was 6 inches of standing manure in portions of the digester slab area that was then pushed and recycled into the digester, lessening the impact of what might have made it into the stormwater system."

Bradley could not confirm how much that may have been.

"The POTB does not have a total gallon number on what might have made it into the stormwater system," she said. "It was tank two, which is a finishing tank of the bay. The manure came from an overflow tank after a technical malfunction. The Port is almost 6 miles via waterway to Tillamook bay. It is not a source of drinking water."

The POTB is the owner of the tank and is responsible for the Stormwater system via a DEQ General Permit, so it is in charge of all stormwater discharge within the industrial park.

"There has been testing from the DEQ, ODA, and Oregon Fish and Wildlife, among others," Bradley said. "A vacuum truck was brought to the location and has been sucking water out of the bay. The POTB doesn't know the impact of the downstream yet but DEQ tested on Tuesday, July 23."

The POTB's stormwater system was built by the Navy when they built the Naval Air Station for WWII. It includes groundwater as well. The Port has a settling pond near the outfall and before Highway 101 that holds millions of gallons of water. From there, it travels under the highway via Anderson Creek, joins with South Prairie Creek, and enters the Tillamook River, then into Tillamook Bay.

"DEQ and ODA have taken and will continue to take samples from various locations in and around the site. The analysis of the samples is expected soon," Cantu-Schomus said. "Because the material is digestate and now raw sewage, there are no restrictions for shellfish operators or recreational harvesters in Tillamook Bay at this time." As sampling results are completed, ODA will decide whether to issue any restrictions. ODA has reached out to all produces in the area to share information about the release of the digestate.

According to the release, results of water samples taken from Tillamook Bay indicate there was no impact on water quality in the bay from the release of treated manure waste at the Regenis facility. As a result, analysts with the Oregon Department of Agriculture shellfish and food safety programs have determined that the release does not pose a health risk and no action is required by shellfish harvesters.

Water samples taken from the Regenis outfall pipe at Anderson Creek did show elevated levels of e coli, but downstream tests did not show elevated e coli levels. The Oregon Department of Environmental Quality is working with the Port of Tillamook Bay on ways to further contain the contaminated water at the outfall.

The ODA will continue to monitor water quality in the bay by taking additional samples and testing for potential contamination.

More than 18,000 cows are dead after dairy farm explosion in Texas Panhandle

https://www.texastribune.org/2023/04/13/texas-dairy-farm-explosion-cows/

The state fire marshal's office is investigating.

BY JAYME LOZANO CARVER AND ERIN DOUGLAS

APRIL 13, 20233 PM CENTRAL

A worker was critically injured and more than 18,000 cattle were killed in a massive explosion Monday at South Fork Dairy Farm in Dimmit, south of Amarillo. Credit: Courtesy of Castro County Sheriff's Office

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LUBBOCK — More than 18,000 cows died and one farm worker is in critical condition following a dairy farm fire in the Texas Panhandle.

The fire started Monday night at South Fork Dairy Farm in Dimmitt, about 66 miles south of Amarillo. The Castro County sheriff's office, along with fire departments from Dimmitt, Hart and Nazareth, were the first responders to the explosion in the small town of nearly 4,200, according to the sheriff's office.

One person was trapped inside the dairy farm but was rescued by first responders, according to the sheriff's office. They were later flown to a Lubbock hospital.

According to the Animal Welfare Institute, the incident is the deadliest fire involving cows in nearly a decade. A statement provided by the Texas Association of Dairymen on behalf of the dairy industry expressed condolences for the incident.

"We are deeply saddened for the family dairy, and everyone affected by the tragedy that occurred at South Fork Dairy farm," the statement said. "The cause of the fire is still under investigation, and we are deferring to the appropriate authorities to make that determination."

In 2019, Texas authorized the facility to more than double the number of cattle allowed on-site from 11,500 to up to 32,000, according to a permit with the Texas Commission on Environmental Quality.

The state also authorized the facility to increase its manure production by more than 50% in that expanded permit.

Wastewater from the facility drains into the Brazos River Basin.

In a statement, TCEQ spokesperson Victoria Cann said that the agency will ensure that dead livestock and debris are disposed of properly. She said the agency is not aware of any environmental impacts from the explosion.

Castro County is the second-highest milk-producing county in the state and has more than 59,361 cows. According to a United States Department of Agriculture report, the county produced more than 147 million pounds of milk in February.

Texas Agriculture Commissioner Sid Miller called the incident devastating but said he was grateful there were no further injuries to workers or loss of human life. He also called for the findings of the investigation to be made public once it is finished.

"This was the deadliest barn fire for cattle in Texas history and the investigation and cleanup may take some time," Miller said. "There are lessons to be learned and the impact of this fire may influence the immediate area and the industry itself. Once we know the cause and the facts surrounding this tragedy, we will make sure the public is fully informed — so tragedies like this can be avoided in the future."

The 18,000 cows killed represent just a fraction of the 625,000 dairy cows in Texas. Including beef cows, there are 13 million in the state, according to the Texas Almanac. Large amounts of cattle have died in Texas before. During Winter Storm Goliath in 2015, 35,000 cattle froze to death.

The state fire marshal's office is conducting an investigation into the cause of the fire.

Disclosure: The Texas Association of Dairymen has been a financial supporter of The Texas Tribune, a nonprofit, nonpartisan news organization that is funded in part by donations from members, foundations and corporate sponsors. Financial supporters play no role in the Tribune's journalism. Find a complete list of them here.

Methane fueled explosion at Aumsville dairy farm causes fire

https://www.oregonlive.com/pacific-northwest-news/2012/07/methane_fueled_explosion_at_au.html

- **Joseph Fanelli, The Oregonian**

An explosion from a methane leak at an Aumsville dairy farm led to a fire Wednesday afternoon.

Betty Bielenberg, co-owner of Oakley Farms at 11314 Mill Creek Road, said the explosion happened after the rubber top of a methane digester expanded and began to release methane around 12:30 p.m. She said the methane" caught a spark," resulting in an explosion and then fire on the original tank and a second methane digester.

A methane digester is a large tank that uses methane from cow manure to produce clean energy.

Bielenberg said no people or animals were hurt and that the fire was "mostly out" by the time Aumsville fire officials arrived.

She said no other structures at the dairy farm were damaged.

KGW television released video of the explosion.

Explosion Rocks US, More Than 10,000 Evacuating

Story by Andrew Sanders • 1mo

https://www.msn.com/en-us/news/world/explosion-rocks-us-more-than-10000-evacuating/ar-AA1ioXhl



A gas pipeline explosion in Middleton, Idaho led to an evacuation of the town.

The explosion occurred after a worker ruptured a 22-inch pipeline with an excavator.

The gas line was turned off within 20 minutes and residents within a 4-mile evacuation zone were asked to shelter in place.

The town of roughly 10,600 people was ordered to evacuate.

Canyon County officials announced, “The gas company is taking over the investigation.”

“There was no ignition, fire, or explosion associated with this incident and the cause is under investigation,” the Williams Companies, a natural gas distributor that owns the pipeline, told the AP.

Chief David Jones of the Middleton Fire Department said, “It was a pretty substantial explosion just due to the pressure in that line.”

“The explosion was felt,” Jones added, “and the gas flow could be felt about a mile away.”

The evacuation orders were lifted later in the day and the area was declared safe.

The gas company denied that there was an explosion, but local residents reported hearing an explosion and a noise resembling low-flying jets.

The cause of the incident is under investigation.

Explosion Rocks US, More Than 10,000 Evacuating (msn.com)

Yakima Valley
Emergency Management
2403 South 18th Street, Suite 200, Union Gap, WA 98903
Phone: (509) 574-1900 Fax: (509) 574-1901

December 5, 2023

Friends of Toppenish Creek
Jean Mendoza, Executive Director
3142 Signal Peak Road
White Swan, WA 98952

Re: Public Disclosure Request dated December 4, 2023, regarding Pacific Ag/Sunnyside RNG proposed bio-digesters in Yakima County.

Dear Ms. Mendoza:

Yakima Emergency Services has received your email for a Public Disclosure Request dated December 4, 2023, requesting copies of all correspondence between Yakima Emergency Services and Pacific Ag/Sunnyside RNG regarding the proposed bio-digesters in Yakima County, including copies of discussions related to concerns regarding the potential for fires and explosions. Additionally, you request responses to questions A through P as outlined in your public records request.

Yakima Emergency Services has completed its search for records responding to your December 4, 2023, public records request. Our office does not possess any correspondence or discussions regarding Pacific Ag/Sunnyside RNG's proposed bio-digesters in Yakima County. After reviewing your request, the information you are requesting falls outside of the scope of Yakima Emergency Services. Below please find contacts that may be able to provide you with the information for your public records request and/or answers to your questions.

Below please find responses to your questions outlined in your public records request:

A. What is the volume of each tank? Not applicable
B. How long does it take to fill a tank? Not applicable
C. How long does it take to empty a malfunctioning tank? Not applicable
D. How would Sunnyside RNG dispose of the tank contents in a situation where the wrong microbes are growing? Not applicable
E. What can go wrong? Not applicable

F. Are there potential chemical and biological processes that might produce gases other than carbon dioxide and methane? Not applicable
G. Please name all the desired microbes that do the work inside the tanks. Not applicable
H. Please name all the undesired microbes that might interfere with digestion. Not applicable
I. Is there a potential for increased pressure inside a tank due to production of undesired gases? Not applicable
J. What is Sunnyside RNG's emergency plan in case of a tank explosion? Not applicable
K. Do emergency plans include a protocol for evacuating neighbors? Not applicable
L. What is the maximum potential range of aerial distribution of materials from a tank in the event of an explosion? Not applicable
M. Please describe protective measures for emergency management personnel assigned to combat fires and explosions at the digester. Not applicable
N. What is the expected life of a digester tank? Of pipes that transport methane, manure, and other digester components? Not applicable
O. Does the Sunnyside RNG digester include add-ons that capture and process excess ammonia, hydrogen sulfide, and phosphorous? Not applicable
P. How will Sunnyside RNG manage ammonia and hydrogen sulfide that is produced by digestion? Not applicable

In your request you have requested that if our agency does not maintain any public records, to advise you of who does and include the proper custodian's name and address.

Pacific Ag
2995 South 1st Street (Physical)
1000 South Highway 395, Ste A #506 (Mailing)
Hermiston, OR 97838
(541) 567-3610
Barbara Laflin Treat, President of Pacific Ag Renewables
Kipp Curtis, Regional Manager of Renewables

Yakima County Public Services
Tommy Carroll, Planning Manager
128 N. 2nd Street, Fourth Floor
Yakima, WA 98902
(509)574-2300

Department of Ecology
Sage Park, Director
1250 W. Alder Street
Union Gap, WA 98903
509-575-2490
Sage.park@ecy.wa.gov

City of Sunnyside
Fire Department Hazardous Materials Response
Cameron Haubrich, Fire Chief
513 S. 8th Street

Sunnyside, WA 98944
(509) 837-3999

City of Sunnyside
Trevor Martin, Community & Economic Development Director
818 E. Edison Avenue
Sunnyside, WA 98944
509-836-6305
tmartin@sunnyside-wa.gov

Yakima County Fire District #5
Ken Shipman, Fire Chief
717 1st Avenue
Zillah, WA 98953

If you have further clarification regarding your request, please let me know by December 15, 2023. Otherwise, this completes our response to your public records request.

Sincerely,

Nicole Parpart
Grant specialist/Planner
Yakima Valley Emergency Management

From:	Maria
To:	Trevor Martin; Elizabeth Alba
Subject:	Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE
Date:	Tuesday, December 5, 2023 1:36:46 PM
Attachments:	image001.png IMG_1714.PNG IMG_1715.PNG IMG_1716.PNG IMG_1717.PNG IMG_1718.PNG IMG_1719.PNG IMG_1720.PNG IMG_1721.PNG IMG_1722.PNG IMG_1723.PNG IMG_1724.PNG IMG_1725.PNG IMG_1726.PNG IMG_1727.PNG

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Trevor Martin
Community and Economic Development Director
City of Sunnyside
818 E. Edison Ave
Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037

I want to be sure that you receive the attachments that I tried to send as a zip file in the other email I sent today.

These are the screenshots of discussion about the Sunnyside RNG Project on What's up Sunnyside Facebook.

Maria Fernandez
Executive Director
509.506.0013
@WeAreELLAorg
www.WeAreELLA.org

What's Up Sunnyside
Keren J. Vazquez · 3h ·

Have you heard of the Sunnyside RNG BioMethane plant being proposed for a port property that will reside next to sunnyside residents and in proximity to city limits developed by PacificAg Port of Sunnyside & City of Sunnyside, WA??

- [ ] Yes, I know about the BioMethane Plant
- [ ] No, I do not know about the BioMethane Plant
- [ ] What is a BioMethane Plant?
- [ ] It doesn't interest me

+ Add poll option...

Like Comment Share

1

5 shares

Most recent

Sandra Zesati
I know about it because We Are Ella held an informational and question session about this project that has been proposed. Have not heard from the port or current city officials.

12m Like Reply

Rules

Comment as We Are Ella



What's Up Sunnyside
Keren J. Vazquez · 3h ·

Like Comment Share

1

5 shares

Most recent



Sandra Zesati
I know about it because We Are Ella held an informational and question session about this project that has been proposed. Have not heard from the port or current city officials.

12m Like Reply

Write a reply...



Sandra Rodriquez
I vote for no! Too close to homes.

40m Like Reply 1



David Rand
Most of us only know about it because of you being very informational about it thank you very much

2h Like Reply 5



Sonya Paxton
David Rand right

51m Like Reply

Write a reply...

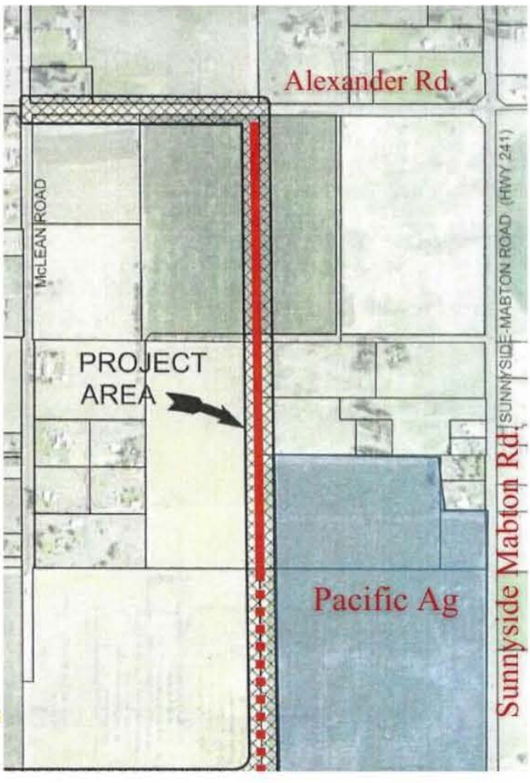
Rules

Comment as We Are Ella

Sunnyside Residents
Notice of Public Comment on 60-Acre BioMethane Plant
Thursday, November 30, 2023
5:30 pm @ Gusto Casa Mia 200 N 1st St Sunnyside

The City of Sunnyside and the Port of Sunnyside announced it has entered into a public comment period on the proposed BioMethane Plant/Digester project and residents may voice any concerns about the economic and environmental impact the project may have. The plant would use anaerobic digesters to process local manure and agricultural waste to create natural gas. We can assist you to enter your public comment to the city and port. If you have questions or concerns, join us for this community meeting about the Pacific Ag project.

- Learn more about what a biomethane digester is.
- What are the water and air quality risks?
- Why is it being built next to a residential area?
- Why hasn't an environmental impact statement been released?
- What is the possibility of a plant explosion? As has happened in other locations.
- Why hasn't any information been provided in Spanish to Spanish-speaking residents?



Public comments must be submitted to Trevor Martin, Community & Economic Development Director, at tmartin@sunnyside-wa.gov by December 5th.

For more information about this community meeting, call Maria with ELLA at 509-506-0013, or email at Maria@WeAreELLA.org.

ELLA LEADING THE WAY @WeAreELLAorg

Friends of Toppenish Creek

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Lindsey Keesling
Regardless of if people agree or disagree, making sure the public is well informed before the comment period closes is awesome, thank

Rules

Comment as We Are Ella

Most recent

Lindsey Keesling
Regardless of if people agree or disagree, making sure the public is well informed before the comment period closes is awesome, thank you ELLA!

6d Love Reply Message 1

Brittany Byma
The Port of Sunnyside human waste water treatment plant is pretty smelly and everyone gets by just fine- and it's in a residential area as well. We need projects like these to solve solutions like using a sustainable resource and turning it into energy. Literally a win win plus creating jobs. Places like this would be heavily up to code on safety and environmental impact because it's funded by taxpayers.

1w Like Reply 12

Chela N. Licona
They can find a different location. This is too close to many of our homes and as it is the mushroom plant with its "state of the art facility" has significantly impacted our quality of life b/c the air quality and smell are much worse than any bad air prior to its existence. I prefer they build it far away from our homes or in their neighborhood. We do not need projects that harm our health and quality of life.

1w Like Reply 7

Rules

Comment as We Are Ella

Marcy Mata-Vidaurri
Chela N. Licona I agree 100%. We don't need it where it is planned to be erected.
We also have dairies and the animal feed plant

1w Like Reply 1

Chela N. Licona
This issue isn't as simple as "getting by just fine" by putting up with yet another stench caused by a project that "will generate jobs" and is for the greater good. Those of us who are against the plant are not against the Port or economic development in our community. We can want better for our community and still disagree with the Port of Sunnyside and County. We can want better for our community and still find it unconscionable that there is no environmental impact statement despite requests for one. Many of us have lived in the area or close to the site for generations, and we have been directly impacted by the Port and the County's shortcomings in the past. Many of us have trusted (hoped) that things would come out as the Port or the County has promised and now live with the consequences (contaminated water, worse air quality, etc.). There are other options: The Port can find another location far away from our

M'Liss Bierlink
Brittany Byma The Port of Sunnyside DOES NOT have a human waste facility. It's industrial waste water only. I worked there for 11 years and know 100% they treat only industrial waste water.

1w Like Reply 2

Brittany Byma
M'Liss Bierlink Thank you for clarifying. Living next to it for 20+ years, I thought it was because of the smell. Still deal with it daily but I don't complain because I know it's for the better of our community. The Port of Sunnyside does great things for all of us that we don't even realize.

1w Like Reply 1

Write a reply...

Write a reply...

Sydney DeWees
https://pacificag.com/sunnyside-rng/
On the pacific ag website they break down what they are doing in Sunnyside. It looks like it helps the farmers, gets jobs for the people, and eliminates waste that would flow back into the water systems via runoff. Not saying it's perfect but there are pros and cons



Sunnyside RNG



Sunnyside RNG
pacificag.com

1w Like Reply 4

Raul Farias
Sydney DeWees that's what they say. Companies don't tend to be transparent.

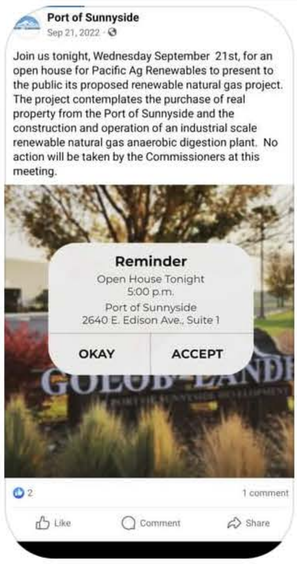
1w Like Reply

Write a reply...

Benjamin Eisenga
Will there be representation from Pacific Ag, the city of Sunnyside and/or the Port of Sunnyside at this meeting? I do know that the Port held an open house about this project over a year ago. Prior to entering any agreements with Pacific Ag.

https://pacificag.com/sunnyside-rng/

I encourage everyone to look at the Pros and Cons on both sides of this project.



Rules

Comment as We Are Ella

Brittany Byma
Benjamin Eisenga I wish I could have made it to this public meeting!
1w Like Reply

We Are Ella
Author
Benjamin Eisenga city and port leaders and Pacific Ag have all been invited to respond to concerns and answer questions.
1w Like Reply

Raul Farias
Benjamin Eisenga These companies are never transparent. So to me there is no cons.
1w Like Reply

Write a reply...

Toni Soto
Again another smelling manure place like monson field lot.You paid millions of dollars and now you want another. Yeah tell the people that live on mabton Sunnyside rd.area that the port district is using our land for that. We pay taxes to port district lots of money. This people have gotten rich on our tax money. And I believe Martin is a member of the port district. You see nothing for the people low income or other only the rich. No no , I tried to share this because I saw it on the Yakima herald a couple of months ago but the website I live in Sunnyside my

the rich. No no , I tried to share this because I saw it on the Yakima herald a couple of months ago but the website I live in Sunnyside my hometown won't let me comment. Are they involve too in this too?

1w Like Reply 1

We Are Ella
Author

Toni Soto Yes, Arnold Martin is a Port Commissioner. He and the other commissioners should be forthcoming about the environmental impact of this biomethane plant. This Oregon digester corporation, Pacific Ag, is getting over $12 million in our WA state taxpayer dollars for the infrastructure development of this proposed industrial site. Examples of what has happened in other communities with biomethane plants.

https://www.capitalpress.com/state/oregon/methane-leak-at-oregon-dairy-leads-to-explosion-fire/article_aac7a6d3-b169-51be-a135-bf2a9e4790c8.html

https://www.opb.org/article/2022/01/27/dairy-methane-oregon-threemil... See more

Methane leak at Oregon dairy leads to explosion, fire
capitalpress.com

1w Like Reply 3

View 5 replies...

Teodora Nancy Martinez
My concern is the traffic this is going to create. The cow waste will be trucked in and with over 30 diaries possibly contracting with them that's a lot of crap being moved. The emissions alone from the trucks is going to cause issues! Plus what are they going to do with the waste water after they are done with their process, dump it where?

1w Like Reply 2

We Are Ella
Author
Teodora Nancy Martinez great question and great points!! 👍🏽

1w Like Reply 1

Tina Coder-Guy
We Are Ella There will be so much truck traffic in that area and what about the cow poop spilled onto the roads making them disgusting and slippery in bad weather. When they move manure it's always spilling onto the roadways.

1w Like Reply 2

Tina Coder-Guy
There are other places away from populated areas which would be better. It shouldn't be in our backyards.

1w Like Reply 2

We Are Ella
Author

We Are Ella
Author
Tina Coder-Guy several people have asked the city and the port exactly those questions about the transportation of manure and how Pacific Ag will prevent possible leakage and spills on the roadway. We still have no answers to any of those questions. They are anticipating at least 140 transported manure loads PER DAY, and we don't know how Pacific Ag will prevent or mitigate possible spills during transportation.

1w Like Reply 1

Write a reply...

Daniel Guthrie
If they're already to that stage, public comment would be pointless.

1w Like Reply

Ramøs Abigail
Daniel Guthrie under the rules of administrative procedure, they're required to consider and respond to public comments.

1w Like Reply

Daniel Guthrie
Ramøs Abigail consider and respond, not cater to the comments.

1w Like Reply

Marissa Medina-Ruiz
Daniel Guthrie consider and respond sound a lot like a plan of action. That could be a turn around if there were enough voices.

1w Like Reply

Write a reply...

Peggy Johnson
A project that gets rid of cow manure? We need that.

1w Like Reply 4

Marci Koch
Peggy Johnson even if you don't really know what it is? Even if it was in your back yard?

1w Like Reply 3

Peggy Johnson
Marci Koch there are six commercial dairies in my back yard poisoning the ground water.

1w Like Reply

Marci Koch
Peggy Johnson let me guess....it's not in your backyard.

1w Like Reply

Write a reply...

We Are Ella
Author

Peggy Johnson we need to fully understand the environmental impact of this biomethane plant. It is proposed for a location with surrounding residents and far too close to the city. How is the city and the port going to ensure safety? These few articles may interest you.

https://www.opb.org/article/2022/01/27/dairy-methane-oregon-threemile-california-energy-credits/

https://www.capitalpress.com/state/oregon/methane-leak-at-oregon-dairy-leads-to-explosion-fire/article_aac7a6d3-b169-51be-a135-bf2a9e4790c8.html



Mega-dairy accused of violating Oregon air pollution rules while s...
opb.org

1w Like Reply 3

Write a reply...

Maria Garza
Another way of stuffing their pockets..
At who's cost?

1w Like Reply 2

Raul Farias
Maria Garza people's health

1w Like Reply 2

Rules

Comment as We Are Ella

energy-credits/

https://www.capitalpress.com/state/oregon/methane-leak-at-oregon-dairy-leads-to-explosion-fire/article_aac7a6d3-b169-51be-a135-bf2a9e4790c8.html



Mega-dairy accused of violating Oregon air pollution rules while s...
opb.org

1w Like Reply 3

Write a reply...

Maria Garza
Another way of stuffing their pockets..
At who's cost?

1w Like Reply 2

Raul Farias
Maria Garza people's health

1w Like Reply 2

Write a reply...

Raul Farias
We don't need that pollutant here. Take it somewhere else

1w Like Reply 4

Shannon Yanez
Tami N Rick Rodriguez ❤️

1w Like Reply 1

Rules

Comment as We Are Ella

From:	Maria
To:	Trevor Martin; Elizabeth Alba
Cc:	Jean Mendoza; Rotakhina, Sierra D (EJC); Roberts, Damon (ECY)
Subject:	Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037
Date:	Tuesday, December 5, 2023 1:32:21 PM
Attachments:	image001.png

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Trevor Martin
Community and Economic Development Director
City of Sunnyside
818 E. Edison Ave
Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037

I am writing during this public comment period about the biomethane plant, Sunnyside RNG, proposed for a location near Sunnyside city limits and residential areas. I have obtained some information about biomethane plants in other cities, and I have concerns about any environmental impact risks, particularly with our air and water quality.

I have not seen the City of Sunnyside or Port of Sunnyside address any aspects of potential harm, which I find disturbing given that a simple internet search of biomethane plants and digesters in other cities provides article after article demonstrating that biodigesters have caused some harm in their respective areas, including significant air pollution, water contamination, and even plant explosions causing area resident evacuations.

With the abundant information available from credible sources about the risks associated with biomethane plants, I do not understand how you came to a mitigated determination of non-significance, through your own SEPA review. I need to better understand your qualifications to conduct a thorough and impartial review. It seems to me that if the City of Sunnyside is the lead in the development of this project, designating significant city funding to the project, it appears to be a conflict of interest for you to conduct the SEPA review. A SEPA review of this type of project must be conducted by an outside agency to objectively examine the potential environmental and human impact.

The city and port must also consider the cumulative impact of this project with other issues already affecting the local environment and residents. For example, many of the local dairies, particularly in the Outlook area, are responsible for contaminating the well water of Outlook residents, and are responsible for trucking in water to residents, regularly testing and monitoring resident wells, and provide water filtration systems to residents. There was also a recent explosion and chemical fire at Nutrien Ag Solutions fertilizer plant, and area residents needed to be evacuated because of harmful

chemical gasses released into the air by the explosion. We also deal with unusually high rates of asthma associated with poor air quality. These are just a few verifiable problems affecting residents and the development of a biomethane plant in the same area seems to me, would only exacerbate the health and environmental problems we are already experiencing.

I also find it concerning that the city and port provided no communications in Spanish about the proposed biomethane plant to residents. As you already know, Sunnyside is 87% Latin@, with 70% of these Latin@ families speaking primarily Spanish in the home. There is no other reason for not communicating with Spanish-speaking residents except deliberate exclusion of their opinions and participation within city developments and processes.

The ELLA team canvassed around the area where the biomethane project is proposed, and of the almost 250 homes we visited, we only encountered five families that knew about the project. The few families that were aware of the project spoke only English. None (0) of the Spanish-speaking families we spoke with were aware of the biomethane plant. Once they became aware of the project, they were very concerned about the potential risks to their health, the environment, their property values, and the safety of children that stand near the Sunnyside Mabton Rd to wait for their school bus in the morning.

We also held a community forum on November 30th about this project so that residents had an opportunity to learn more about the project. We invited you, the city manager and council members to attend and none of you showed any interest in attending the event to answer any questions, respond to any concerns, or even listen to residents. It is extremely disappointing that not one city official or administrator could be bothered to attend, especially during a public comment period about the project.

I would like more information about any potential adverse environmental and public health risks. Please provide me with an environmental impact statement based on an objective third party SEPA review. As a concerned citizen, I would expect for city and port officials and administrators to be clear and transparent with their community about any project as significant as a biomethane plant so that we may become familiar with both the benefits and disadvantages of such a project. Communications about the environmental impact must also be provided in Spanish because our community is made up of a significant number of families that primarily speak Spanish.

I have included articles that have me concerned about biomethane plants. I have also included video of the community forum where residents expressed their concerns and screenshots of discussions about the Sunnyside RNG project on Facebook What's Up Sunnyside. Without a thorough and impartial SEPA conducted by a third-party reviewer, or EIS, it is difficult to come to any other conclusion about biomethane plants than what we find online.

I look forward to the City and Port of Sunnyside providing the environmental impact statement for the Sunnyside RNG project for resident's review and additional public comment.

Maria Fernandez

Executive Director
509.506.0013
@WeAreELLAorg
www.WeAreELLA.org

ELLA
·LEADING THE WAY·

From:	Maria
To:	Trevor Martin; Elizabeth Alba; Teodora Martinez
Subject:	Mabton Public Comments
Date:	Wednesday, December 27, 2023 3:29:00 PM
Attachments:	image001.png Elida Macias Mabton Resident Comment on Sunnyside RNG.m4a Margarita Fonseca Mabton Resident Comment on Sunnyside RNG.m4a

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Trevor Martin, Community & Economic Development Director
City of Sunnyside, Community & Economic Development Department
818 E. Edison Ave., Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 & 2022.0200, WADOE SEPA RECORD NUMBERS#202303037 & 202305593

Mr. Martin,

We have a received a few comments from residents in Mabton. They are also concerned about any possible adverse effects to the environment and their health with the Sunnyside RNG project. Both Elida Macias and Margarita Fonseca are requesting information about the Sunnyside RNG biomethane/digester plant. As you already know, Mabton residents are dealing with water quality issues and many residents have shared their concerns about how this biomethane plant may exacerbate existing water quality issues.

I have attached their recorded comments to this email. I trust that you have in-house translators to transcribe the recordings. It would be prudent to address these concerns directly with both Sunnyside and Mabton residents. They have valid concerns, and the City of Sunnyside must be willing to speak with residents, including Spanish-speaking residents, most of whom are just now learning about this project. And it doesn't help that the public comment period has taken place during the holiday when most people are honoring their cultural and religious customs, therefore distracted.

We will follow up with you on your next steps with this project. Please let me know if you have any questions about the recordings.

Maria Fernandez
Executive Director
509.506.0013
@WeAreELLAorg
www.WeAreELLA.org



From:	Maria
To:	Trevor Martin; Elizabeth Alba; Jean Mendoza
Subject:	Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037
Date:	Tuesday, December 5, 2023 1:42:35 PM
Attachments:	image001.png

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Trevor Martin
Community and Economic Development Director
City of Sunnyside
818 E. Edison Ave
Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037

The videos are too big of a file to export via email, but I will send you the link to where you can find them on our website. These videos are the complete community forum on Sunnyside RNG that the city chose not to attend. As you can see in the videos, many residents were present to share their concerns about the proposed biomethane plant.

https://weareella.org/sunnyside-community-forum-on-sunnyside-rng-methane-plant-project/

Maria Fernandez
Executive Director
509.506.0013
@WeAreELLAorg
www.WeAreELLA.org



From:	Amy van Saun
To:	Trevor Martin
Cc:	Jean Mendoza
Subject:	Fwd: Comments re: SEPA-2022.0200, Sunnyside RNG LLC
Date:	Wednesday, December 6, 2023 6:24:47 PM
Attachments:	image001.png 2023-12-5_CFS comments on Sunnyside RNG MDNS.pdf

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Mr. Martin,

It appears that the email I sent last night using the email copied from the notice of addendum didn't go through. Below is the link to all exhibits which I also attempted to attach but I believe some of the single files were too large for your email server. Please accept these comments, originally sent at 4:45pm yesterday, December 5.

Get Outlook for Android

From: Amy van Saun <AvanSaun@CenterforFoodSafety.org>
Sent: Tuesday, December 5, 2023 4:52:00 PM
To: tmartin@sunntside-wa.gov <tmartin@sunntside-wa.gov>
Cc: Jean Mendoza <jeanrmendoza@icloud.com>
Subject: RE: Comments re: SEPA-2022.0200, Sunnyside RNG LLC

Mr. Martin,

In case the previous emails did not go through, attached again are our comments. Exhibits cited in the comments are available at this link: https://we.tl/t-gXaWvI9h7f.

The link is good until December 12, 2023.

Sincerely,

Amy van Saun
Senior Attorney
Center for Food Safety
Cell: (585) 747-0151
Pronouns: they/them
https://www.centerforfoodsafety.org/pnw

From: Amy van Saun
Sent: Tuesday, December 5, 2023 4:39 PM
To: tmartin@sunntside-wa.gov

Cc: Jean Mendoza <jeanrmendoza@icloud.com>
Subject: Comments re: SEPA-2022.0200, Sunnyside RNG LLC

Mr. Martin,

Attached are comments from the Center for Food Safety on SEPA-2022.0200. Attachments will be send under separate emails due to size.

Amy van Saun
Senior Attorney
Center For Food Safety
2009 NE Alberta Street, Suite 207
Portland, Oregon 97211
(971) 271-7372
Cell: (585) 747-0151
https://www.centerforfoodsafety.org/pnw
Pronouns: they/them

CFS Logo (small)

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Dec. 5, 2023

Re: City of Sunnyside MDNS issued for City File Number SEPA#2023-0200

Trevor Martin, SEPA Responsible Official
City of Sunnyside
Office of Community Development
818 E. Edison Ave.
Sunnyside, WA 98944

Mr. Martin & The City of Sunnyside:

Please accept these comments on behalf of Center for Food Safety's members in the Lower Yakima Valley and specifically Sunnyside. In addition to these comments, CFS joins the comments of Friends of Toppenish Creek, including all comments regarding the proposed factory farm gas project by Pacific Ag, d/b/a Sunnyside RNG LLC, and the City's Mitigated Determination of Non-Significance (MDNS), SEPA#2023-0200.

Center for Food Safety is a non-profit membership organization with offices in the Pacific Northwest, California, and D.C. CFS has members in the Lower Yakima Valley that are very concerned about the impacts of industrial dairy on their air and water, and the immediate impact of a methane digester of the size proposed, as well as its capacity to increase and further entrench the industrial lagoon and spray concentrated animal feeding operation (CAFO) model. **For the reasons below, the City should conduct a full Environmental Impact Statement (EIS) under the State Environmental Policy Act (SEPA), to evaluate the potentially significant impacts cause by this proposed operation.**

The MDNS is not adequate, particularly as it fails to take into account the full air quality impacts of this operation, and the indirect impacts it will have on the Valley by expanding the market for liquid cow manure and further entrenching and/or expanding the industrial CAFO dairy model that has caused water and air quality impacts to the communities in the Lower Yakima Valley for decades. The City cannot accept greenwashing by Pacific Ag in lieu of real environmental evaluation.

Legal Background

The Washington State Legislature, when it enacted the State Environmental Policy Act (SEPA), recognized that "each person has a fundamental and inalienable right to a healthful environment and that each person has a responsibility to contribute to the preservation and enhancement of the environment." RCW 43.21C.020(3). SEPA's substantive and procedural mandates overlay all regulatory and nonregulatory activities of Washington's governmental entities, including its municipalities. The City of Sunnyside, as the lead agency here, has the responsibility to "use all practicable means" so that the state and its people may:

> (a) Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
>
> (b) Assure for all people of Washington safe, healthful, productive, and aesthetically and culturally pleasing surroundings;

> (c) Attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences;
>
> (d) Preserve important historic, cultural, and natural aspects of our national heritage;
>
> (e) Maintain, wherever possible, an environment which supports diversity and variety of individual choice;
>
> (f) Achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities; and
>
> (g) Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources

RCW 43.21C.020(2).

All branches of government, including municipalities, "shall: "Include in every recommendation or report on proposals for legislation and other major actions significantly affecting the quality of the environment, a detailed statement by the responsible official," including environmental impact, unavoidable adverse environmental effects, alternatives to the proposed action, local short-term uses of the environment versus the maintenance and enhancement of long-term productivity; and any irreversible and irretrievable commitments of resources. RCW 43.21C.030(2)(c).

The responsible official also "shall consult with and obtain the comments of any public agency which has jurisdiction by law or special expertise with respect to any environmental impact involved." *Id.* at 43.21C.030(2)(d); WAC 197-11-340(b) (shall send DNS to agencies with jurisdiction).

Major actions having a probable significant, adverse environmental impact require an EIS. RCW 43.21C.031. "Significant" in SEPA "means a reasonable likelihood of more than a moderate adverse impact on environmental quality." WAC 197-11-794(1). Significance involves "context and intensity" and thus does not lend itself to a quantifiable test. The rules state:

> The context may vary with the physical setting. Intensity depends on the magnitude and duration of an impact. The severity of an impact should be weighed along with the likelihood of its occurrence. *An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred.*

Id. at 197-11-794(2) (emphasis added). Even proposals intended to protect or improve the environment may require an EIS. SEPA regulations do not allow threshold determinations to be made by balancing the potential "good/bad" effects of a proposal. WAC 197–11–330(5).

The lead agency "shall make its threshold determination based upon information reasonably sufficient to evaluate the environmental impact of a proposal." WAC 197-11-335. If the SEPA Checklist does not include sufficient information, the responsible official may require the applicant to submit more information, make its own further study, consult with other agencies with

expertise, or decide that the action or its impacts are not sufficiently definite to allow analysis and commit to a timely, subsequent environmental analysis. *Id.* Only if the responsible official "determines there will be no probable significant adverse environmental impacts from a proposal" may they issue a determination of non-significance (DNS). WAC 197-11-340(1).

Impacts of Factory Farm Gas Digesters

Methane digesters that use CAFO waste are often referred to as creating "renewable natural gas" when they rely on the additional methane created by factory farms that use a liquid waste management system. Thus, the gas they produce is more appropriately termed "factory farm gas."

Industrial animal agriculture has already decimated small family farms and is built upon the exploitation of farm workers, communities, animals, and the environment. It is responsible for approximately 37% of all methane emissions in the United States.[1] Indeed, the only source of methane—an extremely powerful short term greenhouse gas—that is *increasing* is manure management. *Id.* Agricultural policy decisions that support the entrenchment and expansion of factory farms is a barrier to real mitigation of the climate crisis and to more sustainable and just farming methods and a diversified food system.[2]

Factory farm gas production is only compatible with industrial animal agriculture that produces far more waste than can be responsibly managed (as we have seen in the Lower Yakima Valley for decades), and perversely encourages the use of liquified manure management systems —the cheapest and most environmentally destructive form of manure management. Factory farm gas incentives have already created a "manure gold rush" by establishing revenue streams for the manufacture of liquid manure.[3] These digester facilities only incentivize the further expansion and consolidation of the largest factory farms, which are already major sources of air and water pollution in the Lower Yakima Valley, and sources of environmental injustice.

Increased herd sizes will significantly increase the amount of methane released into the environment through enteric emissions, while also continuing to increase emissions of other GHGs such as nitrous oxide and carbon dioxide. Indeed, research is finding that GHG emissions from factory farm gas production and use is significantly higher than previously understood, undercutting the supposed climate benefits of factory farm gas even more.[4]

---

[1] *See* EPA (2023). Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2021. U.S. Environmental Protection Agency, EPA 430-R-23-002. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2021.

[2] Ruthie Lazenby, *Rethinking Manure Biogas: Policy Considerations to Promote Equity and Protect the Climate and Environment,* Vermont Center for Agriculture & Food Systems (August 2022), https://www.vermontlaw.edu/sites/default/files/2022-08/Rethinking_Manure_Biogas.pdf.

[3] *See, e.g.*, Phred Dvorak, *California's Green-Energy Subsidies Spur a Gold Rush in Cow Manure, A lucrative state incentive to make natural gas from dairy waste is attracting companies from Amazon to Chevron*, Wall Street J. (Feb. 19, 2022), https://www.wsj.com/articles/californias-green-energy-subsidies-spur-a-gold-rush-in-cow-manure-11645279200.

[4] *See, e.g.*, Semra Bakkaloglu et al., *Methane Emissions Along Biomethane and Biogas Supply Chains Are Underestimated*, 5 One Earth 724–736 (June 17, 2022),

Not only are there air quality concerns in the immediate vicinity of these operations, but they result in the burning of methane that further contributes to climate change and continues and expands the use of fossil fuel infrastructure. The City must take into account both the impacts of a changing climate on the proposed facility and how the facility will contribute to further greenhouse gas emissions.

Digesters do nothing to improve the groundwater conditions under existing CAFOs, where seepage to groundwater comes not just from lagoons holding liquid manure wastewater, but also from pens, manure and feed storage areas, and land application fields. Residents in the Lower Yakima Valley already suffer from drinking water contaminated with high levels of nitrates.[5]

Digesters themselves create additional pollution and public health risks. First, they rely on dirty fossil natural gas infrastructure, including leaky pipelines, which leads to the further entrenchment of this infrastructure. Second, they leak methane and manure and can even explode. For example, a digester on a North Carolina factory farm recently ruptured, spilling three million gallons of "gelatinous gray foam"— enough "to fill more than four Olympic-sized swimming pools."[6] At least 37,000 gallons of the waste reached wetlands. *Id.*

An EIS is Required Under SEPA

The MDNS and the reports it relies on, including the SEPA checklist, do not consider the full impacts of this facility, including its direct impacts of increasing air pollution in the immediate area, the increase to greenhouse gas emissions overall, and the potential for spills or explosions, and its indirect impacts of incentivizing the expansion and entrenchment of CAFOs in the Lower Yakima Valley. The City must consider all direct, indirect, and cumulative adverse impacts before making a DNS. As to air pollution, the City is only now releasing the New Source Review authored in February. The Yakima County Clean Air Agency is the agency responsible for air quality permitting, and it has not even commented on this proposal, in violation of RCW 43.21C.030(2)(d)

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https://www.sciencedirect.com/science/article/pii/S2590332222002676; Michael A. Holly et al., *Greenhouse Gas and Ammonia Emissions from Digested and Separated Dairy Manure During Storage and After Land Application*, 239 Agric. Ecosystems & Env't 410, 418 (Feb. 15, 2017), https://doi.org/10.1016/j.agee.2017.02.007.

[5] *See, e.g.,* EPA, "Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington" (2013); *Community Ass'n for Restoration of the Environment, Inc. v. Cow Palace, LLC*, 80 F.Supp.3d 1180 (E.D. Wash., 2015) ("application, storage, and management of manure at Cow Palace Dairy violated RCRA's substantial and imminent endangerment and open dumping provisions and that all Defendants are responsible parties under RCRA"); *Community Association for Restoration of Environment Inc. v. Washington Dairy Holdings LLC*, 2019 WL 13117758 (E.D. Wash., 2019) (another example of a citizen suit against a Lower Yakima Valley dairy under the Resource Conservation and Recovery Act due to contamination of drinking water with nitrates from dairy operations).

[6] Adam Wagner, *'Really terrible science experiment' leads to weeks-long spill from NC hog-waste lagoon*, The News & Observer (Sep. 6, 2022), *see also*, Sound Rivers, *Wayne Co. toxic spill exposes lack of NCDEQ transparency* (Sep. 7, 2022), https://soundrivers.org/wayne-co-toxic-spill-exposes-lack-of-ncdeq-transparency/ (the spill was likely closer to 3 million gallons of nutrient- and bacteria-laden foam; 37,400 gallons was the number initially cited by the facility in its public notice, but months later they stated that the actual number was approximately 3 million gallons).

and WAC 197-11-340(b). Further, it is commenters' understanding that the Clean Air Agency rejected the February New Source Review application and that no further changes have been made. Nor have permits been granted for stormwater and other water quality issues, meaning that such analysis has yet to be completed. The SEPA Checklist says nothing about what will happen to digestate after the methane is extracted, and how water quality will be protected from its spreading. Without sufficient information about the air and water quality impacts of this facility, the City cannot legally make a DNS.

Even if impacts like explosions are not highly likely, the City must still take them into account. RCW 197-11-794(2) ("An impact may be significant if its chance of occurrence is not great, but the resulting environmental impact would be severe if it occurred."). Emissions of methane and hydrogen sulfide are expected, and these gases are hazardous, and hydrogen sulfide is toxic. Further, the SEPA Checklist does not explain what CAFOs will be paid for their waste, going directly to the question of whether this operation will contribute to the entrenchment and increase in size of CAFOs in the Lower Yakima Valley.

Significance depends on context and intensity, and here there is enough information to point to a reasonable likelihood of more than a moderate adverse impact on environmental quality, but also a lack of information to say there will be no probable significant adverse environmental impacts. WAC 197-11-335.

Environmental Justice

These FFG digesters directly implicate environmental justice, and this proposed digester will be sited in a rural, low-income, community of color. Sunnyside's population is 86.2% Hispanic. And yet the City failed to do any significant outreach to this community, including in Spanish. BIPOC populations across the country are more likely to live next to factory farms and thus bear the burden of pollution from these facilities. The same is now true of factory farm gas digesters.[7]

The City is not operating in a vacuum, but rather in a state with extensive resources to more effectively engage with environmental justice populations, including the Washington State Environmental Justice Task Force and its recent Report and the state's Health Disparities Mapping Tool. Given the resources it is unacceptable that the City failed to conduct sufficient outreach to community members and neighbors of the proposed operation on the SEPA MDNS. No one from the City even appeared at a community organized public meeting held on November 30. The City further noted an appeal deadline, scheduled an appeal hearing, and then canceled it. Appeals to the local legislative body must be held under RCW 43.21C.060 where a nonelected official conditions a proposal under SEPA, as occurred here. Sunnyside Code, Ord. 1475 § 2, 1984, (adopting appeals process established in WAC § 197-11-680).

[7] Southern Envtl. Law Center, Complaint under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, regarding the North Carolina Department of Environmental Quality's Issuance of Permit Nos. AWI310035, AWI301139, AWI230466, and AWS820005 (Sep. 27, 2021), https://www.southernenvironment.org/wp-content/uploads/2021/09/2021-09-27-Title-VI-Complaint-Index-DEQ-Biogas-Permits.pdf.

Finally, this operation was awarded a $500,000 grant from the WA Dept. of Commerce, without any environmental justice analysis under the HEAL Act.[8]

Sincerely,

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[8] https://www.commerce.wa.gov/news/rural-communities-to-benefit-from-nearly-5-million-in-new-state-clean-energy-fund-investments/.

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Greenhouse gas and ammonia emissions from digested and separated dairy manure during storage and after land application

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ABSTRACT

Manure management at dairy production facilities, including anaerobic digestion (AD) and solid-liquid separation (SLS), has shown strong potential for the abatement of greenhouse gas (GHG) and ammonia (NH_3) emissions. However, previous study results are inconsistent and the combined effect of AD + SLS remains to be quantified. This study evaluated the effects of AD, SLS, and AD + SLS on GHG and NH_3 emissions during manure storage through land application over nine months. AD and SLS alone significantly ($P < 0.05$) reduced total GHG emissions for storage and land application compared to untreated manure slurries by 25% and 31%, respectively. The majority of that reduction was from methane during storage. SLS had a greater potential for methane reduction in storage than AD, but the variability in digester performance likely impacts the reduction potential. Digestion with subsequent separation further decreased CH_4 emissions from 3.9 g CO_2-eq to 1.3 g CO_2-eq, but increased emissions of nitrous oxide (N_2O) from 0.6 g CO_2-eq to 2.0 g CO_2-eq during storage eliminating a further reduction of GHG emissions as compared to AD alone. AD resulted in a gas emission tradeoff as it increased NH_3 emissions by 81% during storage, which could be mitigated by subsequent SLS, manure storage covers, or other beneficial management practices.
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1. Introduction

In 2013, 7.7% of all U.S. greenhouse gas (GHG) emissions were from agricultural sources. Gaseous losses from ruminant livestock in the form of manure management were responsible for 15.2% of agricultural emissions (USEPA, 2015). In addition, GHG emissions from dairy manure management increased by 53% from 1990 to 2012 and are expected to continue to rise; therefore, it is critical to recommend efficient manure management mitigation strategies to dairy producers to abate overall agricultural GHG emissions (USEPA, 2015). Many different strategies have demonstrated potential to reduce methane (CH_4), nitrous oxide (N_2O), and ammonia (NH_3) emissions from manure (Montes et al., 2013; Ndegwa et al., 2008). For example, manure processing using anaerobic digestion (AD) can reduce CH_4 emissions and solid-liquid separation (SLS) can reduce both CH_4 and N_2O emissions (Amon et al., 2006; Chadwick et al., 2011; Clemens et al., 2006; Meyer-Aurich et al., 2012).

AD is a microbial process that degrades organic material, such as cattle manure, in the absence of oxygen, producing biogas, which is primarily composed of CH_4 and carbon dioxide (CO_2). Biogas can be captured and combusted to generate electricity, directly burned for heating applications, or further upgraded for use in higher value applications such as vehicle fuel. These processes reduce the net emissions impact from feedstocks natural decomposition as CH_4 in biogas is converted to CO_2 during combustion. When CH_4 is captured and used as an energy source it can also reduce the life cycle depletion of fossil fuels from manure management at a dairy facility by 43% as grid-based electricity is replaced by biogas-based electricity (Aguirre-Villegas et al., 2014). The effluent leaving the digester, known as digestate, has modified chemical content (e.g. total solids, carbon, ammonium (NH_4), and pH), contains more soluble plant nutrients due to mineralization, and has less degradable biomass than the original substrate resulting in changes in GHG and NH_3 emissions (Clemens et al., 2006). These changes can result in an additional benefit as the effluent from the digester has reduced organic matter, which has

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shown potential to mitigate GHG emissions during storage and after land application (Amon et al., 2006; Clemens et al., 2006; Hafner et al., 2013). Amon et al. (2006) found that digestion reduced total GHG emissions by 60% from the untreated slurry due to the reduction of CH_4 emissions, however the results from this study should be used with caution as there was no replication.

While there exists a potential for GHG emissions reductions, a tradeoff may exist in using digestion to mitigate manure GHG emissions, as some of the changes in the manure composition can promote NH_3 emissions following digestion. During the AD process, methanogens and other microorganisms break down proteins, amino acids, and urea forming NH_4 (Bernet et al., 2000). In addition, mineralization of organic N and volatile fatty acids during AD increases manure pH and available N (Petersen and Sommer, 2011), factors which increase NH_3 emissions. Despite these known mechanisms, studies measuring NH_3 emissions after AD have been inconsistent. Amon et al. (2006) found that NH_3 emissions from digested manure storages were similar to untreated. After application, this same study found that NH_3 emissions for the digested manure were 15% greater than the untreated manure. On the contrary, Neerackal et al. (2015) reported significantly higher NH_3 emissions from manure storage after AD, but a reduction of NH_3 emissions after manure land application. In addition, the variability in results highlights the importance of conducting additional research that explores the effect of AD on NH_3 emissions.

Solid-liquid separation is a process in which manure solids are mechanically separated from manure liquids to reduce storage capacity and increase flexibility of manure management (Christensen et al., 2013). The liquid portion after separation has a lower amount of organic matter and carbon available for methanogenesis resulting in lower CH_4 production potential. In comparison with liquid manure, storage of separated manure solids results in an environment that is predominately aerobic, eliminating the anaerobic conditions necessary for CH_4 production and thus decreasing CH_4 emissions. Fangueiro et al. (2008) found that separate storage of the liquid and solid fraction resulted in a reduction of CH_4 emissions of approximately 35% when compared to the raw manure. Further reductions during storage may be possible if AD is utilized before separation as it can lower carbon in the manure prior to separation, but exploring the effect of combining AD and SLS on GHG and NH_3 emissions has been largely absent from the literature.

Similar to AD, a tradeoff may exist in reduction of gaseous emissions from SLS as it can increase NH_3 and N_2O emissions in the separated solids. Aerobic solid manure storage systems promote the production of NH_4 and without a subsequent anaerobic environment for nitrification some NH_4 is volatilized as NH_3 (Hansen et al., 2006). As with AD, the results have been inconsistent regarding the effects of SLS on emissions. Amon et al. (2006) found that SLS increased total NH_3 and N_2O emissions from storage and application by 77% and 19% respectively, with a majority of emissions from the composting of the solid portion. Conversely, Hou et al. (2015) observed no significant difference in N_2O emissions between separated liquids from unprocessed manure and reported that the separated solids show lower N_2O emissions than unprocessed manure in terms of percentage of N applied. Neerackal et al. (2015) also found no significant difference of NH_3 emissions between raw manure and separated liquids.

Altering the composition of manure though AD and SLS can affect GHG and NH_3 emissions from downstream processes, which highlights the importance of keeping track of the emissions throughout all manure handling steps. Studies have focused on specific processing technologies (e.g. only storage or only land application) or specific emissions (Dinuccio et al., 2011; Koirala et al., 2013; Neerackal et al., 2015) but there is limited literature quantifying both GHG emissions and NH_3 emissions from both manure storage and land application and from the same manure stream. Amon et al. (2006) conducted a more comprehensive assessment of emissions from stored and applied manure, but the study contained no replication and followed emission for only 20 days after application. While the prior work conducted in this area was critical to develop data trends, continued work is needed to provide more comprehensive evaluation of manure processing systems, particularly the combination of processing systems. This study is one of the first to compare the magnitude and direction of GHG and NH_3 emissions from manure storage and land-application after combined AD and SLS from the same manure stream.

Literature on CO_2 emissions from processed manure using AD and SLS is also limited. Researchers generally do not quantify gaseous losses of CO_2 from manure as they have been previously absorbed and metabolized by plants that constitute the dairy ration, thus, being part of the carbon cycle and not an additional source of CO_2 (Kulling et al., 2001). While this logic is sound, it is still important to quantify CO_2 emissions to understand the carbon cycling at a dairy farm. In this study, we investigated the influence of AD, SLS, and the combination of AD and SLS on CO_2, CH_4, N_2O, and NH_3 emissions during storage and for one growing season after manure application to the field.

2. Methods & materials

Emissions from processed and unprocessed manure during storage and land application were monitored for CH_4, CO_2, N_2O, and NH_3. Manure collected was measured over a 182-day storage study and upon completion was applied to the field where gas measurements continued for 126 days.

2.1. Manure collection and storage

Manure streams were collected in the pump room of two dairy facilities in 0.21 m^3 barrels for the storage portion of the study. Raw manure at farm 1 (R1), digested manure at farm 1 (D1), digested separated liquids at farm 1 (DL1), and digested separated solids at farm 1 (DS1) were collected from a dairy with a mixed plug-flow digester and screw press separators. The digester operates at a mesophilic range and is loaded with skid steer collecting manure three times per day. Two Bauer™ model # 855 screw press separators are used at the facility for manure solid-liquid separation after digestion with a 260 mm press and 520 mm dewatering section with 0.5 mm screen widths. After separation, at this facility, the digested solids are used for bedding and the separated liquids are stored and then land applied. Raw manure at farm 2 (R2), separated liquid at farm 2 (L2), and separated solids at farm 2 (S2) were collected from the USDA dairy facility located in Prairie du Sac, WI. The dairy uses wheat straw for bedding and collects manure with an automatic scraper. Manure is then pumped to a Vincent™ KP-10 screw press separator with a 372 mm press section and 800 mm dewatering section with 0.381 mm screen widths. Manure was collected from two farms as sampling digestion and separation alone and the combination of the two was not possible at the farm scale. At farm 1 only digested manure (D1) was an input to the separator and no infrastructure existed to separate only R1, therefore an additional farm was required to analyze the effects of separation alone.

Manure slurries and separated liquids were stored in 0.21 m^3 plastic barrels filled with 0.185 m^3 of each manure stream from November 2013 to May 2014. In Wisconsin, separated solid piles are often stored in large unturned piles, impending oxygen supply. Therefore, separated solids in the study were stored in barrels with the lid open. A headspace of 15–20 cm was left at the top of the barrel for gas emission measurements. The mass of manure was

measured at the beginning and end of the storage period (Table A.1 found in the Appendix) and the exact headspace was measured weekly to calculate gas fluxes. Manure streams were collected in triplicate and one barrel was left unfilled to measure ambient air gas concentration as a control.

The manure barrels were stored in an open barn which ranged in temperature from 1 to 18 °C during the study period and were open to the environment when emissions measurements were not being collected to simulate actual manure storage conditions (including digestate which is stored in uncovered anaerobic storages). Concentrations of CH_4, CO_2, N_2O, and NH_3 were measured from the headspace of the barrel once a week by placing a lid over each barrel and using the a Gasmet™ Fourier Transform Infrared Spectroscopy (FTIR) gas monitor (Model DX4030, Gasmet Technologie Oy, Helsinki, Finland) that detected gaseous compounds by absorbance of infrared radiation at 10 s intervals (Powell and Vadas, 2016). The lid connecting the FTIR to the barrel was designed with an inlet, outlet, and an 18 mm diameter opening to vent to the atmosphere and equilibrate pressure from within the barrel to the barn. The chamber headspace air was pulled into the FTIR for CH_4, CO_2, N_2O, and NH_3 concentration measurement through the inlet of the chamber, and the air was returned back into the chamber's headspace through the outlet, resulting in closed loop air circulation required for measuring cumulative gas concentrations (Neerackal et al., 2015; Sun et al., 2014a). At the time of sampling, gas was cycled through the FTIR at a rate of 2 L per minute for 7 min and concentrations were measured every 20 s. Immediately before each barrel was sampled, headspace depth and manure temperature were recorded and the FTIR was calibrated with N_2 gas.

A closed loop chamber measurement system was used for its ability to measure low gas concentrations and provide air mass transport required for NH_3 emission measurement. Manure storages with liquid or slurry manure are mainly anaerobic, and without an organic crust at the surface N_2O production is low (Sommer et al., 2000). After manure is applied to the field, most of the CH_4 is released within the first few days from a pool of dissolved CH_4 trapped in the manure (Chadwick and Pain, 1997; Chadwick et al., 2000; Clemens et al., 2006; Sommer et al., 1996). Dynamic chambers with an open air flow system prevent accumulation, reducing concentrations and ultimately decreasing the sampling resolution of CH_4 and N_2O emissions from the study. Additionally, closed loop measurement systems have the advantage over static chambers as their design facilitates air transport as required for NH_3 flux measurement. While static chambers may underestimate NH_3 emissions (Miola et al., 2015), Neerackal et al. (2015) found that closed loop chambers resulted in similar emissions to laboratory evaluations using flux chambers.

Manure samples were collected at the start of the experiment and monthly throughout the storage study. A Sludge Judge® sampler (Nasco, Fort Atkinson, WI, U.S.A.) was used to collect a composite sample along the entire depth of the barrel. Chemical analysis included measurements for pH, electric conductivity (EC), $NH_4 + NH_3$, total solids (TS), volatile solids (VS), and total kjeldahl nitrogen (TKN), total carbon (total C), acid detergent fiber (ADF), neutral detergent fiber (NDF), and hemi-cellulose (Table A.2). Samples were refrigerated and analyzed for pH and TS analysis within one week, the remaining analysis was completed in 28 days on samples that were diluted and preserved.

Manure characteristics from each manure treatment varied in chemical composition at the beginning of the study. Both D1 and DL1 had greater concentrations of $NH_4 + NH_3$ compared to R1 (Table 1). Digested manures also had lower solids content, VS, aNDF, hemi-cellulose, and C/N ratio. Separation decreased the solids and carbon content of the liquid portion at both farms from their raw slurries. The separated solids had higher concentrations of all parameters except EC. Subsequent separation following digestion further decreased the VS, ADF, aNDF, and hemicellulose.

Table 1
Initial manure characteristics for all treatments. Farm 1 raw manure (R1), farm 1 digested manure (D1), farm 1 digested separated liquid (DL1), farm 1 digested separated solids (DS1), farm 2 manure (R2), farm 2 separated liquid (L2); farm 2 separated solids (S2).

Characteristics	R1	D1	DL1	DS1	R2	L2	S2
pH	7.9	7.7	7.8	9.2	6.8	6.6	8.9
EC (us/cm)	1236	1468	1620	52	1235	1196	39
$NH_4 + NH_3$ (mg/L)	1219	1488	1524	327	771	804	71
TS%	6.1	5.1	2.9	38.1	2.7	2.1	37.7
VS%	0.84	0.78	0.68	0.91	1.03	0.76	0.90
ADF%	38	38	23	59	20	17	55
NDF%	55	47	23	75	26	23	80
Hemi-Cell%	16.1	8.5	1.5	16.8	6.7	5.4	24.9
Total C%	2.3	1.6	1.1	23.3	1.5	1.2	17.7
TKN%	0.22	0.23	0.24	1.34	0.18	0.18	1.25
C/N	10.4	6.9	4.8	17.3	8.1	6.6	14.2

2.2. Manure field application

After 182 days of storage, manure was applied in bands to 1.5 m by 2.1 m plots with bare soil and immediately incorporated to a depth of 17 cm at the USDA Dairy Forage Research Station in Prairie du Sac, WI in May 2014. Manure was applied to plots at an application rate of 320 kg N ha^{-1}, Table 1. Application rates were determined using the TKN content of the manure sampled on day 124 of the storage experiment, 58 days before the application of manure. Emissions of N_2O and NH_3 in the days prior to the application were measured and used to estimate N lost from each manure treatment from day 124 to the day of application which was less than 5%. The percentage of ammoniacal-N was different between treatments and the liquid slurries had more available N applied (Table A.1). Typical N application rates in Wisconsin range from 140 to 235 kg available N ha^{-1} for loamy soils with a high yield potential (Laboski and Peters, 2012). A supplemental application of urea at a rate of 82.6 kg N ha^{-1} was applied 44 days after manure application to simulate actual field conditions, as a supplemental N application is often necessary for corn as indicated by the recommended N application rates. The urea was pretreated with a nitrogen stabilizer with a urease inhibitor, Agrotain© Ultra, at a rate of 3.1 L per metric ton of urea. A control plot that did not receive any manure was established to capture soil gas fluxes.

Treatments were applied to the field using a randomized complete block design. Each barrel was applied to two plots and therefore the number of replicates from the storage to field study went from three to six. The digested solids, DS1, were not applied to the field as digested solids are commonly used for bedding or other purposes and not land applied. Four rows of field corn were planted in each plot at 76.2 cm apart making up two border rows and four rows for harvest analysis. A rectangular 0.3 m^2 anchor was placed near the center of each plot and a chamber lid was placed on the anchor once a week to calculate CH_4, CO_2, N_2O, and NH_3 flux using the Gasmet™ FTIR gas analyzer described above. The chamber lid consisted of a 0.03 m^3 rectangular lid with three 6.35 mm cylindrical tube ports one for the inlet, one for the outlet, and one exposed to the atmosphere for pressure equilibration. Emissions of CH_4, CO_2, N_2O, and NH_3 from field plots were measured following a similar protocol to that of field manure storage studies. Soil temperature and moisture were measured during each gas flux measurement. Soil samples were taken every other week during the trial at a 0–10 cm and 10–20 cm depth for analysis of $NO_2 + NO_3$ and $NH_4 + NH_3$.

2.3. Data analysis

Cumulative emissions, expressed in terms of carbon dioxide equivalents (CO_2–eq), were calculated using piecewise interpolation between sampling points and were determined for a 100 year horizon with characterization factors of 25 for CH_4 and 298 for N_2O (CML, 2001). Biotic CO_2 emissions from manure were not incorporated in the total GHG emission accounting, but are included in the study for carbon balance purposes. Indirect N_2O emisisons from NH_3 volatilization were not included in the analysis.

To compare processed solid and liquid manures after AD and SLS, emissions were calculated per mass of raw unprocessed manure for each scenario. The separation efficiency was calculated based on TS for all separated manures to conduct an equivalent comparison between scenarios. Based on these efficiencies, 97% of the raw manure from farm 1 goes to the liquid fraction (DL1) and 3% goes to the solid fraction (to DS1), and 99% of the raw manure from farm 2 goes to the liquid fraction (L2) and 1% to the solid fraction (S2). Finally, gas emissions from the separated solids and liquids were multiplied by mass fraction corresponding to the raw manure and totaled for comparison. Combined liquids and solids at farm 1 are designated DL1 + DS1 and L2 + S2 at farm 2.

A one tailed *t*-test assuming equal variance was conducted to compare intial charateritics of raw manure and processed manure at the same farm. Statistical analysis was performed using the SAS software version 9.4 (SAS Institute Inc., Cary, North Carolina). A one-way ANOVA (Proc ANOVA) was calculated to determine statistical differences between manure characteristics and gaseous emissions separately for manures from farm 1 and farm 2. A Tukey's studentized range test (HSD) was conducted to compare differences between treatments at alpha = 0.05 confidence level. Farm 1 and farm 2 were not grouped for statistical analysis due to dissimilar chemistry in manure at each farm. It was determined that there was no significant block effect on field emissions, therefore the emissions from the entire study for each treatment were determined by adding the emissions from the storage study to the average emissions of the two field plots for each respective treatment.

Emissions, manure characteristics, and soil characteristics were used in model selection to determine predictors of gaseous emissions. To determine correlation between gaseous emissions and manure and soil characteristics a Pearson Correlation Coefficient test of independence (Proc CORR) was ran in SAS. A multiple linear regression (Proc REG) using the stepwise selection function (Proc GLMSELECT) was calculated to predict gas emissions from CO_2, CH_4, N_2O, and NH_3 determined from manure and soil characteristics. However only the NH_3 regression with parameters of EC, temperature, pH, and total N% of manure during storage is reported as it was the only gas for which a model was statistically significant.

3. Results and discussion

3.1. Manure characteristics

During storage, the TS content of the liquid and slurry manures remained relatively consistent while the TS content of the solid manures increased approximately 40% for both DS1 and S2 over the storage period due to moisture loss (Fig. B.1). The increased porosity and temperature of the solid manures likely caused them to dry at a much faster rate than the liquid and slurry manures. The VS from all manures remained relatively unchanged during the first 30 days except for DL1 and DS1 (Fig. B.1). After the first 30 days, VS content remained relatively constant for all manures. Total C and TKN showed very small differences between sampling dates and no discernible trend could be seen as the sampling and analytical variation may have caused values to increase then decrease (Fig. B.1). The raw slurry from farm 2, R2, had substantial crust formation within the barrel and maintained an approximately 75% crust cover (visual estimate) during storage due to the use of straw bedding. The raw slurry from farm 1, R1, displayed some crusting with crust coverage less than 25% of the surface area given that digested separated solids were used for bedding at this farm.

3.2. Ammonia

Digestion, D1, resulted in an 81% increase in cumulative NH_3 emissions compared to R1 over the entire study period (Fig. 1A) similar to previous studies (Koirala et al., 2013; Neerackal et al., 2015; Sun et al., 2014b). This increase in cumulative NH_3 emissions is expected due to the mineralization of organic N through the digestion process which increased $NH_4 + NH_3$ concentrations in manure from R1 to D1 by 22%. In the case of NH_3, separation following digestion, DL1, was able to significantly reduce this impact by 28% as compared to D1, although overall emissions were still 32% greater than R1. Removal of TS through separation following digestion had a significant effect on reducing NH_3 emissions of DL1 from D1, similar to Neerackal et al. (2015), but the specific mechanism for reduction is not known as the $NH_3 + NH_4$ concentration did not decrease from D1 to DL1. Further, separation alone, L2 + S2, did not significantly reduce NH_3 compared to R2. This is thought to be due to the presence of a crust on R2 which

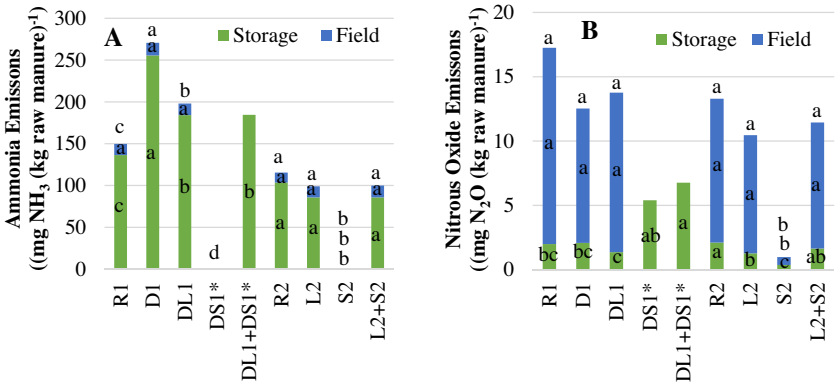


Fig. 1. Nitrogen emissions from liquid slurries and processed manures at both farms: (A) Ammonia (NH_3) and (B) Nitrous Oxide (N_2O). Treatments with similar letters (a, b, and c) at each farm did not show statistical significant difference at the α=0.05 level, ANOVA was ran separately for each farm. *DS1 was removed for the field portion of the study, and was not applied to experimental plots.

served as a barrier to emissions (Aguerre et al., 2012). L2 did not have a crust form on the storage and had elevated NH_3 emissions. While digestion increased NH_3 emissions, it is important to note that there are many management practices, such as manure storage covers and using injection for land application, that can overcome this issues to reduce the overall impact.

Liquid and slurry manures resulted in significantly greater NH_3 emissions than separated solids during storage (Fig. 1A), suggesting mitigations strategies should be targeted at liquid and slurry manures. While some studies suggest this is the case (Dinuccio et al., 2011, 2008) there are some that measured increased NH_3 emissions from manure solids (Amon et al., 2006). An increase in NH_3 emissions is likely when the method of solid manure storage increases aeration (Hansen et al., 2006). Amon et al. (2006) found that when separated solids are aerated NH_3 emissions will increase, up to 77% greater than anaerobically stacked manure solids.

Field application resulted in no treatment differences for NH_3 emissions, likely due to both the measurement system used and the manure incorporation method which has been shown to mitigate NH_3 emissions (Meisinger and Jokela, 2000; Powell et al., 2011). There is abundant literature on reductions of NH_3 when manure is rapidly incorporated (40–90%) (Dell et al., 2011; Hristov et al., 2011; Ndegwa et al., 2008; Powell et al., 2011; Webb et al., 2004; Wulf et al., 2002). However, while incorporation likely reduced the NH_3 concentrations of all treatments, the closed loop measurement system may have underestimated cumulative emissions. Miola et al. (2015) found that cumulative NH_3 emissions were underestimated by 23% when using static chamber 22 days after manure application. This difference was not statistically significant for 75% of the trials, and the difference decreased with the addition of a fan which was more similar to our closed loop system. In addition, Neerackal et al. (2015) determined that NH_3 emissions measured with a closed loop system (very similar to the design in this study) underestimated cumulative emissions compared to a laboratory dynamic system by 32–66%, but found the treatment differences remained consistent between the two measurement systems. While closed loop systems have been used extensively in literature, the results may underestimate NH_3 emissions overall, particularly when ammoniacal-N is low and the measurement period is short.

A multiple linear regression model was developed to predict NH_3 emissions from storage based on EC, manure temperature, pH, and total N. A significant regression was found ($F(4, 55) = 26.51$, $p < 0.0001$), with an R^2 of 0.659. Measured parameters predicted NH_3 emission ng (kg-manure s)$^{-1}$ according to Formula (1) where α = electric conductivity (us/cm), β = manure temperature (°C), γ = pH, and δ = Total N (%).

$$y = 0.006 + 0.447\alpha + 3.49\beta + 23.5\gamma + 0.006\delta \quad (1)$$

Manure pH and temperature had significant positive regression weights indicating, as expected, that manure storages with higher pH and temperature resulted in higher emissions of NH_3. Total N and EC reduced the error of the regression model, improving fit as indicated by the R^2 value, although their inclusion into the model was not statistically significant.

3.3. Nitrous oxide

Nitrous oxide emissions were greater for solid manures during storage compared to liquids and slurry manures, but the largest emissions of N_2O for all treatments were following land application of manure (Fig. 1B). N_2O from slurry and liquid storage is not expected to be a significant source of the total N_2O from manure systems as the anaerobic conditions prevent production, which is supported by literature (Monteny et al., 2001; Sommer et al., 2000). The N_2O from digested separated solids was much higher than the separated solids without digestion, where DS1 had emissions of 5.4 mg N_2O/kg manure and S2 has emissions of 0.4 mg N_2O/kg manure. Although both manures were similar in composition, including similar TKN concentrations of 1.35% and 1.24%, respectively, the mineralization during digestion resulted in an increase in $NH_4 + NH_3$ concentrations of 327 mg N/L for DS1 while S2 was much lower at 71 mg N/L. Higher concentrations of NH_4 have been linked to increased N_2O production (Sommer et al., 2000). While the increase in $NH_4 + NH_3$ through digestion likely contributed to the increase in N_2O, differences in animal diets and separator designs could also impact components contributing to N_2O emissions in the solid streams. While DL1 had a reduction in N_2O emissions as compared to R1, this mitigation was negated by DS1 as DL1 + DS1 significantly increased emissions from R1 by 240% in storage.

Separation has a 40% reduction in N_2O emissions from L2 as compared to R2 during storage, likely due to the crust formation in R2. Natural crust formation has been shown to enhance N_2O emissions (Aguerre et al., 2012) as it provides aerobic and anaerobic environments necessary for N_2O production (Sommer et al., 2000). The lack of a crust in the raw slurry at farm 1, R1, may also explain why there was no treatment difference in N_2O emissions following separation at farm 1. While separation can achieve a reduction in N_2O emissions from R2 to L2 during storage, the N_2O emission from S2 were much higher, resulting in a net increase from storage. While there was a 22% increase in the $NH_4 + NH_3$ concentration from R1 to D1, there was no corresponding increase in N_2O concentrations suggesting crust cover may be a more important factor for the production of N_2O emissions from manure storage. This theory is supported by those who suggest localized sites are critical for N_2O production (Rotz et al., 2012). Again, separation following digestion increased overall N_2O emissions from storage due to elevated N_2O emissions from the digested solids. However, in some cases solids are strictly land applied reducing the amount emitted from storage.

During the field portion of the study, the digested liquid manures, D1 and DL1, had N_2O emission reductions of 31% and 18% from R1, respectively (Fig. 1B). These reductions were not statistically different, which is explained by the relatively large standard deviation in emission of 4.3 mg N_2O kg raw manure^{-1} of R1. During the first 80 days following application, with an exception of emissions on the first day and day 34, N_2O losses remained relatively constant. During this period soil $NO_2 + NO_3$ remained between 2 and 4 ppm and $NH_3 + NH_4$ decreased somewhat linearly from 6 to 8 ppm to around 2 ppm (Fig. 2). Soil moisture rose to ~50% on day 35 corresponding to a peak in N_2O emissions. An increase in soil moisture would have resulted in less oxygen which would have affected rates of denitrification (Bergstermann et al., 2011) thereby increasing N_2O emissions. The addition of urea 44 days after application resulted in an increase in soil $NH_3 + NH_4$ on day 77 (Fig. 2). The delay in release of $NH_3 + NH_4$ was most likely due to the use of the urease inhibitor. The increase in soil $NH_4 + NH_3$ on day 77 resulted in a peak in N_2O emissions on day 84. Soil temperature had no observed effect on N_2O emissions during this study (Fig. 3), similar to findings by Sommer et al. (2000).

The indirect formation of N_2O from NH_3 could increase GHG emissions from D1 by an additional 1.19 mg N_2O kg raw manure^{-1} if the 0.01 kg N_2O-N kg NH_3^{-1} IPCC factor for N_2O emissions from NH_3 is considered (Eggleston et al., 2006). This would increase the overall total GHG emission of D1 by 2% or from 7.43 to 7.55 g CO_2-eq kg raw manure^{-1}, which is still lower than the GHG emissions from R1 of 9.93 CO_2-eq kg raw manure^{-1}.

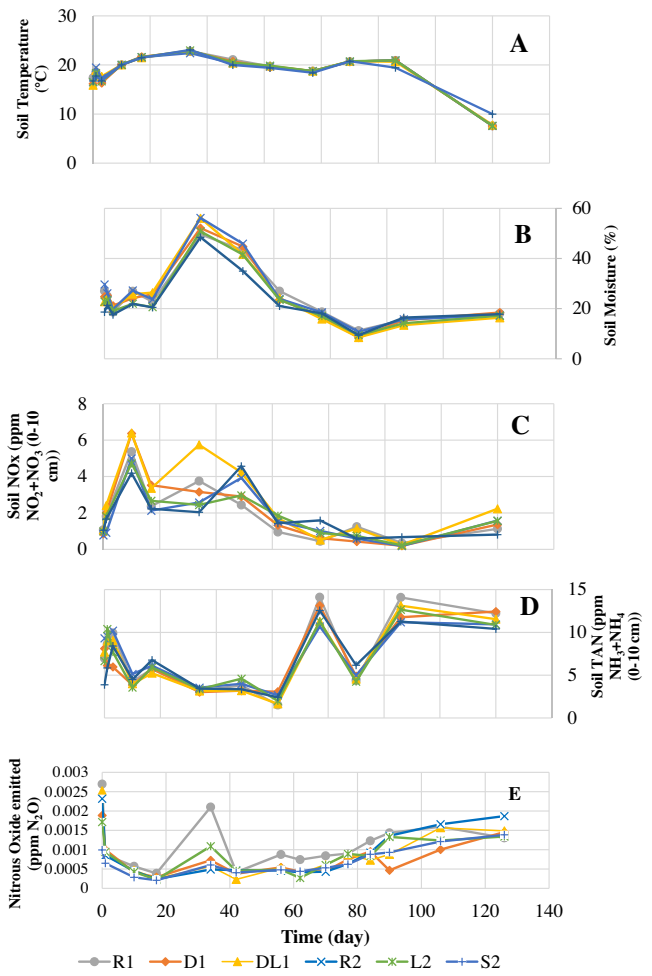


Fig. 2. N_2O emissions and soil characteristics over time (days) for each treatment over the field portion of the study: (A) Soil Temperature, (B) Soil moisture, (C) Soil $NO_2 + NO_3$ at the 0–10 cm depth, (D) Soil $NH_3 + NH_4$ at the 0–10 cm depth, and (E) N_2O emissions.

3.4. Methane

Methane emissions were greater during storage than land application for all treatments, as expected (Fig. 3A). AD and SLS both showed potential for mitigating CH_4 emissions during storage. The digested liquid manures, D1 and DL1, had a 25% and 68% reduction in CH_4 emissions, respectively, during storage compared to R1, which can be explained by the significantly lower initial VS, NDF, TS, and C content (Table 1) than R1 (7% at $p < 0.05$ for D1 and 19% at $p < 0.001$ for DL1). Volatile solids and C are reduced during digestion as methanogens break down biomass to create CH_4 and CO_2 which is then captured and combusted. The separated solids from both farms, DS1 and S2, produced negligible amounts of CH_4. Solid manure storage lacks the anaerobic conditions necessary for methanogenesis, as oxygen is allowed to penetrate due to its porosity, reducing the amount of CH_4 produced as compared to liquid or slurry manures. Additionally, easily degradable carbon for methanogenesis could remain in the liquid portion reducing the methane production potential of the separated solids.

Methane emissions were reduced during storage from D1 (25%), DL1 + DS1 (68%), and L2 + S2 (46%) than their respective raw slurries, R1 and R2, indicating that separation had a greater reduction in methane during storage than digestion. The reduction due to digestion in likely highly variable based on digester performance. The CH_4 emissions reductions during storage from DL1 + DS1 were significantly less than D1 as stated above, indicating that separation further reduces CH_4 following digestion at a similar percentage to separation alone. Separated liquid manure from farm 2, L2, showed no significant difference when compared to R2 even though there was a very large change in CH_4 emissions due to a large standard deviation, 110 mg CH_4 kg raw manure^{-1}. Emissions of CH_4 per gram of VS and CH_4 per gram of C were inconsistent among treatments, indicating that other physical and chemical differences, such as NDF, TS, environmental conditions, and crust coverage may have also played a role in CH_4 emissions.

3.5. Cumulative greenhouse gas emissions (nitrous oxide and methane)

All manure treatments released a majority of the total GHG emissions within the first 30 days of storage (Fig. 4). Emissions decreased over the next 49 days as temperatures in the barn dropped below 10 °C. When the temperatures increased above 10 °C around day 120 for the remainder of the study there was a corresponding increase in emissions. As expected, A Pearson Correlation Coefficient test of independence showed a strong interaction ($r = 0.684$, $p < 0.0001$) between GHG emissions and manure temperature. After land application of manure, cumulative GHG emissions for all treatments increased relatively linearly until

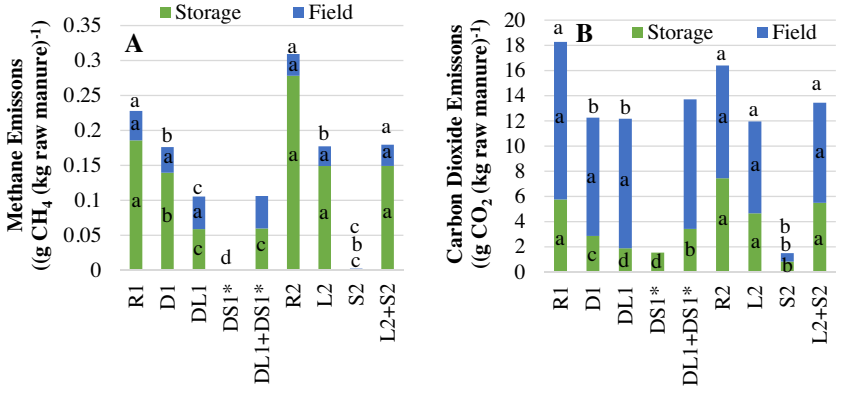


Fig. 3. Carbon emissions from liquid slurries and processed manures: (A) Methane (CH_4) and (B) Carbon dioxide (CO_2). Treatments with similar letters (a, b, and c) at each farm did not show statistical significant difference at the $\alpha = 0.05$ level, ANOVA was ran separately for each farm. *DS1 was removed for the field portion of the study, and was not applied to experimental plots.

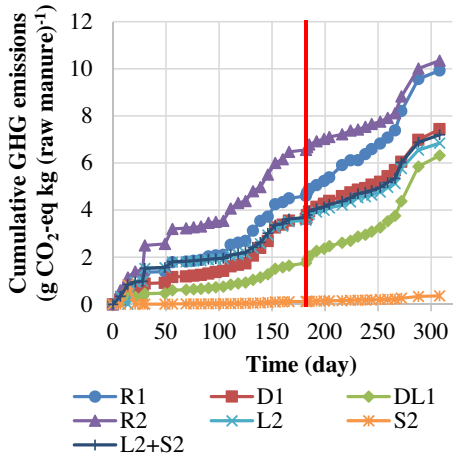


Fig. 4. Cumulative greenhouse gas emissions across storage and field stages of the study. Vertical red line indicates date manure was applied to the field separating the storage study from the field study. (For interpretation of the references to color in this figure legend, the reader is referred to the web version of this article.)

the end of the study suggesting a consistent emission rate when manure is incorporated.

Digested manure, D1, had significantly less (25%) GHG emissions compared to R1 over the entire study period (storage and land application) (Fig. 5). Amon et al. (2006) also found a GHG emissions reduction from digestion following manure storage and application, the magnitude of the reduction was much greater at 59%. Though this previous study was conduted over a shorter time period with no replication, this highlights the range of variability in these experiments. One factor that may directly impact the emissions is the performance of the digester itself, where the level of degradation and carbon capture would greatly impact the downstream mitigation potential. The level of variability supports the need for greater mechanistic understanding to improve predictive models, while also the need to develop parameters to ensure digesters are reaching their potential to remove carbon.

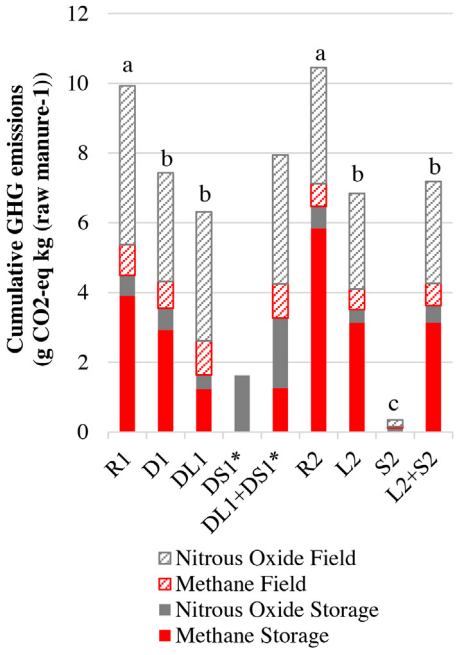


Fig. 5. Greenhouse gas emissions from raw slurries and processed manures proportioned by gas contributing and period of the study. Treatments with similar letters at each farm indicate no statistical difference at the $\alpha = 0.05$ level (ANOVA was ran separately for each farm). *DS1 was removed for the field portion of the study, and was not applied to experimental plots.

With or without processing, the majority of the total GHG contributions from slurry and liquid storage were from CH_4 emissions and following land application were from N_2O (Fig. 5). When analyzing storage independently, D1 had a 21% reduction in total GHG emissions from R1 during the storage portion of the study. Separation did not further reduce cumulative GHG emissions from storage following digestion due to the increased emission of N_2O from the digested solids during storage. For separation alone, there was a significant reduction (44%) in the total GHG emissions over the entire study from R2 to L2 + S2 because storage of the solids did not increase N_2O emissions enough to negate CH_4 mitigation. These results are similar to Amon et al. (2006) which measured a reduction of 37% and contrary to a previous laboratory study by Dinuccio et al. (2011) which concludes that separation of manure increased GHG emssions by 11% during storage and land application. The volatile solids were lower in the initial content of L2 when compared to R2, similar to Amon et al. (2006), resulting in a reduction in CH_4 emissions during storage as expected. However, Dinuccio et al. (2011) measured an increase in CH_4 emissions from separated liquids as compated to the raw slurry during storage even though the VS decreased in the separated liquid. Differences between the current study and Dinuccio et al. (2011) cannot be explained by the measured study parameters.

No GHG treatment differences existed after application of stored manure. After manure was incorporated, it appears that redox conditions were similar between treatments which resulted in similar emissions (Fig. 5). Overall, the methane emissions from storage were reduced by manure processing by 25%, 46%, and 68% for AD, SLS, and AD + SLS, respectively. However, these reductions from storage were somewhat negated when examing total GHG's to 44% and 27% for SLS and AD + SLS due to N_2O losses from solid storage. It is important to note that the reduction from AD in this study may have been low due to reduced performance in the digester, highlighting the need for proper design and operation to maximize C capture in the digester. In addition, managing solids is critical to reduce N_2O production in storage, where providing aeration can reduce N_2O losses.

3.6. Overall emissions and implications for future reductions

According to an inventory of U.S. GHG emissions and sinks in 2014 the dairy manure management emitted 35.5 MMT CO_2-eq of the 574.1 MMT CO_2-eq from agriculture (USEPA, 2016). Dairy manure management is defined by the USEPA as the treatment, storage, and transportation of livestock manure and estimates do not include CO_2. CH_4 accounted for 90% of the 35.5 MMT CO_2-eq from dairy manure management. Based on the results from this study, AD and immediate incorporation of manure following application results in a 25% reduction in CH_4. Therefore, if AD was incorporated at all dairies in the U.S., this would result in a reduction in ~7.2 MMT CO_2-eq. Incorporating AD and SLS further increased the reduction in CH_4 emissions to 40%. Extrapolating these results to all U.S. dairies increased the reduction to ~12.8 MMT CO_2-eq. While using large assumptions concerning manure, these estimates provide a basic understanding of the potential mitigation.

Ammonia loss during storage was the major contributor to losses of nitrogen (Table 3). Digestion increased the amount of ammonia lost in storage due to an increased concentration of ammoniacal nitrogen (Table 3). However, separation following digestion reduced nitrogen losses during storage and the first growing season following land application. Incorporation of SLS following digestion can reduce the ammonia losses in storage, but

the ammonia losses from storage of the digested and separated manure is still greater than the raw manure alone. In practice, it is likely that the solid manures will not be stored for as long as liquid manures, which may further mitigate this practice. However, other land application methods which do not immediately incorporate manure may further increase ammonia losses (Rotz et al., 2014a,b; Webb et al., 2010). Separation alone did show a trend in reduction but was not statistically significant in this study.

Emissions of NH_3 from dairy manure in the contiguous U.S. including emissions from housing, storage, and land application is estimated to be 370 Gg NH_3 per year from 2005 to 2008 (Paulot et al., 2014). Simulated NH_3 emissions from housing, storage, and field application are 18.2, 9.3, and 38.7 kg per cow from a free stall barn with slurry storage on representative dairy farm in Pennsylvania (Rotz et al., 2014a,b). If we assume that manure is immediately incorporated after broadcast 81% of the NH_3 is reduced (Rotz et al., 2014a,b). Given these results we can assume that 7.35 kg NH_3 per cow is lost during after application and housing accounts for 52% of emissions from the housing, storage, and land application of manure. In this study, AD resulted in an 81% increase in emissions of NH_3 meaning that if AD is implemented at all dairies in the U.S., this could result in an increase of 143 Gg NH_3 emissions per year. This estimate assumes that all dairies in the U.S. are free stall barns with manure storage with no cover and that manure applied is immediately incorporated. Given similar assumptions if AD and SLS is implemented at all dairies in the U.S. this would result in an increase of only 57 Gg NH_3 per year.

3.7. Carbon dioxide and carbon cycling

As expected, there are significant losses of carbon in the form of CO_2 during anaerobic storage of manure slurry and liquid. While CO_2 is a large source of GHG emissions from manure as found here and in many other studies (Dinuccio et al., 2011; Hao et al., 2004; Pattey et al., 2005), these emissions are considered to be recycled as part of the carbon cycle that takes places through photosynthesis during the production of crops that are fed to the cows. However, emissions of CO_2 are important as they for evaluation of the carbon cycling within the systems which is critical to mitigation and management strategies. Overall, the objective of manure processing is to reduce the carbon lost as CH_4 while that may increase the carbon lost as CO_2.

Digestion significantly reduced not only the cumulative CH_4 emissions during storage, but also the cumulative CO_2 emissions following digestion (Fig. 3B). However, C captured in the digester can be assumed to be released as CO_2 following combustion. Carbon dioxide emissions during storage for D1 and DL1 were 50% and 67% less than R1, respectively. Both D1 and DL1 had statistically lower initial total C than R1 due to losses during the digestion process with 30% and 48% less C content ($p < 0.1$ and $p < 0.01$, respectively). Emissions of CO_2 per gram of initial C from the entire study period were statistically similar between treatments, indicating that C content was the main driver of CO_2 emissions. DL1 + DS1 had a 19% increase in CO_2 emissions when compared to D1 during storage, which were mostly attributed to the solids portion. This solids fraction had a greater carbon content and the storage was likely more aerobic, both of which are drivers for C to be lost as CO_2 emissions as opposed to CH_4 for solid manure. Separation at farm 2 however reduced cumulative CO_2 emissions as L2 + S2 was 21% lower when compared to R2 during storage, but this reduction was not statistically significant as there was large standard deviation in R2. Although the CO_2 emissions from the solid fraction during storage are less than the CO_2 emissions from the separated liquid fraction at both farms, the solids are the main driver for the net change in CO_2 during storage. The majority of carbon was lost during the storage of manure and was emitted as CO_2 (Table 2).

Manure processing using AD or SLS was able to reduce the carbon lost during manure storage and after one growing season following field application. Digested manure had a reduced amount of initial C (due to the captured C during the digestion process) and had significantly less C loss from storage and application (44%) than their respective raw manures (Table 2). However, it is important to consider the amount of carbon lost during anaerobic digestion to determine its effect on C. The separated liquids DL1, and L2 also had significantly less C loss (58%, and 43%, respectively) than their respective raw manures over the entire study span. The combined C emissions from the L2 and S2 was less than R2 from the entire study span, indicating that separation was effective in reducing carbon losses from storage and land application, although this was not statically significant. Manure processing of AD and SLS was able to reduce the total C lost through the system for the time period of the study. The ratio of C lost as CH_4 and CO_2 remained consistent, meaning that reductions of CH_4 did not result in short increases in CO_2. This suggests that these manure processing systems avoid short term losses of C, which will likely be lost as biotic CO_2 emissions from the soil over a much longer period of time (Table 2).

Table 2
Carbon balance for all treatments during the study. Farm 1 raw manure (R1), farm 1 digested manure (D1), farm 1 digested separated liquid (DL1), farm 1 digested separated solids (DS1), farm 2 manure (R2), farm 2 separated liquid (L2); farm 2 separated solids (S2).

	R1	D1	DL1	DS1	R2	L2	S2
Initial C (mg (kg raw slurry)$^{-1}$)	22,833	16,300	11,400	232,533	14,833	12,200	177,200
C Lost Storage (mg (kg raw slurry)$^{-1}$)	1973	1016	644	491	2577	1595	264
C Lost Field (mg (kg raw slurry)$^{-1}$)	430	326	362	NA	308	253	23
Total C Lost (mg (kg raw slurry)$^{-1}$)	2402	1343	1006	NA	2830	1617	264
C Emitted (%)	10.5	8.2	8.8	NA	19.1	13.3	0.1
Total CO2 (mg (kg raw slurry)$^{-1}$)	7013	3804	2913	NA	8339	5389	896
Total C lost as CO_2 (%)	93	90	93	NA	92	93	99
Total CH4 (mg (kg raw slurry)$^{-1}$)	228	176	105	NA	309	177	2
Total C lost as CH_4 (%)	7	10	8	NA	8	7	1

Table 3
Nitrogen balance for all treatments during the study. Farm 1 raw manure (R1), farm 1 digested manure (D1), farm 1 digested separated liquid (DL1), farm 1 digested separated solids (DS1), farm 2 manure (R2), farm 2 separated liquid (L2); farm 2 separated solids (S2).

	R1	D1	DL1	DS1	R2	L2	S2
Initial N (mg (kg raw slurry)$^{-1}$)	2205	2337	2369	13,417	1838	1842	12,500
N Lost Storage (mg (kg raw slurry)$^{-1}$)	113	211	152	2	86	71	0
N Lost Field (mg (kg raw slurry)$^{-1}$)	16	16	15	NA	13	14	1
Total N Lost (mg (kg raw slurry)$^{-1}$)	129	227	167	NA	100	72	1
N Emitted%	5.8	9.7	7.1	NA	5.4	3.9	0.01
Total NH_3 Lost (mg (kg raw slurry)$^{-1}$)	150	271	198	NA	116	99	1
Total N_2O Lost (mg (kg raw slurry)$^{-1}$)	17	13	14	NA	13	10	1

4. Conclusions

AD significantly reduces emissions of CH_4 from storage (25%) resulting in an overall reduction of GHG emissions. SLS reduced CH_4 emissions from storage by 46% alone and by an additional 43% following digestion (total CH_4 reduction in storage of 68% for AD + SLS). This indicates that SLS has a greater mitigation potential for methane in storage than AD, but this likely varies highly depending upon the digester performance. However, combining AD and SLS does not further reduce total GHG emissions from storage than AD alone as anaerobically stacking digested solids increased emissions of N_2O negating abatement of total GHG. AD could also significantly increase NH_3 emissions from manure storages if manure covers are not implemented, although combing AD and SLS could reduce the amount of NH_3 lost following digestion.

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Appendix A. Supplementary data

Supplementary data associated with this article can be found, in the online version, at http://dx.doi.org/10.1016/j.agee.2017.02.007.

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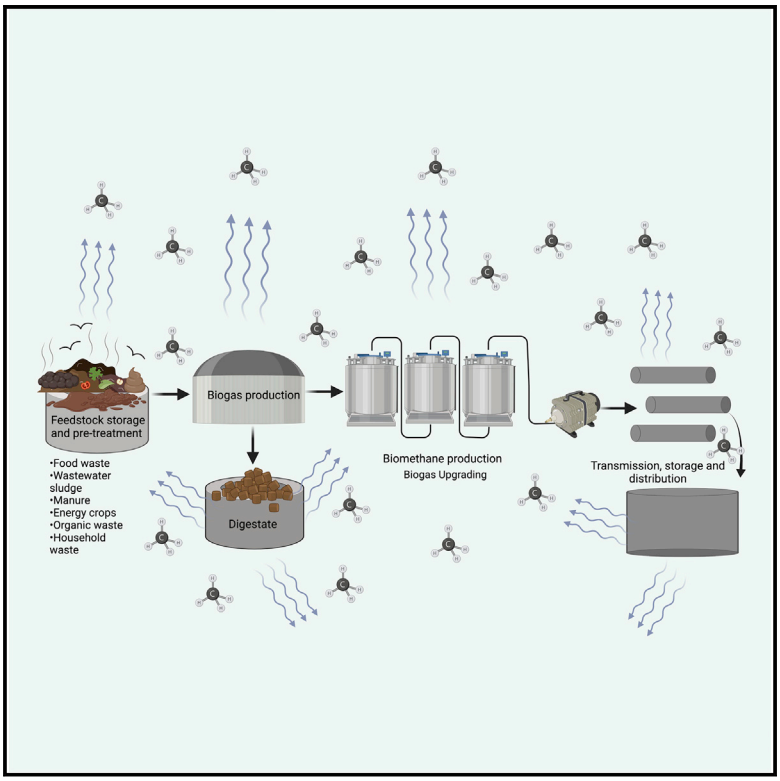
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One Earth

Article

Methane emissions along biomethane and biogas supply chains are underestimated

Graphical abstract



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In brief

Biomethane and biogas have emerged as cleaner alternatives for natural gas, as they generate fewer greenhouse-gas emissions. However, their production and distribution can still result in methane emissions, the magnitude of which remains unclear. Here, we evaluate methane emissions throughout the biomethane and biogas supply chains and show that emissions are greater than previously estimated. The digestate stage generated the most CH_4, and 62% of total emissions were released by just 5% of emitters.

Highlights

- The biomethane and biogas supply chain may emit up to 18.5 Tg CH_4 per year
- Biomethane and biogas emit much less CH_4 than oil and natural gas
- CH_4 loss rates in biomethane and biogas supply chain exceed those in oil and natural gas
- The top 5% of emitters account for 62% of CH_4 emissions

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Article

Methane emissions along biomethane and biogas supply chains are underestimated

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SCIENCE FOR SOCIETY An immediate shift away from coal and oil for energy is necessary to limit rising temperatures but is challenging due to energy needs, particularly in areas like heating and cooling that require substantial energy supply all year round. Natural gas is presently being used as a bridging fuel. It delivers the same performance as coal and oil but has lower CO_2 emissions. However, natural gas releases methane (CH_4), which is a more powerful warming agent than CO_2. Biomethane and biogas have emerged as strong candidates to replace gas and lower CO_2 and CH_4 emissions. However, these replacement fuels are not CH_4 emission free. Indeed, CH_4 is released at various points during production and distribution, but a thorough understanding of where, when, and how much CH_4 is released remains absent. A synthesis and analysis of existing biomethane and biogas CH_4 emission data reveal that CH_4 emissions throughout the supply chains have been underestimated. The majority of CH_4 comes from just a few super-emitters and mainly at the digestate stage. Mitigating CH_4 throughout biomethane and biogas supply chains is urgently needed if we are to limit global warming to 1.5°C.

SUMMARY

Although natural gas generates lower CO_2 emissions, gas extraction, processing, and distribution all release methane, which has a greater global warming potential than CO_2. Biomethane and biogas that use organic wastes as a feedstock have emerged as alternatives to natural gas, with lower carbon and methane emissions. However, the extent to which methane is still emitted at various stages along biogas and biomethane supply chains remains unclear. Here, we adopt a Monte Carlo approach to systematically synthesize the distribution of methane emissions at each key biomethane and biogas supply chain stage using data collected from the existing literature. We show that the top 5% of emitters are responsible for 62% of emissions. Methane emissions could be more than two times of greater than previously estimated, with the digestate handling stage responsible for the majority of methane released. To ensure the climate benefits of biomethane and biogas production, effective methane-mitigation strategies must be designed and deployed at each supply chain stage.

INTRODUCTION

As we move further into the 21st century, energy systems must move away from fossil fuels and grow in renewable energy capacity if Paris Agreement temperature targets are to be met. However, due to challenges in adopting low-carbon technologies, certain areas of global energy systems are difficult to decarbonize. These include heavy industry, transport, and heating and cooling systems, which together account for a significant portion of carbon dioxide (CO_2) emissions.[1] Natural gas has therefore been used as an important alternative fuel, which can offer large-scale energy supply, especially for domestic space heating and hot water needs, electricity generation, and industrial applications, with much lower CO_2 emissions compared with oil and coal. Although replacing oil and coal with natural gas reduces CO_2 emissions, fugitive emissions from the supply chain of natural gas—gas extraction, processing, and distribution—can all release CH_4. Around 39.6 million tonnes of CH_4 were emitted in 2021,[2] representing 61% of oil and gas emissions and 30% of total-energy-sector CH_4 emissions. Since CH_4 has a much stronger global warming potential than CO_2 and is currently responsible for at least one-quarter of global warming, there are strong calls for natural gas use to be reduced by at least 35% by 2050 and 70% by 2100 relative to 2019;[3]

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therefore, alternative clean-energy methods are vital to replace natural gas to limit global warming to 1.5°C.

An alternative method of decarbonizing natural gas is via replacing it with biomethane or biogas, which is a mixture of gases (mostly CH_4 and CO_2) produced from biodegradable materials. Biomethane and biogas production and use have been put forward as part of mitigation efforts,[4] with up to 37 exajoule (EJ)/year of biomass-based gases in Intergovernmental Panel on Climate Change Special Report on Global Warming of 1.5°C (IPCC SR1.5C) scenarios,[5] which limits temperature rises to below 2°C. The International Energy Agency (IEA)[6] reported that global biomethane and biogas production could satisfy nearly 20% of global gas demand if its sustainable potential was fully utilized.[6] Because biomethane is similar to natural gas, it can be easily stored and injected into the existing natural gas infrastructure, potentially providing reliable and affordable energy.[7] At the time of writing, Europe is the world leader in biomethane production by upgrading biogas, followed by the United States, China, and Canada.[8] According to the World Biogas Association (2019), 700 biogas-upgrading plants are operating worldwide, with 195 in Germany (the largest producer), with biogas currently dominating biomethane production. Biomethane and biogas production are expected to grow further, with demand predicted to grow 9-fold by 2040 compared with 2018 levels,[6,9] driven by increases in the volume of organic waste generated by modern societies, changes in waste practices, and the phasing out of fossil fuels aimed at reducing greenhouse gas (GHG) emissions and meeting government targets. Given this host of commitments, investments, and developments, biomethane and biogas could be crucial in helping to establish a clean, reliable, and affordable global energy system.

However, large quantities of CH_4 can still be emitted from the biomethane and biogas supply chains, including digestate handling, anaerobic digesters, upgrading units, feedstock storages and transmission, and storage and distribution stages.[4] CH_4 is a relatively short-lived GHG but has a global warming potential (GWP) 27.2 ± 11 times larger than CO_2 over a 100-year horizon and 80.8 ± 25.8 times larger over a 20-year time horizon for biogenic sources.[10] The importance of reducing CH_4 emissions to meet Paris Agreement[11] targets has been demonstrated by Rogelj et al.,[12] as it is an important GHG in terms of potential overshooting of Paris Agreement targets, where warming exceeds "well below 2°C" and then returns to the target level by 2100,[10] leading to potential tipping points in physical and socio-economic systems. The IPCC (Intergovernmental Panel on Climate Change) Sixth Assessment Report (AR6) (Working Group III)[13] highlighted CH_4 as playing a significant role in determining whether or when 1.5°C is achieved, as reducing CH_4 emissions will offset global temperature increase much more quickly than CO_2, due to its relatively short lifetime and higher GHG potency. The AR6 report also noted that reductions to CH_4 emissions will need to occur more rapidly than CO_2 and that reducing CH_4 (and other non-CO_2 GHG) emissions is essential for lowering warming.[13] As the AR6 scenarios predict biomethane capacity to increase by up to 200-fold between 2020 and 2050,[14] understanding where CH_4 emissions occur and how much is emitted is crucial.

There are some emissions-measurement studies to date focusing on specific biomethane facilities,[4,15–22] which have measured on site (measurement of emissions at each individual point source) and off site (measurement of emissions based on observations made away from the site). These can also be referred to as bottom-up (on-site) and top-down (off-site) studies. These have found that emissions from biomethane facilities can be up to 97 kg h^{-1} CH_4.[4,16–24] However, a comprehensive evaluation by characterizing the distribution of CH_4 emissions at each biomethane and biogas supply chain stage remains unclear.

Here, we bring together the published emissions data from CH_4-measurement studies to assess and synthesize the distribution of emissions from each supply chain stage in order to characterize the emissions profile of the biomethane and biogas supply chain (see experimental procedures and Figure S1 for the selected supply chain route). A Monte Carlo aggregation examines the distribution of supply chain emissions. This allows for the emission profile of biomethane and biogas supply chains to be characterized. We find that, while the biomethane and biogas supply chain emits less CH_4 than the oil and natural gas supply chain, the emission rate is higher. Furthermore, we find that 62% of cumulative emissions are released by just the top 5% of emitters. We also find that methane emissions could be more than two times higher than previously estimated, and the digestate-handling stage contributed to the largest CH_4 emissions along the supply chain. Our results will allow for a greater understanding of how to improve the sustainability of biomethane and biogas production by providing plant operators, investors in the supply chain, and policymakers with information on where improvements can be made in biomethane and biogas supply chains to reduce CH_4 emissions, as well as whether existing or proposed CH_4 regulations are sufficient or need to be revised.

RESULTS

Method summary

To assess overall supply chain emissions, the biomethane supply chain is divided into five major stages: (1) feedstock; (2) biogas production; (3) biogas upgrading; (4) transmission, distribution, and gas storage; and (5) digestate storage. This study was compiled from several published studies and the data from on-site (taken at each individual emission source) and off-site measurements (reported for the entire site). The kernel density estimation (KDE) function was used to assess the characteristics of the data distribution gathered from individual sources for each stage of the supply chain. Following that, a Monte Carlo simulation was performed to estimate total supply chain emissions, which were then compared with the off-site emissions reported from whole-site measurements in previously published studies (see the experimental procedures for further details).

Total supply chain emissions

The cumulative distribution of the supply chain CH_4 emissions is shown in Figure 1A. Median and mean emissions are 40.0–42.3 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (41.1–41.3 at the 95% confidence interval [CI]) and 51.4–52.7 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (52.2–52.4 at the 95% CI), respectively, with a 5th percentile of 11.0–16.3 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (15.6–15.7 at the 95% CI) and a 95th percentile between 118.2 and 144.0 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (131–133 at the 95% CI) using

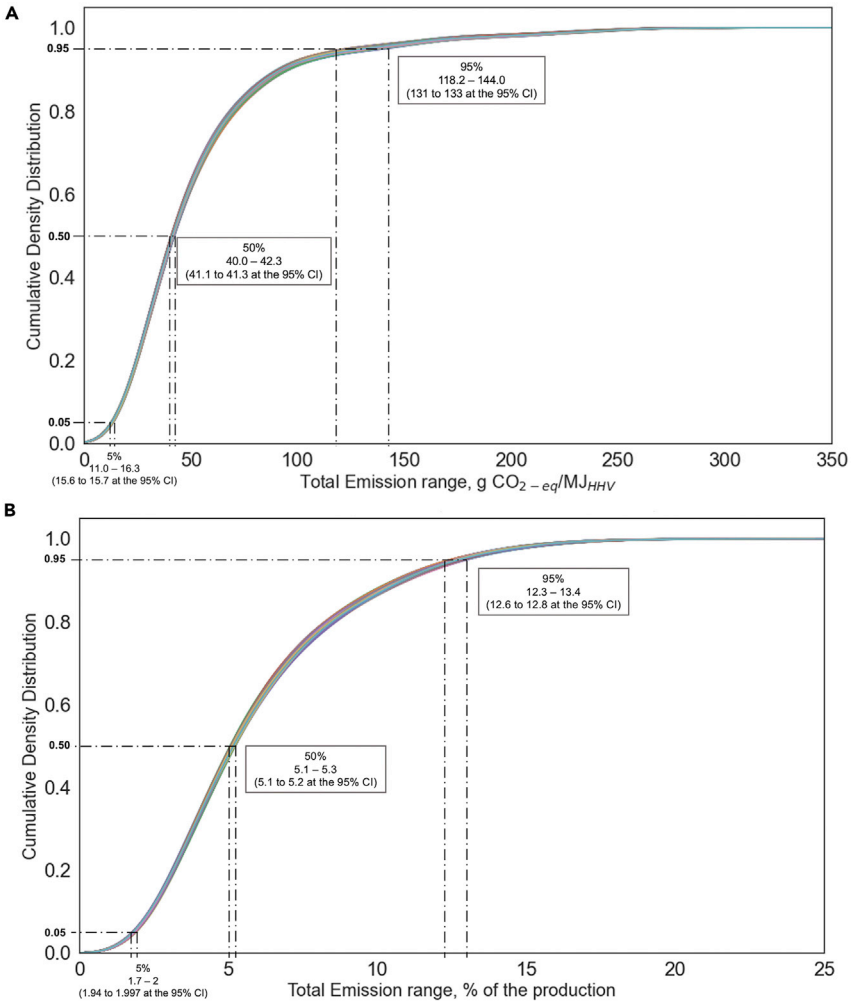


Figure 1. Cumulative distribution of CH_4 emissions from the total supply chain

(A) Cumulative distribution of total supply chain CH_4 emissions for the 10,000 Monte Carlo runs and 100 curves described in the experimental procedures, expressed as g $CO_{2\text{-eq.}}/MJ_{HHV}$.

(B) Cumulative distribution of total supply chain CH_4 emissions for the 10,000 Monte Carlo runs and 100 curves, expressed as percentage of total CH_4 production.

The range of 5th, 50th, and 95th percentile estimates are shown as dotted black lines. CI: confidence interval.

GWP_{100} values. Each curve defines the cumulative distribution for a single Monte Carlo simulation and shows that total supply chain emissions range from 2.5 to 343 g $CO_{2\text{-eq.}}/MJ_{HHV}$. The emissions distribution is highly upward skewed (Figure 1A), which is indicative of disproportionately high emitting sites referred to as "super-emitters" (see the identification of super-emitters section for details). Our findings are consistent with those observed for oil and natural-gas supply chains.[25–30] Using global biogas and biomethane production of 35 megatonnes of oil equivalent (Mtoe) (1.47×10^{12} MJ) in 2018,[6] our model-based estimate of 2018 biomethane supply chain emissions may account for up to 18.5 teragram (Tg) CH_4 per year (6.4–7.8 Tg CH_4 year^{-1} at the 95th percentile and an average of 2.8–2.9 Tg CH_4 year^{-1}), which is more than two times greater than the International Energy Agency's (IEA's) estimate of CH_4 emissions from bioenergy (9.1 Tg in 2021).[2] Our estimate of global biogas and biomethane CH_4 emissions is significantly lower than in the global oil and natural-gas supply chain (82.5 Tg in 2021);[2] on the other hand, it is comparable to the production segment of the US oil and natural-gas supply chain (6.1–7.1 Tg year^{-1})[31] based on site measurements.

The cumulative distribution of emissions as a percentage of total CH_4 produced is shown in Figure 1B. The 5th percentile is 1.7%–2.0% (1.94%–2.0% at the 95% CI) of CH_4 production, and the 95th percentile is 12.3%–13.4% (12.6%–12.8% at the 95% CI) of total gas production. The ranges in minimum, median, mean, and maximum values were fairly consistent across all estimates (Figure 1). While the low and median estimates are nearly identical, the disparity between biomethane and natural gas varies widely in the highest estimates. The median ranged from 5.1% to 5.3% (5.1%–5.2% at the 95% CI), with mean emission rates of 5.90%–6.04% (5.9%–6.0% at the 95% CI) of total CH_4 production, which is higher than natural gas (0.8%–2.2% of CH_4 production).[25,26] Rutherford et al.[31] found CH_4 emissions in the oil and natural-gas-production segment to be 1.3% (1.2%–1.4% at the 95% CI), which is significantly lower than our findings. On the other hand, despite declining gas production, one of the highest reported CH_4 emissions from oil and gas production (Uinta Basin from a multi-year record of in-site observations) reveals a higher emission rate than our results (6%–8%).[32] Although emissions from the biomethane supply chain are comparable to oil and natural-gas production in terms of Tg CH_4 year^{-1}, the production-normalized emission rate is considerably higher. This could be due to a variety of factors, including poorly managed production facilities; a lack of attention to the biomethane industry resulting in lower investments for modernization, operation, and monitoring; and employment of highly skilled plant operators[16,21] when compared with oil and natural gas. In addition, poor design and management of feedstock and digestate storage units[33] as well as a limited interest in infrastructure emissions may result in higher emission rates compared with the amount of gas produced. Because oil and natural-gas supply chains have been primarily operated by large companies for decades, they have invested more in leak detection and repair.[34,35] On the other hand, given the growth in biomethane generation due to national decarbonization strategies, more urgent efforts are also needed for the biomethane supply chain to address not only CH_4 emissions but also the sustainability of biomethane.

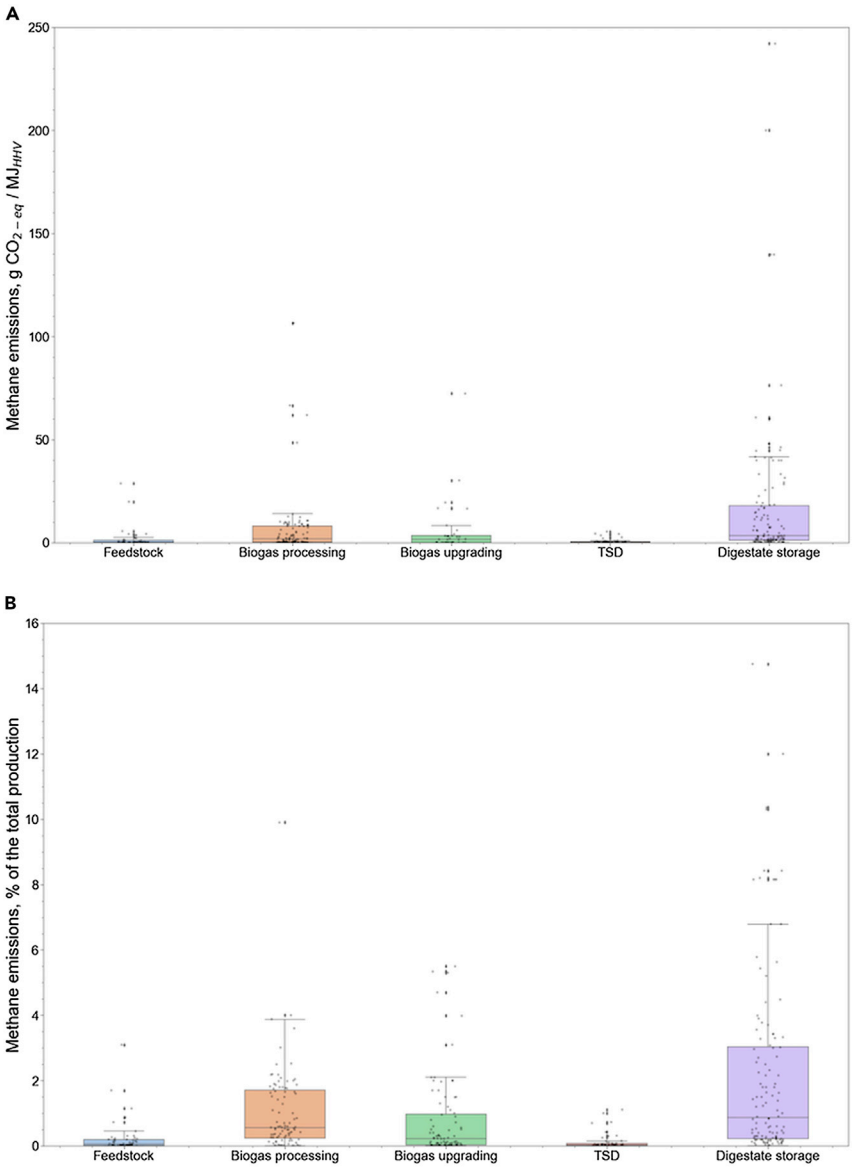


Figure 2. Literature CH_4 emissions from different stages of biomethane supply chain

(A) Emissions range of feedstock (n = 49), biogas processing (n = 100), biogas upgrading (n = 35), TSD (n = 44), and digestate storage (n = 119) stages in g $CO_{2\text{-eq.}}/MJ_{HHV}$.

(B) Emissions range of feedstock (n = 52), biogas processing (n = 95), biogas upgrading (n = 84), TSD (n = 48), and digestate storage (n = 120) stages in terms of total CH_4 emissions as a percentage of the total gas production rate.

Individual estimates are shown as circles in the same color at each stage of the supply chain, with median and 25th and 75th percentile boxes. Sample sizes for each stage are demonstrated in the Figure 3.

Identification of super-emitters

A small proportion of facilities or equipment with disproportionately large emission rates are labeled super-emitters,[36,37] causing the heavy-tailed distribution (see Figure S4). A small number of high emitters may cause under- or overestimations of emissions rates[38] if they have intermittent emissions patterns, insufficient process equipment usage, or inadequate operations and maintenance strategies. In this study, super-emitters have been investigated at various stages across the supply chain, including feeding systems; substrate storage; runoff ponds; pressure relief valves on the anaerobic digesters and gas holders; exhausts and aeration lines of upgrading units; ventilation of units, such as compressors or closed digestate tanks; open digestate storage; and flaring. Within the heavy-tail distribution (Figures 1A and 1B) and the boxplot of each stage's emissions (Figure 2), the mean emission rate is higher than the median because of super-emitters (see Table S1 for details). Since we lack information on on-site CH_4 sources, we identify them as the top 5% of highest emissions based on the cumulative density function of CH_4 emissions, parallel to natural-gas production sites.[29,36,39] The highest 5% of total emissions (199–224.8 g $CO_{2\text{-eq.}}/MJ_{HHV}$) account for 62% (CI: 58%–66%) of cumulative emissions, with a threshold of 211.9 g $CO_{2\text{-eq.}}/MJ_{HHV}$. The characteristics of super-emitters in the biomethane supply chain are similar to those of super-emitters in the oil and natural-gas supply chain (the largest 5% of leaks contribute to 50%–60% of total emissions).[29,36] Since super-emitters are unlikely to remain constant over time, continual monitoring will be required to detect intermittent emission patterns or unpredictable leaks from the biomethane supply chain. Future work is necessary to understand the characteristics of individual super-emitter sites in the biomethane supply chain. The efficiency of mitigation efforts could be improved by investing in the underlying cause of preventable operational conditions at a component level.[30]

Contribution of each supply chain stage

The contribution of each stage of the biomethane supply chain is illustrated in Figure 2A in g $CO_{2\text{-eq.}}/MJ_{HHV}$ and as a percentage of total production in Figure 2B. The distributions are almost identical. Emissions are mainly from digestate storage, followed by production and upgrading stages. Similar results were observed by Reinelt et al.,[17] where the highest emissions are from open digestate storage and pressure-release valves. Similarly, Alvarez et al.[39] found production and gathering units to be the main emission source in the US oil and natural-gas supply chain. Overall, the lowest emissions are exhibited in the transmission, storage, and distribution (TSD) stage, similar to the US oil and natural-gas supply chain.[39]

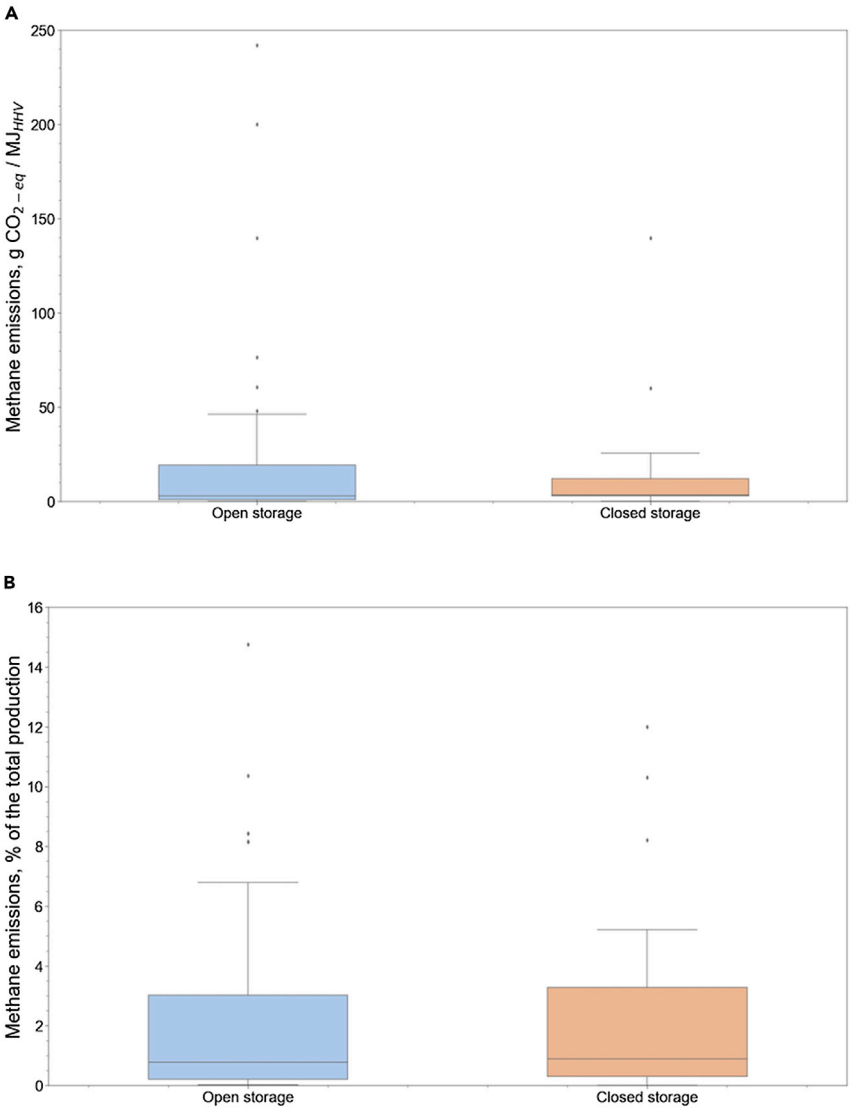


Figure 3. Literature CH_4 emissions of open and closed digestate storage

(A) Emissions from digestate handling from open (n = 98) and closed (n = 21) storage tanks in g $CO_{2\text{-}eq.}/MJ_{HHV}$.

(B) In terms of the percentage of total biomethane produced, illustrating emissions from the open (n = 95) and closed (n = 25) storage tanks.

Closed tank emissions originate mainly from leaks of covered material and ventilation of stockpile building.

Of particular note here is that the digestate storage stage is a significant source of CH_4, ranging between 0.05 and 242.1 g $CO_{2\text{-}eq.}/MJ_{HHV}$ (Figure 2A) or 0.005% and 14.8% of the total biomethane produced (Figure 2B). Sources of emissions are open or covered digestate (liquid and solid) storage tanks and lagoons. The emissions from digestate handling, such as post-composting processes, application of digestate, thickening exhaust, dewatering units, and leaks from centrifuges, were excluded from the biomethane supply chain in this study. Our analysis revealed that CH_4 emissions from this stage are 23% higher than previously reported,[40] while they still form a substantial portion of previous studies.[19,40]

The biogas production stage is the second biggest emission source, ranging from 0.002 to 106.5 g $CO_{2\text{-}eq.}/MJ_{HHV}$ (Figure 2A) or 0.001% to 9.9% of CH_4 production (Figure 2B). Biogas-production emissions are mainly from the anaerobic digester and hygienization tank. Hygienization tanks represent a relatively small fraction of the emissions from this stage. Emissions from the anaerobic digester are highly variable, depending on fugitive emissions from different cover types and control of venting from pressure-release valves. In addition, Zeng et al.[41] found that the fermentation temperature and quality of the feeding material have an effect on the CH_4 emissions from anaerobic digesters. Following biogas production, estimates of emissions from biogas upgrading are 0.002–72.4 g $CO_{2\text{-}eq.}/MJ_{HHV}$ (Figure 2A) or 0.001% to 5.5% of CH_4 production (Figure 2B), which are slightly higher than what was reported by Dumont et al.[40] The emissions from the biomethane production stage arise from the exhaust or aeration of units, ventilation ducts, booster pumps, safely valves on upgrading facilities, water or chemical scrubbers, and membranes.

In addition, feedstock emissions, resulting from fugitives and vents from substrate storage, are the fourth highest contributor to the supply chain, accounting for 0.0003 to 28.8 g $CO_{2\text{-}eq.}/MJ_{HHV}$ (Figure 2A) or 0.0003% to 3.1% of the total CH_4 production (Figure 2B), and represent the smallest proportion of total supply chain emissions. Higher emissions are associated with substrate storage. Dumont et al.[40] reported a larger range in CH_4 emission (0.2%–0.5% of CH_4 production) for feedstock storage.[40] However, their results were based on a smaller dataset than ours, and emissions may have reduced through technology improvements since their study was published.

Digestate-handling approaches

As discussed above, digestate storage is the largest emission source in the biomethane supply chain. This is because of the accumulation of organic material, which leads to CH_4 production from fermentation. According to Döhler et al.,[42] digestate storage may account for nearly 27% of global $CO_{2eq.}$ emissions from anaerobic digestion processes. How digestate is handled has a major impact on emissions, with open digestate storage tanks and lagoons emitting more than closed tanks similar to the results from Paolini et al.[33] (Figure 3). The residual gas potential, digestate temperature, substrate amount, level of filling, and meteorological conditions all have a significant influence on the emission rate from open digestate storage tanks

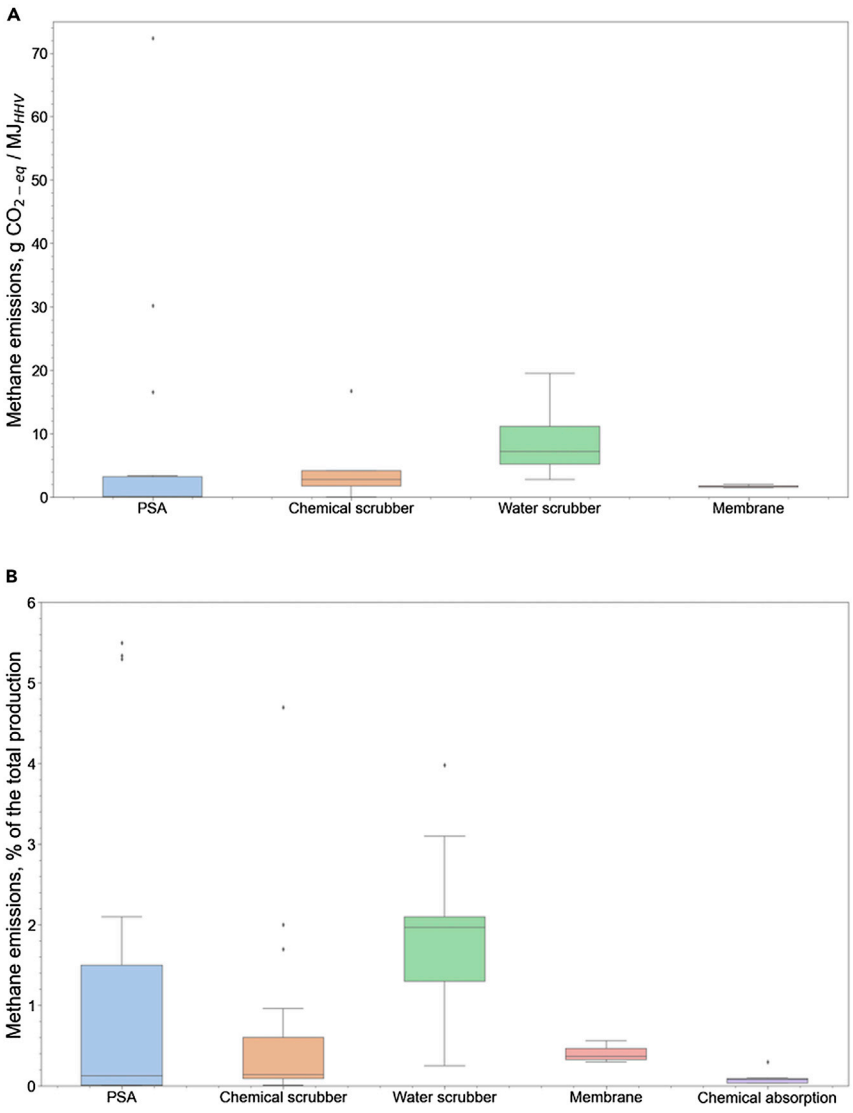


Figure 4. Literature CH_4 emissions from different biogas-upgrading technologies

(A) Emissions from biogas-upgrading technologies in g $CO_{2\text{-eq.}}/MJ_{HHV}$, pressure swing adsorption (PSA) with activated carbon filters (n = 22), water scrubber (n = 4), chemical scrubber (n = 5), and membrane (n = 4).

(B) Emissions from upgrading biogas technologies in terms of the percentage of total biomethane produced, with PSA with activated carbon filters (n = 30), water scrubber (n = 9), chemical scrubber (n = 25), chemical absorption (n = 14), and membrane technologies (n = 6).

Scrubber emissions include chemical (e.g., amine) and water scrubber emissions.

and lagoons.[15,19,43,44] Figure 3 clearly demonstrates that the closed tanks can still emit CH_4, although emissions from closed tanks can be avoided with improved covering materials, effective design, and regular maintenance. The facilities should consider becoming accredited under the Publicly Available Specification (PAS) 110 standards,[45] which recommend coverage of digestate to diminish emissions. Therefore, we recommend using closed digestate storage with vapor-recovery systems directed to the upgrading unit where economically viable to address emissions from this stage. Targeting reductions in digestate-handling emissions provides the greatest environmental improvements, though it is noted that detection and mitigation strategies would require additional expense and regulation.

Impact of biogas-upgrading technologies

Upgrading biogas to biomethane can cause significant emissions. The literature provides scant data on specific upgrading technologies, though available evidence shows that membrane filters and chemical absorption leads to lower emissions than pressure swing adsorption (PSA) and water and chemical scrubbers (see Figures 4A and 4B). Therefore, initial indications are that chemical absorption technology is the best available technology for upgrading to reduce CH_4 emissions, which is the line with previously reported values.[46,47] PSA and water scrubber utilization should be avoided, though more measurements should be conducted.

Total supply chain emission estimates versus whole-site mobile measurements

Alongside the on-site (aggregation of component-based emission) Monte Carlo approach described above, whole-site (off-site) measurements are a useful benchmark. In the literature, CH_4 emissions from 792 whole-site measurements varied between 0.1 and 483 g $CO_{2\text{-eq.}}/MJ_{HHV}$, with an average of 51.7 and a median of 24.6 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (see Figure 5A). This is a larger range with lower median and higher estimate of upper limit than our Monte Carlo simulation of on-site measurements. While the mean of the Monte Carlo runs (51.4–52.7 g $CO_{2\text{-eq.}}/MJ_{HHV}$) and whole-site measurements (51.7 g $CO_{2\text{-eq.}}/MJ_{HHV}$) are comparable, the median of the Monte Carlo runs (40.0–42.3 g $CO_{2\text{-eq.}}/MJ_{HHV}$) are greater than the whole-site measurements (24.6 g $CO_{2\text{-eq.}}/MJ_{HHV}$) due to the heavy-tailed distribution of the Monte Carlo runs. Before running the Monte Carlo simulation, the emissions probability density function of each stage is identified to establish a good fit. The heavy-tailed distribution is due to the presence of super-emitters in each supply chain stage in the Monte Carlo runs, while whole-site emissions data did not exhibit this heavy tail.[48] However, super-emitters are certainly observed in the whole-site measurements and the maximum emission is greater than in the Monte Carlo runs, but these are insufficient in quantity and magnitude to raise the median above the mean. This discrepancy between the distribution of whole-site measurements and that observed in the Monte Carlo approach (i.e., from aggregation of measurements from each stage) is

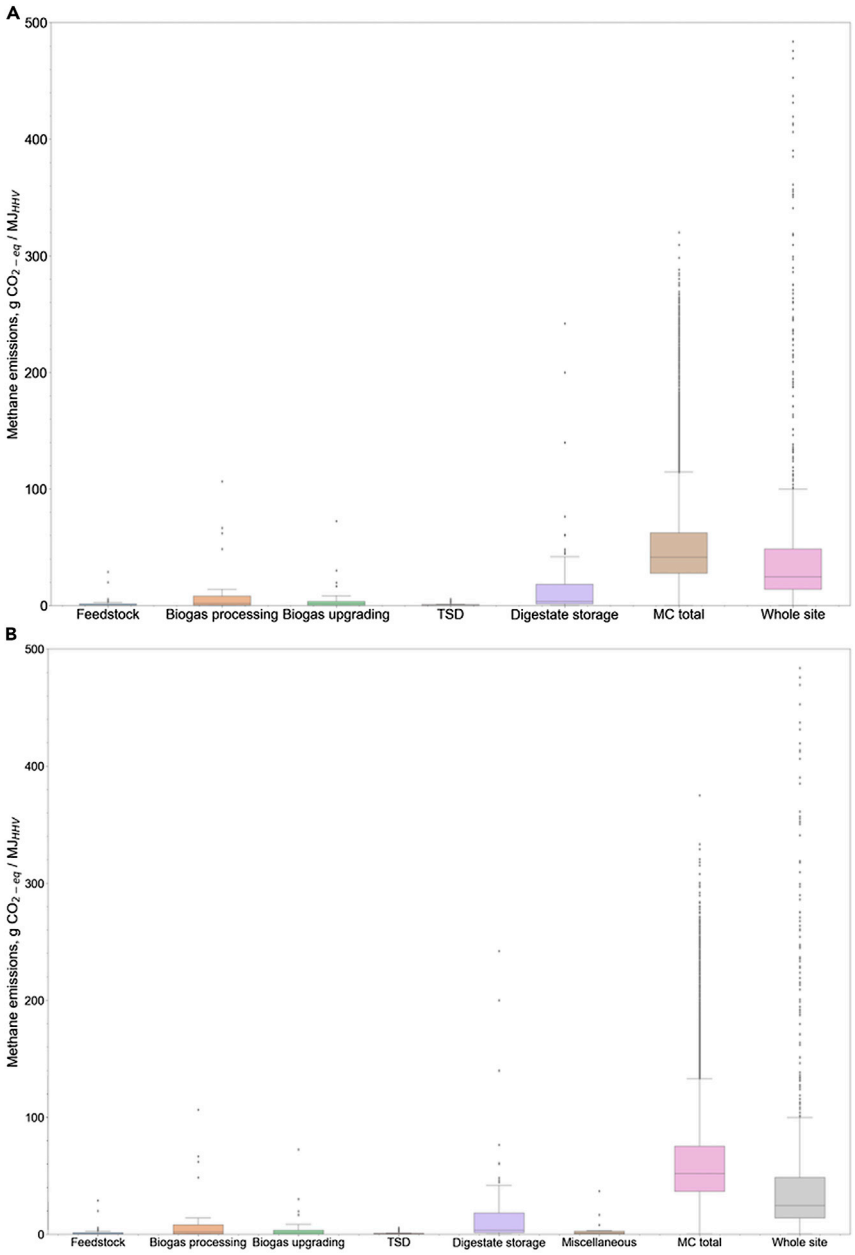


Figure 5. Each stage of emissions with the whole-site measurements and MC runs

(A) Literature emissions range for feedstock (n = 49), biogas processing (n = 100), biogas upgrading (n = 35), TSD (n = 44), and digestate storage (n = 119) stages with whole-site measurements (n = 792) and 10,000 Monte Carlo runs (MC total) with respect to g $CO_{2\text{-eq.}}/MJ_{HHV}$.

(B) Miscellaneous sources (n = 19) were added as an additional stage emission and MC total was reassessed to compare with whole-site emissions (off-site measurements).

Individual estimates are shown as circles in the same color at each stage of the supply chain, with median and 25th and 75th percentile boxes. Sample size for each stage and whole-site emissions are depicted. The median of the MC run is substantially higher than the medians of the five stages added together because (1) the medians of the derived KDE functions for each supply chain stage are substantially higher than those of the raw data and, (2) in any case, it is not expected that the sum of medians from each supply chain stage necessarily approximates the median of the sum of stages (see the experimental procedures for details).

worthy of further research in the future. A number of factors are known to affect measurements, including meteorological conditions during the survey, duration of measurements, uncertainties in emissions rate calculation models, the presence of super-emitters, and process conditions of facilities.[18] It is also likely to be influenced by miscellaneous sources (see Figure 5B),[19] such as biofilters used for odor reduction, stored solids causing fermentation, emissions from service opening,[19] or leakages located on top of units,[49] which are not quantified by the on-site measurement studies. We combined the miscellaneous sources reported in a few studies[19,23,50,51] and estimated their impacts on total emissions using a Monte Carlo simulation (see Figure S2) after identifying the associated KDE (see the experimental procedures), which impacts the data distribution.

Figure 5B demonstrated that miscellaneous sources could increase total supply chain emissions by 22%. However, it is noted that, because only four studies reported emissions from biofilters and solid separators, more detailed monitoring surveys are required to better understand the impact of miscellaneous emission sources on supply chain emissions. The high leakage rate reported in off-site measurements could also be due to process disturbances or extensive venting and flaring caused by insufficient infrastructure, which results in an intermittent and highly unpredictable emissions pattern that can overestimate or underestimate significant CH_4 sources.[38] The divergence between on-site and off-site measurements is most likely due to abnormal operating conditions resulting in high CH_4 emissions primarily from the production segment,[31] which is consistent with that of oil and natural-gas supply chains.[39] We agree with Zavala-Araiza et al.[52] and Rutherford et al.[31] that increasing on-site, component-level emission data through continuous emission monitoring and effective characterization of emission sources can reduce the uncertainty and divergence between on-site and off-site measurements.

DISCUSSION

Overall, this study showed that the broad features of the biomethane supply chain led to emission profiles similar to those of oil and natural gas, although digestate handling, biogas production, and upgrading are key differentiators. The synthesis of

available data here showed that this leads to lower direct CH_4 emissions than the oil and natural-gas supply chain but much higher CH_4 loss rates than the oil and natural-gas supply chain. This conclusion is pertinent in the context of global efforts to mitigate CH_4 emissions, which to date largely focuses on natural-gas supply chains. It is also pertinent to broaden efforts to mitigate climate change, where CH_4 emissions are increasingly recognized as a key climate forcer. Given the strong potential role of biomethane in Paris Agreement compliant energy futures, best available technology must be applied to detect and reduce supply chain emissions, policy and regulation[53] must consider these emissions more systematically, and a better understanding of the counterfactual life cycle emissions for waste and by-product biomethane feedstocks must be developed. It should be noted that, even if feedstocks are not used to generate biomethane, they may still emit CH_4; in fact, some studies have suggested that treating manure for biomethane production could be a mitigation strategy.[54] We believe that this large amount of CH_4 emissions from the biomethane supply chain, on the other hand, can be avoided by taking appropriate emission identification, detection, measurement, and quantification measurements. It is critical to emphasize that, if biomethane is widely used in the future to achieve decarbonization goals, biomethane supply chain emissions should be avoided in order to achieve net zero goals.

Reflecting on these results with respect to the EU Renewable Directive (RED) 2009/28/EC,[55] it is clear that cutting emissions from digestate handling and gas engines could underpin more sustainable biomethane production. According to an EU report[56] on the sustainability of solid and gaseous biomass used for electricity, heating, and cooling, the GHG threshold for biomethane production is 34.8 g $CO_{2\text{-eq.}}/MJ_{HHV}$,[56] excluding digestate emissions. In contrast, CH_4 emissions from the biomethane supply chain are estimated in this study to range from 2.5 to 343 g $CO_{2\text{-eq.}}/MJ_{HHV}$ and 0.8 to 182 g $CO_{2\text{-eq.}}/MJ_{HHV}$ (18.3–19.5 g $CO_{2\text{-eq.}}/MJ_{HHV}$ for the median and 64–74 g $CO_{2\text{-eq.}}/MJ_{HHV}$ for the 95th percentile) when digestate emissions are excluded (see Figure S3). In view of CO_2 and N_2O (GWP_{100} = 273 ± 130)[10] emissions from biomethane production, total GHG emissions from the biomethane supply chain are likely to exceed this threshold limit unless urgent actions are taken. Given the different lifetimes and GWPs of CO_2, CH_4, and N_2O, future research can focus on integrating emissions across different timescales in order to further expand the impact of the biomethane supply chains on global warming and climate change. Clearly, under these operating conditions and in light of the wide diversity of biogas production pathways, biomethane production may lose its advantages as a clean-energy technology and may jeopardize Paris Agreement targets if used extensively. This study would serve as a guideline for the emission ranges associated with each stage while also recommending appropriate measures for each stage to cut emissions and make progress toward Paris Agreement goals. Therefore, emission-minimizing technologies and techniques and more specific regulations on emissions and leak detection and repair are essential to significantly reduce supply chain emissions. We are also aware of the counterfactual case for what level of CH_4 emissions would occur if the feedstock had not been converted into biomethane. Future studies should focus on counterfactual analyses to assess the GHG credits under various counterfactual scenarios.

Our biomethane supply chain emissions model presented in this study represents the most common technologies used in the industry, but it has some limitations regarding data availability and resolution. Firstly, input data were taken only from measurement surveys, and the sample size is not large enough to determine a probability distribution model for each supply chain. As such, the KDE function was used rather than goodness of fit since the data could not be fitted to certain distribution functions, due to the lack of data and heavy-tailed distribution. Furthermore, much of the literature data were excluded, owing to the use of default emission factors, especially in modeling studies. Secondly, some studies could not be included because they did not report biogas or biomethane production rates despite reporting CH_4 emissions.

The most detailed measurement surveys have been conducted in various regions of Europe and mainly at agricultural plants, so this study substantially reflects European agriculture. Further possible research directions associated with this work include adapting the emissions profiles of theoretical supply chain routes, for example, using life-cycle-assessment tools. Future research should target data collection from various biomethane supply chain routes in other countries to reduce uncertainty in the data and improve size and representativeness of the samples, which can help to identify the most sustainable biomethane production routes. This accumulated database can be used to improve equipment, processes design, and operations that would mitigate CH_4 emissions.

EXPERIMENTAL PROCEDURES

Resource availability

Lead contact

Further information and requests for resources should be directed to and will be fulfilled by the lead contact, Semra Bakkaloglu (s.bakkaloglu@imperial.ac.uk).

Materials availability

This study did not generate new unique materials.

Data and code availability

All original datasets used in this work were made available as part of the publications referenced and described in the text. The Python code used for the Kernel density estimation (KDE) function and Monte Carlo simulation with the data have been deposited at Zenodo Data: https://doi.org/10.5281/zenodo.6550794.

Methodological approach

This study aims to estimate CH_4 emissions from the biomethane supply chain and characterize the emissions sources in the various stages of the supply chain (described in Figure S1). The screening criteria for mobile CH_4 emissions measurements required on-site or off-site direct measurements be reported by the study authors, rather than drawing on experimental, lab-scale, and theoretical studies.

The existing literature reports emission rates in different units, and some studies provide insufficient information to allow for unit conversion. In this study, CH_4 emission estimates were converted into percentage of total production (volume of CH_4 emitted/volume of produced gas) and grams of CO_2 equivalent per megajoule of energy based on higher heating value (HHV). These were chosen to allow for comparisons with the oil and natural-gas supply chain without inferring downstream services. The source emissions were divided by the total expected volume of biomethane that would be generated for energy utilization.

Assumptions were applied to convert published emission rates into metric units. It was assumed that the GWP_{100} of CH_4 is 27.2,[10] with an HHV of

38.1 MJ/m^3 or 55.5 MJ/kg. The average volume percentages of CH_4 in biogas and biomethane were taken as 65% and 95%, respectively, unless otherwise stated in a study. We assumed the CH_4 content is 55% in biogas for manure feedstock. We neglect uncertainty of measurements and GWP_{100} (±11), although measurement uncertainty exists whenever an emissions rate is quantified. Similar to Brandt et al.,[28] we evaluate all emissions at their reported levels and investigate the impact of emissions distribution. GHG emissions other than CH_4, such as CO_2, N_2O, and NH_3, were not included because they are out of the scope of this study. Moreover, CH_4 emissions based on GWP_{20} (80.8) were provided in the Figure S4. The three stages of this study are:

1. Building the emissions inventory
2. Assessing the supply chain emissions model
3. Applying Monte Carlo simulations to produce total emissions ranges.

Emissions inventory

Following systematic reviews of the existing evidence base, 51 papers reporting mobile CH_4 emissions measurements were examined, including academic papers as well as governmental and industry reports (see the supplemental experimental procedures). We utilized the data from mobile CH_4 measurements using on-site leak detection and ground-based remote sensing methods (off site). CH_4 emissions from landfill were excluded because there is a lack of data on the amount of biogas and biomethane generated from landfill-gas-collection system, which is mainly calculated using landfill-modeling tools, and CH_4 emissions depend on CH_4 oxidation rate as well as top soil cover material rather than infrastructure emissions.[57] In addition, we only considered the emissions from wastewater treatment plants with anaerobic digesters. The details of the chosen biomethane supply chain route employed in this study are described in detail in the Figure S1.

Emission inventory data availability is highly variable, owing to variations in the applied methodologies, differing plant design and operation, and insufficient data for each supply chain. Most emissions data were for Europe. Datasets for each emissions source were divided into subcategories, where there was discernible variation between feedstock materials (see Table S1). The stages in the biomethane supply chain are (1) collecting and storing organic materials (feedstock); (2) converting them to biogas under anaerobic conditions (AD); (3) upgrading biogas to biomethane (upgrading); (4) transportation, gas storage, and distribution of generated gas (TSD); and (5) digestate storage.

Feedstock storage

Any biodegradable material, such as agricultural residues, maize, crops, sewage sludges, or food and drink waste, utilized in anaerobic digestion is called feedstock. The yield of biogas from a specific feedstock can vary based on the dry-matter content, residence time in the digester, and feedstock purity.[58] Feedstock transported from a third party to the production facility is stored in the facility and pre-treated before being sent to the biogas-production stage. This stage covers four major components: runoff ponds, screw conveyor, mixing tank (homogenization tank), and substrate storage. Substrate storage tanks and biomass-receiving units, such as feedstock piles, runoff ponds, screw conveyors, and mixing (homogenization) tanks, are the main sources of emissions, although few studies have investigated emissions from this stage.[15,17,19,22,46,49,59–61] Feeding system emissions are included in substrate storage emissions (see Table S1). These emissions are mainly fugitives, predominantly from open storage tanks and feeding units.

Biogas production

The physically treated material is pasteurized and delivered to an anaerobic digester to generate biogas. The CH_4 concentration in the biogas depends on the type of digestate feedstock, type of anaerobic digester, and conditions in the digester, such as mesophilic and thermophilic. The biogas production stage consists of a buffer (hygienization) tank and a reactor (anaerobic digester). Previously reported CH_4 emissions from hygienization tanks, anaerobic digesters, and post-digesters are included in this stage (see Table S1).[15–17,19,41,49,50,59,62–76] These emissions are fugitives and venting.

Biomethane production: Biogas upgrading process

The biogas can be upgraded into biomethane by removing impurities. Depending on the biogas quality and the end use, different upgrading technologies can be used. Currently, water scrubbing is the most common commercial technology, followed by chemical scrubbers, membrane, PSA, organic physical scrubber, and cryogenic separation.[77] CH_4 emissions from various upgrading processes, such as carbon filters, chemical and water scrubbers, and membrane technologies, were reported in previous studies[17,19,46,47,49,50,71,78–81] and have been included in the upgrading processes stage (see Table S1). These are fugitives and vent from PSA exhausts and aeration and ventilation ducts.

Transmission, storage, and distribution

Biogas can be utilized to generate heat, electricity, or both. Biomethane can be injected into a gas grid or used as a renewable transport fuel in vehicles. Previous studies reported exhaust CH_4 from cogeneration, electricity production, heat utilization, combined heat and power units, gas engine slip, flare, and gas holder.[17,19,23,41,59,62,67,71,82–85] Emissions from pipeline, flare, compressors, and pressure-relief valves (PRVs) are considered in the transmission, storage, and distribution stage (see Table S1) in order to compare with natural-gas supply chain. End-use emissions mainly coming from incomplete combustion from combined heat and power (CHP), as well as fugitive leaks and vents from energy production units, were not included into emissions from this stage.

Digestate storage

Digestate can be used as is or can be further processed through different methods to be used as fertilizer. The PAS 110 for digestate quality specification is designed to ensure that digestate is no longer classified as waste and is safe and reliable to use as a fertilizer, soil improver, or conditioner, and it recommends that all types of digestate be covered.[45] Although some facilities follow the PAS 110 scheme, none of the published papers address whether the digestate complies with the standard. The solids-liquids separators, such as centrifuge and screw-press separators, membrane filters, biofilters, aerobic treatment, and composting, are widely used to process digestate.[86] The processing and storage of liquid and solid digestate can also cause emissions, depending on the temperature, wind, atmospheric pressure, plant process parameters, and storage tank filling level.[19] Emissions data by digestate types (e.g., solid or liquid) and storage properties (closed or open tanks) were collected from previous studies (see Table S1).[15–17,19,23,24,43,44,49,50,59,62,67,71–73,85,87–92] The emissions are mostly fugitives and venting from open PRVs. The emissions associated with digestate use, such as fertilizer application and post-composting, were excluded from the supply chain because digestate is not always used in the operation area and their emissions are only reported in a few studies.

Miscellaneous emissions

An additional emission stage has been added to account for a variety of sources that are not necessarily present in every biomethane supply chain. The CH_4 emissions from biofilters for odor reduction, compost filters, and separators have been reported in a few studies[19,23,50,51] and are included as miscellaneous emissions.

Whole-site mobile measurements

Whole-site mobile measurements were included for comparisons to the modeled of total emissions from each supply chain.[17,19–23,46,49–51,61–65,71,73,75,88,93] Various emission-measurement techniques were used to quantify emissions and their sources in the whole supply chain, which caused a large variation in emissions.

Supply chain emission models

It is important to determine the probability density function (PDF) of emissions in each stage before running the Monte Carlo simulation.[48] The PDF establishes a good fit of the emissions for each stage, including an uncertainty assessment. Because the emissions in each stage exhibit unique characteristics, particularly with respect to various super-emitters, their data and probability distributions differ (see Table S2 for the characteristics of PDFs). Due to the heavy-tailed distribution (Figure S3) and lack in the sample size, the nonparametric PDF ,which is the KDE, were generated to investigate the PDFs of the emissions from each stage using Python. KDE typically provides more accurate estimates of data distributions than parametric approaches.[94–96] The bandwidth of KDE for each stage was determined automatically in Python's SciPy library using Scott's Rule,[97] which is dependent on the number of data points.[97] The total sample size is 347 and 399 for g $CO_{2\text{-eq.}}/MJ_{HHV}$ and production normalized data, respectively.

Monte Carlo simulation

The total supply chain emissions were estimated using Monte Carlo simulations,[98] which has been widely applied to estimate CH_4 emissions[25,30] with

uncertainty assessment. Each supply chain's PDF, obtained from the KDE, was defined in the simulation to sample from each stage, followed by summing up each stage. Rather than separating the data by feedstock type, we divided it by stage of the supply chain, as shown in Figure S1. The total CH_4 emissions were assessed 10,000 times with random draws from the distributions for each stage. The 10,000 estimates were then used to assess the cumulative CH_4 distribution across the supply chain models by the Python code.

SUPPLEMENTAL INFORMATION

Supplemental information can be found online at https://doi.org/10.1016/j.oneear.2022.05.012.

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AUTHOR CONTRIBUTIONS

Conceptualization, S.B. and A.H.; methodology, S.B., J.C., and A.H.; software, S.B.; validation, S.B. and J.C.; formal analysis, S.B. and J.C.; investigation, S.B., J.C., and A.H.; writing – original draft, S.B.; writing – review & editing, J.C. and A.H.; funding acquisition, A.H.; resources, S.B. and A.H.; supervision, A.H.

DECLARATION OF INTERESTS

The authors declare no competing interests.

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State Environmental Policy Act Handbook

2018 Updates

Washington State Department of Ecology

This SEPA guidance is intended to be used in conjunction with the State Environmental Policy Act (Chapter 43.21C RCW) and the SEPA Rules (Chapter 197-11 WAC) and consequently does not have the legal effect as the RCW or the Rule.

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Table 1: SEPA Process

Is SEPA required?	Is the entire proposal defined?	WAC 197-11-060
	Is there an agency "action"?	WAC 197-11-704
	Is the action "categorically exempt"?	WAC 197-11-305 and 800 through 880
	Has SEPA already been completed?	WAC 197-11-164, 600, and 660
Who is lead agency?	Identify the "lead agency."	WAC 197-11-922 through 944
Are there likely to be impacts?	Review the checklist and identify likely significant adverse environmental impacts.	WAC 197-11-330
Are there existing SEPA documents that analyze the impacts?	Identify documents that analyze probable impacts of the proposal.	WAC 197-11-600 and 330(2)(a)
Can impacts be mitigated?	Identify mitigation required by development regulations, and other local and state laws.	WAC 197-11-158, and 330(1)(c)
	Is the applicant willing to change the proposal to reduce impacts?	WAC 197-11-350
	Consider using SEPA substantive authority for other impacts not adequately addressed.	WAC 197-11-660
After application of identified mitigation, is the proposal likely to have any significant adverse environmental impact?	If not, issue a determination of nonsignificance (which may include mitigation measures).	WAC 197-11-340, 350, and 355
	If yes, issue a determination of significance, and either include an adoption notice or begin the EIS process.	WAC 197-11-360 and Part Four
How is SEPA used in decision-making?	Mitigation under SEPA must be included as permit conditions, or in changes to permit applications for the proposal.	WAC 197-11-660
	Projects may be denied if identified significant adverse impacts cannot be mitigated.	

This table is intended as a general overview of the SEPA process, although many details are not included.

1. SEPA—General Background

The State Environmental Policy Act (SEPA) may be the most powerful legal tool for protecting the environment of the state. Among other things, the law requires all state and local governments within the state to:

- "Utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decision making which may have an impact on man's environment;" and
- Ensure that "...environmental amenities and values will be given appropriate consideration in decision making along with economic and technical considerations...."

The policies and goals in SEPA supplement those in existing authorizations of all branches of government of this state, including state agencies, counties, cities, districts, and public corporations. Any governmental action may be conditioned or denied pursuant to SEPA.

Purpose and Intent

SEPA is intended to ensure that environmental values are considered during decision-making by state and local agencies. When SEPA was adopted, the legislature identified four primary purposes:

(1) “To declare a state policy which will encourage productive and enjoyable harmony between man and his environment;

(2) to promote efforts which will prevent or eliminate damage to the environment and biosphere;

(3) and stimulate the health and welfare of man; and

(4) to enrich the understanding of the ecological systems and natural resources important to the state and nation."

To implement these purposes, the SEPA Rules direct agencies to:

- Consider environmental information (impacts, alternatives, and mitigation) before committing to a particular course of action;
- Identify and evaluate probable impacts, alternatives and mitigation measures, emphasizing important environmental impacts and alternatives (including cumulative, short-term, long-term, direct and indirect impacts);
- Encourage public involvement in decisions;
- Prepare environmental documents that are concise, clear, and to the point;

- Integrate SEPA with existing agency planning and licensing procedures, so that the procedures run concurrently rather than consecutively; and

- Integrate SEPA with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and seek to resolve potential problems.

The environmental review process in SEPA is designed to work with other regulations to provide a comprehensive review of a proposal. Most regulations focus on particular aspects of a proposal, while SEPA requires the identification and evaluation of probable impacts for all elements of the environment. Combining the review processes of SEPA and other laws reduces duplication and delay by combining study needs, combining comment periods and public notices, and allowing agencies, applicants, and the public to consider all aspects of a proposal at the same time.

SEPA also gives agencies the authority to condition or deny a proposal based on the agency's adopted SEPA policies and environmental impacts identified in a SEPA document. (See RCW 43.21C.060, WAC 197-11-660, and **Using SEPA in Decision Making**.)

Proposals can be either
project proposals, such as:
- new construction,
- demolition, or
- remodeling

or **nonproject proposals,** such as:
- rulemaking
- comprehensive plans,
- subdivisions, zoning, or
- development regulations.

History

First adopted in 1971, the State Environmental Policy Act (SEPA) provided Washington State's basic environmental charter. Prior to its adoption, the public had voiced concern that government decisions did not reflect environmental considerations. State and local agencies had responded that there was no regulatory framework enabling them to address environmental issues. SEPA, modeled after the National Environmental Policy Act (1969), was created to fill this need. It gives agencies the tools to allow them to both consider and mitigate for environmental impacts of proposals. Provisions were also included to involve the public, tribes, and interested agencies in most review processes prior to a final decision being made.

2. SEPA Environmental Review

The State Environmental Policy Act (SEPA) is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The environmental review process involves the identification and evaluation of probable environmental impacts, and the development of mitigation measures that will reduce adverse environmental impacts. This environmental information, along with other considerations, is used by agency decision-makers to decide whether to approve a proposal, approve it with conditions, or deny the proposal. SEPA applies to actions made at all levels of government within Washington State. Agency decisions are the hub of SEPA; if there is no agency action,

SEPA is not required.

The SEPA Rules provide the basis for implementing SEPA, and establish uniform requirements for all agencies. By opening up the decision-making process providing an avenue for consideration of environmental consequences, agencies and applicants are able to develop better proposals. Agencies may also deny proposals that are environmentally unsound.

Agency Actions

SEPA environmental review is required for any state or local agency decision that meets the definition of an "action" and is not categorically exempt. Actions are divided into two categories, "project actions" and "nonproject actions".

Project actions are agency decisions to license, fund, or undertake a specific project. For example, project actions include construction or alternation of:

- Public buildings such as city or county offices, jail facilities, public libraries, and school buildings;
- Public facilities such as water and sewer lines, electrical lines, and roads; and
- Private projects such as subdivisions, shopping centers, other commercial buildings, and industrial facilities.

Nonproject actions are agency decisions on policies, plans, and programs, including adoption or amendment of:

- Rules, ordinances, or regulations that will regulate future projects, such as water quality rules, critical area ordinances, and other state and local regulations;
- Comprehensive plans and zoning codes;
- Capital budgets; and
- Road and highway plans;

When deciding if a project requires SEPA review, remember that "agency action" includes not only a license, but also an agency decision to fund or undertake a proposal. Refer to WAC 197-11-704 for a complete definition of an agency action and WAC 197-11-760 for the definition of license.

Summary of the SEPA Process

1. **Provide a preapplication conference (optional).** Although not included in the SEPA Rules, we recommend that agencies offer a process for the applicant to discuss a proposal with staff prior to submitting a permit application or environmental checklist. The applicant and agency can discuss existing regulations that would affect the proposal, the steps and possible timeline for project review, and other information that may help the applicant submit a complete application.

2. **Determine whether SEPA is required**. Determine whether environmental review is required for the proposal by (1) defining the entire proposal, (2) identifying any agency actions (licenses, permits, etc.), and (3) deciding if the proposal fits one of the categorical exemptions. If the project does not involve an agency action, or there is an action but the project is exempt, environmental review is not required.

3. **Determine lead agency**. If environmental review is required, the "lead agency" is identified. This is the agency responsible for the environmental analysis and procedural steps under SEPA.

4. **Evaluate the proposal.** The lead agency must review the environmental checklist and other information available on the proposal and evaluate the proposal's likely environmental impacts. The lead agency and applicant may work together to reduce the probable impacts by either revising the proposal or identifying mitigation measures that will be included as permit conditions.

5. **Distribute draft Checklist for inter-agency and tribal consultation.** Often the best opportunity to make changes to a proposal based on environmental impacts is prior making the threshold determination and issuing the Determination of Nonsignificance or Determination of Significance.

6. **Assess significance and issue a threshold determination**. After evaluating the proposal and identifying mitigation measures, the lead agency must determine whether a proposal would still have any likely significant adverse environmental impacts. The lead agency issues either a determination of nonsignificance (DNS), which may include mitigation conditions, or if the proposal is determined to have a likely significant adverse environmental impact, a determination of significance/scoping notice (DS/Scoping) is issued and the environmental impact statement (EIS) process is begun. The EIS will analyze alternatives and possible mitigation measures to reduce the environmental impacts of the proposal.

7. **Use SEPA in decision-making**. The agency decision-maker must consider the environmental information, along with technical and economic information, when deciding whether to approve a proposal. Decision-makers may use SEPA substantive authority to condition or deny a proposal based on information in the SEPA document and the agency's adopted SEPA policies. (RCW 43.21C.030(b) and 43.21C.060)

Provide a Preapplication Process

Environmental review of a proposal starts long before a lead agency makes a formal determination of whether a project is likely to have a significant impact. Familiarizing the proponent with regulatory requirements and making an informal assessment of likely environmental impacts may lead to changes in the project's location or design that will speed up the formal environmental review and permit approval process. Early environmental project review can reduce expenses and save time for both the proponent and the lead agency.

All agencies are encouraged to offer some form of preapplication process for the applicant. This may be an informal meeting, a site visit, or a formal process with specific requirements. Whatever the format, a preapplication process gives the agency and the applicant an early opportunity to discuss permit application requirements and potential issues. It also provides an opportunity for a "reality check" for the viability of the project and an opportunity to help the applicant understand the review process.

The applicant should provide information on the proposed project, but should not be required to prepare or present detailed plans. Based on the information available, the agency should preliminarily identify applicable regulations and permit needs (including other agency requirements), possible study requirements, potential mitigation, the timeline for review, and other appropriate information.

Issues for agencies to consider when developing a preapplication process include:

- The level of detail needed for a preapplication meeting;
- Whether members of the public should be allowed to participate in the meeting;
- When to invite other agencies to participate;
- Whether to provide a preliminary consistency determination (for GMA jurisdictions);
- Whether and how to provide feedback to the applicant on the results of the meeting;
- How to keep track of the issues discussed and how to access that information when an application is submitted; and
- Methods of making potential applicants aware that the preapplication process is available.

Determine Whether SEPA Is Required

SEPA environmental review is required for all agency actions unless specifically exempted by the SEPA Rules (WAC 197-11-800 to 880) or statute. Agency actions include providing funding or issuing permits for project proposals, and the adoption of plans, regulations, or ordinances for nonproject proposals. (For the full definition of an action under SEPA, see WAC 197-11-704.)

The following steps are used to determine whether SEPA is required:

- Define the total proposal, including any interdependent parts;
- Identify all agency actions required for the proposal (e.g., licenses, funding, etc.); Determine whether the proposal or agency action is categorically exempt.

Some proposals may not require additional environmental review under SEPA if they qualify as a "planned action" under an ordinance adopted by a county or city planning under the Growth Management Act (GMA). In other cases, it may be possible to use existing environmental documents to meet SEPA requirements for a new proposal. (Refer to **Using Existing Documents)**

Defining the entire proposal

- Accurately defining the proposal is key to a successful SEPA process. It is necessary to define the entire proposal to:
- Determine if SEPA is required.
- Determine agencies with jurisdiction and/or expertise.
- Determine lead agency.
- Assure that all related actions are evaluated in a single document, when required (WAC 197-11-060(3)(b)).

Defining the total proposal involves the identification of all the related and interdependent pieces of the proposal. For example, the local agency (city or county) is likely to be lead for development of a dairy farm that consists solely of building construction. If the dairy also required creation of a large water reservoir, the Department of Ecology would become lead agency for the proposal per the lead agency criteria in WAC 197-11-938.

A large proposal involving actions in vastly different locations, such as material being mined at one site, then transported to and processed at another, is another example of defining the entire proposal. Appropriate environmental review would look at the impacts of all the related activities.

It is important to remember that actions are related if they are dependent on each other, so that one will not happen without the other. Related actions may also be spread over time, such as the construction, operation, and closure phases of a proposal.

Related actions may have a single proponent or several. A golf course might be proposed by a private party. However, the city installing a water reuse system needed to serve the site would be a related action. Though the golf course and the water reuse system have separate proponents, since neither would/could proceed without the other, they should be considered together as one proposal under SEPA.

Phased Review

If the proposal consists of a series of actions that are individually exempt, but <u>together</u> may have a significant impact, then the proposal is <u>not</u> exempt. However, the environmental review can be phased or tiered so that SEPA compliance can be done for each phase. Phased review allows agencies and the public to focus on issues that are ready for decision and excludes from consideration issues already decided or not yet ready. (WAC 197-11-060(5)(b))

The sequence of phased review of a project must be from a broad scope to a narrow scope. For example, the review of a multi-phase planned unit development would consist of a general review of the entire proposal and detailed review of those phases ready for construction. Additional review would occur prior to each future phase when adequate information was available to evaluate the environmental impacts.

Phased review is not appropriate when it would merely divide a project to avoid consideration of

cumulative impacts or alternatives. For example, if an industrial facility is proposed, it is not appropriate to limit the review to the impacts of the grade and fill permit without considering construction and operation of the industrial facility.

The "broad to narrow" restriction of phased environmental review does not apply to planning proposals done under the Growth Management Act. For example, the environmental review for the adoption of an interim critical area ordinance (narrow focus) may occur before the review and adoption of the comprehensive plan (broad focus). This is allowed under the 1995 amendments to the SEPA Rules in WAC 197-11-228.

Whenever phased review is used, the SEPA document must clearly state that the proposal is being phased. Future environmental documents should identify the previous documents and should focus on those issues not adequately addressed in the previous documents.

Identify Permits

In defining the proposal, it is necessary to determine what permits or approvals will be needed from state, local, and federal agencies. Some resources that can help are the Office of Regulatory Assistance website includes an Online Permit Assistance System to help you determine which state and federal environmental permits may be needed based on information you provide about a proposal.

When deciding which agency permits or approvals are needed, it may be necessary to consult with other agencies to determine if they have permits or approvals to issue for a specific project. This will help to ensure that all agency actions are identified before determining whether a proposal is categorically exempt.

Categorical Exemptions

There are three separate authorities that contain SEPA exemptions:

1. Statutory exemptions in SEPA listed in RCW 43.21c.
2. SEPA Rule exemptions in WAC 197-11 Part Nine
3. GMA city and county optional provisions
    a. Flexible exemption levels for minor new construction
    b. Eliminate exemptions in critical areas
    c. In-fill exemptions

Some types of projects and some agency actions have been exempted from the requirements of SEPA by the Legislature. These "statutory exemptions" are contained in state law, Chapter 43.21C RCW. The table below summarizes all of the statutory exemptions contained in the SEPA statute as of 2017. Please check the statute for any exemptions adopted after this date. Please remember that this is a summary and the entire exemption must be reviewed before determining if a proposal is exempt from SEPA review.

Statutory Exemption	RCW
Water right for fifty cubic feet of water per second or less for irrigation projects irrigation projects decisions	43.21C.035
Forest practices Class I, II, and III	43.21C.037
School closures	43.21C.038
Air operating permits	43.21C.0381
Watershed restoration projects—Fish habitat enhancement projects	43.21C.0382
Waste discharge permits for existing discharges and certain construction stormwater permits	43.21C.0383
Wireless services facilities (cell towers)	43.21C.0384
Certain actions during state of emergency	43.21C.210
City or town incorporation, consolidation, disincorporation, or annexation of all of a city/town by or of another city/town	43.21C.220 43.21C.222 43.21C.225 43.21C.227
Infill development	43.21C.229
House Finance Commission plans	43.21C.230
Forest Practices Board emergency rules	43.21C.250
Conservation easements, road maintenance & abandonment, Timber harvest schedules involving east-side clear cuts	43.21C.260
Unfinished nuclear power projects	43.21C.400
Battery charging and exchange station installation	43.21C.410
Certain fish protection standards	43.21C.430
Nonproject actions – certain local development regulations	43.21C.450
Categorical exemption for structurally deficient bridges	43.21C.470 43.21C.480

In addition to the statutory exemptions, the Legislature directed rulemaking for types of projects or agency actions that are not subject to SEPA review because the size or type of the activity is unlikely to cause a significant adverse environmental impact. (Refer to SEPA Rules Part Nine.)

Examples of categorically exempt minor projects include construction of four dwelling units or less, commercial buildings with 4,000 square feet or less of gross floor area and no more than

20 parking spaces, and water and sewer facilities related to lines twelve inches or less in diameter. Examples of specific types of agency decisions that are exempt include short plat subdivisions, forest practice class I,II, and III, public property transactions, and business licenses.

Many exemptions for minor new construction or minor land use decisions do not apply when:

- **A rezone is involved;**
- **A license is needed for emissions to air or a discharge to water; or**
- **The proposal involves work wholly or partly on lands covered by water.**

Restrictions are contained in WAC 197-11-305. A proposal that would normally be exempt from SEPA review under Part Nine of the SEPA Rules is not exempt if any of the following apply.

- The proposal is a segment of a proposal that includes a series of related actions, some of which are exempt and some of which are not. For example, the construction of a single family home is usually exempt from SEPA review. However, the single family exemption does not apply when a Class IV forest practice application is required. Since the SEPA statute requires Class IV applications to be evaluated under SEPA, the entire proposal requires SEPA review.
- The proposal includes a series of exempt actions and the lead agency's responsible official determines that together the actions may have a probable significant adverse environmental impact.
- The city or county where the proposal is located has eliminated the categorical exemption for proposals located within a critical area.

To determine if a proposal is exempt from SEPA, review the rule exemptions in Part Nine of the SEPA Rules, the statutory exemptions in SEPA, and any local exemptions and exceptions that may apply. If the proposal meets the criteria for a categorical exemption in either the SEPA Rules or the SEPA statute, no further SEPA review or documentation is required. Remember to watch for "exceptions" and consider the restrictions in WAC 197-11-305.

Categorical Exemptions--Flexible Thresholds

Most categorical exemptions use size criteria to determine if a proposal is exempt. The SEPA Rules allow cities and counties to raise the exemption limit for minor new construction to better accommodate the needs in their jurisdiction. The exemptions may be raised up to the maximum specified in the SEPA Rules (WAC 197-11-800(1)(c). For example, cities and counties may choose to exempt residential developments at any level between 4 and 30 dwelling units in the urban growth area. The exemption for commercial buildings can range between 4,000 and 30,000 square feet. These "flexible thresholds" must be designated through ordinance or resolution by the city or county. If this has not been done, the minimum level applies.

The exemption level set by the county or city will also apply when an agency other than the county or city is lead agency. A state agency or special district may need to consult with the county or city to identify the adopted exemption level for a particular area.

It is also important to remember that the exemptions for minor new construction and minor land use decisions do not apply if any portion of the proposal/decision involves lands covered by water, if a license is needed for a discharge to air or water, or if a rezone is required. (WAC 197-11-800(1)(a) and (2)).

Requirements for Adopting Flexible Thresholds

Several criteria must be met for a city or county to adopt flexible thresholds. Most importantly, the proposal to amend SEPA policies to increase the size of projects exempt from SEPA review must include sufficient documentation that impacts to all elements of the environment have been adequately addressed. There also must be a disclosure of any loss of notice and comment opportunities for future permitting decisions that will be exempt from SEPA.

The documentation that impacts have been adequately address should describe the types, sizes and locations of projects proposed for new exemption level. Impacts to the entire list of SEPA's applicable elements of the environmental must be considered. The proposal should also list the applicable authorities and regulations and describe how much these regulations reduce impacts on each element of the environment for each project types, sizes and locations.

The jurisdiction must also document how specific adopted development regulations and applicable state and federal laws provide adequate protections for cultural and historic resources when exemption levels are raised. A local ordinance or resolution that addresses cultural resources shall include at minimum:

- Use of Available data and other project level review tools, i.e. inventories and predictive models provided by the Department of Archeology and Historic Preservation, other agencies and tribal governments.
- Planning and permitting processes that ensure compliance with applicable cultural resource state laws including chapters 27.44, 27.53, 68.50 and 68.50 RCW.
- Local development regulations that include preproject cultural resource review, where warranted and standard inadvertent discovery (SIDL) for all projects.

Categorical Exemptions in Critical Areas

Cities and counties are required to designate critical areas under the Growth Management Act (GMA). Critical areas are wetlands, aquifer recharge areas, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas. To ensure adequate environmental review of development within these areas, cities and counties may also designate in their SEPA procedures categorical exemptions that do not apply within each critical area. (Refer to WAC 197-11- 908 for the list of exemptions that can be eliminated.)

If a project is not categorically exempt because it is located within a critical area, the environmental review is limited to:

- Documenting whether the proposal is consistent with the requirements of the critical areas

Other agencies should consult with the city or county that has jurisdiction over the project site to determine which categorical exemptions do or do not apply to a proposal.

ordinance;
- Evaluating any significant adverse environmental impacts not adequately addressed by the GMA planning documents and development regulations; and
- Preparing a threshold determination, and an EIS if necessary. (WAC 197-11-908)

Emergency Exemptions

An emergency exemption can be granted by a lead agency when 1) an action is needed to avoid an imminent threat to public health or safety, public or private property, or to prevent serious environmental degradation; and 2) there is not adequate time to complete SEPA procedures. Poor planning by the proponent should not constitute an emergency for the purposes of a SEPA exemption.

Categorical Exemptions for Infill – 2003 Legislation

Cities and counties planning under the Growth Management Act (GMA) must designate urban growth areas, develop comprehensive plans, and adopt implementing regulations to accommodate population growth expected to occur over the next 20 years. As part of this planning effort, GMA cities and counties identify the density of residential development and intensity of mixed use, commercial, and other types of development that will be needed to accommodate the projected population growth.

In 2003, a new section was added to the SEPA statute to encourage infill development at the densities and intensities designated by GMA cities and counties in their comprehensive plans. This new section allows GMA counties and cities to establish categorical exemptions for "…new residential or mixed-use development proposed to fill in an urban growth area designated according to RCW 36.70A.110, where current density and intensity of use in the area is lower than called for in the goals and policies of the applicable comprehensive plan." (RCW 43.21C.229)

Requirements for Adopting Infill Exemptions

Several criteria must be met for a GMA city or county to adopt a categorical exemption for infill:

- The exemption must be limited to new residential or mixed use development within a designated urban growth area;
- The existing density and intensity of use in the urban growth area must be lower than called for in the goals and policies of the applicable city or county comprehensive plan;
- An EIS must have been completed for the adoption of the comprehensive plan; and
- The proposed development must not exceed the density or intensity of use called for in the goals and policies of the applicable city or county comprehensive plan.
- Any infill categorical exemption adopted by a GMA city and county is subject to the same limitations as the categorical exemptions adopted by Ecology in the SEPA Rules.

In addition, many of the categorical exemptions adopted by Ecology do not apply when the proposal is on "lands covered by water". The exemptions for minor new construction in WAC

197-11-800(1) also do not apply if a rezone is required or the project requires a license governing emissions to the air or discharges to water. When establishing a new exemption, the GMA city or county should consider whether one or more of these limitations should be included in the exemption.

GMA cities and counties considering adoption of a new categorical exemption should consider whether the exemption would apply to a project proposed within a critical area. It is recommend that the new exemption not apply in critical areas unless the city or county has updated its critical areas policies and regulations to include best available science under RCW 36.70A.172. This will ensure that the functions and values of critical areas are protected within the urban growth area.

Any categorical exemption adopted under this legislation should be adopted as part of the GMA city or county's SEPA procedures. (Refer to WAC 197-11-904 and 906).

Process for adopting infill categorical exemptions

The following steps are an example of the process that might be used by a GMA city or county to establish a categorical exemption for infill development.

Identify the density and intensity goals specified in the adopted comprehensive plan for residential and mixed use development. If the density/intensity goals have been clearly defined, continue to step 2. If the density/intensity goals are not clearly defined, it may be necessary to update the comprehensive plan before adopting a new categorical exemption.

Evaluate recent residential and/or mixed use projects to identify a specific area(s) where the density/intensity goals in the comprehensive plan are not being met. This review should include consideration of restrictions in other regulations that may prevent the density/intensity from occurring. For example, development in a critical area may be limited due to a wetland buffer zone requirement in the critical area ordinance.

If review of the recent development indicates the density or intensity goals are not being met, identify the development level needed to meet the goals within the selected area.

Evaluate the EIS prepared for the comprehensive plan and determine if the density and intensity goals have been adequately analyzed. Is the analysis up-to-date and does it adequately evaluate the likely environmental impacts of proposed infill development?

If the EIS analysis is not adequate, a supplemental EIS may need to be prepared before adopting an infill exemption. This supplemental EIS should be prepared in conjunction with the adoption or amendment of a subarea plan or an update of the comprehensive plan.

Draft a proposed categorical exemption. The exemption should clearly indicate:

- The level of residential or mixed use development that will be exempt,
- The area where the exemption will apply, and
- How the exemption will be applied to a proposed project.

Review of Proposals

When an application for residential or mixed use development is submitted, the GMA county/city must:

- Compare the proposal to the adopted categorical exemption.
  - Is the proposed density/intensity within the limit established in the exemption?
  - Do any "exceptions" in the categorical exemption apply?
  - Do the criteria in WAC 197-11-305 apply?
  - Is the proposal within a critical area where the exemption does not apply?

If the proposal exceeds the density or intensity in the comprehensive plan, the proposal cannot be exempted.

- Ensure the proposed density or intensity of the development does not exceed the density/intensity levels established in the comprehensive plan. If the proposal meets the criteria in the categorical exemption and does not exceed the density/intensity levels in the comprehensive plan, the proposal is exempt from SEPA review.

Exemption Tips

- The total proposal must be identified before the categorical exemptions can be applied. "Total proposal" means all interdependent parts of a proposal, including all proposed phases. This will limit the piecemeal review of projects, and allow an evaluation of all parts of a proposal. The SEPA Rules do allow phased review under certain circumstances, as defined in WAC 197-11-060(5).

- The SEPA Rules do not require any documentation when a proposal does not meet the definition of an action, or is categorically exempt. However, we recommend the placement of a note in the file or on the permit application (if applicable) to indicate that SEPA compliance had been satisfied or did not apply.

- The Dept. of Ecology considers the exemption for additions or modifications to buildings within WAC 197-11-800(2)(e) to apply to any addition where the existing floor area plus the proposed addition has a total area less than the square footage exempted under WAC 197-11- 800(1) for minor new construction. In other words, SEPA is required for any addition when the <u>total</u> square footage of the entire facility (old plus new) exceeds the threshold adopted by the local jurisdiction. This can include a multi-structure facility.

- If a building is not exempt at the time of construction, neither would any additions to the building be exempt. WAC 197-11-800(3) does exempt minor repair, remodeling (not including additions), and maintenance activities which would not change the use of the building and that does not occur on lands covered by water.

The Lead Agency

For most proposals, one agency is designated as lead agency under SEPA. The lead agency is:

- Responsible for compliance with SEPA procedural requirements.
- Responsible for compiling and assessing information on all the environmental aspects of the proposal for all agencies with jurisdiction.
- The agency responsible for the threshold determination and for the preparation and content of an environmental impact statement when required.

The responsible official represents the lead agency, and is responsible for ensuring adequate environmental analysis is done and the SEPA procedural requirements are met. The responsible official should be identified within the agency's SEPA procedures, and may be a specific person (such as the planning director or mayor), may vary within an agency depending on the proposal, or may be a group of people (such as an environmental review committee or the city council).

Determining Lead Agency

One of the first steps when an application for a new proposal is received is determining who will be the lead agency under SEPA. Usually the agency that receives the first application for a proposal is responsible for determining the lead agency and notifying them of the proposal. If the applicant has filled out an environmental checklist, that is sent to the lead agency with the notification letter.

Lead agency status is determined according to WAC 197-11-922 through 948. If there is a dispute over who shall be lead agency and/or the lead agency cannot be identified, an agency with jurisdiction or the applicant may ask the Department of Ecology for resolution (WAC 197-11-946). Determining the lead agency requires defining the total proposal and identifying all necessary permits. The following criteria are listed in the order of priority:

- If the proposal fits any of the criteria described in WAC 197-11-938, "Lead agencies for specific projects," the agency listed shall be lead.
- If the proponent is a non-federal government agency within Washington State, that agency shall be lead for the proposal.
- For private proposals requiring a license from a city or county, the lead agency is the city or county where the greatest portion of the project is located.
- If a city or county license is not needed, another local agency (for instance a local air authority) that has jurisdiction will be lead.
- If there is no local agency with jurisdiction, one of the state agencies with a license to issue will be lead, based on the priority set in WAC 197-11-936.

Lead Agency Agreements

Any non-federal agency within Washington State may be the lead agency as long as all agencies with jurisdiction agree. The lead agency is not required to have jurisdiction on the proposal.

Two or more agencies may become "co-lead" agencies if both agencies agree. One of the

agencies is named “nominal lead” and is responsible for complying with the procedural requirements of SEPA. All agencies sharing lead agency status are responsible for the completeness and accuracy of the environmental document(s). The written agreement between co-lead agencies, although not required, helps clarify responsibilities, and might typically contain: an outline of each agency’s duties, a statement as to which agency is nominal lead, aspects on how disagreements will be resolved, who will hear appeals, and under what circumstances the contract can be dissolved.

Federal agencies may share lead agency status with a state or local agency to produce a combined NEPA/SEPA document. This allows both agencies to have input into the document preparation, saving time and money, and ensuring that the information needed to evaluate the federal, as well as the state and local permits, is included. This also helps ensure necessary and important coordination among agencies and a more unified understanding of the proposal and mitigation. The co-lead agency agreement can be formalized in a written agreement outlining the responsibilities of both agencies for the environmental review process.

Transfer of Lead Agency Status

A city with a population under 5,000, or a county with less than 18,000 residents may transfer lead agency status for a private proposal to a state agency that has a license to issue for the project. The city or county must forward the environmental checklist and other relevant information on the proposal to the state agency, along with the notification of transfer of lead agency status. The state agency may not refuse. If there is more than one state agency with jurisdiction, the order of priority in WAC 197-11-936 is used to determine which state agency will be the new lead agency.

Assumption of Lead Agency Status

Assumption of lead agency status occurs when the original lead agency issues a determination of nonsignificance (DNS) and another agency with jurisdiction believes that the proposed project is likely to have significant adverse environmental impacts and that an EIS is needed to evaluate the impacts. The notice for lead agency assumption must include a determination of significance.

Any agency with jurisdiction may assume lead agency status during the 14-day comment period on a DNS. If, the lead agency uses the optional DNS process, assumption of lead agency status is made during the comment period on the notice of application. This is the only opportunity for an agency with jurisdiction to assume lead agency status during the optional DNS process. (WAC 197-11-948)

Evaluating the Proposal

Environmental review normally starts with the completion of an environmental checklist. The checklist provides information to the lead agency about the proposal and its probable environmental impacts. It is the lead agency’s responsibility to review the environmental checklist, permit application(s), and any additional information available on a proposal to determine any probable significant adverse environmental impacts and identify potential

mitigation. Consultations with other agencies, tribes, and the public early in the process can help identify both the potential impacts and possible mitigation.

The Environmental Checklist

The environmental checklist is a standard form used by all agencies to obtain information about a proposal. It includes questions about the proposal, its location, possible future activities, and questions about potential impacts of the proposal on each element of the environment (such as earth, water, land use, etc.). The environmental checklist form is located on the SEPA Templates webpage. Guidance on completing and reviewing the environmental checklist is available on the Checklist Guidance webpage and help links are included in the downloaded Checklist template.

The lead agency may choose to fill out the checklist or may require the applicant to fill it out. An advantage to the applicant completing the checklist is that it causes them to examine their proposal from an environmental perspective and they may be motivated to make improvements. If the applicant completes the checklist, the lead agency must review the answers and make corrections and/or additions, if appropriate. For example the lead agency should verify:

- Is the project description complete?
- Have all interdependent pieces of the project been identified? (Refer to WAC 197-11-060(3))
- Have all necessary permits and licenses from local, state, and federal agencies been identified?
- Is the location adequately identified?
- Are the descriptions of the environment complete and accurate?

A thorough review and written revisions to the checklist by the lead agency is critically important because the checklist (and other reports if available) supports the legal validity of the threshold determination. It is also:

- Important for receiving useful feedback from other agencies, tribes, and the public;
- necessary for providing other agencies with jurisdiction with environmental information prior to making decisions on the proposal, and;
- part of the environmental record for an agency decision.

The checklist was designed to be as generic as possible to ensure that it was applicable to every kind of proposal. The items in the checklist are not weighted. The mention of one or more adverse impacts does not necessarily mean they are significant. (WAC 197-11-315(5)) In most cases, if the questions are answered accurately and completely, the impacts of a proposal can be ascertained. If necessary, the lead agency may request additional information from the applicant after conducting the initial review of the checklist. (WAC 197-11-100, 315, 335)

Consultations

Consultations may involve meeting with other agencies, or circulating the checklist and other environmental documents for comment prior to a threshold determination. This can assist the

lead agency in determining permits needed, appropriate mitigation to require, any additional information and/or studies needed, and when an environmental impact statement is or is not needed for a proposal. WAC 197-11-920 includes a list of agencies with expertise on elements of the environment.

Consultations are intended to gather information from agencies with expertise. There is no set form that a consultation must take. It is important that it contain sufficient information for agencies to provide valuable comments, including a clear description of the proposal. At a minimum, the environmental checklist should be included with a written consultation request. Information should also be included on when the comments must be returned for consideration by the lead agency, as well as an agency contact, address, and phone number.

Identify Mitigation

Mitigation is the avoidance, minimization, rectification, compensation, reduction, or elimination of adverse impacts to built and natural elements of the environment. Mitigation may also involve monitoring and a contingency plan for correcting problems if they occur.

When considering the need for mitigation measures, the lead agency should review the environmental checklist and other information available on the proposal, including consultations with other agencies. Mitigation required under existing local, state, and federal rules may not be sufficient to avoid, minimize or compensate for significant impacts. It is important to identify applicable regulations and then analyze and disclose the extent to which they reduce the specific impacts of the specific proposal under SEPA review.

Additional mitigation can be applied to a proposal with the use of SEPA substantive authority, based on identified potential adverse impacts related to the proposal and the agency's adopted SEPA procedures. (See section on Using SEPA in Decision Making) Mitigation conditions must also be reasonable and capable of being accomplished.

It may also be possible to work cooperatively with the proponent to make changes to the proposal that will reduce and eliminate the significant adverse impacts. Voluntary mitigation may sometimes exceed the level that may be required of the applicant under regulatory authority, and produce a much improved and more desirable project. Mitigation conditions must be included in the permit, license or other approval to be binding.

Other agencies with jurisdiction or expertise, and the public may assist the lead agency in determining appropriate mitigation for a proposal. This can be done prior to the threshold determination (see discussion on Notices of Application and Consultations), or may result from comments received on a threshold determination (DNS or DS/scoping notice), or draft EIS.

Assess Significance

The SEPA "threshold determination" is the formal decision as to whether the proposal is likely to cause a significant adverse environmental impact for which mitigation cannot be easily identified. The SEPA Rules state that significant "means a reasonable likelihood of more than a

moderate adverse impact on environmental quality". It is often non-quantifiable. It involves the physical setting, and both the magnitude and duration of the impact. SEPA Rules state that the beneficial aspects of a proposal shall not be used to balance adverse impacts in determining significance.

In evaluating a proposal, the lead agency reviews the environmental checklist and other information about the proposal, and should consider any comments received from the public or other agencies (through consultations, a notice of application, prethreshold meetings, etc.). Likely adverse environmental impacts are identified and potential mitigation is taken into account—particularly that already required under development and permit regulations. The responsible official must then decide whether there are any likely significant adverse environmental impacts that have not been adequately addressed.

The severity of the impact must be weighed as well as its likelihood of occurring. An impact may be significant if its magnitude would be severe, even if its likelihood is not great. In determining if a proposal will have a significant impact, the responsible official may consider that a number of marginal impacts may together result in a significant impact. Even one significant impact is sufficient to require an environmental impact statement.

If significant impacts are likely, a determination of significance (DS) is issued and the environmental impact statement process is started. If there are no likely significant adverse environmental impacts, a determination of nonsignificance (DNS) is issued. Additional guidance for making the threshold determination is included in WAC 197-11-330.

Considerations During the Threshold Determination Process

When evaluating the proposal, the responsible official must consider a number of issues. The following are examples of the type of questions that need to be answered during the review process.

- Are the permit application(s) and environmental checklist accurate and complete?
- Are there any additional studies and/or information available that would help in the evaluation of the proposal? (i.e. an environmental impact statement on the comprehensive plan, or on a similar project, or on a project at a similar location.)
- Are specific studies needed under the (1) development regulations, (2) SEPA, or (3) other local, state, or federal regulations that must be made available prior to making the threshold determination? For example, is a wetland study, a transportation study, or an archaeological review needed?
- Is early consultation with tribes, other agencies, and/or the public required or would it be beneficial? What form should this take?
- Is the project consistent with the local critical area ordinances, development regulations, and comprehensive plans?
- Is the proposal consistent with other local, state, and federal regulations (such as those governed by regional air authorities, health districts, and state natural resource agencies)?
- Will mitigation/conditions be required by the local development regulations

or other local, state, or federal regulations?

- What are the likely adverse environmental impacts of the proposal? Have the reasonable concerns of tribes, other agencies, and the public been met?
- Is the applicant willing to change the proposal to eliminate or reduce the likely adverse environmental impacts of the proposal?
- Are there additional environmental impacts that have not been mitigated? Are there possible mitigation measures that could be required using SEPA substantive authority to mitigate those impacts?
- Are there likely significant adverse environmental impacts that have not been mitigated to a nonsignificant level?

Revising and adopting existing documents

For agency decisions (actions) on the same proposal, existing SEPA documents can be revised and supplemented to provide new information. Instead of preparing a new environmental checklist or Environmental Impact Statement (EIS), agencies can adopt and use previous reviews that include a relevant analysis of all or part of a new proposal.

Revising SEPA documents for the same proposal

The lead agency is responsible for completing the environmental review process for all agencies with jurisdiction. This means other agencies with jurisdiction do not prepare separate SEPA documents or adopt the environmental documents issued by the lead agency for the same proposal.

However, SEPA documents do not have arbitrary expiration dates and can be modified — including revised Determinations of Nonsignificance (DNS), EIS Addendums, or Supplemental EIS — to better inform a pending agency decision. Modifying, revising, and supplementing exiting SEPA documents can be done for the same proposal.

If a DNS or mitigated determination of nonsignificance (MDNS) was previously issued and new information warrants additional analysis, the lead agency can withdraw or modify the DNS and issue a Revised DNS with additional supporting information such as a new staff report, or a new or revised checklist or addendum.

A draft EIS can be modified using an addendum or changes can be reflected in a revised draft EIS. A final EIS can be modified by issuing an addendum or supplemental EIS.

If a proposal is delayed so new permits must be applied for after SEPA review is done, then the additional review process could be limited to:

- Verifying that there is no new environmental information.
- Determining regulatory changes or changes to the proposal require additional SEPA review.

Any notice and comment provided for the underlying permit should still include previous SEPA documents to ensure the permitting agency considers any new or additional information.

Adopting previous SEPA reviews for new proposals

If the impacts associated with a new proposal have been adequately evaluated in a previously-issued SEPA or NEPA document, the document can be adopted to satisfy SEPA requirements. While a lead agency may adopt all or part of the information and environmental analysis in the adopted documents, they will need to make a new threshold determination.

Using existing documents is particularly important cities and counties planning development under the state **Growth Management Act (GMA)**. Jurisdictions that have completed an environmental analysis for their comprehensive plans and development regulations can use the analysis as starting point for reviewing individual projects, allowing them to focus just on those aspects that have yet to be addressed. GMA cities and counties can also use the new Planned Action process in which formal SEPA review is done before proponents submit permit applications for projects.

Agencies can only use documents from a previous SEPA or NEPA review. This is why it is critical to provide a thorough description of the current proposal and clearly identify the SEPA documents being adopted.

In addition, agencies adopting existing environmental documents must independently determine if they meet environmental review standards and a proposal's needs. To be adopted, previous SEPA documents are not required to meet an agency's own preparation procedures. However, in all cases, agencies are required to issue new threshold determinations. They can use the following previous SEPA documents:

- **Adoption / determination of significance (DS)** is issued when an existing EIS addresses all probable significant adverse environmental impacts and reasonable proposal alternatives. While a new comment period is not required, a agency must distribute the adoption notice. There is a 7-day waiting / reading period before an agency can take an action.
- **Adoption / DS and addendum** follows the same procedure as the adoption / DS, except an addendum adding minor new information is circulated with the adoption notice.
- **Adoption / DS and Supplemental EIS** is used when an existing EIS addresses some, but not all, of a new proposal's probable significant adverse environmental impacts. The EIS can be used as the basis for a new supplemental EIS and the adoption notice must be included in the draft and final supplemental EIS.
- **Adoption / Determination of Nonsignificance** is used for existing DNS and environmental checklist, NEPA environmental assessment, or documented categorical exclusion is adopted for a new proposal using the combined adoption / DNS template. The agency must follow DNS procedures including a comment period, distribution, and public notice.

When adopting a document, a copy must be available for review — although the lead agency is not required to recirculate copies with the adoption notice, except to agencies with jurisdiction that have not already received them. Agencies are encouraged to distribute copies of adopted or incorporated SEPA documents to agencies with expertise or interest in the proposal, as well as affected tribal governments. Include the SEPA determination whenever possible since

these documents assist in adequately evaluating a proposal.

Incorporation by reference

Incorporation by reference is similar to directly adopting a previous SEPA document. This is because all or part of the incorporated document becomes part of the agency environmental documentation for a proposal. Unlike the adoption process which is limited to environmental documents issued under either SEPA or NEPA, any information may be incorporated by reference such as studies or reports that provide information relevant to a proposal. To incorporate documents by reference, the agency must identify and describe the documents in the current environmental checklist, threshold determination, or EIS.

Issuing a Determination of Nonsignificance

A determination of nonsignificance (DNS) is issued when the responsible official has determined that the proposal is unlikely to have significant adverse environmental impacts, or that mitigation has been identified that will reduce impacts to a nonsignificant level. (For help making the threshold determination, refer to section on how to Assess Significance**)** The DNS may or may not require a public comment period and circulation to other agencies.

If the lead agency is a GMA city or county, there are specific restrictions under the Local Project Review Act on when a DNS can be issued during the "integrated review process." To avoid needless delays sometimes caused by these restrictions, the "Optional DNS Process" was added to the SEPA Rules.

Mitigated DNS

A primary goal of SEPA is to reduce or eliminate environmental impacts. If significant impacts are identified that would require the preparation of an EIS, those impacts can be reduced either by the applicant(s) making changes to the proposal or by requiring mitigation measures as a condition of approving the project. When changes to the proposal or mitigation measures are identified that will reduce the identified significant adverse impacts down to a nonsignificant level, a "mitigated DNS" is issued in lieu of a Determination of Significance and preparation of an EIS. The mitigating measures are typically shown on the face of the DNS, or as an attachment. A 14- day comment period, distribution, and public notice are always required for mitigated DNS.

SEPA substantive authority can also reduce or eliminate adverse environmental impacts that may be less than "significant". (See section 6 for more information on Using SEPA in Decision Making.)

DNS Comment Period

With the exception of projects for which the optional DNS process is used, if <u>any</u> of the following criteria applies to the proposal, a 14-day comment period is required for the DNS prior to agency action.

- There is another agency with jurisdiction (license, permit, or other approval to

issue).

- The proposal includes demolition of a structure not exempt under WAC 197- 11-800(2)(f) or 197-11-880.
- The proposal requires a non-exempt clearing and grading permit.
- The proposal is changed or mitigation measures have been added under WAC 197-11-350 that reduce significant impacts to a nonsignificant level (mitigated DNS).
- The DNS follows the withdrawal of a determination of significance (DS) for the proposal. (This applies even if the DNS and the withdrawal are issued together.)
- The proposal is a GMA action.

Public Notice and Circulation of a DNS

If a comment period is required for a DNS, public notice and circulation requirements must be met. This ensures agencies with jurisdiction, affected tribes, and concerned citizens know about the proposal and have an opportunity to participate in the environmental analysis and review.

The DNS and the checklist must be sent to:

- The Department of Ecology;
- All agencies with jurisdiction (state, local and federal);
- Affected tribes; and
- All local agencies or political subdivisions whose public services would be affected by the proposal.

Public notice procedures should be stipulated within the lead agency's adopted SEPA procedures. A list of reasonable methods to provide public notice is included in WAC 197-11-510(b). Those agencies that have no stipulated SEPA public notice procedures are required at a minimum to:

- Post the property, for site-specific proposals; and
- Publish notice in a newspaper of general circulation in the area where the proposal is located.

Additional public notice efforts are not required, but are encouraged for important or controversial proposals—regardless of environmental significance. Public hearings or meetings can provide additional avenues for public involvement, comment, and discussion. Many agencies have developed innovative means to "get the word out" to affected community members that may not be reached by more traditional methods. Examples include distributing bilingual flyers or advertising on non-English radio stations.

TIP: Whenever possible, the lead agency should combine the public notice for the DNS comment period with the public notice for any comment period and/or public hearing held on the permit or license.

Table 2: SEPA Document Distribution/Notification Requirements

Document	Comment Period	Public Notification	Agency Distribution *(jurisdiction, expertise, services affected, Tribes) Send electronic or paper copy*	SEPA Register Submittal separegister@ecy.wa.gov *send electronic copy (except one hardcopy of EISs)*
Determination of Nonsignificance (DNS) WAC 197-11-340(2)	Minimum 14 days -if required per WAC 197-11-340(2)	If comment period required, Per agency procedures or SEPA rules	Required to distribute If comment period DNS letter **plus checklist** Staff report if available	Required for all DNSs **Require electronic documents** DNS letter **plus checklist** Staff report if available
Mitigated DNS WAC 197-11-340 and 350	Minimum 14 days	Required	Same as above	**Require electronic documents** DNS letter **plus checklist** Staff report if available
Optional DNS process WAC 197-11-355 **DNS- NOA** **DNS issued after NOA**	Combined with NOA (14 to 30 days) Optional 14 days	Required Optional (but required if there's a comment period)	Required to distribute Include checklist Required – but not the Checklist unless it's been revised	Required to submit **Require electronic documents** Clearly stating *NOA and Optional Process* **Include checklist** **Require electronic documents** but no checklist unless it's been revised
Revised/Modified DNS or MDNS WAC 197-11-340(2)(f)	Not required but recommended – especially if it's an MDNS	Not required but recommended – especially if it's an MDNS	Required – but not the Checklist unless it's been revised	**Require electronic documents** No checklist unless revised

DNS after withdrawal of a DS or previous DNS WAC 197-11-360(4) and 340(2)(iv)	Minimum 14 days	Required	Required to distribute -Include checklist	Required to submit **Require electronic documents** Include checklist
Determination of significance (DS) with Scoping notice WAC 197-11-360, 408, and 410	21 days, up to 30 days for "expanded scoping"	Required	Required to distribute	Required to submit **Require electronic documents**
Draft environmental impact statement (EIS) WAC 197-11-455	30 days, with possible 15-day extension	Required Public Hearing required upon request	Required to submit Distribute DEIS (hardcopy or electronic)	Required to submit **One hardcopy plus one CD**
Supplemental draft EIS WAC 197-11-620(1) and 455	Minimum 30 days	Same as above	Same as above	Same as above
Final EIS WAC 197-11-460	No, but a 7-day waiting period is required before agency action	Not required, but notification to interested parties/parties of record	Same as above	Same as above
Final supplemental EIS WAC 197-11-620(1) and 460	No, but 7-day wait	Same as above	Same as above	Same as above
Adoption Notice with DNS WAC 197-11-340(2) and 630	Minimum 14 day comment period. (unless it's not required under WAC 197-11-340.	Yes, if comment period required	Required Distribute document adopted or provide website access	Required to submit **Require electronic documents** Include document adopted or provide website access
DS/Adoption of EIS (no Supplemental or Addendum) WAC 197-11-630(3)	Not required but 7-day wait	Not required, but encouraged, to notify parties of interest	Same as above	Same as above
Addendum to an EIS WAC 197-11-625	Not required unless comment period on underlying action	Distribute to recipients of EIS	Required Distribute addendum plus CD or access to original EIS	Required to submit **One hardcopy and one CD** of addendum and CD or website access to original EIS

Note: Agencies may automatically extend any comment period for public proposals WAC 197-11 050(7).

Responding to Comments on a DNS

The SEPA Rules require the responsible official to consider all timely comments made on a DNS. The lead agency may then choose to retain the DNS, issue a revised DNS, or—if significant adverse impacts have been identified—they may withdraw the DNS and issue a determination of significance (DS).

Retaining the DNS: If the lead agency decides to retain the DNS, agencies may take action on the proposal after the close of the comment period. A decision to retain a DNS requires no additional paperwork, although some agencies choose to circulate notice to agencies with jurisdiction and other interested parties. Other agencies place a memo in the file indicating the comments have been reviewed and no further review is needed. Sending a written response to commenters or arranging a meeting is at the discretion of the lead agency, but can be beneficial— both in establishing good public rapport and in developing an improved proposal.

Revising the DNS: A revised DNS is most often issued when there is a change in the mitigation conditions that will be applied to a proposal. It may also be used to document changes to a proposal that will not result in any likely significant adverse environmental impacts. A modified or revised DNS must be circulated to agencies with jurisdiction[46], but does not require an additional comment period.

Public notice and a comment period is generally not required unless there is an additional comment period on the underlying action (permit or plan). The format of a revised DNS is similar to other DNSs so the lead agency should clearly indicate that it is a revised or modified DNS and identify the document being modified (project description, date of issue, etc.). Recirculation of an un-changed checklist is not required, but is required when notable changes have been made or enough time has passed that the original may no longer be available.

Withdrawing the DNS: The lead agency must withdraw the DNS if:

- There are substantial changes to the proposal that are likely to result in significant environmental impacts;
- There is new information available on a proposal's probable significant adverse environmental impacts; or
- The DNS was obtained by misrepresentation or lack of material disclosure on the part of the proponent.

It is also advisable to withdraw a DNS if the lead agency determines that it needs time to reconsider the significance of the proposal, reassess mitigation needs, or to do additional investigation. A new threshold determination and comment period will be required, but this will prevent the "locking in" of the original DNS by another agency issuing a non-exempt permit. Locking-in of the DNS can restrict the lead agency's ability to impose additional mitigation measures for impacts not identified in the original DNS, or to require that an EIS be prepared.

The notice of withdrawal must be circulated to all agencies with jurisdiction. There is no set format for a withdrawal notice, but agencies should clearly identify the document being withdrawn, the project description and location, and the applicant's name. It also may be helpful to include information on the reason for the withdrawal.

3. Environmental Impact Statement Process

An environmental impact statement (EIS) is prepared when the lead agency has determined a proposal is likely to result in significant adverse environmental impacts (see section on how to **Assess Significance**). The EIS process is a tool for identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and possible mitigation.

The EIS process:

- **Provides opportunities for the public, agencies, and tribes to participate in developing and analyzing information**. Public, agency, and tribal input help to identify a proposal's significant adverse environmental impacts, reasonable alternatives, possible mitigation measures, and methods of analysis for the EIS. Outside participation during all phases of the process increases understanding of the proposal and garners trust.

- **Improves proposals from an environmental perspective.** Proposals are improved through mitigation of identified adverse environmental impacts, and development of reasonable alternatives that meet the objective of the proposal. Changes may be made voluntarily by the proponent, or they may be mitigated through SEPA substantive authority or other regulatory authority. Through the EIS process, areas of controversy and other significant issues are identified early when the opportunities to consider a broad range of solutions are greatest.

- **Provides decision-makers with environmental information.** An EIS provides decision-makers and the public with a complete and impartial discussion of the proposed project, existing site conditions, probable significant adverse environmental impacts, and reasonable alternatives and mitigation measures that would avoid or minimize adverse impacts. This provides the information needed for informed decisions.

- **Provides the information necessary for conditioning or denying the proposal.** Based on information in the EIS and the agency's adopted SEPA policies, SEPA substantive authority allows a decision-maker to:
    - Deny a proposal when "significant" environmental impacts cannot be reasonably mitigated;
    - Place additional conditions on the project to protect the environment from adverse environmental impacts; or
    - Approve the proposal without further mitigation.
    (See section on **Using SEPA in Decision Making**)

There are several steps in the EIS process:

1. Conducting "scoping," which initiates participation by the public, tribes, and other agencies and provides an opportunity to comment on the proposal's alternatives, impacts, and potential mitigation measures to be analyzed in the EIS;
2. Preparing the draft EIS, which analyzes the probable impacts of a proposal and reasonable alternatives, and may include studies, modeling, etc.;
3. Issuing the draft EIS for review and comment by the public, other agencies, and the tribes;
4. Preparing the final EIS, which includes analyzing and responding to all comments received on the draft EIS, and may include additional studies and modeling to evaluate probable impacts not adequately analyzed in the draft EIS;
5. Issuing the final EIS; and
6. Using the EIS information in decision-making.

There are two types of EISs: project and nonproject (often referred to as programmatic).

A **project EIS** is prepared for a proposal that generally involves physical changes to one or more elements of the environment (see WAC 197-11-444 for a list of the elements of the environment). Examples of the types of proposals that could be analyzed in a project EIS include:

- New construction,
- Facility operation changes,
- Demolitions
- Environmental clean-up projects, and
- The purchase, sale, lease, transfer, or exchange of natural resources (such as the lease of public lands for timber harvest).

A **nonproject EIS** is prepared for planning decisions that provide the basis for later project review. Nonproject actions are the adoption of plans, policies, programs, or regulations that contain standards controlling the use of the environment or that will regulate a series of connected actions. Examples include comprehensive plans, watershed management plans, shoreline master programs, and development regulations. (See **Nonproject Review** section)

Encouraging Public Participation in the EIS

Including the public early in the EIS process is key to identifying public issues, establishing communication lines, and facilitating trust. Taking time up-front to plan how to involve the public and being responsive to the public's needs as the process proceeds can result in a more complete and accurate document and a more satisfied public. Early involvement can also avoid later pitfalls and unnecessary delays.

SEPA requires agencies to involve the public during:

1. The "scoping" period, where agencies, tribes, and the public are invited to comment on the range of alternatives, areas of impact, and possible mitigation measures that should be evaluated within the EIS; and

2. The draft EIS review period, where comments are requested on the merits of the alternatives and the adequacy of the environmental analysis.

Agencies are encouraged to think beyond regulatory requirements in determining how best to inspire public participation and create interagency cooperation. Agencies may enhance the required involvement opportunities or add to them, as the proposal warrants. For example, under "expanded scoping," SEPA suggests several methods for enhancing public involvement beyond the basic requirements. The intent is to provide agencies with maximum flexibility to meet the purposes of scoping. Additionally, the lead agency may elect to provide supplementary opportunities for communicating with the public, starting before the determination of significance/scoping notice is issued and continuing throughout the EIS process.

A public participation plan can be a valuable tool in the EIS process. The lead agency should begin planning for public participation prior to issuing the scoping notice, as this initiates the formal involvement of agencies, tribes, and the public. Agencies may also find that pre-threshold meetings can be useful, even when it is certain that an EIS will be required. In developing the plan, the agency should consider each of the different stages of the process and then identify which methods would work best for the stage in question. The agency may also wish to consider extending the participation plan through the permitting stage as well.

Scoping

Scoping is the first step in the EIS process. The purpose of scoping is to narrow the focus of the EIS to significant environmental issues, to eliminate insignificant impacts from detailed study, and to identify alternatives to be analyzed in the EIS. Scoping also provides notice to the public and other agencies that an EIS is being prepared, and initiates their involvement in the process.

The scoping process not only alerts the lead agency, but also the applicant to areas of concern and controversy early in the process. As a result, it offers more opportunities for the applicant to consider and explore means to address the concerns. From an environmental perspective, this can result in changed proposals with fewer environmental impacts.

Issuing a Determination of Significance/Scoping Notice

Once the responsible official determines an EIS is needed, a determination of significance/scoping notice (DS/Scoping) is issued. The form is located in the SEPA Rules at WAC 197-11-980. This form may be modified by the lead agency, but informational fields (i.e. project description, applicant, etc.) should not be omitted. The scoping notice should give as thorough a description of the proposal as possible and should include information on the areas to be addressed in the draft EIS. If the lead agency has identified possible alternatives, they should also be described in the scoping notice.

The scoping process begins when the lead agency circulates the DS/scoping notice and gives

public notice. The date of issuance is the date the scoping notice is sent to the Department of Ecology, agencies with jurisdiction, and is made available to the public. Agencies and the public are encouraged to provide comments on the proposal and scope of the EIS, including commenting on alternatives, mitigation measures, and probable significant adverse impacts.

The lead agency may use various methods to involve the public in the scoping process:

- **Written comment periods.** The lead agency must give public notice and circulate the scoping notice for public and agency comment[52]. If a GMA county or city issues a scoping notice in combination with a notice of application, the comment period for the NOA is used (between 14 and 30 days, as determined by the lead agency). For non-GMA agencies, the comment period is 21 days, unless expanded scoping is used to extend the comment period to as many as 30 days.

- **Expanded scoping.** The use of expanded scoping is intended to enhance public and agency participation in identifying the scope of an EIS. Expanded scoping typically runs 30 days, rather than the standard 21-day written comment period. The additional time enables the lead agency to expand the methods used for informing agencies, tribes, and public of the proposal and to gain their input. It can involve the use of public or interagency meetings, the circulation of questionnaires or information packets, the coordination and integration of other government reviews, etc. (Refer to WAC 197-11-410 for other suggested methods of doing expanding scoping.)

Responding to Scoping Comments

Although no formal response to the scoping comments is required, some agencies choose to prepare a scoping document that 1) summarizes the comments received during the scoping process; 2) identifies the elements of the environment, alternatives and mitigation measures to be analyzed; and 3) provides other relevant information.

The scoping document can be a valuable tool to:

- Provide a record of the scoping process;
- Provide a summary of the issues raised during scoping;
- Communicate the decisions made on what is to be analyzed in the EIS; and
- Provide a reference for the reader to assess whether the agency has heard all the concerns and is accurately interpreting them.

Determining the Scope of the EIS

After reviewing the comments received during scoping, the lead agency must determine the scope of the EIS. The lead agency selects the alternatives and the elements of the built and natural environment[54] that will be analyzed in the EIS. The alternatives selected must include the proposal, the no-action alternative, and other reasonable alternatives. The elements of the environment that are evaluated in the EIS should be narrowed to just those that may be significantly impacted.
For example, an EIS for an apartment complex in a large city might focus only on transportation issues. Minimizing discussion of nonsignificant issues makes the document

more readable for reviewers and useful to decision-makers. (Additional guidance on defining the no-action alternative and identifying reasonable alternatives can be found in Section 3)

Revising the Scope of the EIS

The scope of the EIS can be revised by the lead agency whenever changes to the proposal are made, or new information is learned. This does not always require a new DS/Scoping notice. The lead agency should consider whether the intent and purpose of preparing the EIS would be compromised –if scoping is not reissued or improved –if scoping is redone.

Withdrawing a DS/Scoping Notice

A determination of significance (DS) is withdrawn by the lead agency if:

- the applicant withdraws the proposal (no new threshold determination), or
- the proposal has been changed so there will no longer be any significant adverse impacts (DNS or MDNS required).

There is no set format for the notice of withdrawal; it may take the form of a memo or letter, or it may be combined with a new threshold determination. The notice of withdrawal should be circulated to the Department of Ecology and any agencies with jurisdiction. When a DNS is issued for a proposal for which a DS has been withdrawn, a 14- day public comment period, public notice, and distribution of the DNS and checklist are required. In addition to the Department of Ecology, agencies with jurisdiction, and affected tribes, a copy of the DNS must be sent to anyone who had commented on the DS/scoping notice.

Purpose and Content of an EIS

The primary purpose of an EIS is to provide an impartial discussion of significant environmental impacts, and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts. This environmental information is used by agency officials—in conjunction with applicable regulations and other relevant information—to make decisions to approve, condition, or deny the proposal. (See Using SEPA in Decision Making)

An EIS is not meant to be a huge, unwieldy document. The text of a typical EIS is intended to be only 30 to 50 pages. It is not to exceed 75 pages unless the proposal is of unusual scope or complexity, in which case it may not exceed 150 pages. The EIS should provide information that is readable and useful for the agencies, the applicant, and interested citizens.

A readable document:

- Is well organized;
- Provides useful tools for the reader, such as a table of contents, glossary, index, references;
- Is not overly technical (technical details necessary to support information and conclusions in the EIS should be included in appendices or incorporated by reference); and

- Is brief and concise.

A useful document:

- Focuses on the most significant and vital information concerning the proposal, alternatives, and impacts;
- Provides sufficient information about each alternative so that impacts can be compared between alternatives; and
- Presents the lead agency's analysis and conclusions about the likely environmental impact of the proposal.

Format requirements for an EIS are outlined in WAC 197-11-430, 440, 442, and 443. A cover letter or memo is required and the fact sheet must be the first section of every EIS. (A sample fact sheet can be found in Appendix D, on page 140.) Otherwise, the lead agency has the flexibility to use any format they think appropriate to provide a clear understanding of the proposal and the alternatives.

The lead agency is responsible for the content of the EIS and for meeting the procedural requirements of the SEPA Rules. The lead agency, the applicant, or an outside consultant can prepare the EIS[59]. The lead agency must specify, within its own SEPA procedures, the circumstances and limitations under which the applicant will participate in the preparation of the EIS.

Describing the Proposal

Explaining what is being proposed is fundamental to the usefulness of the EIS. Therefore, the EIS should:

1. Describe the <u>total proposal</u>:
   - For project actions, this includes construction activities, operation/use, and post operation/closure.
   - For nonproject actions, this includes adoption and implementation of a plan, policy or rule.
2. Describe any related physical activities and physical changes/disturbances. For example, the construction of an electrical line or water line extension needed to service the project, or the development of a borrow pit to provide fill for the project site, etc.

3. Include information on any agency requirements that would be applied to the proposal that relate to the elements of the environment. For example, mitigation required under a critical area ordinance, or requirements from a storm water rule, etc.

Agencies are encouraged to describe a proposal as an objective, particularly for agency actions. For example, a city could propose the construction of a series of settling ponds and a chlorination system at the wastewater treatment facility. Instead, the proposal could be described as meeting the wastewater treatment needs of future development for the next 15 years. This encourages the consideration of a wider range of alternatives, where different treatment processes, and even water reuse options are contemplated rather than limiting the consideration to size and location options.

Identifying Alternatives

The EIS evaluates the proposal, the no-action alternative, and other "reasonable alternatives"[60]. A reasonable alternative is a feasible alternate course of action that meets the proposal's objective at a lower environmental cost. Reasonable alternatives may be limited to those that an agency with jurisdiction has authority to control either directly or indirectly through the requirement of mitigation.

Alternatives are one of the basic building blocks of an EIS. They present options in a meaningful way for decision-makers. The EIS examines all areas of probable significant adverse environmental impact associated with the various alternatives including the no-action alternative and the proposal.

Project alternatives might include design alternatives, location options on the site, different operational procedures, various methods of reclamation for ground disturbance, closure options, etc. For public projects, alternative project sites should also be evaluated. For private projects, consideration of off-site alternatives may be limited prohibited except under certain circumstances (see WAC 197-11-440(5)(d)).

It is not necessary to evaluate every alternative iteration. Selecting alternatives that represent the range of options provides an effective method to evaluate and compare the merits of different choices. The final action chosen by decision- makers need not be identical to any single alternative in the EIS, but must be within the range of alternatives discussed. (Additional analysis in a supplemental EIS or in an addendum can be used to address any portions of the final proposal that lie outside the analysis in the EIS. See section on Use of Existing Documents**)**

As potential alternatives are identified, they should be measured against certain criteria:

- Do they feasibly attain or approximate the proposal’s objectives?
- Do they provide a lower environmental cost or decreased level of environmental degradation than the proposal?

It may not be evident at the beginning of the process whether an alternative meets all of these criteria. The lead agency should continue to analyze each alternative until information becomes available that indicates an alternative fails to meet the criteria. The alternative can then be eliminated from further consideration. Any decisions to eliminate an alternative and the reasons why should be documented in the EIS.

Occasionally, a lead agency may decide that there are no reasonable alternatives to a proposal. In this case, the no- action alternative and the proposed action would be the only alternatives examined in the EIS.

As part of the discussion of alternatives, the EIS must discuss the benefits and disadvantages of delaying implementation of the proposal. The urgency of implementing the proposal can be compared to any benefits of delay. The foreclosure of other options should also be considered (i.e. conversion of timberland to residential development eliminates the possible use of the site for future timber production, conversion to farmland, etc.).

No-Action Alternative

SEPA requires the evaluation of the no-action alternative, which at times may be more environmentally costly than the proposal, or may not be considered “reasonable” by other criteria. Still, it provides a benchmark from which the other alternatives can be compared.

The identification of a no-action alternative can sometimes be difficult. It is typically defined as what would be most likely to happen if the proposal did not occur. If a rezone is proposed, what is the most likely development on the site under existing zoning? If the proposal involves conversion of forestland to another use, this can be compared to the impacts of continued use of the site for timber production.

There are other methods of defining the no-action alternative, such as “no new government action,” or the “lock the gate and walk away” scenario where all current activities are also ceased. As the SEPA Rules do not define what the no-action alternative must look like, the lead agency has some discretion in its design

Preferred Alternative

SEPA does not require the designation of a “preferred alternative” in an EIS. By identifying a preferred alternative, reviewers are made aware of which alternative the lead agency feels is best or appears most likely to be approved. This can be helpful for public proposals when the purpose and objectives are more general.

Identifying a preferred alternative may also have disadvantages. The public may feel that the decision has already been made, which can cause frustration with the process. Also, comments received may be limited to arguments against the agency "decision," with supporters of the preferred alternative not bothering to respond at all. This may result in a lack of feedback both on the problems related to other "non-preferred" alternatives and on the benefits of the preferred alternative.

If used, the preferred alternative can be identified at any time in the EIS process—scoping, draft EIS, or final EIS. When designated early in the process, it should be expected that changes are likely to occur to the preferred alternative prior to issuing the final EIS. Early designation of a preferred alternative in no way restricts the lead agency’s final decisions.

Affected Environment, Significant Impacts, and Mitigation Measures

An EIS describes the existing environment that will be affected by the proposal, analyzes significant adverse environmental impacts of each alternative, and discusses reasonable mitigation measures. This discussion should be concise, not overly detailed, and should focus on those elements of the environment that will be significantly impacted. For example, it would be a rare necessity to describe the impacts of the Ice Age on the project site. However, if the type of soil will affect the type of stormwater control needed for the site, the EIS should identify the type of soil on the site (affected environment), describe proposed stormwater controls (proposal), and identify other appropriate stormwater controls (mitigation measures).

When describing the environmental impacts of a proposal, the lead agency should consider direct, indirect, and cumulative impacts. For example:

- A new residential development may propose to place fill in a wetland in order to construct a road (a direct impact).
- The new road will encourage increased development in the area because of the improved access (an indirect impact).
- Increased runoff and contaminants from the development would be added to the volumes and levels of contamination from similar developments surrounding the wetland (cumulative impacts).

Impacts can be temporary, such as the short-term impacts associated with the construction phase of a proposal, or permanent, such as the long-term impact of increased runoff and contamination from a widened roadway. Both should be considered when identifying significant adverse environmental impacts to be analyzed in the EIS.

Mitigation is defined as avoiding, minimizing, rectifying (repairing), reducing, eliminating, compensating, or monitoring environmental impacts (see WAC 197-11-768). Mitigation may be suggested by the applicant; mandated by local, state, and federal regulations; or required through the use of SEPA Substantive Authority. (See Using SEPA in Decision Making section)

The EIS should identify possible mitigation measures that will reduce or eliminate the adverse environmental impacts of a proposal. The discussion should include information on the intended environmental benefit of the proposed mitigation as it relates to the identified impact. If the technical feasibility or economic practicality is uncertain, the mitigation measure may still be discussed but discussion of the uncertainties should be included. The EIS should also clearly identify the mitigation measures as either mandatory or as potential so reviewers may better assess the impacts of the proposal.

Mitigation measures must be reasonable and capable of being accomplished. The applicant may be required to implement mitigation measures only to the extent attributable to the identified adverse impacts of the proposal.

EIS Summary Section

The summary section, which should be at the beginning of the EIS text, is the portion most likely to be read by decision-makers and members of the public. It should include a summation of the main issues in the EIS, including a concise description or discussion of:

- the proposal,
- the proposal's objective
- purpose and need
- environmental impacts,
- alternatives,
- mitigation measures, and
- significant adverse impacts that cannot be mitigated.

The summary should also identify: (1) the major conclusions and significant areas of controversy, and (2) any remaining uncertainties and issues to be resolved. The discussion is useful because it presents the proposal as a whole, rather than separated by individual

element.

Matrices and charts, although not required, can be useful for summarizing alternatives, impacts and mitigation measures. See WAC 197-11-440(4) for additional detail.

Other (non-environmental) impacts, such as a cost/benefit analysis, may be included in the EIS if the lead agency determines this information would be helpful in evaluating the proposal.

Draft EIS

A draft EIS documents the lead agency's analysis of a proposal, and provides an opportunity for agencies, affected tribes, and the public to review the document and provide suggestions for improving the adequacy of the environmental analysis.

Comments on the draft EIS stimulate discussion and thoughts about how to change or condition the proposal to further protect the environment. Lead agency review of those comments offers the opportunity to improve the completeness, accuracy, and objectivity of the environmental analysis of a proposal. Improvements can then be made in the final EIS that will provide information to decision-makers. In some cases, the proponent may choose to modify the proposal based on comments made during the draft EIS comment period. In that instance, the modifications would also be described and evaluated in the final EIS.

Issuing a Draft EIS

When the lead agency is satisfied with the content of the draft EIS, the EIS is issued and is circulated for review (see WAC 197-11-455 for specific requirements). The lead agency must also give public notice, and is encouraged to send a notice of availability or a copy of the draft EIS to anyone that has expressed an interest in the proposa1. Reviewers then have the opportunity to comment on the accuracy and completeness of the environmental analysis, the methodology used in the analysis, and the need for additional information and/or mitigation measures, so that improvements to the EIS can be made before it is finalized.

A 30-day comment period is required on the draft EIS. The lead agency may extend the comment period up to an additional 15 days without consulting the applicant. The lead agency will sometimes include the additional days in the comment period when the EIS is issued, or they may grant an extension of the comment period on request. When an extension of the comment period is granted, the lead agency should whenever feasible provide notice of the extension to other reviewers. (The lead agency is not required to provide this notice, and there are no requirements regarding how notice is given.)

When the lead agency is also the proponent of the proposal, the time periods may be extended to whatever the lead agency thinks is appropriate. The lead agency is required to hold a public hearing if 50 or more persons, within the agency’s jurisdiction or who would be adversely impacted by the proposal, make written request within 30 days of the issue date of the draft EIS. Lead agencies may also at their option provide this additional avenue

and opportunity for agencies, tribes, and the public to comment on the document. The hearing must be held between 15 and 50 days after the draft EIS is issued, and a minimum of 10-day notice must be made. If held, this hearing does not constitute the one open-record hearing that is allowed under RCW 36.70B.020(3).

Except when SEPA requires a document to be sent to an agency, lead agencies may charge for providing an EIS and related environmental documents[68]. Each agency should have policies regarding charges for requested documents. When requested by public interest organizations, agencies are encouraged to provide environmental documents free of charge.

Final EIS

The final EIS provides decision-makers with environmental information about a proposal to help them decide whether to approve the proposal, approve it with conditions (mitigation), or deny the proposal. It is the lead agency's record of the environmental analysis conducted for the proposal. The final EIS includes information and input from the applicant, lead agency, other agencies with jurisdiction or concern, tribes, and the public regarding the proposal. It is completed early enough so that there is still a choice between reasonable alternatives.

Responding to Comments on the Draft EIS

The lead agency must consider comments received during the draft EIS comment period, and respond to them in the final EIS. Lead agency responses to comments should be as specific and informative as possible. Possible responses are to:

- Explain how the alternatives, including the proposed action, were modified;
- Identify new alternatives that were created;
- Explain how the analysis was supplemented, improved, or modified;
- Make factual corrections; or
- Explain why the comment does not warrant further agency response.

All timely and substantive comments and the lead agency's responses to them must be included in an appendix in the final EIS. If repetitive or voluminous, the comments may be summarized and the names of the commenters included. The lead agency may respond to each comment individually, respond to a group of comments together, cross-reference comments and the corresponding changes in the EIS, or any other reasonable method to provide an appropriate response.

Tip: If the comment is generic or nonspecific (e.g., "There will be unacceptable air quality impacts"), the response might be: "Your comment was considered but it was not specific or applicable enough to respond to. Please see Section XX of the final EIS for a discussion of air quality impacts and possible mitigation."

Timing of Final EIS

The final EIS is intended to follow closely after the draft EIS, if at all possible. The SEPA Rules state that a final EIS shall be issued within 60 days after the end of the comment period for the draft EIS, except when:

- the proposal is unusually large in scope;
- the environmental impacts are unusually complex; or
- responding to the draft EIS comments requires extensive modifications to the EIS and/or the project.

Format of Final EIS

After considering comments on the draft EIS, the lead agency has several options for completing the EIS:

- If there are no substantial comments or changes proposed on the draft EIS, the lead agency may state that in an updated fact sheet. The final EIS is then composed of the draft EIS with the new fact sheet attached.
- If changes to the draft EIS are minor (e.g. response to comments involves factual corrections or an explanation that the comment does not warrant additional consideration), an "addendum" may be prepared. In this case, the final EIS consists of the draft EIS, a new fact sheet, and the attached addendum. The addendum must contain the comments received on the draft EIS, the lead agency's responses, and any changes to the information and analysis in the draft. Previous recipients of the draft EIS need only be sent the new fact sheet and the addendum.
- If there are substantive comments that warrant substantial changes to the EIS, the final EIS is typically issued with a similar format to the draft. The draft EIS comments together with the lead agency's responses (see Responding to Comments on the draft EIS) are included as an appendix, and the necessary changes are made throughout the EIS text. Using a similar format for both the draft and the final EIS makes the two documents easier to compare.
- If any significant new issues have been raised, the lead agency may choose to issue a supplemental draft EIS with a second comment period prior to issuing the final EIS. This allows the public, tribes, and other agencies to review and comment on the new material and analyses before the document is finalized. (See the following Supplementing an EIS for additional discussion.) The final EIS, when it is ultimately issued, may have any of the above formats.

Issuing a Final EIS

The final EIS is distributed to the Department of Ecology (two copies), all agencies with jurisdiction, any agency who commented on the draft EIS, and (though a fee may be charged) to any person requesting a copy. The final EIS or a notice that it is available must also be sent to anyone who had commented or received the draft EIS. Agencies may take an action/make a decision on the proposal seven days after the final EIS has been issued.

Supplementing an EIS

A supplemental EIS adds information and analysis to supplement the information in a previous EIS. It may address new alternatives, new areas of likely significant adverse impact, or add additional analysis to areas not adequately addressed in the original document. When the additional information is minor and does not involve the analysis of

new significant impacts, an addendum may be issued.

A supplemental EIS includes a draft (with comment period) and a final document, which essentially follows the same requirements as a draft EIS and final EIS. Scoping for a supplemental EIS is optional.

The supplemental EIS process is normally used after a draft and final EIS have been issued. However, a supplemental draft EIS may be issued before a final EIS if there are significant changes in the draft EIS. In this case, the draft EIS is circulated for review, then a supplemental draft EIS is circulated for review, and a final EIS is issued which responds to comments on both the draft and supplemental draft EISs.

There are several situations when a supplemental EIS is appropriate:

- The proposal has changed and is likely to cause new or increased significant adverse environmental impacts that were not evaluated in the original EIS.
- New information becomes available indicating new or increased significant environmental impacts are likely.
- The lead agency decides that significant issues/impacts were missed in the draft EIS and/or additional alternatives or mitigation should be evaluated and SEPA goals would be better served with another draft EIS and comment period.
- The original EIS was issued for a different proposal (such as a comprehensive plan), but provides the basis for review of the current proposal. In this instance, the original EIS is adopted and the adoption form must be included within the draft supplemental EIS, which contains analysis of any likely significant adverse environmental impacts not yet evaluated.
- An agency with jurisdiction concludes its comments on the draft EIS were not adequately addressed in the lead agency's final EIS. In this case, the agency with jurisdiction must prepare the supplemental EIS at their own expense.

Tips:

- To facilitate review and the comparison of options, it is helpful for the supplemental EIS to use the same organization and format as the original EIS.
- When a supplemental EIS is being prepared after the final EIS is issued, agencies with jurisdiction should consider waiting to issue permits until after the final supplemental EIS is issued. Although, the SEPA Rules do not address this, the additional analysis, changes to the proposal, or new mitigation may be relevant to other agencies' decisions. The agency preparing the document should notify all agencies with jurisdiction that a supplemental EIS is being prepared.

4. Nonproject Review

Nonproject actions are governmental actions involving decisions on policies, plans, or programs that contain standards controlling use or modification of the environment, or that will govern a series of connected actions. This includes, but is not limited to, the adoption or amendment of comprehensive plans, transportation plans, ordinances, rules, and regulations[77]. Any proposal that meets the definition of a nonproject action must be reviewed under SEPA, unless specifically exempted.

Nonproject review allows agencies to consider the "big picture" by conducting comprehensive analysis, addressing cumulative impacts, possible alternatives, and mitigation measures. This has become increasingly important in recent years for several reasons:

- **Provides the basis for future project decisions:** Environmental analysis at the nonproject stage forms the basis for later project review, providing greater predictability.
- **Expedites project analysis and decisions:** The more detailed and complete the environmental analysis during the nonproject stage, the less review needed during project review. Project review is able to focus on only those environmental issues not adequately addressed during the nonproject stage.

General Guidance for Nonproject Actions

The procedural requirements for SEPA review of a nonproject proposal are basically the same as a project proposal. Environmental review starts as early in the process as possible when there is sufficient information to analyze the probable environmental impacts of the proposal. The first step is usually to complete an environmental checklist (including Part D, Supplemental Sheet for Nonproject Activities), unless the lead agency has already determined that an environmental impact statement is needed or SEPA has already been completed.

Review of a nonproject proposal should include a consideration of other existing regulations and plans, and any under development. For example, during development of a critical area ordinance, the agency should consider the relationship to the Clean Water Act, Shoreline Management Act, and similar regulations.

If the nonproject action is a comprehensive plan or similar proposal that will govern future project development, the probable impacts need to be considered of the future development that would be allowed. For example, environmental analysis of a zone designation should analyze the likely impacts of the development allowed within that zone. The more specific the analysis at this point, the less environmental review needed when a project permit application is submitted.

Whenever possible, the proposal should be described in terms of alternative means of accomplishing an objective. For example, a statewide plan for use of chemicals to treat aquatic vegetation could be described as a plan to control aquatic vegetation. This would encourage the review of various alternatives for treating vegetation in addition to the use of chemicals. This might include a review of biological or mechanical methods, or a combination of the various methods. Environmental review of nonproject actions by GMA cities and counties have additional specific guidance and requirements.

Contents of a Nonproject EIS

In most instances, the development of a nonproject action (i.e. plan or policy) involves an

analysis of alternatives and the potential consequences of future project actions. Since an EIS also evaluates alternatives and probable impacts, it should be possible to combine the EIS with the analysis of the nonproject action and issue an integrated document.

Agencies have great flexibility in formatting a nonproject EIS and are encouraged to combine the EIS with the planning document. The EIS should discuss impacts and alternatives with the level of detail appropriate to the scope of the nonproject proposal. Although the format is flexible, the EIS must include a cover letter or memo, a fact sheet, a table of contents, and a summary.

In preparing a nonproject EIS the following areas should be considered for inclusion:

Background and Objectives

- Background of the issue, including the purpose and need for action.
- Legislative authority or mandate.
- Statement of the primary objective.
- Relationship to ongoing and future regulatory and planning efforts.

Existing Situation

- Description of the existing situation—current regulations, existing means of achieving the objective, current institutional structure.

Proposal and Alternatives

- Description of the proposed regulation, policy, plan, etc.
- Alternatives to the proposal which could reasonably meet the primary objective.

Environmental Impacts

- Summary of the adverse environmental impacts relative to other policies. For example, the consequences of the transportation plan on housing policy or plans.
- Summary of environmental impacts from the proposal and alternatives.

Tip: When preparing a nonproject environmental document, the lead agency should think about the use of the document during the environmental review of future project proposals. Will the information provide a solid foundation for additional analysis at the project phase? Will the information be easy to locate and cross reference in later environmental documents?

5. Agencies Role in Review & Commenting

An important part of SEPA is the opportunity for citizens and other agencies to review and comment on many proposals. When an opportunity to comment on a SEPA document is missed or ignored, the opportunity to have a beneficial effect on the proposal is often lost. Comments can provide the lead agency with missing information on the proposal, identify inaccurate information, and/or provide input on possible mitigation or alternatives.

It is vital that comments are filed with the lead agency before the comment period closes. Lack of timely comment by agencies or the public is construed as a lack of objection to the environmental analysis completed by the lead agency.

It is particularly important for agencies with jurisdiction to comment when they have concerns about a proposal. Since the comments become part of the SEPA record, the information can be used by any agency with jurisdiction when making permit decisions. (See section 6. **Using SEPA in Decision Making**). Additionally, the SEPA rules include a list of state agencies "with expertise" on each element of the environment. They should be consulted at the earliest opportunity to review a Checklist or other draft SEPA document.

When to Comment

Citizens and agencies are accustomed to commenting on project proposals where it is easy to see the potential for on-the-ground impacts. It has become increasingly important to also review and comment on nonproject proposals. These include the adoption of state or local rules, resource management plans, comprehensive plans, critical area ordinances, development regulations, etc. Plans and the implementing regulations are likely to have a much more widespread influence, as they may affect the permitting, approval, or denial of unknown numbers of future project proposals or permit renewals.

As more cities and counties are planning under the Growth Management Act, many environmental concerns are considered during the development of plans and implementing regulations. Many of these issues cannot be reconsidered or appealed during later project review.

Table 2 contains information on the public comment periods, public notice, and circulation requirements for SEPA documents. Although the majority of SEPA documents require a comment period, some do not. The following types of documents may provide opportunities to comment on a proposal, although no proposal—project or nonproject—will offer all:

If a consulted agency fails to comment on a draft EIS, the agency is barred from alleging any defect in the analysis in the EIS. A consulted agency is any agency with jurisdiction or expertise that is requested by the lead agency to provide information or comments on a proposal during the SEPA process.

If an agency with jurisdiction comments on a draft EIS and the lead agency does not provide adequate response to the concerns, the agency with jurisdiction may prepare a supplemental EIS.

6. Using SEPA in Decision Making

Substantive authority is an essential part of SEPA. It allows decision-makers to use the environmental analysis required under SEPA to condition or deny proposals.
One of the most important aspects of the SEPA process is the consideration of environmental impacts and possible mitigation measures during agency decision- making. SEPA substantive authority gives all levels of government the ability to condition or deny a proposal based on environmental impacts.

Mitigation must be included as permit conditions to be enforceable. The exception is when a proponent alters the permit application(s) to include the needed changes or conditions.

Identification of mitigation in a DNS or EIS alone is not sufficient to allow enforcement.

Before requiring mitigation measures under SEPA substantive authority, agencies are to first consider whether local, state, or federal requirements and enforcement would mitigate the identified significant adverse impacts.

Decision-makers should judge whether possible mitigation measures are likely to protect or enhance environmental quality. Mitigation measures must be related to a specific adverse impact clearly identified in an environmental document[86] on the proposal, and must be reasonable and capable of being accomplished.

When using SEPA substantive authority, the decision-maker must:

1. Cite the agency SEPA policy that is the basis for conditioning or denying the proposal;
2. Document the decision in writing; and
3. Make available to the public a document that states the decision, and any mitigation measures will be required. This document may be the permit, license, or approval; or it may be combined with other agency documents; or
4. the decision document may reference relevant portions of environmental documents.

To deny a proposal under SEPA, an agency must find that:

1. The proposal would be likely to result in a significant adverse environmental impact identified in a final EIS or final supplemental EIS; and
2. Reasonable mitigation measures are not sufficient to mitigate the identified impact to a non-significant level.

SEPA supplements the existing authority of all agencies. To exercise SEPA substantive authority each agency must adopt SEPA policies that will be the basis for conditioning or denying proposals. These policies must be readily available to the public for the benefit of applicants and concerned citizens. (See adoption procedures in WAC 197-11-902.)

7. SEPA and the Growth Management Act (GMA)

Environmental review at the planning stage allows the GMA city or county to analyze impacts and determine mitigation system-wide, rather than project by project. This allows cumulative impacts to be identified and addressed, and provides a more consistent framework for the review, conditioning, or denial of future projects.

Planned Actions

In 1995, the legislature authorized a new category of project action in SEPA called a “planned action.” Designating specific types of projects as planned action projects shifts environmental review of a project from the time permit application is made to an earlier phase in the planning process. The intent is to provide a more streamlined environmental review process at the project stage by conducting more detailed environmental analysis during planning. Early

environmental review provides more certainty to permit applicants with respect to what will be required and to the public with respect to how the environmental impacts will be addressed.

The GMA city or county must first complete an EIS which addresses the likely significant adverse environmental impacts of the planned action. After completing the EIS, the GMA city or county designates by ordinance or resolution those types of projects to be considered planned actions, including mitigation measures that will be applied. The types of project action must be limited to certain types of development or to a specific geographic area that is less extensive than a city or town's jurisdictional boundaries. (See RCW 43.21C.440, WAC 197-11-164 and 168 for requirements and restrictions on the designation of planned actions.)

While normal project review requires a threshold determination, a project qualifying as a planned action project does not require a new threshold determination. If the city or county reviews the project, verifies that it is consistent with the planned action project(s) previously designated, and determines that the impacts are adequately addressed in the EIS on which the planned action relies, project permit review continues without a threshold determination. All of the project's significant probable environment impacts must have been addressed at the plan level in order for the project to qualify as a planned action.

Designating planned action projects reduces permit-processing time. There are no SEPA public notice requirements or procedural administrative appeals at the project level because a threshold determination or new EIS is not required. The only notice requirements are those required for the underlying permit.

The designation of planned action projects will only be appropriate in limited situations. The designation of planned action projects is probably most appropriate for:

- Smaller geographic areas;
- Relatively homogenous geographic areas where future development types, site-specific conditions, and impacts can be more easily forecast;
- Development sites with significant overlapping regulatory requirements; or
- Routine types of development with few impacts.

Examples of appropriate project actions limited to a specific geographic area might be projects anticipated in a subarea or neighborhood plan with a limited number of development types. Another example could be a large parcel in single ownership, such as a university campus or a large manufacturing complex where project construction will be done in phases.

Designating Planned Action Projects

The basic steps in designating planned action projects are to prepare an EIS, designate the planned action projects by ordinance or resolution, and review permit applications for projects proposed as consistent with the designated planned action.

Step 1: Prepare the EIS

The significant environmental impacts of projects designated as planned actions must be identified and adequately addressed in an EIS. The EIS must be prepared for a GMA

comprehensive plan or subarea plan, a master planned development or resort, a fully contained community, or a phased project.

Planned action projects should only be designated when a county or city can reasonably analyze the site-specific impacts that will occur as a result of the types of projects designated, and can adequately address those impacts in the EIS. A generalized analysis of cumulative environmental impacts will not provide enough information to address a project's impacts when it is time for the jurisdiction to issue permits for specific projects proposed as planned action projects.

Step 2: Adopt Planned Action Ordinance or Resolution

Planned action projects must be designated or identified in an ordinance or resolution adopted by a GMA county or city. There are a number of procedural requirements for this. A GMA county/city considering the adoption of a planned action ordinance or resolution should review the requirements in RCW 43.21C.440 and WAC 197-11-164, 168, and 315. The following specific points should be considered:

- An extensive level of public review for both the EIS and the proposed planned action ordinance is crucial. Since a new threshold determination or EIS is not required when a permit application is received, there may not be an opportunity for public review or administrative appeal at the project review stage. In order to build support for an abbreviated permit process, public awareness is needed at these earlier phases.
- Although the statute allows a jurisdiction to designate planned action projects by an ordinance or resolution, adoption by resolution is not recommended. The provisions for adoption of a resolution do not allow sufficient opportunity for public participation.
- The planned action ordinance should be as specific as possible, should indicate where in the EIS or associated planning document the projects' environmental impacts have been addressed, and should include or reference mitigation measures which will be required for a project to qualify as a planned action project. For example, the ordinance should indicate what mitigation has been identified in the EIS or what level of service has been accepted in the subarea plan for traffic impacts.
- If desired, the city or county may set a time limit in the ordinance during which the planned action designation is valid. If a GMA county/city does set a time limit on the designation, it should consider how this affects any permits for which there is an expiration date. For example, a project with a permit valid for five years is found to qualify as a planned action project and the permit is issued just prior to the sunset date for the planned action designation. Is the project still considered a planned action project for the life of the permit after the sunset date?
- Although a GMA county or city must require the applicant to submit a SEPA environmental checklist with a project proposed as a planned action project, a revised format for the checklist may be developed by the city or county. A draft of

the revised form must be sent to Ecology for a thirty- day review[105]. While not required at this phase, it would be helpful if the revised checklist were developed in conjunction with the ordinance or resolution designating planned action projects.

Step 3: Review the Proposed Planned Action Project

When a permit application and environmental checklist are submitted for a project that is being proposed as a planned action project, the city or county must verify:

- The project meets the description of any project(s) designated as a planned action by ordinance or resolution;
- The probable significant adverse environmental impacts were adequately addressed in the EIS; and
- The project includes any conditions or mitigation measures outlined in the ordinance or resolution.

If the project meets the above requirements, the project qualifies as a planned action project. Neither a threshold determination nor an EIS will be required. Consequently, there will be no administrative SEPA procedural appeal (an appeal of whether the proper steps in the SEPA process were followed). The planned action project will continue through the permit process pursuant to any notice and other requirements contained in the development regulations.

If the project does **not** meet the requirements of the planned action ordinance or resolution, or if the EIS did not adequately address all probable significant adverse environmental impacts, the project is not a planned action project. In this instance, the city or county must then make a threshold determination on the project. The project would go through normal environmental review as part of project review. The county or city may still rely on the environmental information contained in the EIS and supporting documents in analyzing the project's environmental impacts and making the threshold determination. If an EIS or SEIS is found to be necessary for the project, it only needs to address those environmental impacts not adequately addressed in the previous EIS.

Consistency Requirements for Planned Action Projects

A project proposed as a planned action project must still be analyzed for consistency with the local comprehensive plan and development regulations (see section on **Analyzing Consistency**). Designation of planned action projects does not limit a city or county from using other authority (e.g. transportation mitigation ordinances) to place conditions on a project; it only addresses procedural SEPA requirements. The GMA county or city may still use its SEPA substantive authority or other applicable laws or regulations to impose conditions on a project qualifying as a planned action project.

8. GMA and SEPA: Local Project Review Act

The Local Project Review Act was part of the Land Use Regulatory Reform Act signed into law in 1995 (ESHB 1724, codified in Chapter 36.70B RCW). It requires counties and cities to combine permit review and environmental review, and to consolidate administrative appeals of

permit and SEPA decisions. Integrated project review can provide a more streamlined permit and environmental review process for proposals projected in the comprehensive plan.

Requirements for Integrated Project Review

Counties and cities planning under GMA have additional requirements that must be adopted by ordinance or resolution. The following steps must be included in their project review process:

- Determination of Completeness
- Notice of Application
- Notice of Decision–issued within 120 days of the Determination of Completeness
- Combined permit and SEPA administrative appeals

There have been a number of questions on whether the project review requirements in Chapter 36.70B RCW apply to comprehensive plan or development regulation amendments, such as rezones. Comprehensive plan and development regulation amendments are nonproject actions and therefore not subject to project review requirements. Amendments to the comprehensive plan and development regulations are nonproject regardless of whether they are initiated by the county or city or by citizen request, however, in all instances they remain subject to SEPA and GMA requirements for public review and comment.

Steps in the *Project Review* Process for GMA Counties and Cities

Non-GMA cities and counties may also choose to follow this process for integrating their permit and environmental review procedures.

Preapplication Process
A preapplication process can be beneficial to the applicant and to reviewing agencies. The process usually involves a meeting between the applicant, various county or city departments, and other agencies that issue permits. A preapplication meeting allows the applicant to discuss the project and gather information on what studies and mitigation may be required. The county or city has an opportunity to inform the applicant whether the project appears to be consistent with the development regulations and/or comprehensive plan, and to identify any environmental studies or mitigation that may be required.

Determination of Completeness
Counties and cities planning under GMA are required to determine whether an application is complete enough to begin processing within 28 days of submittal. If the application is determined complete, it is documented in a "determination of completeness" and sent to the applicant. If the application is not complete, the GMA county or city may request additional information from the applicant. Once this information is submitted, the agency has 14 days to determine whether the application is now complete and to notify the applicant in writing.

Even though a county or city has determined an application to be complete, it is not precluded from later requesting additional information or studies.

SEPA considerations at this stage of project review:

Is SEPA review required? If this is the first permit application submitted for a proposal, the county or city will also determine whether the proposal is categorically exempt (or whether SEPA has already been completed). If SEPA review is not required, the county or city must still comply with the requirements of the Local Project Review Act.

Who is lead agency? In most instances, the county or city will be the lead agency. However, the county or city will not be the lead agency when another agency is the proponent or is designated lead under the SEPA Rules for a specific type of proposal (see WAC 197-11-938). If the county or city is not the lead agency, it will still analyze the consistency of the project with applicable development regulations and/or comprehensive plan policies. That information should be provided to the lead agency.

What if the lead agency is also the project proponent? When there is a public proposal, such as a road project or sewer system, the proponent is usually the SEPA lead agency. Public proposals often take several years to plan and implement. The public agency proponent usually does its environmental review under SEPA months or years prior to submitting a permit application to the county or city. The Local Project Review Act and SEPA were amended in 1997 to allow a public agency that is funding or implementing a proposal to conduct its environmental review and complete procedural appeals under SEPA prior to submitting a permit application.

Other issues to consider:

- Issues that should be considered during initial project review by GMA counties or cities include the following:
- Is the project description complete? Is the project properly defined? Have all interdependent pieces of the project been identified? (See WAC 197-11-060(3))
- Is the project consistent with the development regulations, or in the absence of applicable development regulations, the comprehensive plan? (See RCW 36.70B.030 and 040, and the section below on Analyzing Consistency.)
- Are specific studies needed under the development regulations and/or SEPA environmental review, or by other local, state, or federal regulations (e.g., a wetland study, transportation study, etc.)?
- What are the environmental impacts of the proposal? Have they been addressed by existing environmental documents (for example, an EIS on the comprehensive plan or an EIS on a similar project or located in a similar geographic area)?
- Will mitigation/conditions be required by the development regulations; or other local, state, or federal regulations?

Are there environmental impacts that have not been addressed by the regulations? It may not be possible to answer all of these questions during the initial review phase, but it is important to consider them as early in the review process as possible.

Notice of Application (NOA)

The determination of significance (DS/Scoping notice) may be combined with the NOA if a GMA county or city is also lead agency under SEPA and has determined an EIS is needed at the time it issues the notice of application. The county or city may also issue the DS and scoping notice prior to issuing the notice of application, or they may wait to consider comments received on the NOA before making a threshold determination.

Optional DNS

The optional DNS process gives GMA counties and cities the flexibility to consolidate the notice and comment process prior to issuing the DNS. When the GMA city or county is the SEPA lead agency for a proposal and they have completed their environmental review at the time they will issue the NOA, they may choose to use the optional DNS process and receive comments on the Checklist prior to formal issuance of the DNS –which occurs with the Notice of Decision.

With the optional DNS process, the agency solicits comments on environmental issues during the NOA comment period. Reviewing agencies and the public are warned that they may have only the one opportunity to comment on the proposal. Later, when the DNS is formally issued at the end of the NOA comment period, the lead agency is not required to provide a second comment period.

A GMA county or city should consider the following points before deciding to use the optional DNS process:

- It is intended for minor projects that can be fully reviewed prior to issuing a NOA. If the proposed project is more complex, or environmental review cannot be completed within the time limits for the NOA, the regular DNS process should be used.
- The NOA must contain sufficient information on the proposed project, including proposed mitigation measures, to allow other agencies and the public to understand the proposal and comment on any areas of concern. This is particularly important since this is likely to be the only opportunity for the other agencies and public to comment on the probable impacts of the proposed project. It is also the only time that other agencies with jurisdiction will have the opportunity to assume lead agency status.
- A DNS may be issued at the time of NOA and avoid the need for the optional process because the comment period for SEPA automatically coincides with the NOA comment period.

If the optional process is being used, the county or city must state on the first page of the NOA that:

- The optional DNS process is being used;
- The agency expects to issue a DNS for the proposal; and
- This may be the only opportunity to comment on the environmental impacts of the proposed project.
- The NOA and the environmental checklist are distributed to agencies with jurisdiction or expertise, affected tribes, and the public.

After the close of the comment period on the NOA, the agency reviews any comments on the environmental impacts of the project and decides whether to proceed with issuing a DNS. The choices at this point are:

- Issue a DNS without an additional comment period;
- Issue a DNS with a second comment period;
- Issue a DS; or
- Require additional information or studies prior to making a threshold determination.

The lead agency is required to circulate the DNS, if issued, to the Department of Ecology, agencies with jurisdiction, anyone who commented on the NOA, and anyone requesting a copy.

If the lead agency uses the optional DNS process, an agency with jurisdiction may assume lead agency status during the comment period on the notice of application.

Notice of Final Decision

Once the public comment period on the notice of application ends, the agency will review the comments and complete the project review process, including environmental analysis. At the end of the review, a notice of final decision on the permit is issued. The county or city may include permit conditions in the notice of decision based on the development regulations or under the jurisdiction's SEPA substantive authority. (See **Using SEPA in Decision Making**)

9. SEPA's Relation to NEPA

Each federal agency must adopt its own procedures to meet the requirements and intent of NEPA. The review process of each agency will therefore vary. In general, the NEPA process includes the preparation of an environmental assessment (EA) followed by either a finding of no significant impact (FONSI) or by preparation of an environmental impact statement (EIS).

The EA contains information about the proposal that the lead agency uses to decide whether to prepare an EIS or a FONSI. It includes a description of the proposal, a discussion of the proposal's purpose and need, and identification of probable environmental impacts and possible alternatives. In some cases, the EA is circulated for public review and comment before the lead agency issues either a FONSI or an EIS.

The NEPA EIS process is much like the EIS process under SEPA: starting with scoping, then issuance of a draft EIS, and finally the preparation of a final EIS. After completion of the EIS, the federal agency usually issues a record of decision that includes the decisions made, the alternatives considered, and the factors that were considered in reaching a decision.

Integrating NEPA and SEPA

Some projects may require approval from both federal agencies and state or local agencies, thus requiring compliance with both NEPA and SEPA. For example, a major dredging operation might need approvals from the U.S. Corps of Engineers, Washington Department of Ecology,

and from the county or city. Since both federal and state/local licenses are required, compliance with both NEPA and SEPA would be needed.

SEPA's purpose and goals are almost identical but federal agencies may have procedures for environmental review (aside from the list of categorical exclusions) that are not fully aligned with SEPA requirements. The main areas of divergence could include the scope of the review, types of impacts and range of alternatives. SEPA provides an expressed substantive provision that authorizes agencies to deny or condition a proposal based upon the impacts addressed in the environmental documents. RCW 43.21C.060. This affords agencies and the public with an important purpose and need for SEPA review regardless of the extent of NEPA review established by the lead federal agency.

Proposals covered under a specific NEPA exclusion but also involve "agency actions" by state or local agencies – may require SEPA review. The environmental review requirements under SEPA are separate and independent from those required or exempted under NEPA. Both the process and criteria are different for establishing and applying exemptions under each statute and their implementing regulations.

1. NEPA EA/FONSI is completed first and the SEPA lead agency issues a DNS and "adopts" the EA in lieu of preparing an Environmental Checklist. A minimum 14-day SEPA comment period is required and additional information and analysis can be included in the DNS or added to the EA in the form of an Addendum. This option often involves close coordination between the NEPA and SEPA lead agencies to ensure that the NEPA analysis is sufficient for SEPA purposes;

2. NEPA EIS is completed first and the SEPA lead agency issues a DS and adopts the EIS in lieu of preparing a separate EIS. Technically the ROD does not have to have been issued prior to adoption under SEPA, however the NEPA EIS cannot have been found "inadequate" by a court, EPA or CEQ.

3. NEPA and SEPA processes are concurrent and a joint NEPA/SEPA EIS or a combined EA/FONSI/DNS is issued by the relevant "cooperating" agencies; or

4. NEPA documents and SEPA documents are issued independently and no adoption of previously prepared NEPA documents is involved.

Additionally, a "documented categorical exclusion" can also be adopted under SEPA when issuing a DNS, in lieu of preparing a Checklist –as long as all of SEPA's environmental elements have been adequately addressed in the NEPA documentation.

Federal public projects are considered "private" proposals for the purpose of determining the SEPA "lead agency." Local government agencies are typically designated as the SEPA lead for private projects if there is a corresponding local permit or approval for the project.

The table below compares NEPA and SEPA terms and procedural requirements:

NEPA	SEPA
Categorical Exclusion (CE), 40 CFR 1508.4, 40 CFR 1507.3	Categorical Exemption, WAC 197-11-800-880.Statutory Exemptions, RCW 43.21c
Environmental Assessment, 40 CFR 1508.9, 40 CFR 1501.3	Environmental Checklist, WAC 197-11-960,
Finding of No Significant Impact, 40 CFR 1508.13	Determination of Nonsignficance (DNS), WAC 197-11-340.
Notice of Intent, 40 CFR 1508.22	Determination of Significance (DS) and Scoping notice. WAC 197-11-360.
Draft Environmental Impact Statement (DEIS), 40 CFR 1502, 40 CFR 1508.11 Review	Draft Environmental Impact Statement (EIS), WAC 197-11-455.
Final Environmental Impact Statement (FEIS), 40 CFR 1502, 40 CFR 1508.11	Final EIS (FEIS), WAC 197-11-460.
Supplemental EIS,	Supplemental EIS,
Record of Decision, 40 CFR 1505.2	Agency decision – but SEPA agencies must wait seven days before taking action. WAC 197-11-460

10. SEPA and MTCA

In 1988, citizens passed Initiative 97, creating the Model Toxics Control Act (MTCA). An amendment to the SEPA statute in 1994 directed the integration of the review requirements of MTCA and SEPA. To meet this directive, several sections were added to the SEPA Rules that contain procedures to combine the MTCA and SEPA processes to reduce duplication and improve public participation.

WAC 197-11-250 through 268 apply to interim and final hazardous site cleanup activities conducted by the Department of Ecology, or by a potentially liable party under an order, agreed order, or decree. They do not apply to independent cleanup actions (which are reviewed under the normal SEPA process). If the Department of Ecology is not SEPA lead agency, the SEPA/MTCA integration procedures are used to the extent practicable.

11. Appeals

SEPA provides a process for citizens and other agencies to challenge both procedural and substantive decision made using SEPA review. **Procedural appeals** include the appeal of a threshold determination—both determinations of significance (DS) and nonsignificance (DNS)—and of the adequacy of a final environmental impact statement (EIS). **Substantive appeals** are challenges of an agency's use (or failure to use) SEPA substantive authority to condition or deny a proposal.

Appeals may also be heard at two levels:

- **Administrative appeals**, heard by agencies; and
- **Judicial appeals**, which are heard by courts when the administrative appeal process is either not available or has been exhausted.

Administrative appeals are not required but some local agencies provide this process and appellants must complete this process prior to pursuing a judicial challenge. Not all agencies provide an administrative appeal process, or they may provide for a substantive appeal or a procedural appeal but not both. In some situations, the first appeal may be a judicial appeal filed in superior court.

For more information on the SEPA appeal process, refer to RCW 43.21C.060, 075, and 080; and WAC 197-11-680. Also refer to the Local Project Review Act (Chapter 36.70B RCW), since it contains provisions relating to SEPA administrative appeals. Anyone interested in appealing a SEPA procedural issue should contact the lead agency to determine what administrative appeal, if any, will be allowed. Questions on the availability of administrative appeals for substantive decisions should be directed to the agency that made the decision (i.e. to deny, condition, or not to condition a permit or other approval).

Administrative Appeals

Each agency must decide whether or not to offer administrative appeals. If an agency offers an administrative appeal, the agency must specify its appeal procedure by ordinance, resolution, or rule.

An agency may provide appeals of some, but not all, reviewable SEPA decisions. The only decisions that may be appealed at the agency level are a final threshold determination or EIS (including a final supplemental EIS), and SEPA substantive decisions. Other decisions, for example the applicability of categorical exemptions, may only be appealed to the courts.

A DS, DNS, or EIS are each subject to a single administrative appeal proceeding. Successive reviews within the same agency are not allowed. For example, a hearing examiner's decision on the appeal of a DS cannot be further reviewed by the local legislative body. Further consideration is limited to review by a court as part of a judicial appeal.

Procedural and substantive SEPA appeals in most instances must be combined with a hearing or appeal on the underlying governmental action (such as the approval or denial of a permit). If a SEPA appeal is held prior to the agency making a decision on the underlying action, it must be heard at a proceeding where the person(s) deciding the appeal will also be considering what action to take on the underlying action.

SEPA appeals that do not have to be consolidated with a hearing or appeal on the underlying action are related to:

- A determination of significance (DS);
- An agency proposal;
- A non-project action; or
- The appeal of a substantive decision to local legislative bodies.

A local agency must also decide whether or not to allow an appeal of a non- elected official's decision to use SEPA substantive authority to condition or deny a proposal. If a local agency

chooses not to allow an appeal to a local legislative body, the agency must clearly state that decision in its procedures.

Judicial Appeals

Judicial appeals are those appeals heard in court. A judicial appeal in most instances must be of the underlying governmental action (permit decision, adoption of a regulation, etc.) and the SEPA document (DNS or final EIS). (Information on exceptions is given on page 110.) If the agency allows a SEPA administrative appeal, it must be used prior to initiating judicial review.

The time period for filing a judicial appeal will depend on several factors:

- **Time limit on the underlying governmental action** (issuance of permit, adoption of a plan, etc.). If there is a time limit established by statute or ordinance for appealing the underlying governmental action, then appeals raising SEPA issues must be filed within that time period. (see RCW 43.21C.075(5) for additional information.)
- **Time limit when publication of notice of action taken.** If there is no time limit for appealing the underlying governmental action, the notice of action provisions in RCW 43.21C.080 may be used to establish a 21-day appeal period.
- If there is **no time limit** for appealing the underlying governmental action and the notice of action is not used, then SEPA does not provide a time limit for judicial appeals. However, the general statutes of limitation or the common law may still limit appeals.

12. Adopting Agency SEPA Procedures and Policies

Each state and local agency must adopt its own rules and procedures for implementing SEPA. These “agency SEPA procedures” must be formally designated by rule, ordinance, or resolution. Before adopting their agency SEPA procedures, the agency must provide public notice and an opportunity for public comment.

An agency's SEPA procedures identify the agency's responsible official, the method(s) for public notice, the procedures for administrative appeal, if any, and other information about the agency's review procedures. If an agency does not adopt agency SEPA procedures, the defaults in the SEPA Rules will apply. For example, if the agency has not identified procedures for public notice, the agency must publish notice for SEPA documents in a newspaper of general circulation and post the site (for site-specific proposals). Another example is the administrative appeal process. To offer an administrative appeal of procedural and/or substantive issues, an agency must specify their administrative appeal process in their agency SEPA procedures.

Agencies have the option of adopting sections of the SEPA Rules by reference. This allows an agency to list the section title and a brief summary without repeating the entire text of the section. If incorporation by reference is used, the agency must have at least three copies of the full text of the SEPA Rules on file for public review.

Each agency must also adopt policies that will be used as the basis for conditioning or denying an action using SEPA substantive authority. These "agency SEPA policies" must be formally designated by rule, ordinance, or resolution, and may be part of the agency's SEPA procedures.

If an agency does not adopt SEPA policies, the agency cannot use SEPA substantive authority to condition or deny an action.

WAC 197-11-900 through 918 contains specific requirements for agency SEPA procedures and SEPA policies. WAC 197-11-906 specifically identifies provisions of the SEPA Rules that an agency cannot change or add to, and those that an agency cannot change but can add to (provided any additions are consistent with SEPA).

Examples of mandatory provisions that cannot be added to or changed include:

- Definitions of "proposal," "action," "significant," "mitigation," "etc.;
- Criteria for determining lead agency;
- Information required from applicants; and
- Style and size of an EIS.

Examples of provisions that cannot be changed but can be added to include:

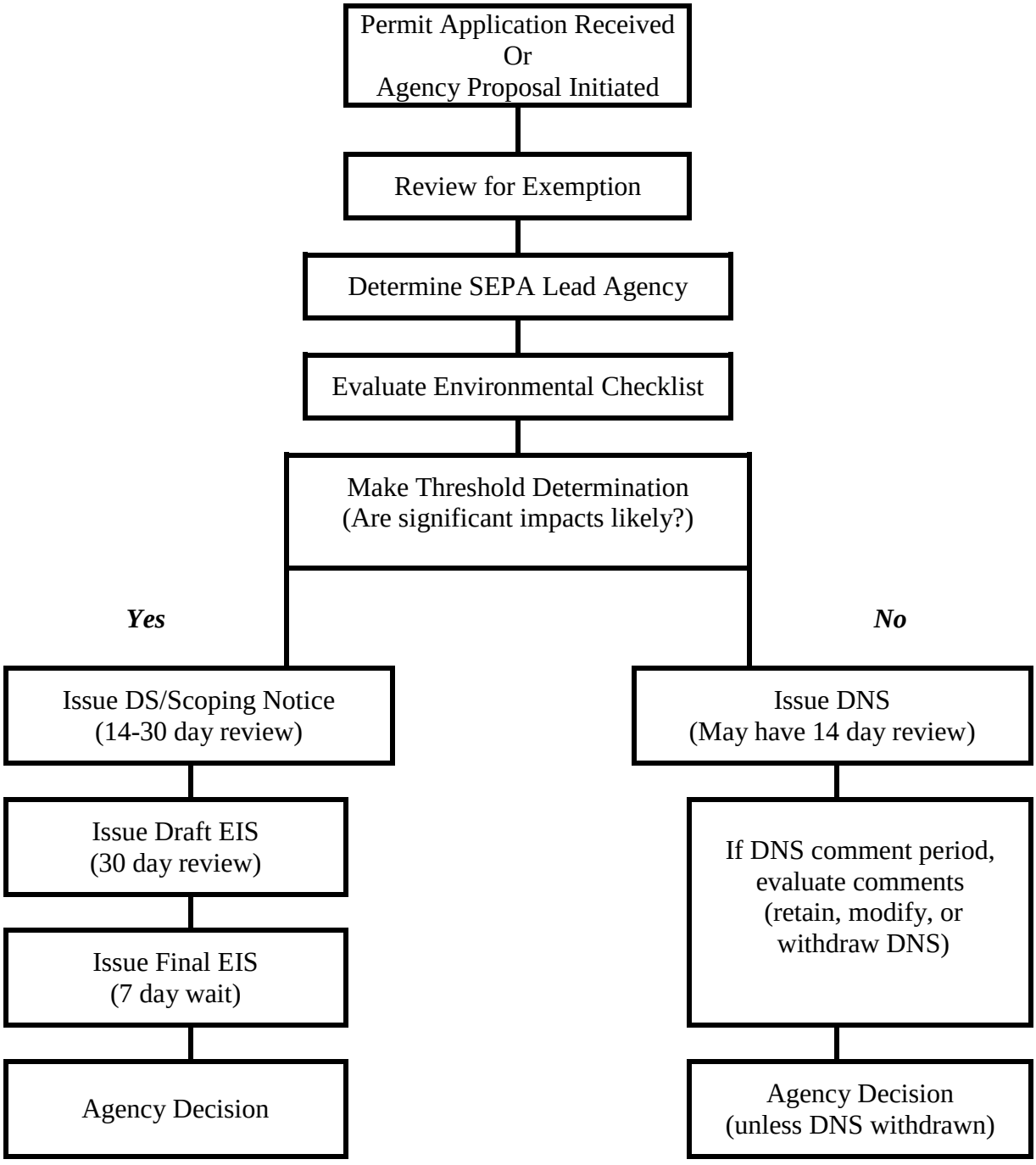
- Part 4 (of the SEPA Rules), Environmental Impact Statement;
- Part 5, Commenting; and
- The list of agencies with environmental expertise.

Examples of provisions that are optional include:

- Establishment of an administrative appeal procedure;
- Elimination of some categorical exemptions in critical areas (counties and cities only);
- Establishing the categorical exemption level for minor construction within the minimum and maximum specified in the SEPA Rules (counties and cities only); and
- Specifying procedures for enforcement of mitigation measures.

An agency may amend it agency SEPA procedures at any time. If the agency's SEPA procedures change after the review of a proposal has started, the revised procedures will apply to any portions of SEPA that have not yet been started. For example, if a permit application and checklist are submitted before the new agency SEPA procedures become effective but the threshold determination is not made until after the effective date, the revisions would apply to the threshold determination but would not affect the checklist. The amended procedures cannot be used to invalidate or require modification of a threshold determination or EIS.

SEPA REVIEW PROCESS



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Re: Complaint under Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d, regarding the North Carolina Department of Environmental Quality's Issuance of Permit Nos. AWI310035, AWI301139, AWI230466, and AWS820005

Dear Administrator Regan and Director Dorka:

On behalf of the Duplin County Branch of the North Carolina Conference of the National Association for the Advancement of Colored People ("Duplin County NAACP") and the North Carolina Poor People's Campaign (together, "Complainants"), the Southern Environmental Law Center submits this complaint against the North Carolina Department of Environmental Quality ("DEQ") for its issuance of four permits ("Permits") authorizing swine waste management systems that lack necessary protections against air and water pollution at four industrial hog operations (together the "Hog Operations") in Duplin and Sampson Counties in rural eastern North Carolina.[1] A disproportionate share of the families who live around these operations are Black and Latinx. [2]

[1] *See* DEQ, Waters Farm-M&M Rivenbark Farm Permit No. AWI310035 (March 31,2021), https://files.nc.gov/ncdeq/afo/AWI310035P20210331.pdf (Exhibit 1); DEQ, Benson Farm Permit No. AWI310039 (March 31, 2021), https://files.nc.gov/ncdeq/afo/AWI310039P20210331.pdf (Exhibit 2); DEQ, Kilpatrick Farm 1, 2, 4, & 5, & Merritt Farm Permit No. AWS92005 (March 31,2021), https://files.nc.gov/ncdeq/afo/AWS820005P20210331.pdf (Exhibit 3); and DEQ, Farm 2037 & 2038 (Goodson) Permit No. AWI820466 (March 31,2021), https://files.nc.gov/ncdeq/afo/AWI820466P20210331.pdf (Exhibit 4).

[2] DEQ, Draft Environmental Justice Report, 20 (Dec. 22, 2020), https://files.nc.gov/ncdeq/afo/Biogas-DWR-Draft-EJ-Report.pdf (hereinafter "DEQ EJ Report") (Exhibit 5) (explaining the findings of DEQ's environmental justice

The Permits authorize the Hog Operations to collect methane from hog waste lagoons for use as fuel ("biogas"), but they fail to address the longstanding, serious pollution problems of using open lagoons and sprayfields to store and dispose of hog waste—and in particular, they fail to address the *increases* in pollution that will result from the production of biogas at these operations under the new Permits.

Two local community groups, Environmental Justice Community Action Network and Cape Fear River Watch challenged these permits in the N.C. Office of Administrative Hearings alleging violations of state law. *See* Prehearing Statement, *Env't Justice Comm. Action Network & Cape Fear River Watch v. N.C. Dep't of Env't Quality – Div. Water Res & Murphy Brown, LLC*, Case Nos. 21 EHR 02068, 02069, 02070, 02071 (consolidated) (Exhibit 7). EJCAN and Cape Fear River Watch have not alleged violations of federal civil rights laws as part of the cases, which are currently pending.

DEQ's issuance of the Permits will put more harmful ammonia into the air nearby residents breathe, increasing fine particulate pollution associated with premature death and serious health problems. For example, a recent study by the National Academy of Sciences attributes an astounding 95 premature deaths in Sampson County and 83 premature deaths in Duplin County to the fine particulate pollution caused, in part, by ammonia emissions from hog operations every year.[3] The Permits will also increase the water pollution that results from ammonia settling in the surrounding area and more water-soluble pollutants being applied directly to crop fields.[4] These are unacceptable added harms for communities that have suffered from pollution and health problems from hog operations and other polluting industries for decades. DEQ's failure to address these added harms violates Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d to 2000d-7, as well as the Title VI implementing regulations of the U.S. Environmental Protection Agency ("EPA"), 40 C.F.R. Part 7.

Your office previously expressed "deep concern" about North Carolina's permitting program for industrial hog operations, which authorizes the storage of hog urine and feces in open cesspits and spraying of the waste on fields.[5] This harmful approach to waste management has been linked to severe environmental degradation and increased mortality and illness in nearby communities, and disproportionately burdens Black, Latinx, and Native American North Carolinians.[6] The Permits continue to rely on this primitive system, which EPA found may be

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report including, "[t]he study area [for the project] displays higher percentages of African-American and Hispanic residents compared to the state, and in some cases, the county as well"); *see also* Demographics of Impacted Communities, So. Env't Law Ctr. (Sept. 21, 2021) (Exhibit 6).

[3] *See* Nina G.G. Domingo et al., *Air quality-related health damages of food*, 118 PROCEEDINGS OF THE NAT'L ACAD. SCIS. 1 (May 18, 2021), https://www.pnas.org/content/118/20/e2013637118 (Exhibit 8); *see also* County-Level Data (Exhibit 9).

[4] *See infra* Section III(C).

[5] Letter from Lilian Dorka, EPA, to William Ross, DEQ, 1, 5–6, 11 (Jan. 12, 2017) https://www.epa.gov/sites/production/files/2018-05/documents/letter_of_concern_to_william_g_ross_nc_deq_re_admin_complaint_11r-14-r4_.pdf (hereinafter "Dorka Letter") (Exhibit 10).

[6] *See, e.g.*, Julia Kravchenko et al., *Mortality and Health Outcomes in North Carolina Communities Located in Close Proximity to Hog Concentrated Animal Feeding Operations*, 79 N.C. MED. J. 278, 278 (2018), https://doi.org/10.18043/ncm.79.5.278 (finding higher mortality rates for people living near industrial hog operations) (Exhibit 11); *see also* Steve Wing, et al., *Environmental Injustice in North Carolina's Hog Industry*, 108

racially discriminatory and may provide "potential evidence of systemic concerns,"[7] and they make it worse by authorizing new waste systems that will increase the levels of harmful pollutants emitted from hog waste stored in open lagoons and sprayed into the environment.

The Permits issued by DEQ authorize not only the continued use of the discriminatory lagoon and sprayfield system, but also the use of anerobic digesters and uncovered "secondary" lagoons, which will exacerbate the underlying system's impacts on communities of color. DEQ's own Environmental Justice Report notes that this area has higher percentages of people of color as compared to the State, and in many cases, the county.[8] Yet drafting this report was merely a paper exercise; DEQ failed to address these impacts on nearby communities by including permit conditions that would protect nearby residents and the environment. For example, the Permits are ostensibly "non-discharge" permits that contain prohibitions against discharges of waste, yet they lack any groundwater and surface water monitoring to enforce these provisions. The Ninth Circuit Court of Appeals recently rejected this approach as arbitrary and capricious.[9]

The new waste treatment systems at the Hog Operations are nearly complete, and will shortly begin processing all of the hog waste at these operations through covered anaerobic digesters that change the chemical and biological processes to increase the amount of ammonium/ammonia and concentrate other harmful pollutants in the hog waste that remains after the biogas is removed; it is this waste that the Permits authorize to be dumped into polluting open cesspits and then sprayed on nearby fields.

Further adding to the urgency of this complaint is the passage of the North Carolina Farm Act in July 2021, N.C. Sess. L. 2021-78, which gives DEQ until July 2022 to develop a new general permit for biogas production at North Carolina's industrial hog operations.[10] The law creates a one-size-fits-all approach to permitting, limits community input and agency review of proposed projects, weakens long-standing siting restrictions, and removes tax incentives for the installation of cleaner waste management technology.[11] Further, it automatically approves coverage under the proposed general permit ninety days after DEQ receives applications for such coverage, all but guaranteeing a lack of adequate consideration of the concerns of neighboring residents or the local impacts on the environment or public health.[12] Smithfield Foods, the largest hog producer in North Carolina, estimates 90 percent of its industrial hog finishing operations will be producing biogas within the next decade.[13]

Env't Health Perspectives 225 (2000), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1637958/ (hereinafter Wing 2000 study) (documenting that hog operations are concentrated in areas with higher populations of people of color and low-wealth communities) (Exhibit 12).

[7] Dorka Letter, *supra* note 5, at 11 (explaining that EPA's External Civil Rights Compliance Office (ECRCO) "continues to be concerned about possible discriminatory impacts" from the lagoon and sprayfield system because the findings of its investigation "indicates that the [ ] adverse impacts described [in the investigation report] are being felt by large segments of the communities of color and are potential evidence of systemic concerns, not purely anecdotal claims").

[8] *See* DEQ EJ Report, *supra* note 2, at 7, Table 3b.

[9] *See Food & Water Watch, et. al. v. U.S. EPA*, No. 20-71554 (9th Cir. Sept. 16, 2021) (Exhibit 13).

[10] N.C. Sess. L. 2021-78 § 11 (Exhibit 14).

[11] *Id.* § 11(b), (g), (h).

[12] *Id.* § 11(b).

[13] Press Release, *Smithfield Foods Announces Landmark Investment to Reduce Greenhouse Gas Emissions*, SMITHFIELD FOODS (Oct. 25, 2018), https://www.smithfieldfoods.com/press-room/2018-10-25-Smithfield-Foods-

As Reverend Jimmy Melvin of the Mt. Zion AME Zion Church in Sampson County recently explained, "[b]lanket permission will just add more to the backs of people like our parishioners, who have worshipped in our church for generations and also borne so much of the environmental burden of industrial agriculture."[14] Complainants request that EPA act quickly to protect communities of color living in eastern North Carolina.

The Duplin County NAACP and the North Carolina Poor People's Campaign request that the External Civil Rights Compliance Office ("ECRCO") enforce Title VI of the Civil Rights Act of 1964 and EPA's implementing regulations, and respond to this complaint with the full force of the law to protect communities of color who live and work near hog operations whose biogas production and animal waste management systems will unsafely dispose of waste, exacerbating the ongoing public health and pollution burden on these families unless DEQ changes its current permitting policy of ignoring these pollution problems and the disparate impacts they create.

I. COMPLAINANTS

The Duplin County NAACP is non-profit public interest organization with members in Duplin County, where two of the Hog Operations are located. The Duplin County NAACP was founded in 1946, and is a local branch of the nation's oldest and largest civil rights organization whose mission is to ensure the political, educational, social, and economic equality of rights of all persons and to eliminate racial hatred and discrimination. The Duplin County NAACP works to promote this mission by engaging in local issues across the state and in Duplin County. The NAACP has also long been involved in seeking environmental justice for low income communities and for people of color.

The North Carolina Poor People's Campaign is part of the national Poor People's Campaign, which was formed to confront the interlocking evils of systemic racism, poverty, and ecological devastation, among other issues. The Campaign aims to shift the moral narrative and impact policies at every level of government, and build lasting power for poor and impacted people. The North Carolina Poor People's Campaign is a network of compassionate, hardworking people from all walks of life from across North Carolina who are dedicated to advancing racial, social, and economic justice for their communities. The Poor People's Campaign Circles are groups that represent the different geographical regions of the state.

Announces-Landmark-Investment-to-Reduce-Greenhouse-Gas-Emissions (last visited Sept. 21, 2021). Three of the four Hog Operations are part of the first large-scale biogas project sponsored by Align RNG, a joint venture of Smithfield Foods and Dominion Energy. According to public statements, the project will involve capping hog waste lagoons at 19 industrial hog operations, laying approximately 30 miles of pipeline connecting the hog operations and a processing plant, and constructing a processing plant where the biogas will be collected, processed, and injected into the existing natural gas pipeline. Order Approving Participation in Pilot Program with Conditions, N.C. Utilities Comm., Dkt. No. G-9, Sub 764 at 2 (Apr. 3, 2020), https://starw1.ncuc.net/NCUC/ViewFile.aspx?Id=71c9990f-3bc4-4ce0-9618-c47f733c04f6.

[14] Rev. Jimmy Melvin, *Minister: Hog operations have harmed Sampson-Duplin church, but NC legislators have turned deaf ear*, FAYETTEVILLE OBSERVER (June 25, 2021), https://www.fayobserver.com/story/opinion/2021/06/25/minister-hog-operations-have-harmed-sampson-duplin-church-but-nc-legislators-have-turned-deaf-ear/5332715001/ (Exhibit 15).

DEQ is an agency of the State of North Carolina. N.C. Gen. Stat. § 143B-279.1. The North Carolina General Assembly charged the agency to protect the environment and human health. *Id.* at § 143B-279.2. DEQ has the authority to issue permits, including permits for animal feeding operations, to carry out this charge. *Id.* at § 143-215.1.

II. JURISDICTION

EPA has jurisdiction over a complaint under Title VI of the Civil Rights Act of 1964 if the complaint meets four requirements: (1) the complaint is in writing; (2) the complaint alleges discriminatory acts that, if true, violate EPA's Title VI regulations; (3) the complaint identifies a recipient of EPA funding that committed the alleged discriminatory act; and (4) the complaint is filed within 180 days of the alleged discriminatory act.[15]

This written complaint is timely filed and identifies violations by DEQ, a state government agency that receives EPA funding and is thus bound by Title VI of the Civil Rights Act of 1964.[16] At the time the Permits were issued, DEQ was a recipient of EPA assistance.[17] According to USASpending.gov, "the official source for spending data for the U.S. Government,"[18] EPA awarded DEQ $165,891,031 in fiscal year 2020 and $68,583,413 in fiscal year 2021.[19] DEQ is required to comply with Title VI and EPA's Title VI implementing regulations but failed to do so, resulting in disproportionate adverse impacts to individuals protected under Title VI.

III. FACTUAL BACKGROUND

A. Pollution from lagoons and sprayfields disproportionately affect communities of color in eastern North Carolina.

For decades, the swine industry has avoided properly managing animal waste to prevent pollution, and instead displaced harm onto communities of color.[20] As a result, North Carolinians

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[15] 40 C.F.R. § 7.120; *see also* EPA External Civil Rights Compliance Office, *Case Resolution Manual* (January 2017), 7-11, https://www.epa.gov/sites/production/files/2017-01/documents/final_epa_ogc_ecrco_crm_january_11_2017.pdf.

[16] 42 U.S.C. § 2000d (2018); 40 C.F.R. § 7.25; 40 C.F.R. § 7.35(b); *see also Title VI Compliance*, N.C. DEP'T OF ENV'T QUALITY, https://deq.nc.gov/permits-regulations/title-vi-compliance (last visited July 20, 2021) ("As a recipient of federal funding, DEQ is required to comply with the rules, laws and regulation of Title VI.").

[17] Under EPA's Title VI regulations, a "[r]ecipient" is "any State or its political subdivision, any instrumentality of a State or its political subdivision, [and] any public or private agency… to which Federal financial assistance is extended directly or through another recipient . . ." 40 C.F.R. § 7.25. "EPA assistance" is "any grant or corporative agreement, loan, contract . . . , or any other arrangement by which EPA provides or otherwise makes available assistance in the form of funds." *Id.*

[18] USA Spending, *About*, https://www.usaspending.gov/about (last visited Sept. 21, 2021).

[19] USA Spending, *Recipient Profile, North Carolina Department of Environmental Quality*, https://www.usaspending.gov/recipient/c6114f75-d069-29a6-efae-646feca75f61-C/latest (last visited Sept. 21, 2021) (showing that DEQ received $165,891,031 and $68,583,413 in federal funding in 2020 and 2021, respectively, the years during which DEQ prepared and issued the Permits).

[20] *See* Wing 2000 Study, *supra* note 6, at 229-30 (finding that North Carolina's more than 2,000 industrial hog hog operations are "located disproportionately in communities with higher levels of poverty, higher proportions of nonwhite people, and higher dependence of wells for household water supply"); *see* Steve Wing & Jill Johnston, *Industrial Hog Operations in North Carolina Disproportionately Impact African-Americans, Hispanics and*

who live close to hog operations experience a lower life expectancy and higher likelihood of death from common illnesses than those who live further away.[21] Research has repeatedly shown that industrial hog operations are much more likely to be located near Black, Latinx, and Native American residents than White residents.[22]

These hog operations are concentrated in the Black Belt—the crescent-shaped swath of dark, fertile soils stretching from Virginia to Mississippi where large numbers of African Americans were enslaved on plantations before the Civil War.[23] Many formerly enslaved people stayed in the area after Emancipation and worked as farmers, on their own land or as sharecroppers or tenant farmers.[24] Some Black families live on land that has been passed down for generations.

In addition to Black residents, Native Americans have lived in eastern North Carolina since before European settlers began arriving in the 1600s. The Waccamaw Siouan and Lumbee tribes are located in eastern counties, as well as an Urban Indian Organization in Cumberland County.[25] The Coharie Tribe, one of North Carolina's eight recognized American Indian tribes,[26] is located in Sampson and Harnett counties, where approximately 80% of the tribe's 3,000 members reside within tribal communities around the Little Coharie River.[27]

There is also a large, growing Latinx population in this part of the State. Among all counties in North Carolina, Duplin and Sampson counties have the largest share of their population made up of Latinx residents.[28]

In 2013, hundreds of neighbors, most of whom are Black, filed private nuisance claims against Smithfield Foods, claiming that the company's use of the lagoon and sprayfield system

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American Indians 2 (2014), *available at* https://www.ncpolicywatch.com/wp-content/uploads/2014/09/UNC-Report.pdf (hereinafter Wing & Johnston) (noting that industrial hog operations operating under North Carolina's state general permit are disproportionately located near communities of color) (Exhibit 16).

[21] *See* Kravchenko et al., *supra* note 6, at 278; *see also* Virginia Guidry, et al., *Connecting Environmental Justice and Community Health*, 79 N.C. MEDICAL J. 324 (2018), https://www.ncmedicaljournal.com/content/ncm/79/5/324.full.pdf (Exhibit 17).

[22] Wing & Johnston, *supra* note 20, at 1; *see also* Wing 2000 Study, *supra* note 6.

[23] *See* Wendee Nicole, *CAFOs and Environmental Justice: The Case of North Carolina*, 121 ENV'T HEALTH PERSPECTIVES A182, A183 (2013), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3672924/ (Exhibit 18); Wing 2000 Study, *supra* note 6, at 225.

[24] Wing 2000 Study, *supra* note **Error! Bookmark not defined.**.

[25] N.C. Comm. of Indian Affairs, *N.C. Tribal and Urban Communities* (2020), https://files.nc.gov/ncdoa/cia/documents/populationdata/NC-Tribal-and-Urban-Communities-Map-2020.pdf.

[26] N.C. Dep't of Admin., *N.C. Tribal Communities*https://ncadmin.nc.gov/public/american-indians/nc-tribal-communities (last visited June 8, 2021).

[27] Coharie Tribe, *History*, https://coharietribe.org/history/ (last visited June 8, 2021). While the Native American population near the Hog Operations is very small, *see* DEQ EJ Report, *supra* note 2 at p. 7 Table 3b. EPA's earlier investigation noted that Native Americans are disproportionately impacted by the lagoon and sprayfield system. *See* Dorka Letter, *supra* note 5. This community may also be impacted by the forthcoming biogas general permit.

[28] *See* Carolina Demography, *North Carolina's Hispanic Community: 2020 Snapshot*, https://www.ncdemography.org/2021/02/05/north-carolinas-hispanic-community-2020-snapshot/ (last visited Sept. 24, 2021).

made living nearby unbearable.[29] Five juries heard these cases, and each jury sided with the plaintiffs and also awarded punitive damages, indicating that Smithfield willfully and wantonly disregarded these conditions that significantly diminished neighbors' quality of life.[30] One of these cases was appealed, and U.S. Court of Appeals for the Fourth Circuit affirmed the verdict as to liability for compensatory and punitive damages.[31] In a scathing concurrence, Judge J. Harvie Wilkinson described the "outrageous conditions" endemic in the use of "large uncovered cesspool[s]" that "bred horrible outcomes for pigs and human alike," including toxic gases, noxious fumes, respiratory problems, increased likelihood of asthma among children, and the presence of buzzards and flies.[32]

Shortly after these nuisance cases were filed, in 2014, the North Carolina Environmental Justice Network, the Rural Empowerment Association for Community Help, and Waterkeeper Alliance filed a Title VI complaint with this office against DEQ.[33] These complainants asserted that DEQ's issuance of the swine general permit, which covers the majority of industrial hog operations in North Carolina, violated Title VI because it authorized industrial hog operations to use "grossly inadequate and outdated systems of controlling animal waste . . . [that have] an unjustified disproportionate impact on the basis of race and national origin against African Americans, Latinos and Native Americans[.]"[34]

In 2017, after a months-long investigation, this office expressed "deep concern about the possibility that African Americans, Latinos, and Native Americans have been subjected to discrimination as the result of NC DEQ's operation of the Swine Waste General Permit program[.]"[35] Key findings included that:

- People experienced an increase in the number and severity of health effects, like asthma and other respiratory illnesses, nausea, and headaches, which residents reported were "compounded by the increase in industrial poultry operations, as well as the operation of landfills and waste disposal sites for hog sludge and carcasses."[36]

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[29] *See* Barry Yeoman, *Here are the rural residents who sued the world's largest hog producer over waste and odors – and won*, FOOD & ENV'T REPORTING NETWORK (Dec. 20, 2019), https://thefern.org/2019/12/rural-north-carolinians-won-multimillion-dollar-judgments-against-the-worlds-largest-hog-producer-will-those-cases-now-be-overturned/. After these cases were filed, the North Carolina General Assembly adopted House Bill 467 in 2017 and Senate Bill 711 in 2018, which together significantly limited the ability for neighbors living nearby hog operations to sue for nuisance. Several community groups have challenged these legislative actions as violations of the North Carolina Constitution; this litigation is pending. *Rural Empowerment Ass'n for Comm. Help, et al. v. State of N. Carolina*, Docket 21-175 (N.C. Ct. of Appeals).
[30] *McKiver v. Smithfield*, 980 F.3d 937 (4th Cir. 2020) (Exhibit 19).
[31] *Id.* at 946.
[32] *Id.* at 979 (J. Wilkinson, concurring).
[33] *See* Complaint (Sept. 3, 2014), *available at* https://earthjustice.org/sites/default/files/files/North-Carolina-EJ-Network-et-al-Complaint-under-Title-VI.pdf.
[34] *Id.* at 1.
[35] *See* Dorka Letter, *supra* note 5.
[36] *Id.*

- The stench and fear of health impacts caused residents to feel a loss of community because young people leave and do not return, and people no longer gather together outdoors.[37]

- Community members were concerned that the drinking water, fish, and vegetables grown in home gardens were contaminated by pollution from the industrial hog operations. They also could no longer keep their windows open or dry clothes outdoors when nearby hog operations were spraying untreated waste on fields. People spent money on water, clothes dryers, air fresheners, pesticides, air conditioning, and food, to try to deal with the odor and avoid potentially contaminated food and water.[38]

The 2014 complaint resulted in a settlement with DEQ, which required, among other things, that DEQ enhance public participation, stakeholder engagement, and communication with community members impacted by DEQ permitting decisions.[39] DEQ also agreed to conduct environmental justice analyses and develop an environmental justice mapping tool to evaluate impacts of permitting decisions on community members.[40] That settlement does not address the increased pollution risks from biogas digester waste that DEQ has authorized with the Permits.

These problems found by EPA in 2017 persist today and are likely to get worse as a result of the Permits. Industry-sponsored biogas projects exacerbate this long-standing environmental injustice by increasing the risks of the polluting lagoon and sprayfield system without addressing the system's disproportionate impact on communities of color.[41]

B. Pollution and harm to human health from the industry's use of lagoons and sprayfields is well-documented and long standing.

Approximately 9 million hogs are housed at more than 2,000 industrial hog operations in the low-lying, flood-prone coastal plain of eastern North Carolina.[42] Duplin and Sampson counties produce more hogs and poultry than any other counties in the state[43] and more hogs

[37] *Id.*
[38] *Id.*
[39] *See* Settlement Agreement, Section VI(C) (May 3, 2018), *available at* https://waterkeeper.org/wp-content/uploads/2018/05/Final-Settlement-Agreement_attachments-and-sig.pdf.
[40] *See id.* at Section VI(B).
[41] *Id.*; *see also* Wing & Johnston, *supra* note 20.
[42] According to the 2017 Agricultural Census, the total hog inventory in North Carolina was 8,899,459. USDA, National Agricultural Statistics Service, *Quick Stats*, https://quickstats.nass.usda.gov/#6D9024D3-45BC-3F9C-AFBC-E5725EA69F09 (filter by "census" "animals &products" "livestock" "hogs" "inventory" "state" "North Carolina" "2017") (last visited Sept. 24, 2021); *see also* DEQ, *List of Permitted Animal Facilities* (Apr. 1, 2020), https://deq.nc.gov/about/divisions/water-resources/water-resources-permits/wastewater-branch/animal-feeding-operation-permits/animal-facility-map.
[43] Soren Rundquist & Don Carr, *Under the Radar: New Data Reveals N.C. Regulators Ignored Decade-Long Explosion of Poultry CAFOs*, 3 (2019), https://cdn3.ewg.org/sites/default/files/u352/EWG_NC-CAFO_Report_C05.pdf?_ga=2.1334065.1430473716.1551716861-932720297.1551716861.

than any other counties in the nation.[44] Hogs produce an enormous amount of waste—billions of gallons of waste each year.[45]

Industrial hog operations in North Carolina use the harmful and primitive "lagoon and sprayfield" system to dispose of this waste. Untreated hog urine and feces are stored in giant open cesspits, known as lagoons. The chemical and biological processes that take place in these lagoons generate and release harmful pollutants such as ammonia and methane. Periodically the waste is pumped out of the pits and sprayed into the air and onto nearby fields. The spray often blows onto neighboring homes and passing cars.[46] Even when operators only spray as much waste as the crops can use, which is referred to as the agronomic rate, pollutants in the waste reach rivers and streams through leaching and runoff.[47] When waste is applied above the agronomic rates, excess nutrients also run off into surface waters and leach into groundwater.[48] Making matters worse, operators often pump down the liquid in lagoons ahead of major rainfall events to reduce the risk of lagoon overflows; often the land is oversaturated and the sprayed waste runs off the fields onto neighboring properties and streams during and after these heavy rain events.[49] The lagoon and sprayfield system causes significant pollution; this system

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Jennifer Shike, *America's Top 20 Pig Counties*, PORK BUSINESS (July 23,2019), https://www.porkbusiness.com/news/hog-production/americas-top-20-pig-counties.

[45] A single hog at a farrow-to-finish facility, which grows to be approximately 280 lbs., produces approximately 10,479 gallons of manure per year. *See* 2021 NC Agricultural Chemical Manual, Table 4-14, https://content.ces.ncsu.edu/north-carolina-agricultural-chemicals-manual/fertilizer-use (last visited Sept. 24, 2021).

[46] *See* Nicole, *supra* note 23, at A183.

[47] *See* JoAnn Burkholder et al., *Impacts of Waste from Concentrated Animal Feeding Operations on Water Quality*, 115 ENV'T HEALTH PERSPECTIVES 308, 308-09 (2007), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1817674/pdf/ehp0115-000308.pdf (hereinafter Burkholder 2007) (Exhibit 20); Stephen L. Harden, *Surface-Water Quality in Agricultural Watershed of the North Carolina Coastal Plain Associated with Concentrated Animal Feeding Operations, Scientific Investigations Report 2015-5080*, U.S. DEP'T OF INTERIOR 2–4 (2015), https://pubs.usgs.gov/sir/2015/5080/pdf/sir2015-5080.pdf. (Exhibit 21); *see also* Michael Mallin, et al., *Industrial Swine and Poultry Production Causes Chronic Nutrient and Fecal Microbial Stream Pollution*, 226 J. WATER AIR SOIL POLLUTION 1, 8-13 (2015), https://uncw.edu/cms/aelab/reports%20and%20publications/2015/mallin%20et%20al%202015%20cafo%20pollution%20wasp.pdf (hereinafter Mallin 2015 Study) (documenting pollution from a watershed with a high concentration of industrial hog operations and noting elevated levels of many pollutants, including nutrients and fecal bacteria, among others) (Exhibit 22).

[48] *See, e.g., id.*

[49] *See, e.g., id.*

degrades rivers and streams,[50] contaminates groundwater,[51] poisons the air,[52] and detrimentally impacts quality of life for nearby families.[53]

Hog waste pollutes waterways in four primary ways: (1) runoff of pollutants from sprayfields; (2) leaching of pollutants into groundwater from lagoons and sprayfields; (3) atmospheric deposition of ammonia from barns, lagoons, and spraying into surface waters and land; and (4) spills from lagoons and flooding of sprayfields due to weather or other failures. The agronomic rate applies exclusively to nitrogen, allowing phosphorus and heavy metals to be applied at high concentrations without any consequences.[54] Numerous studies have shown that hog operations routinely apply more waste to fields than can be absorbed,[55] leading to excessive nitrogen and phosphorus in soils, groundwater, and surface water.[56] Eastern North Carolina's high water table and sandy soil composition make the region particularly vulnerable to pollutants leaching into groundwater.[57] Making matters worse, the pollutants then migrate through groundwater into nearby surface waters.[58] For decades, scientists have documented seepage of contaminants from hog waste lagoons into nearby surface and groundwater.[59] In the 1990s, researchers found the majority of lagoons studied in North Carolina leached pollutants, including

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[50] *See, e.g.,* Colleen N. Brown et al., *Tracing nutrient pollution from industrialized animal production in a large coastal watershed*, 192, ENV'T MONITORING & ASSESSMENT 515 (July 2020), https://www.researchgate.net/publication/342931475_Tracing_nutrient_pollution_from_industrialized_animal_production_in_a_large_coastal_watershed (tracing nutrient pollution in the Cape Fear River Basin from hog waste all the way to the Cape Fear estuary near Wilmington, NC) (Exhibit 23); *see also* Michael A. Mallin & Lawrence B. Cahoon, *Industrialized Animal Production: A Major Source of Nutrient and Microbial Pollution to Aquatic Ecosystems*, 24 POPULATION & ENV'T 369 (2003). https://www.researchgate.net/publication/263519914_Industrialized_Animal_Production-A_Major_Source_of_Nutrient_and_Microbial_Pollution_to_Aquatic_Ecosystems (describing the impact of nutrient pollution from swine and poultry waste on water quality on vulnerable surface waters of the Cape Fear Watershed) (Exhibit 24).

[51] *See, e.g.,* Burkholder 2007, *supra* note 47, at 308-09; *see also* Harden, *supra* note 47, at 4-5; Wing 2000 Study, *supra* note 6, at 225 (finding hog operations are located disproportionately in communities with higher dependence on wells for household water supply).

[52] *See* Domingo, *supra* note 3.

[53] *See* Kravchenko et al., *supra* note 6, at 278 (documenting physical and mental health risks in communities near industrial hog operations); Dorka Letter, *supra* note 5, at 3–4 (describing "the loss of community that has occurred since industrial hog farms began operating" and physical, mental, and emotional impacts upon residents).

[54] *See, e.g.* Murphy-Brown, Nutrient Utilization Plan, 4 (Jan. 29, 2020) (Nutrient Utilization Plan for the Waters operation, stating "[t]his plan only addresses nitrogen.") (Exhibit 25).

[55] *See, e.g.,* J.C. Barker & J.P. Zublena, *Livestock manure nutrient assessment in North Carolina*, N.C. COOPERATIVE EXTENSION SERV. (1996), http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.532.5169&rep=rep1&type=pdf; Robert L. Kellog et al., *Manure Nutrients Relative to Capacity of Cropland and Pastureland to Assimilate Nutrients: Spatial and Temporal Trends for the United States*, USDA, 74-75 (2000), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs143_012133.pdf.

[56] Mallin & Cahoon, *supra* note 50, at 375.

[57] *See* Burkholder 2007, *supra* note 47, at 309; Brown et al., *supra* note 50, at 515; Mallin 2015 Study, *supra* note 47 at 2.

[58] Harden, *supra* note 47, at 4–5 (finding that streams near industrial hog operations were more enriched with nitrate than streams that were not located near hog operations).

[59] *See, e.g.*, T.G. Ciravolo et al., *Pollutant Movement to Shallow Ground Water Tables from Anaerobic Swine Waste Lagoon*, VA. WATER RES. RESEARCH CTR. (1977), https://vtechworks.lib.vt.edu/bitstream/handle/10919/46584/WRRC_Bull_100.pdf?sequence=1&isAllowed=y (Exhibit 26).

fecal bacteria, nitrogen, and phosphorus, into groundwater.[60] Many of those lagoons remain in operation today.

The threat of groundwater contamination is particularly serious for communities in eastern North Carolina where the vast majority of industrial swine operations are located, because these communities are heavily dependent on well water for drinking water.[61] Groundwater contamination from pathogens and nitrates present in swine waste can have devastating impacts on human health.[62] In 1995, the North Carolina Governor's Office initiated a water testing program for residents located near industrial animal operations; by 1998, 1595 wells in 57 counties had been tested, over 10 percent of which had nitrate contamination at or above the drinking water standard of 10 parts per million.[63] Duplin and Sampson Counties had higher percentages of contamination: nitrate levels greater than 9.5 parts per million were found in 22.5 percent of tested wells in Sampson County and in 11.7 percent of tested wells in Duplin County.[64] Other pollutants from lagoons and sprayfields, including phosphorus, fecal coliform, and heavy metals, have also been found in groundwater and surface waters near hog operations, often at levels that exceed drinking water standards.[65]

This year, the congregation of Mt. Zion AME Zion Church in Sampson County, which is surrounded by hog operations, was forced to spend more than $3,800 to dig a deeper well for the church after the County posted notices at the church that the water was unsafe to drink due to high levels of nitrates detected in the water.[66] As Rev. Melvin put it, "I participated in the public hearings to share my concern about the biogas facility and share my church's experiences with ground water issues. I also drove to Raleigh a little over a month ago to share my concerns in

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[60] *See* R.L. Huffman & Phillip W. Westerman, *Estimated Seepage Losses from Established Swine Waste Lagoons in the Lower Coastal Plain of North Carolina*, 38 TRANSACTIONS AM. SOC'Y AGRIC. ENG'RS 449, 453 (1995) https://elibrary.asabe.org/abstract.asp?aid=27852 (Exhibit 27).

[61] *See* Wing 2000 Study, *supra* note 6 (finding hog operations are located disproportionately in communities with higher dependence on wells for household water supply).

[62]Shane Rogers & John Haines, *Detecting and mitigating the environmental impact of fecal pathogens originating from confined animal feeding operations: Review*, U.S. EPA, (2005), https://nepis.epa.gov/Exe/ZyPDF.cgi/P10089B1.PDF?Dockey=P10089B1.PDF (Exhibit 28); *Nitrate and Drinking Water from Private Wells*, CTR. FOR DISEASE CONTROL AND PREVENTION, https://www.cdc.gov/healthywater/drinking/private/wells/disease/nitrate.html (last visited Aug. 9, 2021).

[63] Kenneth Rudo, *Groundwater Contamination of Private Drinking Well Water by Nitrates Adjacent to Intensive Livestock Operations (ILOs)*, N.C. DEP'T OF HEALTH AND HUMAN SERV., 414, 418 (June 1999) (Exhibit 29); *see also* Kenneth C. Stone et al., *Impact of Swine Waste Application on Ground and Stream Water Quality in an Eastern Coastal Plain Watershed*, 41 TRANSACTIONS AM. SOC'Y AGRIC. ENG'RS 1665 (1998), https://www.researchgate.net/profile/Pg-Hunt/publication/43269888_Impact_of_swine_waste_application_on_ground_and_stream_water_quality_in_an_eastern_Coastal_Plain_watershed/links/548f1b710cf214269f26363a/Impact-of-swine-waste-application-on-ground-and-stream-water-quality-in-an-eastern-Coastal-Plain-watershed.pdf (documenting increased nitrate in monitoring wells near hog facilities and lagoons) (Exhibit 30).

[64] Rudo, *supra* note 63, at 414, 418.

[65] *See id.*; Amy R. Sapkota et al., *Antibiotic-Resistant Enterococci and Fecal Indicators in Surface Water and Groundwater Impacted by a Concentrated Swine Feeding Operation*, 115 ENV'T. HEALTH PERSPECTIVES 1040, 1043-45 (2007), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1913567/ (detecting elevated fecal indicators and antibiotic-resistant bacteria in surface waters down gradient from hog lagoons and sprayfields) (Exhibit 31); Huffman, *Seepage Evaluation of Older Swine Lagoons in North Carolina*, 47 TRANSACTIONS AM. SOC'Y AGRIC. ENG'RS 1507, 1511 (2004) (Exhibit 32).

[66] *See* Melvin, *supra* note 14.

person. It seems my concerns have fallen on deaf ears. . . . This is not only a water and environment issue. It is a humanity issue."[67]

Almost all of North Carolina's industrial hog operations, including the Hog Operations that received the Permits, are located in the flood prone, low-lying eastern coastal plain.[68] During rain events, which are becoming increasingly more severe and frequent,[69] hog waste lagoons are often damaged or flooded and sprayfields flood, releasing untreated waste into nearby rivers and streams.[70] For example, during Hurricane Florence in 2018, millions of gallons of hog waste spilled into rivers and streams throughout eastern North Carolina.[71]

Lagoons are also prone to leaking or overflowing on sunny days. The first major spill to capture the attention of policy-makers and the public occurred in 1995, when 25 million gallons of raw hog sewage spilled into the New River.[72] More recently in December 2020, a Jones County hog operation that had been cited twice for freeboard violations in the last year, spilled 1 million gallons of untreated hog waste into the Trent River after a lagoon breached.[73] In 2017 and again in 2019, the Waters Operation—one of the four Hog Operations DEQ permitted to produce biogas— spilled hog waste into a nearby stream due to equipment malfunctions.[74]

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[67] *Id.*

[68] *See* DEQ, *Animal Facility Map*, https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=85ae6392d0e94010a305eedf06e3f28.

[69] DEQ, *NC Climate Risk Assessment and Resiliency Plan* (2019) https://deq.nc.gov/energy-climate/climate-change/nc-climate-change-interagency-council/climate-change-clean-energy-4.

[70] JoAnn Burkholder et al., *Impacts to a Coastal River and Estuary from Rupture of A large Swine Waste Holding Lagoon*, 26 J. ENV'T QUALITY 1451, 1451 (1997), https://uncw.edu/cms/aelab/reports%20and%20publications/1997/1997,jeq,%20impacts%20to%20a%20coastal%20river....pdf (Exhibit 33); Michael A. Mallin, *Impacts of Industrial Animal Production on Rivers and Estuaries*, 88 AM. SCI. 26, 26 (2000) (Exhibit 34), https://www.researchgate.net/publication/246425558_Impacts_of_Industrial_Animal_Production_on_Rivers_and_Estuaries; *see also* Kendra Pierre-Louis, *Lagoons of Pig Waste Are Overflowing After Florence. Yes, That's as Nasty as It Sounds*, N.Y. TIMES (Sept. 19, 2018), https://www.nytimes.com/2018/09/19/climate/florence-hog-farms; K. Gee & C. McWhirter, *North Carolina's Poultry, Hog Producers Bail Out from Under Hurricane Matthew: Disposal of millions of carcasses poses challenges and raises public-health concerns*, WALL STREET J. (Oct. 15, 2016), https://www.wsj.com/articles/north-carolinas-poultry-hog-producers-bail-out-from-under-hurricane-matthew-1476554376; Nathanael Johnson, *Why the heck are there pig farms in the path of hurricanes?*, GRIST (Oct. 19, 2016), https://grist.org/food/why-the-heck-are-there-pig-farms-in-the-path-of-hurricanes/.

[71] *See, e.g.*, Wynne Davis, *Overflowing Hog Lagoons Raise Environmental Concerns in North Carolina*, NPR (Sept. 22, 2018), https://www.npr.org/2018/09/22/650698240/hurricane-s-aftermath-floods-hog-lagoons-in-north-carolina; *see also* Pierre-Louis, *supra* note 70; Chick Jacobs, *Final report on Hurricane Florence's record-smashing destruction*, THE FAYETTEVILLE OBSERVER (May 6, 2019), https://www.fayobserver.com/news/20190506/final-report-on-hurricane-florences-record-smashing-destruction

[72] *Huge Spill of Hog Waste Fuels an Old Debate in North Carolina*, N.Y. TIMES (Jun. 25, 1995), https://www.nytimes.com/1995/06/25/us/huge-spill-of-hog-waste-fuels-an-old-debate-in-north-carolina.html.

[73] *See* Lisa Sorg, *Hog farm that spilled 1 million gallons of feces, urine into waterways had been warned of lagoon problems*, N.C. POLICY WATCH (Jan. 12, 2021), http://www.ncpolicywatch.com/2021/01/12/hog-farm-that-spilled-1-million-gallons-of-feces-urine-into-waterways-had-been-warned-of-lagoon-problems/.

[74] See *infra* Section III(E).

This pollution causes terrible health effects for people living nearby, including serious, chronic illnesses and premature death. Earlier this year, the National Academy of Sciences published a study linking emissions from industrial hog operations to increased mortality in nearby communities.[75] Ammonia-derived particulate matter with a diameter of 2.5 microns or less, known as PM2.5, can penetrate deep into lungs and case serious cardiovascular and respiratory problems.[76] There is a well-established link between particulate matter and various adverse health outcomes including increased mortality rates.[77] This study found that the emissions from industrial hog operations are responsible for a combined total of 178 premature deaths in Sampson and Duplin Counties annually.[78]

In addition, researchers have documented excessive respiratory symptoms in neighbors of hog lagoons and increased levels of mood disorders, including anxiety, depression, and trouble sleeping.[79] Children living near industrial hog operations have an increased risk of asthma.[80] In 2018, researchers from Duke University found that in North Carolina communities near hog operations using the lagoon and sprayfield system, mortality rates are substantially higher from common diseases such as anemia, kidney disease, tuberculosis, and lower birth rates than residents who live further away from these operations.[81] The study also found higher rates of low birth weight and infant hospitalization among residents who live near industrial hog operations.[82] The presence of nitrate in wells used for drinking water endangers the health of infants, pregnant women, children, the elderly, and others with weakened immune systems.[83]

Hog operations' use of polluting waste management systems disrupts communities, curtails social and recreational opportunities, and likely contributes to a loss in generational wealth for people of color in particular.[84] In addition to economic, environmental, and health impacts, the lagoon and sprayfield system also has adverse social impacts, reducing quality of life for communities and making it difficult or impossible for people to enjoy time together

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[75] Domingo et al., *supra* note 3, at 2.
[76] *Id.* While EPA cited scientific uncertainty about the positive health effects of reducing PM2.5 levels below the NAAQS, the agency also found that decreasing long-term PM2.5 exposure decreases cardiovascular mortality—and could "not identify a threshold below which effects do not occur." Review of the National Ambient Air Quality Standards for Particulate Matter, 85 Fed. Reg. 82705, 82698 (Dec. 18, 2020).
[77] C.A. Pope III et al., *Lung cancer, cardiopulmonary mortality, and long-term exposure to fine particulate air pollution*, 287 J. AM MED ASSOC. 1132 (2002), https://jamanetwork.com/journals/jama/fullarticle/194704 (Exhibit 35).
[78] Domingo et al., *supra* note 3, at 2; *see also* County Level Data for Domingo Report, *supra* note 3 (noting 83 deaths in Duplin County and 95 in Sampson County due to emissions from hog operations).
[79] *See, e.g.,* Kelley Donham, et al., *Community Health and Subeconomic Issues Surrounding Concentrated Animal Feeding Operations*, 115 ENV'T HEALTH PERSPECTIVES 317, 318 (2007), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1817697/ (Exhibit 36).
[80] *Id.*
[81] Kravchenko et al., *supra* note 6, at 278.
[82] *Id.*
[83] EPA, CHILDREN AND DRINKING WATER STANDARDS 6, https://www3.epa.gov/safewater/kids/kidshealth/pdfs/brochure_childrenstandards.pdf (last visited Sept. 24, 2021); Ward, et al, *Drinking Water Nitrate and Human Health: An Updated Review*, 15 INT'L J. ENV'T RESEARCH & PUBLIC HEALTH 1 (July 23, 2018), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6068531/(Exhibit 37).
[84] *See* Dorka Letter, *supra* note 5, at 3–4.

outdoors.[85] The waste management practices also bring conflict into communities. As EPA has found, people who complain about the odor and other negative aspects of the hog operation often are ignored or harassed.[86] They also are more likely to have fewer financial resources—"[t]he concentration and industrialization of agriculture are associated with economic and community decline locally and regionally[.]"[87] People living nearby these hog operations also experience a loss of community because of the odors, decreased quality of life, and pollution resulting from lagoons and sprayfields.[88]

C. Storing digester waste in open lagoons and spraying it on fields without cleaner technology is likely to increase harm to the community and the environment.

Under the new Permits issued by DEQ, the hog waste will be moved from confinement barns into covered anaerobic digesters, where the waste will break down faster and to a greater extent than in a conventional lagoon.[89] Processing waste in a covered lagoon and removing the biogas significantly alters the properties of the resulting waste. The process increases the concentration of ammonia/ammonium (forms of nitrogen)[90] and produces other forms of nitrogen, namely nitrate and nitrite, that are more likely to infiltrate groundwater and run off into surrounding waterways when land-applied.[91] Once the biogas is siphoned off, the remaining waste will be pumped to one or more open-air secondary lagoons. Due to the increased ammonia/ammonium concentration, the waste in the open secondary lagoon is likely to emit significantly more ammonia than a conventional open-air hog waste lagoon.[92]

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[85] Donham *supra* note 79, at 318; *see also* Dorka Letter *supra* note 5, at 2. ("Residents described the loss of community that has occurred since the industrial hog farms began operating . . . Prior to the arrival of the industrial hog operations, many of their family, community, and church gatherings had been held outdoors. Now they said those events are rarely held outdoors or if attempted outdoors, they are marred or forced to end early due to odors, flies, and other impacts.").

[86] Donham, *supra* note 79, at 318. *See also* Dorka Letter, *supra* note 5, at 4 ("[The External Office of Civil Rights] was told the filing of complaints with NCDEQ would be pointless and has resulted in retaliation, threats, intimidation, and harassment by swine facility operators and pork industry representatives.").

[87] Phoebe Gittelson, et al., *The False Promises of Biogas: Why Biogas is an Environmental Justice Issue*, ENV'T JUSTICE 3 (2021https://www.liebertpub.com/doi/full/10.1089/env.2021.0025 (Exhibit 38).

[88] *See* Dorka Letter, *supra* note 5, at 4.

[89] *See* EPA, *Basic Information about Anaerobic Digestion (AD)*, https://www.epa.gov/anaerobic-digestion/basic-information-about-anaerobic-digestion-ad (last visited September 23, 2021).

[90] Baines, R. (Edited), *Reducing greenhouse gas emissions from livestock production*, Taylor & Francis Group, London, 145 (2021) ("NH4+ content and pH in digested slurry are higher than in untreated slurry. Thus, potential for ammonia emissions during subsequent slurry storage are increased. Digested slurry therefore has to be stored in covered slurry stores.") (Exhibit 39).

[91] *Conservation Practice Standard, Anaerobic Digester, Code 366*, U.S. DEP'T AGRICULTURE, NAT. RES. CONSERVATION SERV.., 366-CPS-6, (June 2017) ("USDA Conservation Practice Standard"), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1254996.pdf (Exhibit 40) ("Compounds such as nitrogen, phosphorus and other elements become more soluble due to anaerobic digestion and therefore have higher potential to move with water".).

[92] *See* Viney Aneja, et. al, *Characterizing Ammonia Emissions from Swine Farms in North Carolina: Part 2—Potential Environmentally Superior Technologies for Waste Treatment*, 58 J. AIR & WASTE MGMT. ASS., 1145, 1156 tbl. 4 (2008) (finding a 11.9% increase in ammonia emissions from an open secondary lagoon storing digester waste over an open lagoon storing conventional hog waste) (hereinafter Aneja 2008 Study) (Exhibit 41); *see also* Kupper et al., *Ammonia and greenhouse gas emissions from slurry storage—A Review*, 300 AGRICULTURE, ECOSYSTEMS, & ENV'T 1, 9 tbl. 10 (2020) (the one result showing emission decreasing was from a lab study where the waste was stored in sealed, heated containers) (Exhibit 42); *see also* Lowry A. Harper et al, *The Effect of Biofuel Production on*

In short, with the more-polluting digester waste being stored and disposed of using open lagoons and sprayfields under the waste system DEQ has authorized, any benefits from capturing emissions of methane and other gases through biogas production will come at the expense of not only ongoing but *increased* ammonia emissions, increased mobility of pollutants, and resulting air and water pollution. Furthermore, for all but one of the four Hog Operations, these new systems do not even reduce the amount of open lagoons susceptible to overflowing during rain events, and in fact add an additional waste-holding structure—the anaerobic digesters—which has potential to leach pollutants into groundwater.

Additional technologies that address water and air pollution—and that are compatible with biogas production—are available and practicable. Comments submitted to DEQ during the permitting process suggested additional technologies and called on DEQ to comply with its statutory obligation under N.C. Gen. Stat. § 143-215.1(b)(2) to require the practicable waste treatment and disposal alternative with the least adverse impact on the environment.[93] Yet the Permits do not require any additional treatment of this more harmful waste to reduce impacts to the environment and nearby communities.[94] As a result, these new biogas permits stand to worsen harm to the communities living near industrial hog operations in Duplin and Sampson counties, and in particular communities of color.

i. The digester process increases ammonia emissions.

Anaerobic digesters capture methane and other gases unlike conventional open-air hog waste lagoons which emit these gases directly into the atmosphere. However, the process of anaerobic digestion and removal of methane (a form of carbon) alters the composition of the remaining waste in the digester ("digester waste"). The digester waste contains more ammonia and ammonium, less carbon, and has a higher pH.[95] As a result, digester waste stored in open secondary lagoons and land-applied is likely to emit *more* ammonia into the atmosphere than conventional hog waste lagoons or fresh hog waste.[96] Increased ammonia emissions from an open lagoon storing digester waste has been documented in North Carolina and many other

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Swine Farm Methane and Ammonia Emissions, 39 J. ENV'T QUAL. 62 (2010), https://pubmed.ncbi.nlm.nih.gov/21284295/ (finding a 46 percent increase in ammonia emissions from mesophilic biogas digester relative to control lagoons) (Exhibit 43).

[93] *See, e.g.*, Letter from Blakely Hildebrand and Maia Hutt, SELC, to Ramesh Ravella, DEQ (Jan. 29, 2021) (hereinafter Comment Letter) (Exhibit 44).

[94] DEQ admitted that "atmospheric loses from the lagoons" would occur, and relies on this statement to support its statement that land-applied digester waste will not contain a higher concentration of pollutants than waste from a conventional hog lagoon. *See* Public Meeting Report, *infra* note 122, at 18.

[95] *See* Jeffery Lorimor & John Sawyer, *Final Report: Swine USA Anaerobic Digester Performance Analysis*, NAT. RES. CONSERVATION SVC. – IOWA STATE UNIV. 3, 5 (2004) (Exhibit 45); Baines, *supra* note 90, at 116 (explaining that as ammonia (NH_3) increases as a portion of Ammoniacal nitrogen, pH also increases); Roger Nkoa, *Agricultural benefits and environmental risks of soil fertilization with anaerobic digestates: a review*, 24 AGRONOMY FOR SUSTAINABLE DEV. 473, 480 (2015), https://hal.archives-ouvertes.fr/hal-01234816/document (Exhibit 46).

[96] *See* Aneja 2008 Study, *supra* note 92, at 1155, 1156; Harper et. al, *supra* note 92; Kim Weaver et al, *Effects of Carbon and Nitrogen Emissions due to Swine Manure Removal for Biofuel Production*, J. ENV'T QUALITY, 1371, 1374 (2012) (Exhibit 47); T. Nyord et. al, *Ammonia Volatilization and crop yield following land application of solid-liquid separated, anaerobically digested, and soil injected animal slurry to winter wheat,* 160 J. AGRIC., ECOSYSTEMS, AND ENV'T, 75, 78 (2012) (Exhibit 48); Nkoa, *supra* note 95, at 480.

places.[97] When the digester waste effluent is applied to fields, the increased rate of ammonia emission is likely to continue.[98] This is especially the case in summer months and with the use of high pressure spray irrigation equipment at the Hog Operations.[99] For this reason "[d]igested slurry … has to be stored in covered slurry stores" and experts "strongly recommend to apply biogas slurry with low-emission techniques near or below the soil surface."[100] The permits issues by DEQ fail to require either of these necessary safeguards.

ii. Increased ammonia emissions harm air quality and water quality.

Increased ammonia emissions from secondary open-air lagoons and land application worsen air quality and water pollution. Ammonia travels through the air and deposits on land, contaminating soil, groundwater, and ultimately rivers and streams, and also deposits directly in waterways.[101] Atmospheric deposition of ammonia accounts for a significant portion of nitrogen impacts in North Carolina's coastal ecosystems, including the Albemarle and Pamlico Sounds.[102] Aerosolized ammonia can travel as far as 60 miles from its point of origin.[103] Ammonia emissions can contribute to eutrophication of waterways, and can reduce dissolved oxygen levels.[104]

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[97] *See* Aneja 2008 Study, *supra* note 92, at 1155, 1156 (finding a 11.9 percent increase in NH3 emissions from an open lagoons storing digester waste relative to a conventional primary anaerobic lagoon); Harper et al, *supra* note 92 (finding a 46 percent increase in NH_3 emissions from hog operations using open secondary lagoons to store digester waste relative to those using a conventional primary anaerobic lagoon); Weaver et al., *supra* note 96, at 1374 (finding a statistically significant increase in NH_3 emissions from secondary open lagoons storing digester waste relative to conventional lagoons); Kupper, *supra* note 92 (finding increases in NH_3 emissions from stored digester slurry relative to conventional manure slurry—the one instance of NH_3 emissions decreasing involved a lab-scale study where digester waste was kept in a sealed, heated container—very different from an ambient temperature open lagoon).

[98] *See* Nyord, *supra* note 96, at 78-79.

[99] *Id.* at 79 ("Compared to surface application, soil injection seems to reduce the NH3 emission[.]"); *see also* Biswanath Dari et. al, *Understanding Factors Controlling Ammonia Volatilization from Fertilizer Nitrogen Applications*, UNIV. OF IDAHO – EXTENSION (2019) (finding that surface application of N-fertilizers without incorporation "increase the susceptibility to NH3 loss.") (Exhibit 49).

[100] Baines, *supra* note 90, at 145.

[101] Viney P. Aneja et al, *Atmospheric nitrogen compounds II: emissions, transport, transformation, deposition and assessment*, 35 ATMOSPHERIC ENV'T 1903, 1904-06 (2001) (hereinafter Aneja 2001 Study) (Exhibit 50).

[102] *See* Jennifer K. Costanza et al., *Potential geographic distribution of atmospheric nitrogen deposition from intensive livestock production in North Carolina, USA,* 398 SCI. OF TOTAL ENV'T 76, 77 (2008) http://jencostanza.com/docs/Costanza_et_al_2008_STOTEN.pdf (noting the significant amount of ammonia deposition accounting for new nitrogen inputs into the coastal ecosystem) (Exhibit 51).

[103] *See* John T. Walker et al, *Atmospheric transport and wet deposition of ammonia in North Carolina*, 34 ATMOSPHERIC ENV'T, 3407, 3416 (2000) (detecting deposition of NH3 and/or NH4+ at distances up to 80 km from their source) (Exhibit 52); Aneja 2001 Study, *supra* note 101 (noting that while 20-40 percent of ammonia in the atmosphere deposits near its source, ammonium aerosols, which have longer atmospheric lifetimes, tend to deposit at larger distances downwind of sources); *see also* Constanza, *supra* note 102.

[104] *See* Mallin 2000 Study, *supra* note 70, at 11; *see* Aneja 2001 Study, *supra* note 101, at 1905–06 (stating that "NH_3 emissions from this source region, primarily evolving from swine and poultry operations, are found to increase NH_4+ concentration in precipitation at sites up to +80 km away."); Kanwardeep S. Bajwa et al., *Modeling studies of Ammonia dispersion and dry deposition at some hog farms in North Carolina*, 58 J. AIR & WASTE MGMT. ASSOC. 1198-07 (2008) ("Dry deposition of NH_3 up to 2500 m downwind of the farm was studied under different stability conditions and over crop and grass surfaces. The majority of deposition as a percentage of total emission occurs within 500 m of the farm because ground-level concentrations are much higher there.") (Exhibit 53); *see* Costanza, *supra* note 102, at 77; Burkholder 2007 Study, *supra* note 47, at 309 ("Inorganic N forms are added to the

When exposed to oxygen and deposited on soils, ammonia is converted to nitrate, which is highly soluble in water, which means water carries the nitrate with it as it moves through and over soil.[105] Sandy soils are prevalent in eastern North Carolina, including at the Hog Operations, and the water table is high, increasing the risk that nitrate moves into groundwater and eventually into nearby streams.[106] Nitrate is a form of nitrogen whose presence in drinking water has been linked to various health effects including blue baby syndrome.[107] In addition, this increased nitrate pollution can lead to algal blooms, affect aquatic life, and drive down dissolved oxygen levels in waterways, which in turns creates biochemical oxygen demand and results in degraded water quality that is unsafe and/or undesirable for recreation.[108]

Ammonia air pollution can cause adverse health impacts in humans and drives production of PM2.5, which is associated with respiratory issues in humans.[109] Furthermore, airborne ammonia deposited on land and various forms of nitrogen, including nitrate, in hog waste sprayed or land-applied on crop fields can pollute groundwater.[110]

In sum, the increased ammonia emissions as a result of the Permits are likely to further degrade groundwater, surface water, and air quality.

iii. The secondary lagoons are still at risk for flooding and failures

The installation of covered anaerobic digesters does not address the significant risk of pollution from industrial hog operations during major rain events, which are becoming more frequent and intense because of climate change. As noted above, the lagoon and sprayfield system is extremely vulnerable to flooding during major rain events. Uncovered secondary lagoons will continue to be vulnerable to inundation and structural failure, while sprayfields remain equally susceptible to flooding from major storm events. For example, the Goodson Operation in Sampson County is located partially within the FEMA flood hazard zone, with at least one sprayfield located in the floodplain.[111]

The permits issued by DEQ for all but one of the four Hog Operations do not even reduce the amount of open lagoons susceptible to overflowing during rain events, and in fact add an

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atmosphere during spray practices, and both ammonia and phosphate can also adsorb to fine particles (dust) that can be airborne . . . [A] significant proportion of the total ammonium from uncovered swine effluent lagoons and effluent spraying . . . reenters surface waters as local precipitation or through dry fallout.").

[105] *See* Mary Berg et al, *Nitrogen Behavior in the Environment*, N.D. AGR. EXTENSION SERV. 3 (2017), https://www.ag.ndsu.edu/publications/environment-natural-resources/nitrogen-behavior-in-the-environment (Exhibit 54).

[106] *See, e.g.,* W.F. Ritter & A.E.M. Chirnside, *Impact of Animal Waste Lagoons on Ground-Water Quality*, 34 BIOLOGICAL WASTES 39 (1990) (Exhibit 55); Dennis Keeney & Robert Olsen, *Sources of nitrate in groundwater*, 16 CRITICAL REVIEWS IN ENV'T SCI. & TECH. 257 (1986) (Exhibit 56); William Liebhardt, et al, *Nitrate and Ammonium Concentrations of Ground Water Resulting from Poultry Manure Applications*, 8 J. OF ENV'T QUALITY 211 (1979).

[107] *See* CHILDREN AND DRINKING WATER STANDARDS, *supra* note 83, at 6; *see also* Ward, et al, *supra* note 83, at 1.

[108] *See* Burkholder 2007, *supra* note 47; Mallin 2015 Study, *supra* note 47.

[109] *See* Domingo et al., *supra* note 3.

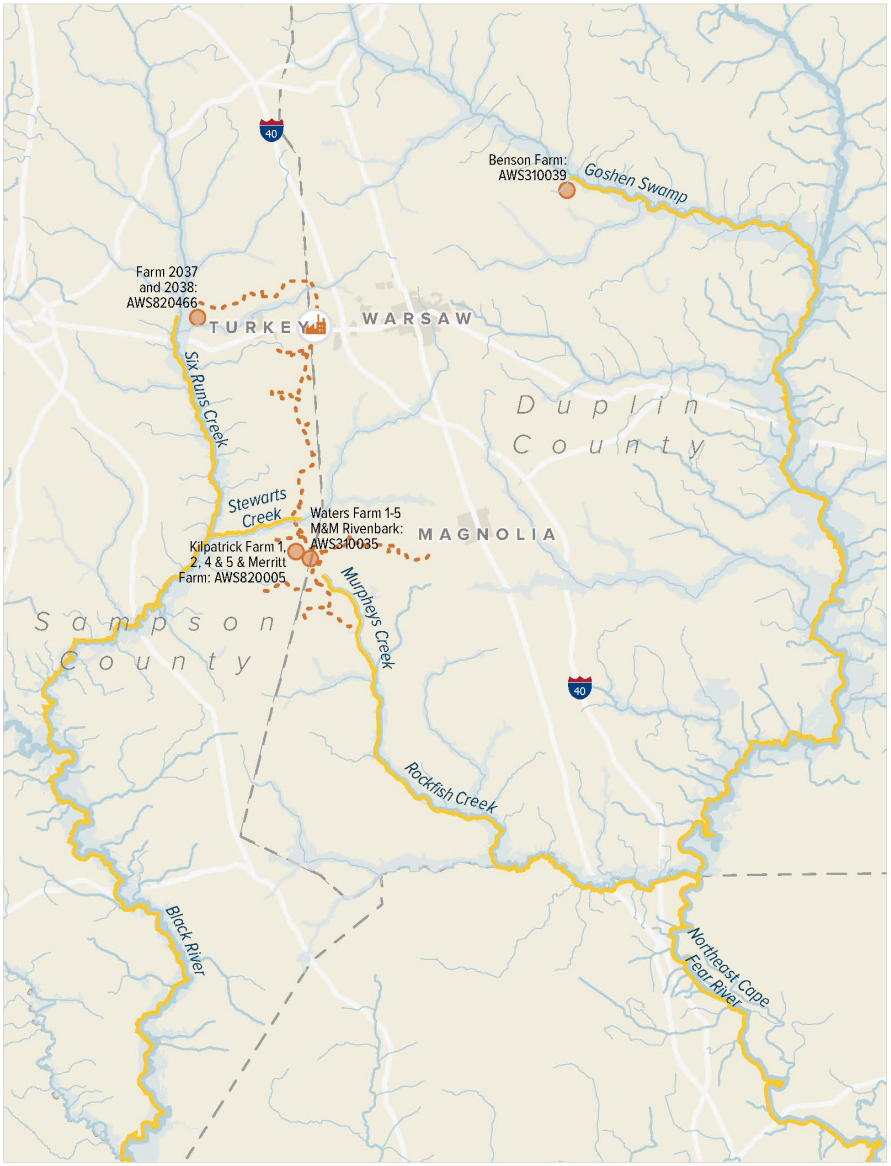
[110] *See supra* Sections III(A)-(B).

[111] DEQ, Certificate of Coverage No. AWS820466, Farm 2037 and 2038 (Sept. 23, 2019), https://edocs.deq.nc.gov/WaterResources/DocView.aspx?id=1114491&dbid=0&repo=WaterResources.

additional waste-holding structure—the anaerobic digesters—which has potential to leach pollutants into groundwater. Moreover, the secondary lagoons and sprayfields will store more concentrated waste that is more likely to contaminate groundwater and move with runoff, increasing the risk of pollution, particularly during major rain events.

As illustrated below, the Hog Operations at issue here are all located in the lower Cape Fear River Basin, close to tributaries of the Cape Fear River. The Goodson Operation is located on Six Runs Creek. The Kilpatrick and Waters Operations are located on Stewarts Creek, which drains into Six Runs Creek. The Waters Operation is also near Murpheys Creek, which drains into Rockfish Creek. The Benson Farm is located near Goshen Swamp and Nahunga Creek. In 2015, the United States Geological Survey sampled at multiple sites along Six Runs Creek and a site at Nahunga Creek,[112] and based on the levels of nitrates and other pollutants, concluded that there were "[swine] waste manure influences" on water quality at each site.[113] The proximity of these waterways to the Hog Operations increases the chances of flooding, and thus pollution into waterways. DEQ's recent sampling on Murpheys Creek downstream of the Waters Operation showed elevated levels of nitrate, among other pollutants.[114]

[112] Harden, *supra* note 47, at 9.
[113] *Id.* at 40 (Table 13, indicating waste manure influences at the Six Runs sampling sites, SP-11, 11A, 11B, 11C, 11D); *id.* at Table 14 (indicating waste manure influence at Nahunga Creek sampling site, SP-13).
[114] DEQ, *Cape Fear River Animal Feeding Operations Monitoring Study: Preliminary Report* (May 4, 2020), Cape Fear River Animal Feeding Operations Monitoring Study: Preliminary Report, https://files.nc.gov/ncdeq/EJ/AttachG-CFRAFOMS--Preliminary-Report.pdf (Exhibit 57).



D. DEQ has failed to protect people of color and the environment from hog waste pollution.

Despite being on notice of these environmental injustices for many years and despite the settlement reached after the 2014 Title VI complaint referenced above, DEQ has done little to actually prevent or reduce disproportionate harms caused by industrial hog operations. Pollution from the lagoon and sprayfield system persists today, and DEQ's current permitting approach to biogas projects is only making it worse.

Despite having agreed to do so, DEQ has not initiated rulemaking to codify a Violation Points System, which is required by state law.[115] The Violation Points System would hold repeat violators accountable for continued non-compliance with their permit and protect the

[115] *See* Settlement, *supra* note 39, at 5; *see also* N.C. Gen. Stat 143-215.6E.

environment and the surrounding communities. In the meantime, DEQ enforcement efforts have fallen short and fail to protect communities and the environment. When DEQ identifies violations or deficiencies, the agency rarely initiates enforcement actions. For instance, in 2020, DEQ found 224 deficiencies and violations during annual inspections.[116] Yet DEQ only initiated 29 enforcement actions against violators.[117]

More recently, DEQ has enabled the hog industry's push for biogas.[118] On March 31, 2021, DEQ issued the Permits. The Permits are a continuation of this history of systemic discrimination. Despite strong pushback and legal challenges from community members and environmental groups,[119] reams of research documenting the harms of the system,[120] and reduced capacity for proper enforcement, DEQ continues to authorize the industry to use the lagoon and sprayfield system at existing operations at the expense of community health and the environment.[121]

E. The Hog Operations have repeatedly violated their permits.

The Hog Operations have histories of non-compliance with their permits, increasing the risks of pollution. In fact, during the site visit before the Permits were issued, DEQ staff noticed several compliance issues, including high freeboard levels and mismanagement of pollutant-laden sludge.[122] Nevertheless, on March 31, 2021 DEQ issued the Goodson, Waters, and Benson operations were new individual permits to install new anaerobic digesters, produce biogas, and dispose of digester waste in secondary open lagoons and crop fields, and the Kilpatrick Operation was issued a new certificate of coverage under the state general permit to convert an existing lagoon into a covered anaerobic digester, produce biogas, and dispose of digester waste in secondary open lagoons and crop fields.[123]

In recent years, the Goodson Operation has struggled to comply with requirements meant to prevent waste from contaminating nearby rivers and streams.[124] For example, in March 2019

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[116] DIV. WATER RES., N.C. DEP'T ENV'T QUALITY, ANNUAL REPORT TO THE NORTH CAROLINA GENERAL ASSEMBLY ON ANIMAL WASTE MANAGEMENT PERMITTING, INSPECTION AND COMPLIANCE ACTIVITIES: JULY 1, 2019 – JUNE 30, 2020, Table 3 (Oct. 2020), https://www.ncleg.gov/documentsites/committees/ERC/ERC%20Reports%20Received/2020/DEQ/2020-Oct%20DEQ_Animal%20Waste%20Management.pdf (Exhibit 58).

[117] *See id.*

[118] *See* Public Meeting Report, *infra* note 122 (indicating a lack of response to comments regarding environmental justice, degradation of water and air quality, and other concerns raised by community members and other members of the public). *See also infra* note 130 (showing that DEQ staff did not directly address comments and question from community members during the public meeting on the draft Permits).

[119] *See,* Complaint, *supra* note 33; *see also* Letter from B. Hildebrand, et al. to DEQ (March 2019) (Exhibit 60) (providing extensive technical comments on the draft swine general permit on behalf of numerous environmental and community organizations).

[120] See *supra* Sections III(B).

[121] *See* DEQ Swine Waste Management System General Permit (Apr. 2019), https://files.nc.gov/ncdeq/General-Permit---Swine-2019.pdf (Exhibit 59).

[122] *Swine Biogas Permit Modifications: Public Meeting Report and Recommendations*, DEQ, (Mar. 31, 2021), https://files.nc.gov/ncdeq/afo/BiogasMtgReport20210331_FINAL.pdf (hereinafter Public Meeting Report) (Exhibit 61).

[123] See Permits for the Hog Operations, *supra* note 1.

[124] *See* Compliance History for Goodson Farm (Farm 2037 & 2038) (Jan. 2019-Mar. 2021) (Exhibit 62).

an inspection report indicated an overflow of hog waste at the facility. A December 2019 Plan of Action for sludge management shows the facility violated the sludge requirements for two of the lagoons on-site and was required to remove nearly five million gallons of pollutant-laden sludge that had accumulated at the facility in order to come back into compliance. And on at least four occasions in the past year alone, the facility failed to maintain sufficient storage capacity in its lagoons to avoid waste overflowing during heavy rainfall.

Like the Goodson Operation, the Waters Operation has also repeatedly failed to maintain sufficient room in its lagoons to prevent a spill of untreated hog waste during a heavy rainfall.[125] In 2017, a pipe at the operation broke, leading to the spill of 900 gallons of hog waste into an unnamed tributary of Stewarts Creek. On May 20, 2019, a pipe at one of the lagoons cracked, causing 13,200 gallons of raw hog feces and urine to gush out of the lagoon at a rate of 10 gallons per minute, some of which spilled down a ditch and into a nearby creek. The Waters Operation also kept too much sludge in all of its lagoons, violating its sludge level requirements.

In an April 2020 inspection report, DEQ noted the Benson Operation facility was "out of compliance with permit conditions related to sludge" because sludge accumulation in the lagoons at the facility exceeded safe levels.[126]

The Kilpatrick Operation is located very close to the 100-year floodplain. It too has a history of non-compliance with its permit requirements. In 2019, the facility built up more pollutant-laden sludge in its lagoons than was allowed, and it was required to remove more than 1.3 million gallons to come back into compliance.[127]

F. DEQ's Permitting Process Did Not Prevent Disparate Impacts.

i. The Permitting Process

On December 23, 2019, Murphy-Brown submitted four applications for permit modification for the Hog Operations.[128] On December 22, 2020, DEQ issued draft permits for each of the Hog Operations and a notice of a public hearing and a public comment period. DEQ solicited comments from the public between December 23, 2020 and January 29, 2021. On March 31, 2021, DEQ issued individual waste management permits to the Waters Operation, Benson Operation, and Goodson Operation and a modified certificate of coverage under the swine general permit for Kilpatrick Operation.[129]

[125] Compliance History for Waters Operation (Mar. 2018-Mar. 2021) (Exhibit 63).
[126] DEQ, Routine Compliance Inspection, Benson Farm, Facility No. 31-39 (Apr. 2, 2020), https://edocs.deq.nc.gov/WaterResources/DocView.aspx?id=1156021&dbid=0&repo=WaterResources (Exhibit 64).
[127] DEQ, Plan of Action (POA) for Lagoon Sludge Reduction, Facility No. AWS 820005 (May 21, 2019), https://edocs.deq.nc.gov/WaterResources/DocView.aspx?id=1380337&dbid=0&repo=WaterResources (Exhibit 65).
[128] *See* Public Meeting Report, *supra* note 122.
[129] *Swine Biogas Processing Permitting Actions and Information*, N.C. DEP'T OF ENV'T QUALITY, https://deq.nc.gov/swinebiogas.

A virtual public meeting was held on January 26, 2021, through the WebEx online platform, and many people spoke out in opposition to issuance of the draft water permits.[130] Community members raised concerns about their personal health, the safety of their drinking water, noxious odors, and the wellbeing of their local economies, and asked DEQ not to issue the permits without considering the cumulative impacts of the many polluting industries in Sampson and Duplin counties.[131] One community member stated that "Sampson County is being turned into the county of waste and we really need to consider if we want to add to the waste issues that we are already dealing with . . . most of these neighborhoods are Black and Brown and we are being impacted the most."[132] Another community member demanded to know why DEQ wasn't protecting her community by requiring monitoring in the Permits.[133] Yet another community member implored DEQ to "listen to the concerns of the most impacted communities affected by the proposed [biogas] project and take the steps necessary to protect the health of these vulnerable communities."[134] Community members also requested that DEQ require Murphy-Brown to install cleaner technology that would address many of the adverse environmental and public health effects caused by covering a hog waste lagoon. Community and environmental groups submitted written comments opposing issuance of the draft permits, including comments that urged DEQ to evaluate and address the increased pollution risks from the Hog Operations and the disproportionate impacts of these permits on communities of color.[135]

ii. DEQ's own environmental justice report shows disproportionate impact on Black and Latinx people living near the Hog Operations

DEQ's own environmental justice report shows that the communities around the Hog Operations have disproportionately higher Black, Latinx, and low-wealth populations as compared to the rest of the state.[136] DEQ used EJSCREEN to report the demographics of communities within one mile of each of the Hog Operations.

As illustrated in Exhibit 6 f the people living within one mile of the Waters Operation 76 percent are people of color; within one mile of the Benson Operation 55 percent are people of color; within one mile of the Goodson Operation, 54 percent are people of color; and within one mile of the Kilpatrick Operation, 58 percent are people of color. The report also identifies two churches—Mount Pleasant Baptist Church and Six Runs Baptist Church—and *209 households*

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[130] N.C. Dep't of Env't Quality, Video of Public Meeting (Jan. 26, 2021), https://files.nc.gov/ncdeq/afo/Swine-Biogas-Public-Meeting-20210126-2300-1.mp4. The January 26, 2021 public meeting was held on the WebEx platform and was inaccessible to many and fraught with technological issues. Many impacted community members have limited internet access. Many who were able to access the virtual meeting had trouble with the WebEx software and were unable to speak even though they had registered to do so. Further, DEQ staff repeatedly refused answer numerous specific questions posed by impacted community members. *Id.* (responding to questions about environmental justice, cumulative impacts, and other concerns saying that the concerns "are outside the scope" of these permits).

[131] *Id*.

[132] *Id.* (comments by Danielle Koonce).

[133] *Id.* (comments by Beth Henry).

[134] *Id.* (comments by Sherri White-Williamson).

[135] *See* Comment Letter, *supra* note 93; *see also* Letter from E. Haddix and M. Dorosin, Lawyers Committee for Civil Rights Under Law, to Ramesh Ravella, DEQ (Jan. 29, 2021) (Exhibit 66).

[136] *See* DEQ EJ Report, *supra* note 2.

within a one-mile radius of the four hog operations.[137] These congregations and households, which are predominantly made up of people of color and already bear the burden of the hog industry's pollution, as well as poultry operations and other polluting industries, would face additional environmental and health impacts if the permits are issued as drafted. Yet, the report did not include any recommendations or requirements for mitigating impacts to these communities.

IV. LEGAL VIOLATIONS

A. Legal Background.

i. Title VI of the Civil Rights Act of 1964 & EPA's Implementing Regulations

Title VI of the Civil Rights Act of 1964 prohibits recipients of federal funds from discriminating against individuals on the basis of race, color, or national origin, and provides that "[n]o person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."[138] Title VI applies to all programs and activities receiving federal financial assistance.[139]

In 1973, EPA adopted nondiscrimination regulations implementing the purposes of Title VI. EPA regulations require state permitting agencies to minimize the "environmental impacts to local communities and ensur[e] that their practices and policies are implemented in a nondiscriminatory manner."[140]

In sum, federal civil rights laws and EPA regulations prohibit a recipient of federal funds from using criteria or methods of administering a program or activity which have the effect of subjecting individuals to discrimination.[141] Additionally, "Title VI imposes on states an affirmative obligation to include consideration of Title VI criteria in permitting decisions."[142] Therefore, DEQ—as a recipient of federal funds—is required to administer its permitting regime in a manner that does not have the effect of subjecting individuals to discrimination.

ii. North Carolina State Laws

The North Carolina General Assembly specifically "provid[ed] for the conservation of [the State's] water and air resources" and "achiev[ing] and [] maintain[ing] for the citizens of the State a total environment of superior quality,"[143] and authorized DEQ to deny a permit or attach

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[137] *Id.* at 15.
[138] 42 U.S.C. § 2000d.
[139] CIVIL RIGHTS DIV., U.S. DEP'T OF JUSTICE, TITLE VI LEGAL MANUAL 22, https://www.justice.gov/crt/book/file/1364106/download.
[140] Title VI Public Involvement Guidance for EPA Assistance Recipients Administering Environmental Permitting Programs (Recipient Guidance), 71 Fed. Reg. 14207, 14214 (Mar. 21, 2006), , https://www.epa.gov/sites/default/files/2013-09/documents/title6_public_involvement_guidance.3.13.13.pdf.
[141] 42 U.S.C. § 2000d (2018); 40 C.F.R. § 7.35(b).
[142] *S. Camden Citizens in Action v. New Jersey Dept. of Env't Prot.*, 145 F.Supp. 2d 446, 476 (D.N.J. 2001).
[143] N.C. GEN. STAT. § 143-211(a).

a condition to a permit when DEQ "finds such denial or such conditions are necessary to effectuate the purposes of this Article."[144] The General Assembly requires anyone seeking to carry out any activity that impacts the waters of the State, including construction or operation of an animal waste management system, to obtain and comply with a state permit.[145] DEQ's Division of Water Resources ("DWR") has the authority to grant, modify, or revoke any permit as necessary to effectuate the State's policies.[146]

B. Legal Violation.

i. The Permits issued by DEQ disparately impact Black and Latinx families in Duplin and Sampson Counties by increasing the risks of hog waste pollution.

DEQ's Permits authorize waste treatment systems that will put more harmful ammonia into the air that nearby residents breathe—an unacceptable added harm for communities that have suffered health problems from hog operations for decades. In addition, the ammonia emissions and other changes to the hog waste from biogas production will exacerbate pollution to groundwater, rivers, and streams nearby the Hog Operations, potentially contaminating drinking water for residents and causing algal blooms and fish kills.[147] The Permits also allow Murphy Brown to continue to dispose of waste using the harmful lagoon and sprayfield waste management system, about which EPA itself has expressed "deep concern."[148] These harms will be disproportionately borne by Black and Latinx neighbors of the Hog Operationsin violation of Title VI.

The Hog Operations at issue here are all located in parts of Duplin and Sampson Counties that are already overburdened by industrial pollution that has compromised surface water and groundwater quality in the Cape Fear River Basin and harmed the health and well-being of local, predominantly Latinx and Black communities.[149]

ii. DEQ's Failure to Prevent Disproportionate Adverse Impacts on Communities of Color Is Not Justified.

Many people, including impacted community members, submitted comments to DEQ during the public comment period for the Permits. As noted above, several themes emerged from these comments: concern about the Permits' risk to drinking water, concern about the Permits' impact on air quality, concern about the Permits' pollution of nearby waterways, and concern that these risks, as well as other negative impacts, would be disproportionately shouldered by predominately people of color already suffering under a legacy of industrial pollution facilitated by DEQ.

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[144] *Id.* § 143-215.1(b)(1).
[145] *Id.* § 143-215.1(a)(12).
[146] *Id.* §§ 143-211(c) & 143-215.1(b). The General Assembly granted the Environmental Management Commission certain powers as to these permits, which the Commission delegated to the DEQ's Division of Water Resources. *Id.* § 143-211(c).
[147] *See supra* Section III(A)-(C).
[148] Dorka Letter, *supra* note 5, at 1, 6.
[149] *See supra* Section III.

As EPA Title VI regulations provide, "[i]n administering a program or activity receiving Federal financial assistance in which the recipient has previously discriminated on the basis of race, color, sex, or national origin, the recipient shall *take affirmative action* to provide remedies to those who have been injured by the discrimination."[150] Yet in the "Environmental Justice" response section of its public meeting report, DEQ cited no information on environmental or public health impacts, nor did it point to any substantive protections included in the Permits to address those impacts. Instead, DEQ stated only that it gave "meaningful consideration of Environmental Justice issues," and cited to the public notice and public hearing on the Permits as sufficient to resolve any environmental justice concerns.[151] This does not constitute DEQ taking action to resolve disparate impacts and is not sufficient.

Although it is true that DEQ drafted an environmental justice report as part of the permitting process, this report simply evaluated the demographics and socioeconomics of the project area. DEQ did nothing to reduce the disproportionate adverse impacts of the Permits on the Black and Latinx communities in Duplin and Sampson County as Title VI requires. The report itself is devoid of any actual analysis of these impacts, much less any recommendations for reducing these impacts.[152]

If DEQ could justify these environmental harms and other harms, it would need to "offer evidence that its policy or decision in question is demonstrably related to a significant, legitimate goal related to its mission."[153] But to date, DEQ has not put forward *any* justification for failing to consider disproportionate adverse impacts to communities of color, in the environmental justice report, public meeting report, or elsewhere. Nor could it, given that DEQ's Division of Water Resources' mission is "to protect, enhance, and manage North Carolina's surface water and groundwater resources for the health and welfare of the citizens of North Carolina and the economic well-being of the state."[154]

When considering whether a disparate impact on a particular community is justified, EPA guidance instructs DEQ to consider whether any purported benefits would be "delivered directly to the affected population," keeping in mind "the views of the affected community" about

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[150] 40 C.F.R. § 7.35(a)(7) (emphasis added). Here, DEQ's permitting practices have had a disparate effect on people of color. *See, e.g.,* Dorka Letter, *supra* note 5, 1, 5-6; *see also* Complaint, *supra* note 33 (alleging discriminatory effect of DEQ's permitting of lagoons and sprayfield systems on people of color in eastern North Carolina). *See also* § 7.35(b) ("A recipient shall not use criteria or methods of administering its program or activity which have the effect of subjecting individuals to discrimination because of their race, color, national origin, or sex, or have the effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to individuals of a particular race, color, national origin, or sex.").

[151] *See* Public Meeting Report, *supra* note 122, at 17; *see also id.* at 13 (referencing non-specific "necessary monitoring requirements" as addressing commenters' concerns).

[152] *See generally* DEQ EJ Report, *supra* note 2.

[153] U.S. EPA's External Civil Rights Compliance Office Compliance Toolkit, 15 (Jan. 18, 2017), https://www.epa.gov/sites/default/files/2020-02/documents/toolkit_ecrco_chapter_1-letter-faqs_2017.01.18.pdf; *see also* DEQ EJ Report, *supra* note 2 at 9.

[154] *About Water Resources*, N.C. DEP'T OF ENV'T QUALITY, https://deq.nc.gov/about/divisions/water-resources/about-water-resources; *see also* N.C. Constitution, Art. IXV, Sect. 5 ("It shall be the policy of this State to conserve and protect its lands and waters for the benefit of all its citizenry.").

whether the benefits justify the disparate impacts.[155] The community made its voice very clear, as the comments given indicate: it did not think the Permit benefited them, and thought it would actually harm them—socially, economically, and environmentally.[156]

DEQ is fully capable of ensuring that its permitting program fulfils its primary purpose while also avoiding discriminatory effects. Its decision to forgo such analysis here, despite comments and evidence suggesting that the decision to issue the Permits would cause disproportionate adverse impacts to Black and Latinx communities, violates Title VI's requirement to administer programs in a non-discriminatory manner.

iii. Less discriminatory alternatives to the Permits exist and are within DEQ's authority to require.

DEQ has the authority, indeed the obligation, to permit biogas projects in a way that protects nearby communities and the environment.[157]

Researchers and businesses have developed technologies and practices that significantly reduce the environmental impacts associated with managing hog waste, and industrial hog operations—including Murphy-Brown's parent company, Smithfield—have implemented such technologies elsewhere. These cleaner technologies include, for example:

- separating solids and liquids, which removes solid waste so it can be sold as fertilizers or soil amendments and minimizes sludge accumulation;
- nitrification-denitrification systems to eliminate nitrogen and nitrate, as well as reducing ammonia air pollution, from digester waste;
- alkaline treatment to address phosphorus and pathogens in digester waste; and
- injection or hose drag irrigation systems to apply waste directly to the soil, which reduces pollutant runoff.[158]

These technologies and practices have been successfully implemented, often in combination, on other hog operations in North Carolina and elsewhere and have significantly reduced the environmental impacts associated with hog waste management, and thus the impact

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[155] Civil Rights Compliance Toolkit, *supra* note 153, at 15.

[156] *See, e.g.,* Public Meeting Report, *supra* note 122, at 12-13 (documenting comments from community members expressing concerns about public health, reduced property values, and the cumulative impacts of polluting industries, including poultry and hog operations, in the vicinity of the Hog Operations); *see also* Comment Letter, *supra* note 93.

[157] In addition to DEQ's obligations under federal civil rights and environmental laws, DEQ is also bound by state laws ensuring protection of the environment and public health. *See* N.C. Gen. Stat. § 143-215.1(b)(1) (providing that DEQ "prevent . . . any significant increase in pollution of the waters of the State"); *id*. § 143-211 ("It is the public policy of the State to maintain, protect, and enhance water quality within North Carolina."); *see also* 15A N.C. Admin. Code 2T.0108(c) (providing DEQ with the authority to "require monitoring and reporting requirements, including of groundwater, surface water or wetlands, waste, wastewater, residuals, soil, treatment processes, lagoon or storage ponds, and plant tissue, if necessary to determine the source, quantity, and quality of the waste and its effect upon the surface water, ground waters, or wetlands.").

[158] *See generally* Comment Letter, *supra* note 93, at 23-27; *see also* Garry Grabow, Overview of Different Lagoon Effluent Application Methods on Odor and Ammonia Emissions (2007) https://projects.ncsu.edu/project/swine_extension/ncporkconf/2007/generalsessions/grabow.pdf.

on communities living nearby.[159] These solutions are commercially available[160] and are compatible with the use of covered digesters to produce biogas. Community and environmental groups provided DEQ information about these and other alternatives during the permitting process.[161] Yet DEQ failed to include any additional treatment technology or other protective practices as part of the Permits.

DEQ also failed to include surface water monitoring or groundwater monitoring to confirm a basic assumption underlying the Permits—that the waste generated at the Hog Operations will not reach waters of the State or otherwise pollute the environment. Instead, DEQ ignored decades of research documenting pollution and public health harms from industrial hog operations utilizing the lagoon and sprayfield waste management system, including data from the agency itself.[162] Earlier this month, the Ninth Circuit Court of Appeals roundly rejected as arbitrary and capricious this approach of blindly assuming that non-discharge facilities do not affect water quality. *See Food & Water Watch v. U.S. Environmental Protection Agency*, No. 20-71554 (9th Cir. Sept. 16, 2021). The court stated, "[w]ithout a requirement to monitor runoff . . . there is no way to ensure that a [hog operation] is complying with the [p]ermit's . . . non-discharge requirement for land-application areas." *Id.* at 24-25. DEQ's permits contain exactly this fatal flaw.

DEQ also failed to add more protective freeboard or sludge management conditions to reflect the changing nature of the waste and the increased risk of water and air pollution, and did not require any operations to update their waste utilization plans or animal waste management plans before spraying of digester waste begins.

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[159] *See*, *e.g.*, Jiele Xu et al, *Performance Evaluation of a full-scale innovative swine waste-to-energy system*, 216 BIORESOURCE TECH. 494 (2016) (evaluating nitrification-denitrification technology used to reduce nitrogen pollution and ammonia emissions at Lloyd Ray Farms in Yadkinville, North Carolina) (Exhibit 67); Matias B. Vanotti et al, *High-rate solid-liquid separation coupled with nitrogen and phosphorus treatment of swine manure: effect on water quality*, FRONTIERS SUSTAINABLE FOOD SYS. (Aug. 16, 2018), https://www.frontiersin.org/articles/10.3389/fsufs.2018.00049/full (evaluating solid-liquid separation, nitrification-denitrification, and phosphorus removal system implemented in Kenansville, North Carolina) (Exhibit 68); Kyoung S. Ro, *High-Rate Solid-Liquid Separation Coupled with Nitrogen and Phosphorous Treatment of Swine Manure: Effect on Ammonia Emission*, 2 FRONTIERS IN SUSTAINABLE FOOD SYS. 1 (Sept. 28, 2018), https://www.ars.usda.gov/ARSUserFiles/60820500/Manuscripts/2018/Man1059.pdf (Exhibit 69); *Sistrates*, EMBRAPA, https://www.embrapa.br/en/suinos-e-aves/biogasfert/biogas/sistrates (last visited May 13, 2021 (describing a modular waste management system that employs and anaerobic digester, nitrification-denitrification, and phosphorus removal modules to significantly improve water quality and reduce ammonia emissions); Betsy Freese, *SF Special: How Smithfield Saved the Worst Hog Farm in America*, SUCCESSFUL FARMING (Jan. 4, 2018), https://www.agriculture.com/livestock/pork-powerhouses/how-smithfield-saved-the-worst-hog-farm-in-america. (describing Smithfield's Missouri waste management system, which includes barn scrapers and nitrification-denitrification).

[160] *See, e.g.*, *Manure and Digestate Management*, DIGESTED ORGANICS, https://digestedorganics.com/manure-and-digestate-management/ (last visited May 14, 2021); *Newtrient Technology Catalogue*, NEWTRIENT, https://www.newtrient.com/Catalog/Technology-Catalog (last visited May 14, 2021).

[161] *See* Comment Letter, *supra* note 93.

V. RELIEF REQUESTED

As detailed above, DEQ issued permits for biogas waste management systems that fail to protect the health and environment of families living near the Hog Operations, and in fact may make pollution and the risk of health harms even worse. And DEQ is preparing to issue a biogas general permit that will continue this same defective approach on an even greater scale.

These harms disproportionately affect Black and Latinx people living near the Hog Operations, and it is these communities who will suffer most if pollution from the Hog Operations worsens, as is expected with the Permits. Decades of research—including research reviewed by this office—demonstrate how the lagoon and sprayfield waste management system authorized by the Permits pollute rivers, streams, and air quality throughout eastern North Carolina. Despite this, and despite evidence indicating the increased risk of pollution and adverse health impacts to nearby residents from the increases to harmful hog waste pollutants resulting from biogas production, DEQ issued the Permits without addressing these harms. This is unacceptable and a violation of federal law.

Complainants request that ECRCO conduct an investigation to determine whether DEQ violated Title VI and EPA regulations in issuing the Permits with inadequate protections for the water quality and health of people living nearby, a disproportionate share of whom are Black and Latinx.

In addition, DEQ must change its current policy of refusing to consider ongoing and increasing water quality, air quality, and health impacts caused by the hog industry's polluting waste management systems. With regard to the Permits at issue in this complaint and future permits for biogas production, DEQ must identify, avoid, and if necessary mitigate any discriminatory effects caused by its permitting decisions. DEQ's policies and practices lead to disparate adverse impacts, and EPA should counsel DEQ on how to develop a permit decision-making policy that is fair, equitable, and Title VI-compliant going forward, as well as on how to administer that policy in a non-discriminatory manner.

VI. CONCLUSION

For all of the reasons outlined above, Complainants request that EPA accept this compliant for investigation, and upon a finding of disparate impact, bring DEQ into compliance with Title VI of the Civil Rights Act of 1964 and EPA's implementing regulations.

Thank you for your consideration of this matter. Should you have any questions or wish to discuss this matter further, please contact me at bhildebrand@selcnc.org or 919-967-1450.

Sincerely,

Blakely E. Hildebrand

Blakely Hildebrand
Staff Attorney
Southern Environmental Law Center

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Exhibit No.	Title
01	DEQ, Waters Farm-M&M Rivenbark Farm Permit No. AWI310035 (March 31, 2021)
02	DEQ, Benson Farm Permit No. AWI310039 (March 31, 2021)
03	DEQ, Kilpatrick Farm 1, 2, 4, & 5, & Merritt Farm Permit No. AWS92005 (March 31, 2021)
04	DEQ, Farm 2037 & 2038 Permit No. AWI820466 (March 31, 2021)
05	DEQ, Draft Environmental Justice Report, 20 (Dec. 22, 2020)
06	Demographics of Impacted Communities, So. Env't Law Ctr (Sept. 21, 2021)
07	Prehearing Statement, *Env't Justice Comm. Action Network & Cape Fear River Watch v. N.C. Dep't of Env't Quality – Div. Water Res & Murphy Brown, LLC*, Case Nos. 21 EHR 02068, 02069, 02070, 02071 (consolidated)
08	Nina G.G. Domingo et al., *Air quality-related health damages of food*, 118 PROCEEDINGS OF THE NAT'L ACAD. SCIS. 1 (May 18, 2021)
09	County-Level Data
10	Letter from Lilian Dorka to William Ross (Jan. 12, 2017)
11	Julia Kravchenko, *Mortality and Health Outcomes in North Carolina Communities Located in Close Proximity to Hog Concentrated Animal Feeding Operations*, 79 N.C. Med. J. 278
12	Steve Wing, et al., *Environmental Injustice in North Carolina's Hog Industry*, 108 Env't Health Perspectives 225 (2000)
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14	N.C. Sess. L. 2021-78 § 11
15	Rev. Jimmy Melvin, *Minister: Hog operations have harmed Sampson-Duplin church, but NC legislators have turned deaf ear*, FAYETTEVILLE OBSERVER (June 25, 2021)

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18	Wendee Nicole, *CAFOs and Environmental Justice: The Case of North Carolina*, 121 Env't Health Perspectives A182 (2013)
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21	Stephen L. Harden, *Surface-Water Quality in Agricultural Watershed of the North Carolina Coastal Plain Associated with Concentrated Animal Feeding Operations, Scientific Investigations Report 2015-5080*, U.S. Dep't of Interior (2015)
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23	Colleen N. Brown et al., *Tracing nutrient pollution from industrialized animal production in a large coastal watershed*, 192, Env't Monitoring & Assessment 515 (July 2020)
24	Michael A. Mallin & Lawrence B. Cahoon, *Industrialized Animal Production: A Major Source of Nutrient and Microbial Pollution to Aquatic Ecosystems*, 24 Population & Env't 369 (2003)
25	Murphy-Brown, Nutrient Utilization Plan for Waters Farm (Jan. 29, 2020)
26	T.G. Ciravolo et al., *Pollutant Movement to Shallow Ground Water Tables from Anaerobic Swine Waste Lagoon*, Va. Water Res. Rsch. Ctr. (1977)
27	R.L. Huffman & Phillip W. Westerman, *Estimated Seepage Losses from Established Swine Waste Lagoons in the Lower Coastal Plain of North Carolina*, 38 Transactions Am. Soc'y Agric. Eng'rs 449 (1995)
28	Shane Rogers & John Haines, U.S. EPA, *Detecting and mitigating the environmental impact of fecal pathogens originating from confined animal feeding operations: Review* (2005)

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29	Kenneth Rudo, *Groundwater Contamination of Private Drinking Well Water by Nitrates Adjacent to Intensive Livestock Operations (ILOs)*, N.C. DEP'T OF HEALTH AND HUMAN SERV., 414 (June 1999)
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33	JoAnn Burkholder et al., *Impacts to a Coastal River and Estuary from Rupture of A large Swine Waste Holding Lagoon*, 26 J. Env't Quality 1451 (1997)
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37	Ward, et al, Drinking Water Nitrate and Human Health: An Updated Review, 15 Int'l J. Env't Research & Public Health 1 (July 23, 2018)
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39	Baines, R. (Edited), *Reducing greenhouse gas emissions from livestock production*, Taylor & Francis Group, London, 145 (2021)
40	USDA, Natural Res. Conservation Serv., Conservation Practice Standard, Anaerobic Digester, Code 366, 366-CPS-6, (June 2017)
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43	Lowry A. Harper et al, *The Effect of Biofuel Production on Swine Farm Methane and Ammonia Emissions*, 39 J. Envt. Qual. 62 (2010)
44	Letter from Blakely Hildebrand and Maia Hutt, SELC, to Ramesh Ravella, DEQ (Jan. 29, 2021)
45	Jeffery Lorimor & John Sawyer, *Final Report: Swine USA Anaerobic Digester Performance Analysis*, NAT. RES. CONSERVATION SVC. – IOWA STATE UNIV. 3 (2004)
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47	Kim Weaver et al, *Effects of Carbon and Nitrogen Emissions due to Swine Manure Removal for Biofuel Production*, J. ENV'T QUALITY, 1371 (2012)
48	T. Nyord et. al, *Ammonia Volatilization and crop yield following land application of solid-liquid separated, anaerobically digested, and soil injected animal slurry to winter wheat,* 160 J. AGRIC., ECOSYSTEMS, AND ENV'T, 75 (2012)
49	Biswanath Dari et. al, *Understanding Factors Controlling Ammonia Volatilization from Fertilizer Nitrogen Applications*, UNIV. OF IDAHO – EXTENSION (2019)
50	Aneja, Viney P. et al., *Atmospheric nitrogen compounds II: emissions, transport, transformation, deposition and assessment*, Atmospheric Env't, 1903-11 (2001)
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Re: Supplement to Complaint Number 05RNO-21-R4 Regarding the North Carolina Department of Environmental Quality's Issuance of Swine Farm Digester General Permit

Dear Administrator Regan and Acting Director Hoang:

On behalf of the Duplin County Branch of the North Carolina Conference of the National Association for the Advancement of Colored People ("Duplin County NAACP") and the North Carolina Poor People's Campaign (together, "Complainants"), the Southern Environmental Law Center submits this supplement to complaint number 05RNO-21-R4 ("2021 complaint"). The 2021 complaint alleges that the North Carolina Department of Environmental Quality ("DEQ") violated the U.S. Environmental Protection Agency's ("EPA") implementing regulations under Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d, *et seq*. ("Title VI"), when it issued four individual water quality permits authorizing digester systems at industrial hog operations in

Duplin and Sampson Counties in March 2021.[1] In issuing the 2022 Swine Farm Digester System General Permit ("Digester General Permit"),[2] DEQ again—and in the same ways—failed to comply with EPA's implementing regulations under Title VI.[3] Specifically, DEQ failed to conduct a comprehensive cumulative impacts analysis as part of the permitting process and failed to include necessary protections in the Digester General Permit that would mitigate air and water pollution at hog operations in eastern North Carolina. As a result of these failures, DEQ's decision to issue the Digester General Permit is likely to have a discriminatory impact on Black, Latino, and Native American families in eastern North Carolina.[4] The Digester General Permit suffers from the same deficiencies, and contains nearly identical terms, as the four individual permits that are the subject of the 2021 complaint and investigation. Like the four individual permits, a disproportionate share of the harms from operations covered by the Digester General Permit will be borne by communities of color. Unlike the four individual permits, however, more than 2,000 industrial hog operations in North Carolina could apply for coverage under the Digester General Permit.[5]

Notably, three of the four permits that were the subject of the 2021 complaint have since been rescinded, and those three facilities are now covered under the Digester General Permit.[6]

Complainants made OECRC aware of the then-forthcoming Digester General Permit in the 2021 complaint and in subsequent verbal and written communications with OECRC.[7] In the 2021 complaint, Complainants stated that "adding to the urgency of this complaint is the passage of the North Carolina Farm Act in July 2021, N.C. Sess. L. 2021-78, which gives DEQ until July 2022 to develop a new general permit for biogas production at North Carolina's industrial

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[1] Letter from Blakely Hildebrand, SELC, to Lilian Dorka, EPA (Sept. 21, 2021) [hereinafter 2021 Complaint].
[2] Swine Farm Digester Waste Management System General Permit, Permit No. AWG400000, N.C. Dep't of Env't Quality (June 30, 2022) [hereinafter Digester General Permit] (Exhibit 1).
[3] EPA's Title VI regulations require that civil rights complaints be filed within 180 days of an action by a federal funding recipient. 40 C.F.R. § 7.120. This supplement is not a new complaint and is therefore not subject to the 180-day rule. Nevertheless, this supplement is provided to EPA within the 180-day window after the Digester General Permit was issued.
[4] *See* 2021 Complaint, *supra* note 1; *see also* Letter from Lilian Dorka, EPA, to William Ross, DEQ (Jan. 12, 2017) [hereinafter 2017 Dorka Letter], https://www.epa.gov/sites/default/files/2018-05/documents/letter_of_concern_to_william_g_ross_nc_deq_re_admin_complaint_11r-14-r4_.pdf (expressing "deep concern" about DEQ's permitting program for industrial hog operations and the potential discriminatory effect of this program on communities of color in eastern North Carolina). DEQ's 2022 Digester General Permit adopts many of the same provisions as the 2014 swine general permit, which was the subject of the 2014 civil rights complaint prompting EPA's letter to DEQ expressing "deep concern" about discriminatory effects on communities of color.
[5] Digester General Permit, *supra* note 2, at 1 (stating that any hog operation that houses 250 or more swine, utilizes a "farm digester system," and is considered a non-discharge operation may apply for coverage under the Digester General Permit).
[6] *See* Certificate of Coverage No. ADS310035, Waters Farm 1-5 M&M Rivenbark (Oct. 11, 2022) (Exhibit 2) (rescinding coverage under Permit No. AWI310035); Certificate of Coverage No. ADS820005 Kilpatrick Farm 1, 2, 4, & 5 & Merritt Farm (Oct. 11, 2022) (Exhibit 3) (rescinding coverage under Permit No. AWS820005); Certificate of Coverage No. ADS 820466, Farm 2037 and 2038 (Oct. 11, 2022) (Exhibit 4) (rescinding coverage under Permit No. AWI820046).
[7] 2021 Complaint, *supra* note 1, at 3.

hog operations."[8] To emphasize the urgency of resolving this complaint, Complainants also cited to a provision of the 2021 Farm Act that automatically approves coverage under the Digester General Permit ninety days after DEQ receives a complete application.[9] Moreover, Complainants expressed concerns about the forthcoming Digester General Permit to OECRC repeatedly throughout the permitting process.[10] Complainants urged OECRC to move quickly in resolving the 2021 complaint and bringing DEQ into compliance with its obligations under Title VI, thereby influencing the terms and conditions within the Digester General Permit. Complainants also kept OECRC up to date about the Digester General Permit process, including sharing Complainants' written comments with the Office and alerting the Office when the Digester General Permit was issued on June 30, 2022.[11] Notably, OECRC tolled the investigation into the 2021 complaint on the same day, indicating that, after months of no response, DEQ signaled its willingness to participate in facilitated discussions to reach an informal resolution to the 2021 complaint.[12]

I. Issuance of the Digester General Permit

In July 2021, the North Carolina General Assembly passed the 2021 Farm Bill, which instructed DEQ to create a general permit for farm digester systems by July 1, 2022.[13] On February 1, 2022, DEQ issued a draft Digester General Permit.[14] On May 2, 2022, Complainants submitted written comments on the draft Digester General Permit, raising several concerns, including that the Digester General Permit as drafted violated Title VI and EPA's regulations.[15]

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[8] *Id.*

[9] *Id.* at 3

[10] *See* Email from Blakely Hildebrand, SELC, to Jeryl Covington, EPA (Feb. 1, 2022) (explaining Complainants' concerns about the risk of increased pollution from hog operations utilizing digesters and open-air secondary lagoons and sharing Complainants' Dec. 2021 stakeholder comments to DEQ in response to a call for comments about the 2022 Digester General Permit) (Exhibit 5); *see also, e.g.*, Email from Blakely Hildebrand, SELC, to Jeryl Covington (May 2, 2022) (providing a copy of Complainants' and others' extensive technical comments on DEQ's draft Digester General Permit) (Exhibit 6).

[11] Email from Blakely Hildebrand, SELC, to Jeryl Covington (May 2, 2022); *see also* Press Release, *DEQ Issues Digester System General Permits*, NC DEQ (June 30, 2022), https://deq.nc.gov/news/press-releases/2022/06/30/deq-issues-digester-system-general-permits; Letter from Blakely Hildebrand, SELC, to Ramesh Ravella, DEQ (May 2, 2022) [hereafter Comments on Draft Digester General Permit] ("Comments on 2022 Draft Swine Digester System General Permit (AWG400000)") (Exhibit 7).

[12] Email from Jeryl Covington, EPA, to Blakely Hildebrand, SELC (July 13, 2022) (confirming verbal conversation in which OECRO staff conveyed DEQ's decision to pursue informal resolution); *see also* Letter from Anhthu Hoang, EPA, to Blakely Hildebrand (Oct. 11, 2022) (tolling the investigation of the 2021 Complaint in light of DEQ's decision to engage in informal resolution discussions).

[13] N.C. Sess. L. 2021-78 § 11.(d) (Exhibit 8).

[14] *See* Press Release, *DEQ Will Host Public Meetings on Digester System General Permits in April*, NC DEQ (Feb. 1, 2022), https://deq.nc.gov/news/press-releases/2022/02/01/deq-will-host-public-meetings-digester-system-general-permits-april; Comments on Draft Digester General Permit, *supra* note 11.

[15] *See* Comments on Draft Digester General Permit, *supra* note 11, at 52 – 57.

DEQ's Digester General Permit allows hog operations that are currently covered by the swine waste management system general permit to construct and operate animal waste management systems that include digester systems that produce biogas. The terms of the four individual permits are largely repeated in the Digester General Permit. The Digester General Permit allows hog operations to dig new lagoons, operate existing lagoons that lack a synthetic liner, and operate near impaired waterways. It does not require monitoring for ammonia or that secondary lagoons, which store digester waste, be covered or lined. It further allows digester waste, after being stored in an open-air secondary lagoon, to be sprayed on nearby fields. Moreover, the analysis included in DEQ's Environmental Justice Report showing the likelihood of disparate impacts on communities of color had no effect on DEQ's permitting decision; DEQ failed to include additional safeguards or application requirements for hog operations that will disproportionately harm communities protected by Title VI.

On July 28, 2022, the Environmental Justice Community Action Network and Cape Fear River Watch filed a petition for a contested case hearing challenging DEQ's issuance of the Digester General Permit.[16] The community groups claimed that, in issuing the permit, DEQ failed to consider the "practicable waste treatment and disposal alternative with the least adverse impact on the environment," as required by state water pollution control statute for "[a]ll permit decisions."[17] Murphy-Brown, LLC, a subsidiary of Smithfield Foods, Inc., intervened in that action.[18] Both DEQ and Murphy-Brown have argued that the state law requiring cleaner, practicable waste management technology does not apply to hog operations covered under the Digester General Permit. A decision in this case is expected in early 2023.

The Digester General Permit suffers from the same deficiencies as the individual permits. However, because a general permit, by its nature, covers more operations, the effects of the Digester General Permit will be felt in Black, Latino, and Native American communities across eastern North Carolina.

II. The Digester General Permit Authorizes the Same Polluting System as the Individual Permits

Many of the concerns raised in Complainants' 2021 complaint are present in the Digester General Permit. Like the individual permits, the Digester General Permit issued by DEQ authorizes use of the cesspit and sprayfield system. OECRC has previously expressed "deep concern" about North Carolina's permitting programs for industrial hog operations, which

[16] *Env't Just. Cmty. Action Network et. al v. N.C. Dep't of Env't Quality*, Case No. 22 EHR 02881, Petition for a Contested Case Hearing [hereinafter *EJCAN v. DEQ II*] (Exhibit 9). The parties had a hearing on motions for summary judgment on December 13, 2022.
[17] *See* N.C. Gen. Stat. 143-215.1(b)(2) ("All permit decisions shall require that the practicable waste treatment and disposal alternative with the least adverse impact on the environment be utilized.").
[18] *See EJCAN v. DEQ II*, Order Allowing Intervention (Sept. 19, 2022).

authorizes the storage of hog urine and feces in open cesspits and spraying of the waste on fields.[19] The Digester General Permit further entrenches use of the system by not only allowing operations with existing lagoons to install digesters and store digester waste in those existing lagoons, but also by permitting operations to dig new lagoons for digester systems.[20] Moreover, the permit includes no limits on venting or flaring methane and other harmful gases from digesters. As a result, communities living nearby these hog operations are likely to experience decreased air quality, contaminated drinking water, and more polluted water ways due to increasing ammonia emissions from the open-air secondary lagoons, increased methane production, and more harmful land-applied waste.[21]

Three of the four operations that received individual digester permits last year are now covered under the Digester General Permit; the fourth facility is likely having a significant effect on air quality and neighbors because the facility is not utilizing the methane and other gasses it is harvesting.[22] Both DEQ and Murphy-Brown, which owns all four of the individual operations, have argued in the past that coverage under the Digester General Permit would preclude any challenges to the individual permits.[23] But the facts remain the same: DEQ's permitting of digesters, whether under individual permits or a Digester General Permit, has had and is likely to have a disproportionate impact on communities of color.

III. More Facilities Will be Permitted Under the Digester General Permit

The Digester General Permit authorizes widespread construction and operation of digester systems with less permitting oversight. The Digester General Permit is open to any hog operation that is currently covered by the swine animal waste management general permit.[24] Currently, more than 2,000 hog operations are covered by the swine animal waste management general permit,[25] and the Digester General Permit does very little to prohibit, limit, or

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[19] 2017 Dorka Letter, *supra* note 4, at 1, 5–6, 11.
[20] Digester General Permit, *supra* note 2, at 1.
[21] *See* Comments on Draft Digester General Permit, *supra* note 11, at 28-39.
[22] The fourth operation that received an individual digester permit, Benson Farm, applied for coverage under the Digester General Permit but withdrew its application in November. Currently, the methane produced on Benson Farm is not being utilized as an energy source and is presumably being flared or vented. Letter from Kraig Westerbeek, to Christine Lawson, DEQ (Aug. 19, 2022) (Exhibit 10) (suggesting that the Benson operation has not been hooked up to any pipeline to transport captured gases from the facility); *see also* Letter from Ramesh Ravella, DEQ, to Murphy Brown (Nov. 7, 2022) (Exhibit 11) (confirming that the Benson operation withdrew its application for coverage under the Digester General Permit).
[23] *Env't Just. Cmty. Action Network et al. v. N.C. Dep't of Env't Quality*, 22-CVS-443, Transcript of Recording at 48:8–22; 39:16–24 (Super. Ct., New Hanover Cnty. Aug. 17, 2022) ("We hope, and I would like to say anticipate, that certificates of coverage under that new general permit will be issued hopefully very soon. . . . once that happens, . . . the permits before you today will no longer be in effect. . . So in our view this appeal is hopefully going to be moot shortly.") ("[The general assembly's] instructions would preclude petitioners' claim.").
[24] Digester General Permit, *supra* note 2, at 1.
[25] *List of Permitted Animal Facilities*, N.C. Dep't of Env't Quality, https://deq.nc.gov/permitted-animal-facilities-4-1-2020/download.

particularize permit conditions for any of those operations. In fact, by its very design, the permit will more quickly approve permits for digester systems.[26] Industry has long stated its intentions to install digester systems at hog operations across the state.[27] While it is unknown exactly how many of these operations will apply for coverage under the Digester General Permit, the impacts and harms from these operations are likely to be felt disproportionately by the Black, Latino and Native American communities that more commonly live near industrial hog operations.[28]

IV. The Digester General Permit Will Disproportionately Harm Black, Latino and Native American Communities

A. The Digester General Permit Will Harm Communities in Eastern North Carolina

Like the individual permits, industrial hog operations permitted under the Digester General Permit will produce dangerous new waste streams that will harm people living nearby. Notwithstanding the existence of more environmentally protective pollution control technology, these operations will be authorized to dig new hog waste lagoons or cap existing unlined ones, install digester systems, store digester waste in open-air potentially unlined lagoons, and spray the ammonia-rich digester waste on fields across eastern North Carolina. Since Complainants filed their complaint last September, the harms authorized by North Carolina's issuance of the individual permits and the general permit have become even more evident.

As stated in Complainants' 2021 complaint to OECRC, digester systems exacerbate pollution and negatively impact human health. Several studies have shown that digester waste emits substantially more ammonia than hog waste from conventional lagoons. A study co-authored by North Carolina State University's Dr. Viney Aneja found that digester waste stored in uncovered secondary lagoons emits more ammonia per-hog than conventional hog waste in a lagoon.[29] Since Complainants' submission of their 2021 complaint, Dr. Aneja has further distilled the results from that study and isolated the source of the increase in ammonia emissions. He found that emissions from the open lagoon portion of the hog operation specifically increased by 66 percent relative to conventional lagoons.[30]

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[26] *See* N.C. Sess. Law 2021-78 § 11.(b) (giving DEQ only 90 days to issue a certificate of coverage under the Digester General Permit once it receives a complete application).

[27] Press Release, *Smithfield Foods Announces Landmark Investment to Reduce Greenhouse Gas Emissions*, SMITHFIELD FOODS (Oct. 25, 2018), https://www.smithfieldfoods.com/press-room/2018-10-25-Smithfield-Foods-Announces-Landmark-Investment-to-Reduce-Greenhouse-Gas-Emissions.

[28] *See, e.g.,* SELC Demographic Analysis in Exhibit 12, showing that Black families live much closer to industrial hog operations than white families in rural eastern North Carolina.

[29] Viney P. Aneja et al., *Characterizing Ammonia Emissions from Swine Farms in Eastern North Carolina: Part 2—Potential Environmentally Superior Technologies for Waste Treatment*, 58 J. AIR & WASTE MGMT. 1145, 1152–55 (2008) (showing higher ammonia emissions from swine operation that utilized open hog lagoon).

[30] Viney P. Aneja, Ammonia Emissions from North Carolina Hog Operations' Animal Waste Management Systems to Produce Biogas, 1, 4 (Jan. 20, 2022) (Exhibit 13).

The removal of carbon from a digester makes the remaining nitrogen and phosphorus in the digester waste more soluble[31] and decreases dry matter in the waste[32] both of which can increase the ability of pollutants to infiltrate soil and contaminate groundwater. As a result, a leak or overflow from a lagoon storing digester waste can be even more devastating for the environment than a leak or overflow from a conventional lagoon.

The heightened risk of water pollution persists when, after being stored in the secondary lagoons, the digester waste is sprayed on nearby fields. When the waste is sprayed from high pressure hoses—the most common land-application method used on hog operations in North Carolina—more ammonia volatilizes and enters the atmosphere, where it compromises local air quality, drives particulate matter formation, and ultimately deposits in nearby waterways as nitrogen or nitrate.[33] Once the digester waste reaches the ground, the risks of increased soil infiltration and runoff of nitrogen and phosphorus due to reduced dry matter[34] and more soluble nitrogen and phosphorus persists.[35]

Due to the nature of this general permit, these harms will be more pronounced. The Digester General Permit opens a one-size-fits all, direct pathway for digester construction and operation, with very little consideration of the particularities or location of each operation. While industry is likely to target larger, finishing operations,[36] the general permit does not bar any operation with coverage under the existing swine animal waste general permit from receiving coverage under the Digester General Permit. Therefore, the Digester General Permit opens the door to the same harms detailed in the original complaint on a vastly greater scale by potentially authorizing the construction and operation of digester systems at more than 2,000 hog operations, most of which are in eastern North Carolina.

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[31] USDA NAT. RES. CONSERVATION SERV., CONSERVATION PRACTICE STANDARD: ANAEROBIC DIGESTER, at 366-CPS-6 (2017), https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1254996.pdf ("Land application of digester effluent, compared with fresh manure, may have a higher risk for both ground and surface water quality problems."); RICHARD BAINES, REDUCING GREENHOUSE GAS EMISSIONS FROM LIVESTOCK PRODUCTION 171 (2020) ("During the [anaerobic digestion] process, livestock and poultry manure are decomposed through the action of microorganisms into biogas slurry containing proteins, amino acids and other water-soluble substances.").

[32] BAINES, *supra* note 31, at 145 ("Due to the reduced [dry matter] content, biogas slurry can infiltrate more rapidly into the soil[.]").

[33] *See* Viney P. Aneja et al., *Characterization of Atmospheric Ammonia Emissions from Swine Waste Storage and Treatment Lagoons*, 105 J. GEOPHYSICAL RSCH. 11,535, 11,535-36, 11543 (2000); John T. Walker et al., *Atmospheric Transport and Wet Deposition of Ammonia in North Carolina*, 34 ATMOSPHERIC ENV'T 3407, 3416-17 (2000) (correlating increased ammonia emissions with the increased in the number of local swine operations).

[34] BAINES, *supra* note 31, at 145.

[35] *See* Comments on Draft Digester General Permit, supra note 11, at 29-32.

[36] *See* Press Release, *supra* note 27.

B. Disproportionate Harm Expected for Communities of Color

The disproportionate burden of pollution shouldered by Black, Latino and Native American families living around industrial hog operations in North Carolina is well documented.[37] To date, DEQ's approach to permitting digesters at hog operations has disproportionately impacted communities of color as well as low-wealth communities, making this a significant environmental justice issue. At a special meeting in fall 2021 regarding pollution and adverse health outcomes affecting families living near hog operations in eastern North Carolina and ahead of DEQ's permitting process for the Digester General Permit, members of DEQ's Environmental Justice & Equity Advisory Board adopted a strongly worded recommendation expressing "significant concerns about the pollution and public health implications of this general permitting scheme" and requesting DEQ to "take steps to protect . . . families, their health, and the environment."[38] DEQ ignored these recommendations altogether when issuing the Digester General Permit.

An independent analysis of DEQ's permitting of hog operations with digesters as of May 2022 (see Table 1 below) indicates that the facilities operating under individual biogas permits located in predominantly white, more affluent communities each employ animal waste management systems that are significantly more protective of the environment and local communities than those used by facilities located in and around majority Black, Latino, and Native American communities and communities with higher poverty levels.[39] Not only are biogas producing hog operations disproportionately sited in and around communities of color and low-wealth communities, but the facilities in and around these communities pollute more than those sited in whiter, more affluent communities.[40]

[37] *See, e.g.*, Letter from Marianne Engelman Lado, Earthjustice, to Gina McCarthy, EPA at 34–41 (Sept. 3, 2014), https://earthjustice.org/sites/default/files/files/North-Carolina-EJ-Network-et-al-Complaint-under-Title-VI.pdf.
[38] Letter from N.C. Env't Just. Equity Advisory Bd. to Sec'y Elizabeth Biser, N.C. Dep't of Env't Quality (Oct. 22, 2021), https://deq.nc.gov/media/25052/open (Exhibit 14).
[39] *See supra* note 28; *see also* Table 1. In Table 1, green highlighting indicates that a facility uses some combination of nitrification/denitrification, covered secondary lagoons, and other pollution-reduction technologies.
[40] *See* Comments on Draft Digester General Permit, *supra* note 11, at 46-50.

Table 1. SELC Analysis of "Potentially Underserved Communities"			
Permit Number	**Percentage of population within 3 miles made up of people of color[41]**	**Poverty rate[42]**	**Name of Facility**
AWI090025	32%	9%	Storms Farm Waste to Energy Digester Facilities
AWI310015	70%	24%	Magnolia III, DM Section 4 Sites 1-4, Section 3 Sites 4-5
AWI310017	70%	24%	DM Farms Sec 2 Sites 1-4
AWI310035	66%	23%	Waters Farm 1-5 M&M Rivenbark
AWI310039	50%	27%	Benson Farm
AWI310048	69%	25%	Stockinghead Creek Farm, LLC Farm
AWI310077	59%	21%	Circle K Farm I & II
AWI310082	51%	21%	Vestal I&II Farm
AWI430029	40%	14%	W. Thomas Butler Farms, LLC
AWI820466	53%	17%	Farm 2037 and 2038
AWI960067	30%	17%	White Oaks Farm Inc
AWI990031	18%	13%	Loyd Ray Farms, Inc.
AWS310014	77%	24%	DM Farms Sec 3 Sites 1-3, Wendy 3-8
AWS820005	69%	23%	Kilpatrick Farm 1, 2, 4 & 5 & Merritt Farm
AWS820077	57%	23%	Magnolia 4, Melville I & II, DELL, DM Section 1 Site 4

DEQ's own Environmental Justice Report for the Digester General Permit showed that the five North Carolina counties with the highest number of hog operations per square mile have higher percentages of nonwhite and Hispanic or Latino populations compared to the state.[43] With the overwhelming majority of industrial hog operations being located in just a few counties, if even a small percentage of these operations seek coverage under the Digester General

[41] Statewide, the total percentage of people of color is 39.5 percent; highlighting in Table 1 indicates percentage of people of color is 50 percent or greater. *See* Draft Environmental Justice Report, N.C. Dep't of Env't Quality, at 5 (Feb. 2, 2022), https://deq.nc.gov/media/27116/download?attachment.

[42] The state-wide poverty rate is 14.7 percent; highlighting in Table 1 indicates a poverty rate of five percent or more above the state rate or over 20 percent. *Id.*

[43] N.C. DEP'T OF ENV'T QUALITY, ENVIRONMENTAL JUSTICE REPORT: BIOGAS DIGESTER GENERAL PERMIT DEVELOPMENT 10 (June 30, 2022) [hereinafter EJ Report], https://deq.nc.gov/media/30369/download?attachment (Exhibit 15).

Permit, Black, Latino and Native American families are likely to be disproportionately impacted.[44]

C. DEQ Failed to Consider These Harms in Issuing the Digester General Permit

In issuing the Digester General Permit, DEQ failed to act in accordance with its obligations under Title VI. While DEQ did publish an environmental justice report, that report did not evaluate many other metrics, including for example the presence of other polluting industries in eastern North Carolina, nor did it appear to influence DEQ's permitting decision; DEQ provided no additional safeguards in the permit to ensure that communities protected under Title VI are not disproportionately impacted by the permit.[45] Further, DEQ did not acknowledge, much less respond, to Complainants' comments about the disparate permitting of hog operations in white communities versus permitting of hog operations in communities of color.[46] And despite being on notice of the pending investigation of the 2021 complaint and past enforcement action regarding DEQ's permitting of hog operations, DEQ did not include conditions in the permit necessary to protect nearby communities and the environment.

Complaints submitted written comments to DEQ detailing the potential Title VI violations associated with the Digester General Permit.[47] DEQ responded that it "operates a robust nondiscrimination program that complies with EPA's Title VI regulations."[48] DEQ further stated that it is "monitoring the national landscape of the discussion and guidance around cumulative impact scoring, including what other states are implementing, and engaging in discussions with EPA staff regarding the anticipated release of cumulative impact analysis guidance documents by the end of 2022."[49] DEQ made no changes to the final permit based on these comments.[50]

Commenters, including Complainants, also raised concerns to DEQ about the cumulative impacts and environmental injustices associated with the Digester General Permit.[51] Completely ignoring evidence of ongoing impacts to surface waters and air quality from industrial hog operations,[52] DEQ responded that because permitted operations cannot discharge to surface waters, the Digester General Permit "do[es] not increase the potential for impacts to surface

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[44] *See id.*
[45] *Id.* at 15-16.
[46] *See* Hearing Officer's Report and Response to Public Comments for the Issuance of the State General Permits for Farm Digester Systems on Animal Feeding Operation 12–16 (June 30, 2022) (Exhibit 16) [hereinafter Hearing Officer's Report], https://deq.nc.gov/media/30387/download?attachment.
[47] Comments on Draft Digester General Permit, *supra* note 11, at 53–56, 71–74.
[48] Hearing Officer's Report, *supra* note 46, at 15–16.
[49] *Id.* at 16.
[50] *Id.*
[51] *Id.* at 15 – 16.
[52] Comments on Draft Digester General Permit, *supra* note 11, at 28–33.

water and groundwater."[53] DEQ claims that prohibiting discharges to waterways "ensure[s] protection of human health and the environment, regardless of race, color or national origin."[54] This response is unmoored to the facts on the ground and the best available science and ignores DEQ's mandatory obligations under Title VI of the Civil Rights Act.

V. Relief Requested

Complainants request that DEQ's actions and impacts from issuance of the Digester General Permit be included and considered during the informal resolution process and further investigation into this matter.

VI. Conclusion

For all the reasons outlined above, Complainants request that OECRC bring DEQ into compliance with Title VI of the Civil Rights Act of 1964 and EPA's implementing regulations.

Thank you for your consideration of this additional information. We look forward to continuing discussions with OECRC regarding this matter.

Sincerely,

Blakely E. Hildebrand

Blakely E. Hildebrand
Senior Attorney

[53] Hearing Officer's Report, *supra* note 46, at 15.
[54] *Id.* at 16.

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https://www.wsj.com/articles/californias-green-energy-subsidies-spur-a-gold-rush-in-cow-manure-11645279200

BUSINESS

California's Green-Energy Subsidies Spur a Gold Rush in Cow Manure

A lucrative state incentive to make natural gas from dairy waste is attracting companies from Amazon to Chevron

By Phred Dvorak Follow *Photographs by Jennifer Emerling for The Wall Street Journal*

Feb. 19, 2022 9:00 am ET

Clean Energy Fuels Corp., CLNE **-3.88%** ▼ a major distributor of natural gas made from waste, found a way to boost its earnings by millions of dollars, virtually overnight.

All it had to do was switch the main biofuel it supplies to power cars and trucks in California—currently a type of natural gas produced with methane emissions from garbage—to a chemically identical gas produced from the manure of cows.

California's clean-fuels grading system gives cow-poop gas a much better score—and much higher subsidies—than landfill gas. So that simple substitution could net Clean Energy an additional $70 million in earnings before interest, taxes, depreciation and amortization by 2026, the company estimates.

Together with European energy giants BP PLC and TotalEnergies SE, Clean Energy is pouring hundreds of millions of dollars into gas production on dairy farms to milk that advantage. A host of developers, financiers and carbon-conscious corporations, from Chevron Corp. to Amazon.com Inc., AMZN **1.41%** ▲ are looking to buy or produce the fuel as well.

"It is like magic," said Andrew Littlefair, Clean Energy's president and chief executive, of the projected earnings boost.

The surging interest in dairy renewable natural gas, as it is called, shows how incentives can spur action to address the emissions linked to climate change—and sometimes unintended consequences as well. Until a few years ago, the gas, which is interchangeable with conventional natural gas and can replace dirtier fuels like diesel, was a niche product that was too expensive to make commercially.

Now, California's generous subsidies have prompted what some observers are dubbing a manure gold rush. One developer said he showed up at a dairy only to discover that the farmer had gotten more than 10 pitches for business tie-ups already. Others said competition for business has gotten so heated that some developers are promising to pay farmers a fixed amount per cow—a risky setup if the price of the California credits plummets.



David Ribiero, co-owner of Rib-Arrow Dairy in central California, said methane sales have finally become economically feasible.

Driving the boom is California's Low-Carbon Fuel Standard. The standard requires companies that sell transportation fuels in the state to lower their products' carbon intensity—the

carbon dioxide emitted during manufacture, distribution and consumption. Companies that exceed the carbon-intensity maximums have to buy offset credits, each of which represents a metric ton of emissions. Those with low-scoring fuels generate credits, whose price goes up and down depending on demand.

The lowest carbon-intensity scores go to fuels that keep warming gases out of the air—particularly methane, a greenhouse gas that can be 84 times more potent in trapping heat than carbon dioxide, according to the Intergovernmental Panel on Climate Change, the scientific group that helps the United Nations evaluate the state of research on the issue.

Other waste sources such as landfills produce methane, too. But California already requires landfills to curb methane emissions while farms don't have to, and thus they emit more. So capturing the methane from decomposing manure at dairies to make truck fuel cuts net emissions a lot, and reaps some of the best scores of all.

U.S. regulators haven't generally imposed controls on methane emissions from livestock, since they are tough to implement and politically sensitive.

California Bioenergy LLC, which develops projects to make energy out of manure, in 2016 received the first provisional carbon-intensity score—around negative 270—for a dairy-gas facility. Diesel by comparison has an average carbon-intensity score of more than 100. CalBio, as it is known, now has 41 dairy-gas projects in operation and another 60-odd projects in development.

Its latest project to go online is the 1,500-cow Rib-Arrow Dairy in central California, where manure is now flushed from the floor of the stalls into a covered lagoon, called a digester, so the methane can be collected for processing rather than released into the air. That raw biogas, which is around 60% methane and the remainder mostly carbon dioxide, is piped to a central facility that collects gas from a cluster of dairies in the area and purifies it for injection into the local utility's pipeline.

David Ribeiro, a third-generation co-owner of Rib-Arrow, said he had been approached by digester salesmen before, but that adding the gas sales to the environmental benefits finally made everything economically feasible: "We're like, 'Wow, this makes sense.'"

There are 116 such facilities currently operating in the U.S.—more than half of which went online last year—and another 121 planned or in construction, according to the Coalition for Renewable Natural Gas, a nonprofit that promotes gas made from waste. Analysts say

thousands more dairies could support such plants, which can reduce foul odors in addition to capturing emissions.

The market is likely to remain small compared with the U.S.'s overall appetite for natural gas in homes, businesses and transport. Even in an optimistic scenario, biogas from manure would supply only around 3% of today's demand by 2040, according to a 2019 study commissioned by the American Gas Foundation.

Still, money is pouring in from big companies looking to lower their carbon footprints quickly —as well as entrepreneurs smelling a business opportunity. Clean Energy said it is working on more than a billion dollars worth of deals through its dairy-gas joint ventures with BP and Total, and that it hopes to channel more than $2 billion in investment by 2026.

California-based Chevron has committed around $500 million to develop renewable natural-gas supply, starting with dairies. A Chevron investor presentation in September showed plans for a national network of as many as "190,000 milking cow equivalents" and forecast double-digit returns. Amazon has inked a deal with Clean Energy to buy biogas for its massive trucking fleet; it declined to comment.



At a California Bioenergy plant, methane is separated from carbon dioxide before it is injected into a local utility's pipeline.



The entire separation process happens over the course of a minute.

More than half of California's methane is released from dairy and livestock manure, and by cow burps. The state has vowed to lower greenhouse gas emissions by 40% compared with

1990 levels by 2030, and it is focusing on methane reductions in particular. It is also targeting a 20% reduction in the carbon intensity of its transportation fuel relative to 2010, and has so far managed to cut it by more than 7%.

“From our perspective, the program is working to drive private investment” to accomplish the state’s environmental goals, said Matthew Botill, the division chief at California’s Air Resources Board who oversees the state’s low-carbon fuel standard and other climate change programs.

California officials said the program doesn’t cost the state money because its market-based mechanism results in producers and consumers of higher-carbon fuels effectively paying the incentives to the producers and consumers of low-carbon fuels.

Oregon and the Canadian province of British Columbia are implementing similar fuel standards, and a number of other states are considering them, too. The federal government issues its own, less-lucrative, subsidies for low-carbon fuels.

California’s aggressive incentive system is producing some odd results. One dairy that was already using digesters to collect methane and produce electricity from its manure—the 35,000-cow Threemile Canyon Farms in Oregon—got a relatively high carbon-intensity score of negative 189 when it shifted to making gas for California, since it had fewer emissions to reduce.

“The manure management practices on the farm were so good…that they were penalized a bit,” said Ben Vitale, CEO of Resilient Infrastructure Group, which owns Threemile’s gas plant.

Financiers at Cresta Fund Management, a Texas-based private-equity fund that has two renewable natural gas producers in its portfolio, said they have seen an increasing number of entrepreneurs with little experience in the area trying to raise money for dairy-gas projects.

“We had some authors pitch us,” said John Skrinar, Cresta’s director of sustainable investments. “The reality is, it’s a lot more complicated than just show up, put a swimming pool in the ground, shovel a bunch of cow manure into it, and make a fortune.”



At Rib-Arrow Dairy, water used in the methane-capture process is stored in this lagoon. The water will eventually be used for cow feed and fertilizer.

Write to Phred Dvorak at phred.dvorak@wsj.com

Appeared in the February 22, 2022, print edition as 'California Green Subsidies Boost New Biofuel'.

FALSE PROMISES and HIDDEN IMPACTS of DAIRY DIGESTERS

The Basics

Dairy digesters are facilities that create biogas, also known as biomethane, from wet manure from large, confined animal feeding operations (CAFOs). The gas is then injected into pipelines or, possibly, used as transportation fuel. Biomethane is not clean; burning manure-produced gas emits the same air contaminants as the combustion of fossil fuel, and releases other harmful pollutants into the air and water that are unique to factory farms.

False Promises

Dairy digesters are the only option to deal with the methane released from wet manure in dairy operations.

REALITY: Dry manure management techniques and other alternative practices can prevent the creation of methane.

Dairy digesters are addressing the full scope of greenhouse gas emissions from dairies.

REALITY: Dairy digesters do nothing to address enteric (intestinal) methane emissions from cows, or other GHG emissions from dairies.

Dairy digesters are accessible to small dairies, and helping them thrive..

REALITY: Only large dairies can provide enough manure to make adopting digester technology worthwhile, allowing big dairy to only get bigger.

Who's Paying the Price?

Community and environmental impacts: CAFOs produce serious environmental impacts, particularly in nearby communities, by contaminating groundwater, emitting air contaminants beyond methane, attracting heavy-duty truck traffic and producing odors. These pollution, public health, and social equity effects fall especially on disadvantaged rural communities.

Unintended consequences: Increased funding for dairy digesters is likely to exacerbate these problems by incentivizing even larger dairy operations, and in effect, bigger herd sizes and higher concentrations of cows that produce more harmful methane.

Manure Pit, or Money Pit?: Despite hundreds of millions of dollars in grant funds to support digester development and operations, dairy digester proponents themselves note the need for continued grants and rate-payer subsidies to sustain the industry.

Whose cash cow?

Only two digester developers (California Bioenergy & Maas Energy Works) have received 100% of the <$110 million from CDFA's digester program in 2017 & 2018. Plus, Maas and CalBio received 95.5% of $319 million from the CPUC for six digester cluster projects. CalBio gets another $26.5 million in loans for digesters from the Aliso Canyon Settlement.

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NORTH CAROLINA

‘Really terrible science experiment’ leads to weeks-long spill from NC hog-waste lagoon

BY ADAM WAGNER
UPDATED SEPTEMBER 06, 2022 2:11 PM

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White Oak Farms in Fremont, NC operates an anaerobic digester that turns hog waste and parts into electricity for sale to Duke Energy. In May, it ruptured, sending thousands of gallons of gray slurry across the farm and toward nearby Nahunta Swamp. BY KEVIN KEISTER

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FREMONT

The state inspector knew immediately there was trouble at White Oak Farms.

When she visited the Wayne County farm on Feb. 3, the N.C. Department of Environmental Quality inspector saw a thick layer of hay laden with charcoal-colored foam in a ditch. That foam seemed to have oozed from under a black tarp covering a hog waste lagoon where manure was combined with unusual ingredients like liquified hog carcasses and discarded hot dogs and deli meat in a slurry to generate methane.

The farm's owners, including a former member of the National Pork Board, had not reported a spill.

In a notice of violation dated Feb. 18, two weeks after the inspection, David May, a supervisor in DEQ's Washington Regional Office, wrote that the inspector couldn't tell how deep the foam was. But, May wrote, "the inspector stepped in that area sinking at least 4 inches on the edge."

White Oak Farms' problems were just beginning.

Four months later, on May 30, the black cover ruptured, sending an estimated three million gallons of the gelatinous gray foam across the farm and toward nearby

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reached wetlands.



An anaerobic digester on White Oak Farms in Fremont, N.C., tore on May 30, sending foam across the property. This photo, taken by N.C. Department of Environmental Quality staff, shows foam about half-way up a propane tank. *N.C. Department of Environmental Quality*

Environmental advocates learned about the spill by chance.

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finalizing a permit making it easier for anaerobic digesters to get environmental approval and easier for farmers to install them.

Riverkeepers argue that DEQ's regulation of White Oak Farms shows the department is not prepared for a potentially exponential increase of digesters on North Carolina's hog farms.

They learned about the White Oaks Farms spill on Aug. 3, more than two months after it began, when Sound Rivers' Neuse Riverkeeper Samantha Krop flew over the facility. Krop saw that the black bubble that was supposed to be capturing gas appeared deflated, with water pooled across its surface.

Krop also noticed that there was no vegetation around the lagoon and that it looked like dirt had been moved around southeast of the digester, where the property borders Nahunta Swamp.

"It just didn't look right," Krop said. "It didn't look like they were functioning properly."

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An anaerobic digester on White Oak Farms in Fremont, N.C., split open in late May, sending foam oozing out for at least three weeks. Shown here on August 3, the farm mixed hog waste with deli meat, hot dogs and liquified pig carcasses to generate methane in the digester. Samantha Krop *Sound Rivers*

'ONE REALLY TERRIBLE SCIENCE EXPERIMENT'

The Feb. 3 inspection focused on the covered lagoon, a system called an anaerobic digester.

Farmers pump manure and other unwanted material into the lagoon, where it decomposes, releasing methane and other gases. Digesters capture those gases, particularly methane, and use them to produce electricity or purified natural gas.

In recent years, agricultural groups and environmentalists have debated the use of anaerobic digesters in North Carolina.

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permit allowing most future digesters to move quickly through the environmental approval process.

The N.C. Pork Council and other agricultural interests argue that covering waste lagoons reduces odor and prevents emissions of methane, a potent greenhouse gas. They also offer farmers a revenue stream.

In a written statement, Roy Lee Lindsey, the Pork Council's CEO, said, "Digesters are a safe and proven technology that provide significant environmental benefits. While this situation was unfortunate, it is an isolated incident and should not discourage us from continuing to pursue renewable natural gas projects in North Carolina."

Environmental groups argue that digesters effectively lock in what they call a primitive waste management system in which hog manure and urine are washed into lagoons before being sprayed across nearby fields. The White Oak Farms spill demonstrates the risks digesters pose, said Blakely Hildebrand, a senior attorney at the Southern Environmental Law Center.

"It goes to show that these digester systems aren't the environmental, climate silver bullet that the hog industry has painted them to be," Hildebrand said.

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revealed publicly that staff had been monitoring an active digester spill.



That general permit would not have covered White Oak Farms' digester. It only covers systems that process hog manure and urine, said Anna Gurney, a DEQ spokeswoman, not those that add other things into the slurry like White Oak Farms' liquid pig carcasses, cast-off hot dogs and deli meat.

Despite the digester debate, almost nobody knew a North Carolina hog operation was already operating by adding hogs and meat products to the manure under its black plastic balloon.

"We have never heard of this before. We started asking around and nobody else in the environmental advocate world that we're in has heard of this, either," Jill Howell, the Pamlico-Tar riverkeeper, told The News & Observer.

Howell continued, "It just all seems very strange and like one really terrible science experiment."

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A N.C. Department of Environmental Quality inspector holds a handful of the foam that spilled May 30 from an anaerobic digester on White Oak Farms in Fremont, N.C. The farm was mixing hog manure, slurry made from dead hogs and cast-off deli meat in the digester to generate methane. *N.C. Department of Environmental Quality*

'THIS IS THE ULTIMATE RECYCLING'

Deborah and Todd Ballance started hog farming in 1990, first as contract growers. When Coharie Hog Farm folded in 2009, the Ballances bought the pigs on their farm and went independent.

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“Since the farm was built by my husband’s grandfather our family has always strived to look to the future in order to do what is best for our family, our animals, our community, and our environment,” Deborah Ballance wrote in an email to The News & Observer. “We believe strongly in being sustainable and that is why we covered our lagoon and captured the methane for electricity.”

The N.C. Pork Report, a N.C. Pork Council trade publication, profiled the Ballance family in 2017, shortly after then-U.S. Agriculture Secretary Sonny Perdue named Deborah Ballance to the National Pork Board.

The story says Deborah and Todd met in first grade and farm land passed down by Todd’s grandfather. It also discusses the possibilities their efforts to turn manure into energy offer.

Deborah Ballance told the Pork Report, “I think we basically reinvent ourselves every three years. You need to keep your ear to the ground and see what you need to be doing next or thinking about next, and that’s what we try to do.”

The Ballance family had long been exploring how to generate revenue from hog waste, according to decades of permitting documents reviewed by The News & Observer.

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fields. The farm planned to keep hog manure from reaching the lagoon and spread it on a field.

Evaluations were underway, the permit said, of compacting solid waste and using it as animal feed. A 1997 application said, “White Oak Farms is very confident that the waste will become suitable animal feed. When it is converted to animal feed it will no longer be land applied.”

In 2002, the farm said the manure capture system hadn’t worked as advertised and the equipment used to move liquid between lagoons had proven noisy and expensive to operate.

At that point, the farm was permitted to have 5,500 sows.

They wanted more hogs, but were limited by a moratorium on new or expanded hog operations the N.C. General Assembly made permanent in 2007 — a moratorium rooted in The News & Observer’s Pulitzer Prize-winning “Boss Hog” series that showed how a lack of regulation around the industry was leading to environmental threats near some farms.

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that 0.2% of the state's energy come from swine waste by 2018.

In 2013, White Oaks Farms asked DEQ: Could it add 60,000 hogs as long as it added an anaerobic digester, controlling odor, groundwater contamination and other environmental impacts?

“Despite a moratorium in place in North Carolina on new hog farm construction, we found the ideal way to expand with finishing floors. We could build a methane digester and sell power to the power company,” the Ballance family wrote in a 2017 USDA loan application.

Electricity generated by White Oak Farms could power about 3,000 homes on Duke Energy’s grid, according to the application.

“We will take our hog waste and mortality and use it as fuel! This is the ultimate recycling,” the Ballances wrote.

DEQ approved the permit in October 2013. In later permits, the regulatory agency would require the Ballances to expand in phases, starting with 15,000 hogs

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contaminants from seeping into soil or groundwater. The permit approved by DEQ in 2013 and again in 2017 says the 8.75-million gallon anaerobic digester is "earthen-lined."

"It's a very prescriptive standard," Hildebrand said. "These performance standards aren't vague."

The digester started operating in April 2019. Randy Wheeless, a Duke Energy spokesman, said the utility has bought power from White Oak Farms since 2019. Over that period, it has averaged enough electricity to power about 400 homes.

Energy generated by hog waste, Wheeless said, is more expensive than energy from solar farms or natural gas.

Wheeless said, "It's a premium product because there's just not that many facilities in a position to do that, and you still have a law in place in the state that says utilities shall buy or secure that type of power."

CHANGING SOURCES

In 2020, DEQ approved an updated permit limiting what could go into the digester each day. The farm could add swine waste, up to 20,000 pounds of food waste like hot dogs or deli meat from Smithfield's Kinston plant, and 210,000 pounds of dead pigs.

With that approval, the farm started adding the dead pigs in July 2020. They later reported the pigs caused significantly higher methane production.

Around the same time, the COVID-19 pandemic was impacting the farm's operation. Despite having permission to add as many as 15,000 hogs, the farm instead found itself operating with 100 sows at most.

That impacted the digester, too.

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In a year-end report, the Ballances wrote, “With swine production and processing decreasing industrywide, the facility has experienced a temporary change from a manure dominated digester feed source to primarily a food waste and mortality source.”

In other words, the farm was putting more dead pigs and cast-off meat into the digester than hog waste, despite its permit explicitly stating that manure should be the main additive.

The trend continued throughout 2021, with the number of hogs dwindling from 81 to 50.

Still, the digester was operating well on mostly dead pigs and unwanted meat. In 2021’s year-end report, the Ballance family wrote, “From an energy production standpoint, the facility experienced its best period to date.”

The farm submitted that report on Jan. 31, 2022. Three days later, the DEQ inspector found signs of the digester’s unreported spill.

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During a February inspection, a N.C. Department of Environmental Quality inspector found signs that a discharge of foam from an anaerobic digester on White Oak Farms had not been reported. Those signs included foam on top of the digester. *N.C. Department of Environmental Quality*

THE SPILL

The bubble burst in the middle of the night.

White Oak Farms' digester ruptured around 3 a.m. on May 30, according to a press release the farm sent to local newspapers.

Later, the farm would write that "an unexpectedly severe digester foaming event" started with a fissure on the northern face of the black plastic covering. That's also where the DEQ inspector identified the previous, unreported spill during her February inspection.

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A “thick foam” made of hog matter, liquid and gases gurgled out of the digester. According to the farm’s accounts, the foam ran across a field and reached a forest that contains wetlands.

The farm maintains none of the foam reached Nahunta Swamp on its southern boundary.

DEQ staff conducted several inspections over the ensuing weeks. On June 3, they saw foam on nearby surface water, possibly including Nahunta Swamp. That foam was cleaned up when staff returned on June 7.

The spill was still active on June 23, according to a notice of violation DEQ issued in July. That notice said DEQ staff had detected “objectionable” odors and air quality and saw foam coming out of concrete structures on the digester’s western edge.



The covering on a Wayne County lagoon broke open in late May, sending more than four swimming pools’ of foam across White Oak Farms in Fremont. The damaged anaerobic digester is shown here on August 3. Samantha Krop *Sound Rivers*

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But an N.C. State professor who studies anaerobic digesters said the dead hogs and cast-off meat could have played a role.

Adding materials containing fat, oil and grease to anaerobic digesters can significantly heighten biogas production, Mahmoud Sharara wrote in an email to The News & Observer. But at the same time, long chain fatty acids within the so-called FOG material can cause a layer of foam and crust to develop on top of the slurry.

Sharara, an agricultural and biological engineering professor, does not have first-hand knowledge of the White Oak Farms facility.

It is possible, Sharara added, that the higher levels of gas could have been incompatible with existing infrastructure like the generator or motor that processed the gas. Pressure could have built up underneath the cover, he wrote, ultimately causing the rupture and allowing the foam to spill out.

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began immediate cleanup. We have repaired our cover and complied with every requirement and suggestion made by DEQ. We will continue to consult with our engineer and scientific consultants to perfect our unique operation."

As of June 13, there were no hogs on White Oak Farms.

LINGERING QUESTIONS

After learning of the spill via Krop's flight, riverkeepers dug into the permit record. They were alarmed that they hadn't heard of the spill before and that the public notice requirements allowed White Oak Farms to report the spill without specific details.

"There was no reference to what was in the wastewater foam, there was no acknowledgment that it was swine waste or dead hogs or food waste product," Howell said. "It's like a bare, bare bones public notice."

North Carolina laws require any facility that spills more than 15,000 gallons of animal waste into the state's surface waters or wetlands to issue a press release in both the county where the spill happened and the county immediately downstream. That press release needs to say where and when the spill happened, how much waste was discharged, how long the spill went on and what the facility is doing to prevent further spills.

Hildebrand, of the Southern Environmental Law Center, said White Oak Farms followed the law, but that the law or DEQ should require information about a spill to be spread futher than a public notice in a local newspaper's classified section.

"Especially in this day and age. I think the law could be better, the requirements could and should be better around public notification," Hildebrand said, adding that DEQ is able to issue public notification itself or require operators that have spills to issue more widespread notification.

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Advocates also wonder whether DEQ can adequately regulate digesters, particularly considering Dominion Energy and Smithfield's joint $500 million Align RNG initiative that is already forging ahead in Duplin and Sampson counties.

With more digesters appearing likely to come online in the coming years, Howell and other advocates are concerned that DEQ field staff have not been specifically trained to inspect them.

Gurney, the DEQ spokesman, said the Division of Water Resources "will conduct additional training for regional inspectors as needed as facilities are covered by the Digester General Permit."

The department's field staff noted violations at White Oak Farms and issued notices of violation, including the one in February, but Howell argues that wasn't enough to convince the farm to correct the problems.

"DEQ's enforcement was insufficient in all of this," Howell said.

On July 5, DEQ issued another notice of violation against White Oak Farms. The department said the Ballance family's improper operation of the digester had resulted in the spill and impacts on nearby surface waters and wetlands.

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than 20,000 pounds of food waste on a given day, exceeding the amounts allowed in its permit. It noted that ammonia levels in wells between the digester and Nahunta Swamp were more than 12 times higher than the allowable concentration.

In response to DEQ, the Ballance family said they stopped adding new material to the digester “at least three weeks” before the spill happened.

The Ballance family also mentioned its plans to build another digester.

Ideally, they wrote, the manure and meat products that had spilled from the old digester could be pumped into the new one to “seed the digestion process.” The new digester would have a synthetic liner to protect groundwater, as well as a berm on its southern side to contain any future spills.

This story was produced with financial support from 1Earth Fund, in partnership with Journalism Funding Partners, as part of an independent journalism fellowship program. The N&O maintains full editorial control of the work.

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ADAM WAGNER

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Adam Wagner covers climate change and other environmental issues in North Carolina. His work is produced with financial support from the Hartfield Foundation and 1Earth Fund, in partnership with Journalism Funding Partners, as part of an independent journalism fellowship program. Wagner’s previous work at The News & Observer included coverage of the COVID-19 vaccine rollout and North Carolina’s recovery from recent hurricanes. He previously worked at the Wilmington StarNews.

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Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington







U.S. EPA Region 10
March 2013

ERRATA

Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington

In 2010, the U.S. Environmental Protection Agency (EPA) conducted a study to identify potential sources of nitrate contamination in groundwater and residential drinking water wells in the Lower Yakima Valley in central Washington State. EPA released a report on this study in September 2012, entitled "Relation Between Nitrate in Water Wells and Potential Sources in the Lower Yakima Valley, Washington" ("EPA 2012 Report"). The EPA 2012 Report was assigned document number EPA-910-12-003. Further review of the document identified errors in the report. Corrections to the EPA 2012 Report are summarized below and incorporated into this version of the document which has been assigned document number EPA-910-R-13-004. The page numbers below refer to the new document (EPA-910-R-13-004) and may vary slightly from the page number in the original version of the report (EPA-910-R-12-003).

ACKNOWLEDGEMENTS

Page xvi, third paragraph: During the public input period, David Tarkalson, PhD requested that his name and affiliation be removed from the final report. His name and affiliation were removed from the acknowledgements section.

Page xvi, third paragraph: Roger Burke, PhD of U.S. EPA's Office of Research and Development also provided an independent third party review of the EPA 2012 Report. His name has been added to the acknowledgements section.

EXECUTIVE SUMMARY

Page ES-3: The following was added to the end of the "Study Design" section.

> "A discussion of the quality assurance and quality control (QA/QC) procedures and a summary of the data validation process are presented in Appendix E. Uncertainties and limitations with analytical data were noted in Appendix E and described in detail in the data validation memoranda. Data usability is also indicated in the data summary tables by inclusion of data qualifiers."

Page ES-11, Table ES-1: Deleted "DVM" from the reference to the Sunny Dene Ranch.

SECTION I: INTRODUCTION

Page 1, 4th paragraph: The following revisions were made in response to comments made by the *Yakima Herald Republic* during the public input period and to correct the statement attributed to a letter from the *Yakima Herald Republic*:

> "According to the Herald, following the series, the reporter received a number of inquiries from citizens asking whether EPA could take action under the Safe Drinking Water Act (SDWA). These inquiries prompted the reporter to send a letter to EPA asking whether the agency would consider invoking emergency authority under Section 1431 of the SDWA to address the problem."

SECTION II: PURPOSE AND SCOPE

Page 2: The following sentence was added to the end of the second paragraph.

> "A data usability review and validation independent of the laboratories were conducted by EPA and are discussed in Appendix E."

SECTION VI: THREE STUDY PHASES

Page 15, Table 1: Deleted "DVM" from the reference to the Sunny Dene Ranch.

SECTION VII: PHASE 3: COMPOUNDS AND ANALYTICAL TECHNIQUES

Page 28: Inserted "δ" in several places.

SECTION VIII: QUALITY ASSURANCE AND QUALITY CONTROL

Page 29: In the fifth sentence, the word "is" was changed to "are".

SECTION IX: ANALYTICAL RESULTS AND DISCUSSION

Page 30: The following was added after the first full paragraph:

> "A data usability review and validation independent of the laboratories were conducted by EPA and are discussed in Appendix E. Data usability is indicated in the data summary tables by inclusion of data qualifiers. The data qualifiers are defined in the footnotes of the data summary tables and further explained in Appendix E. A discussion of data bias, where it could be determined, also is included in Appendix E."

Page 31: The following was added to the first paragraph:

> "A farm with 2500 dairy cattle is similar in waste load to a city of 411,000 people (EPA 2004). A difference lies in the fact that human waste is treated before discharge into the environment, but animal waste is either not treated at all or minimally treated before discharge into the environment (EPA 2004)."

Page 32: Replaced the first two full paragraphs with the following:

> "NRCS Washington recommends avoiding the use of "agricultural waste storage ponds" (lagoons), unless no reasonable alternative exists, at locations like the Haak Dairy where there is an aquifer that serves as a domestic water supply (NRCS Washington 2004). If no reasonable alternative exists, consideration should be given to the following: 1) a clay liner designed in accordance with procedures of Agricultural Waste Management Field Handbook Appendix 10D ("NRCS Appendix 10D") with a thickness and coefficient of permeability so that specific discharge is less than 1×10^{-6} cm/sec; 2) a flexible membrane liner over a clay liner; 3) a geosynthetic clay liner (GCL) flexible membrane liner; or 4) a concrete liner designed in accordance with slab on grade criteria for fabricated structures requiring water tightness."
>
> "EPA estimated the seepage from lagoons for the Haak Dairy using unit seepage rates from NRCS Appendix 10D and from a field study by Ham and DeSutter (Ham 2002). Lagoon design should consider unit seepage rates in addition to other factors such as state and local requirements and site-specific conditions (e.g., groundwater flow and depth to groundwater) (NRCS 2008). State regulations for specific discharge range from about 500 gallons per acre per day (1/56 inch or 0.45 mm per day) to about 6,800 gallons per acre per day (1/4 inch or 6.35 mm per day)

> (NRCS 2008). Applying a unit seepage rate of 500 gallons per acre per day to the surface area of the Haak Dairy lagoons equates to an approximate seepage volume of 1,080,000 gallons per year, the equivalent of about 1.6 volumes of an Olympic-size swimming pool annually (Table 7)."

Page 32, Table 7: Corrected the title of the third column to read: "Estimated Lagoon System Leakage, Based on Unit Seepage Rate of 500 Gallons per Acre per Day (gallons per year)" and a footnote (formerly footnote number 24) was deleted.

Page 33: Replaced the second paragraph with the following:

> "The seepage rate of 0.45 mm per day falls within the Ham and DeSutter range of 0.2 to 2.4 mm per day. Leakage rates for the Haak Dairy lagoons would likely be greater than the above estimates if the lagoons are unlined. If the lagoons are lined with a plastic liner, the actual leakage rates could be lower, although plastic liners can be punctured during construction and lagoon maintenance, especially during periodic dredging activities."

Page 43, first paragraph: The second sentence was modified as follows: "Total coliform, but not *E. coli* or fecal coliform, was detected in WW-04."

Page 44: Table 16 has been corrected to reflect that atrazine was not detected in WW-03.

Page 48, Table 18: Corrected the title of the third column to read: "Estimated Lagoon System Leakage, Based on Unit Seepage Rate of 500 Gallons per Acre per Day (gallons per year)" and a footnote (formerly footnote number 30) was deleted.

Page 48: Replaced the second paragraph with the following:

> "As discussed previously, the NRCS Washington recommends avoiding the use of "agricultural waste storage ponds" (lagoons), unless no reasonable alternative exists, at locations like the Dairy Cluster where there is an aquifer that serves as a domestic water supply (NRCS Washington 2004). Assuming the same unit seepage rate as for the Haak Dairy (500 gallons per acre per day), seepage volume at the Dairy Cluster is approximately 7,391,000 gallons per year. This is the equivalent volume of about 11 Olympic-size swimming pools annually."

Page 51: The second sentence in the first paragraph was corrected as follows: "Figures 11 and 15 show the sample locations for the Dairy Cluster."

Page 58, Table 22: Deleted the reference to WW-18 which is not associated with the Dairy Cluster.

Page 65, Table 26: Deleted "DVM" from the reference to the Sunny Dene Ranch.

Page 67, Table 29: Added the units of measure to the bentazon result for SO-11 so that it reads "38 ug/kg".

SECTION X: STUDY LIMITATIONS AND UNCERTAINTIES

Page 79: The following was added to this section.

> "A discussion of the QA/QC procedures and a summary of the data validation process are presented in Appendix E. Uncertainties and limitations with analytical data were noted in Appendix E and described in detail in the data validation memoranda. Data usability is also indicated in the data summary tables by inclusion of data qualifiers."

SECTION XII: REFERENCES

Page 88: Reference EPA 2010b has been corrected to read "Yakima Basin Nitrate Study Phase 3 – Comprehensive Analytical Source Tracer Sampling April 2010 Sampling Event. Quality Assurance Project Plan. EPA Region 10. April 8, 2010."

APPENDICES

Appendix C

Table C11: Deleted the "h" from the end of the word "anti-inflammatory" after the word "naproxen".

Tables C11, C12 and C14: The sample type designations were corrected for samples SO-11 through SO-16.

Appendix E, pages E-8 and E-9, Section 1: The following paragraphs were added.

> Microbial Source Tracking
>
> Microbial Source Tracking (MST) analysis was performed on nine lagoon and four wastewater treatment plant samples using a polymerase chain reaction (PCR) technique. All quality control measures passed including laboratory QC, sterility controls, and blank analyses. Samples were assessed on a present (P) / absent (A) basis for *Bacteroides* species with possible source identification of general *Bacteroides* (GB), human (H), ruminant (R), or both human and ruminant (H/R).
>
> Bacteria
>
> Twenty-one well water, six lagoon, and three wastewater treatment plant samples were analyzed for total coliform by Standard Method (SM) 9222B, fecal coliform by SM 9221E, and/or *E. coli* by SM 9221F. All quality control measures passed including holding time requirements, laboratory QC, sterility controls, and blank analyses. All lagoon and wastewater treatment samples were qualified estimated ("J") for *E. coli* as the method, SM 9221F, has not been approved for use under the Clean Water Act (CWA).

Appendix E, page E-13, Section 6: The second sentence in the third paragraph was revised by replacing "changed" with "replaced".

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ACRONYMS/ABBREVIATIONS

Ada – U.S. Environmental Protection Agency's Robert S. Kerr Environmental Research Center in Ada, Oklahoma

AOAC – Association of Analytical Communities

CARE – Community Action for a Renewed Environment

CFC – chlorofluorocarbon

CHHP – Center for Hispanic Health Promotion

DEHP – bis-(2-ethylhexyl) phthalate

DOH – Washington State Department of Health

DQO – data quality objective

Ecology – Washington State Department of Ecology

EJ – environmental justice

EPA – U.S. Environmental Protection Agency

FDA – U.S. Food and Drug Administration

GIS – Geographic Information System

GPS – Global Positioning System

"J" data qualifier – Compound was positively identified, but the associated numerical value is an estimate.

LG – dairy lagoon

MCL – maximum contaminant level

MDL – method detection limit

MEL – U.S. Environmental Protection Agency Manchester Environmental Laboratory

mg/L – milligrams per liter

MST – microbial source tracking

NCEC – Northwest Communities Education Center

NRCS – Natural Resources Conservation Service

ng/g – nanograms per gram

ng/L – nanograms per liter

N_2 – nitrogen gas

^{14}N– nitrogen 14

^{15}N – nitrogen 15

NH_4 – ammonium

NO_2^- – nitrite

NO_3^- – nitrate

ND – not detected

NS – not sampled

NMP – nutrient management plan

NWQL – USGS National Water Quality Laboratory

ORD – U.S. Environmental Protection Agency Office of Research and Development

PCB – polychlorinated biphenyls

ppm – parts per million

QA/QC – quality assurance/quality control

QAPP – Quality Assurance Project Plan

QC – quality control

"R" data qualifier – The data are unusable for all purposes

RARE – Regional Applied Research Effort

REDOX – oxidation/reduction potential

SDWA – Safe Drinking Water Act

SF_6 – sulfur hexafluoride

SMOW – Standard Mean Ocean Water

SOP – standard operating procedure

TKN – total Kjeldahl nitrogen

"U" data qualifier – The analyte was not detected at or above the reported result.

µg/kg – micrograms per kilogram

µg/L – microgram per liter

UG – upgradient

"UJ" data qualifier – The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in the sample.

UNL – University of Nebraska – Lincoln Water Sciences Laboratory

U.S.C. – United States Code

USDA – U.S. Department of Agriculture

USGS – U.S. Geological Survey

VIRE – Valley Institute for Research and Education

WSDA – Washington State Department of Agriculture

WW – water well

WWTP – wastewater treatment plant

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ACKNOWLEDGEMENTS

This report was initiated as part of an U.S. Environmental Protection Agency (EPA) Regionally Applied Research Effort (RARE) project with additional support from EPA's regional and national Office of Compliance and Enforcement, including the Environmental Justice Showcase Community pilot program.

The report was prepared by EPA Region 10's Office of Environmental Assessment with assistance from Region 10's Offices of Water and Watersheds, Regional Counsel, Ecosystems, Tribal, and Public Affairs, Compliance and Enforcement and EPA's National Risk Management Research Laboratory at the Robert S. Kerr Environmental Research Center in Ada, Oklahoma.

We would like to acknowledge the following individuals who provided an independent third party review of the report: Megan Young, PhD, U.S. Geological Survey; Stephen Kraemer, PhD, U.S. EPA Office of Research and Development; Roger Burke, PhD, U.S. EPA Office of Research and Development; and Lorraine Edmond, U.S. EPA Region 10.

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EXECUTIVE SUMMARY

Several investigations relating to nitrate contamination in the Lower Yakima Valley in Washington State have been conducted over the last 30 years. These studies have repeatedly shown nitrate levels in drinking water above the U.S. Environmental Protection Agency (EPA) maximum contaminant level (MCL) of 10 mg/L. Nitrate contamination in groundwater is primarily a health risk for rural populations who rely on private wells for drinking water.

From February through April 2010, EPA conducted sampling of drinking water wells and potential sources of nitrate contamination in the Lower Yakima Valley, which is in Yakima County in central Washington State. The Yakama Reservation composes a large percentage of the Lower Yakima Valley**.** EPA's effort entailed collecting over 331 samples from residential drinking water wells for nitrate and bacteria, and multi-parameter sampling on 29 water wells (26 residential drinking water wells and three dairy supply wells), 12 dairy lagoons (15 samples), 11 soil samples (five at dairy application fields and six at irrigated and fertilized crop fields[1]), five dairy manure pile samples, and three wastewater treatment plant (WWTP) influent samples. This report presents the results of these sampling efforts.

Purpose and Scope

The primary purpose of this study was to investigate the contribution from various land uses to the high nitrate levels in groundwater and residential drinking water wells, which is the predominant source of drinking water for many residents in the Lower Yakima Valley.

The study included sampling of residential drinking water wells, dairy supply water wells, and three sources of nitrate: dairies; irrigated cropland; and residential septic systems. In addition to nitrate and other forms of nitrogen, EPA analyzed samples for a variety of chemicals to evaluate whether chemicals other than nitrate can be used to identify likely sources of the nitrate contamination in the groundwater and drinking water wells.

EPA analyzed samples for chemicals that were expected to be associated with one or more of the sources. These included pharmaceuticals (both veterinary and human medications), personal care products, steroids and hormones, pesticides and herbicides, as well as other indicators of water quality such as total nitrogen and major ions such as chloride and calcium.

EPA also used microbial analysis to determine whether the water wells, lagoons and WWTP influent samples exhibited fecal contamination. If the samples were found to have fecal contamination, then microbial source tracking (MST) was performed to identify the source of the fecal contamination (in this case, human or ruminant). Isotopic analysis of water wells was conducted to identify the possible origin of the nitrate in water wells. Age dating analysis on the well samples was conducted to estimate the time since water infiltrated to the aquifer.

[1] In this report, "application field" refers to fields owned or leased by the dairies and "crop field" or "irrigated cropland" refers to fields owned or leased by other farmers. Both application fields and crop fields could receive applications of manure and/or synthetic fertilizer.

The Yakima Basin is a watershed of great diversity in climate, vegetation, and land use. More than 30 percent of the Yakima Basin is forested, 30 percent is sage-steppe rangeland, and 28 percent is in agricultural production (USGS 2009). This investigation focused on a portion of the Yakima Basin referred to as the Lower Yakima Valley**.** This broad valley is bounded by basalt ridgelines to the north and south, the Cascade Mountains to the west, and encompasses two counties (Yakima and Benton) and the million-acre Confederated Tribes and Bands of the Yakama Nation Reservation (Yakama Reservation). The study area includes portions of the Toppenish Basin (western area) and the Benton Basin (eastern area) along the Yakima River. Together, both areas cover approximately 368,600 acres within Yakima County. The Lower Yakima Valley is home to about 75,000 people, of which about one-third (24,000) use private, unregulated residential wells (Ecology 2010).

Background

Nitrate is an inorganic compound and a naturally occurring form of nitrogen. On a national scale nitrate is typically found in shallow groundwater at concentrations up to 1.1 mg/L (Nolan and Hitt 2003). Higher nitrate concentrations than this usually indicates that human activities have contributed additional nitrate to the groundwater. Nitrate is highly soluble in water and mobile in soil, which makes it relatively easy for nitrogen from a variety of point and non-point sources to move through the soil and into the groundwater as nitrate.

EPA has established a MCL for nitrate in drinking water of 10 mg/L under the Safe Drinking Water Act (SDWA). EPA regulates nitrate in public drinking water systems because nitrate concentrations greater than the MCL may cause health problems. Exposure to excess nitrate can result in methemoglobinemia (blue-baby syndrome) in infants and susceptible individuals, which can lead to death in extreme cases (Ward 2005). Some studies have shown a positive association between long-term exposure to nitrate in drinking water and risk of cancer and certain reproductive outcomes, while other studies have shown no association (Ward 2005).

Study Design

EPA designed a three-phased study. The purpose of Phase 1 was to identify the major sources of nitrogen in the study area, based on historical records and available information. During Phase 1 EPA combined information on land use with some simple calculations to estimate the amount of potential nitrogen available from several sources. The estimates indicate that three sources — livestock (primarily dairy cattle), irrigated cropland, and septic and biosolids — account for as much as 98 percent of the nitrogen available for application to the land (EPA 2012b). Livestock (primarily dairy cattle) account for about 65 percent, irrigated cropland for about 30 percent and septic and biosolids about 3 percent of the available nitrogen. The estimates do not account for losses of nitrogen from various biological, physical, and chemical processes and do not account for crop utilization. Based on the estimates developed in Phase 1, EPA focused the Phase 2 and 3 sampling on the three predominant sources: dairies; irrigated cropland; and residential septic systems.

The objectives of Phase 2 were to: (1) evaluate nitrate contamination of groundwater at locations downgradient of the three types of sources identified in Phase 1; (2) assist in identifying sampling locations for Phase 3 sampling; and (3) provide residents with information on the nitrate levels in their drinking water wells. EPA conducted Phase 2 sampling between February 22 and March 6, 2010. EPA

found that water from wells at 67 homes, about 20 percent of the wells sampled in Phase 2, exceeded the MCL of 10 mg/L for nitrate.

The results of Phases 1 and 2 were used in Phase 3 to identify residential drinking water wells with high nitrate concentrations and potential upgradient sources of nitrogen. Once these locations were identified, EPA collected and analyzed samples from the potential source areas and downgradient residential drinking water wells. EPA also collected and analyzed representative drinking water wells upgradient of the dairies (See Table ES-1). No drinking water wells upgradient of the crop fields or septic systems were sampled.

EPA analyzed samples for nearly 200 chemicals and used several analytical techniques to investigate the source of high levels of nitrate in water wells. The chemical analyses and analytical techniques were grouped as follows: general chemistry; microbial data; organic compounds; isotopic analysis; and age dating. The data for each of the analytical techniques were evaluated independently in an effort to identify the specific likely sources of the high nitrate concentrations found in residential drinking water wells (See Table ES-2). A discussion of the quality assurance and quality control (QA/QC) procedures and a summary of the data validation process are presented in Appendix E. Uncertainties and limitations with analytical data were noted in Appendix E and described in detail in the data validation memoranda. Data usability is also indicated in the data summary tables by inclusion of data qualifiers.

Phase 3 Study Limitations and Uncertainties

Several limitations in the study are important to note. First, water well samples were collected from existing wells. No new wells were installed for this study. Information on the depths and screened intervals of the water wells is known for about a third of the wells that were sampled. In this report, designations of upgradient and downgradient are based on regional groundwater flow data from the United States Geological Survey (USGS). Lack of complete well information limits our ability to verify if the wells upgradient and downgradient of the sources draw water from the same water bearing zone.

In addition, EPA lacks complete information regarding the dairies in this study. EPA requested information on specific aspects of the dairy operations and the physical setting; however, the dairies in this study did not provide this information. This information would have contributed to a more complete understanding of the dairy facilities, practices, and use of specific chemicals. It would have allowed EPA to provide actual values, or narrower ranges of estimates, for certain parameters in this report (for example, numbers of animals, quantities of nitrogen, estimates of lagoon leakage). EPA has, however, referenced general information regarding dairy operations, and specific information regarding the dairies in the Yakima Valley to the extent it was available.

Finally, EPA has limited information about the irrigated crop fields in this study. Verifiable, detailed crop production data, in terms of nutrients applied (the likely source of nitrate associated with irrigated crops), were not available and no irrigation data were available. EPA has included information about the crop fields to the extent it was available. In addition, the irrigated crop fields are surrounded by similar agricultural uses, and many are situated downgradient of dairies, making more difficult EPA's ability to discern the source of nitrate in drinking water wells downgradient of the irrigated crop fields.

Phase 3 Study Results

As stated previously, the primary purpose of the study was to investigate the contribution of various land uses to the high nitrate levels in groundwater and residential drinking water wells in the Lower Yakima Valley. The four main source areas sampled and the results of the sampling are discussed below.

Haak Dairy

The R&M Haak Dairy (Haak Dairy) is located in an agricultural area north of the Yakima River, about four miles north of the community of Sunnyside. EPA selected the Haak Dairy for this study because it generally met the criteria identified in the study plan for inclusion. Specifically, the dairy has a high concentration of animals per acre; Washington State Department of Agriculture (WSDA) inspectors noted in their reports for the Haak Dairy that elevated levels of nitrogen were detected in its application fields[2] in the past (WSDA 2012); it is located near the northern edge of cultivated land use and in a location with relatively few upgradient potential sources of nitrogen; and drinking water wells downgradient of the Haak Dairy showed levels of nitrate significantly above the MCL.

Several locations were sampled at the Haak Dairy during Phase 3: one dairy supply well; one dairy manure pile located on the dairy; two dairy lagoons; and one dairy application field. During Phase 3 EPA also resampled three of the residential drinking water wells downgradient of the Haak Dairy that exceeded the MCL during Phase 2, and one residential drinking water well upgradient of the Haak Dairy.

Based on data from the WSDA (WSDA 2010), EPA estimated that the Haak Dairy generates an estimated 84 to 210 tons of nitrogen per year after accounting for losses from volatilization and denitrification during storage.[3] Based on information from a field study by Ham and DeSutter (Ham 2002) and from the Natural Resources Conservation Service (NRCS) Agricultural Waste Management Field Handbook (NRCS 2008), EPA estimated that the Haak Dairy lagoons leak 482,000 to 5,873,000 gallons[4] of liquid waste per year into the underlying soils. The Dairy applies solid and liquid animal wastes to its application fields. WSDA inspectors documented that the Haak Dairy has also used inorganic fertilizer on its application fields (WSDA 2012).

Concentrations of total nitrogen increase in the direction of groundwater flow from the upgradient well to three residential drinking water wells downgradient of the Haak Dairy, with the highest concentrations detected in the dairy sources (lagoons, manure pile, and application field). The upgradient well was within the expected background concentration for nitrate.

The three residential drinking water wells downgradient of the Haak Dairy all have nitrate levels greater than EPA's MCL of 10 mg/L. Also, the concentration of six major ions (chloride, calcium, magnesium, potassium, sodium, and sulfate) show a pattern of increasing concentrations from the upgradient well to

[2] See footnote 1.

[3] The Washington State Department of Agriculture can only provide information on the number of animals at each dairy in ranges. Because of this, the estimated amount of nitrogen generated at the Haak Dairy is presented as a range. See Section IX.A for a more detailed discussion.

[4] The EPA estimates are presented in a range because the Ham 2002 study provided a range of lagoon leakage rates. See Section IX.A for a more detailed discussion.

the three downgradient residential wells, with the highest concentrations in the dairy sources (with the exception of sulfate which was not detected in two lagoon samples). Alkalinity and the metals barium and zinc show a similar pattern. Information on the construction and depth of the upgradient and one downgradient well would be helpful to provide additional certainty regarding the likely sources. However, review of the data suggests that the Haak Dairy is a likely source of the nitrate and major ions in the three downgradient residential drinking water wells. Inorganic fertilizer used on the Haak Dairy's application fields also could be a source of the nitrate observed in the downgradient wells.

Two pharmaceuticals, tetracycline and monensin, were detected in all the dairy source samples collected at the Haak Dairy, indicating that these compounds are used by the dairy. Tetracycline was detected in two of the three downgradient residential drinking water wells but not in the upgradient well, indicating the Haak Dairy is a likely source. Monensin was detected in the upgradient well and in the three downgradient residential drinking water wells, although the upgradient residential drinking water well had a higher concentration than two of the downgradient water wells. It is possible that the Haak Dairy is a source of the monensin detected in the downgradient residential drinking water wells. Given the presence of monensin in the upgradient well, another source of monensin is likely. Additional information that supports that the dairy may be a source of monensin is that it was not detected in samples collected from the WWTP influents that were collected as surrogates for rural septic systems.

The isotopic data provide strong evidence that animal (human or non-human) waste is the likely dominant source of the nitrate contamination in at least one of the residential wells downgradient of the Haak Dairy. However, since isotopic analysis alone cannot differentiate between human and non-human waste, both could be sources of the nitrate in this downgradient well.

Several compounds that tend to be less mobile in groundwater than nitrate and some of the major ions were detected in Haak Dairy lagoon, manure pile, and application field samples, but not detected in the downgradient water wells (for example, trace organics and hormones). Fecal coliform was not detected in any of the wells downgradient of the Haak Dairy.

Dairy Cluster

The "Dairy Cluster" refers to a group of dairies, including George DeRuyter & Son Dairy, D and A Dairy, Cow Palace 1 and 2, Liberty Dairy, and Bosma Dairy, situated north of the Yakima River. The Dairy Cluster is located about 2 miles north of the town of Liberty, near the northern edge of the irrigated area in the Yakima Valley. The facilities generally consist of cow pens, milking parlors, animal waste lagoons, and animal waste application fields.[5] Irrigation ditches run through the dairy properties.

EPA selected these dairies for this study because they generally met the criteria identified in the study plan for inclusion. Specifically, the Dairy Cluster has; a high concentration of animals per acre; WSDA inspectors noted in their reports for the Dairy Cluster that elevated levels of nitrogen were detected in its application fields in the past (WSDA 2012); the dairies are located near the northern edge of cultivated

[5] See footnote 1.

land in the Lower Yakima Valley with relatively few upgradient potential sources of nitrogen; and drinking water wells downgradient of the dairies showed levels of nitrate significantly above the MCL.

Several locations were sampled in the Dairy Cluster during Phase 3: three dairy supply wells; four dairy manure piles; ten dairy lagoons; and four dairy application field samples. During Phase 3, EPA also sampled eight downgradient residential drinking water wells that were found to exceed the MCL for nitrate during Phase 2, and one upgradient residential drinking water well.[6]

Based on data from the Washington State Department of Agriculture (WSDA 2010), EPA estimated that the Dairy Cluster generates more than 2,055 tons of nitrogen per year after accounting for losses from volatilization and denitrification. Based on information from a field study by Ham and DeSutter (Ham 2002) and from the NRCS Agricultural Waste Management Field Handbook (NRCS 2008), EPA estimated that the Dairy Cluster lagoons leak between 3,330,000 and 39,600,000 gallons[7] of liquid lagoon waste per year into the underlying soils. All the dairies in the Dairy Cluster apply animal wastes as fertilizer onto application fields that they own or lease according to WSDA inspection reports (WSDA 2012). The dairies, (except for Cow Palace) also reported using synthetic fertilizer on some of their application fields.

Similar to the Haak Dairy, the results from the sampling indicate that the concentration of total nitrogen increases in the direction of groundwater flow from the upgradient well to the downgradient residential drinking water wells, with the highest concentrations detected in the dairy sources.[8] The nitrate concentrations in the residential drinking water wells downgradient of the Dairy Cluster, with the exception of one unusually deep residential drinking water well, have nitrate levels greater than the EPA MCL. The concentrations of five major ions, especially calcium and chloride, increase between the upgradient well and the downgradient residential drinking water well, with the highest concentrations in the dairy sources. Alkalinity and barium show a similar pattern. The relatively young water in the upgradient well that EPA sampled in Phase 3 suggests that it is a shallow well.

As with the Haak Dairy, information on the construction and depth of the upgradient well and five of the downgradient water wells sampled during Phase 3 would be helpful to clarify the contribution of sources to the increased concentrations measured in the downgradient wells. However, the information presented above indicates that the Dairy Cluster is a likely source of the nitrate, major ions, and other substances in the downgradient residential drinking water wells.

The pharmaceuticals tetracycline and monensin were detected in all but one of the dairy source samples, which indicate they are used by the dairies in the Dairy Cluster. Tetracycline was detected in two of the downgradient residential drinking water wells, two dairy supply wells, dairy lagoons, manure piles and application fields. The concentration of tetracycline found in the upgradient residential well was similar

[6] The results for samples that EPA collected during Phase 2 from other wells located upgradient of the Dairy Cluster were also below the MCL for nitrate. Those data are included in this report in Table C1 in Appendix C (sample locations WW-22103 and WW-22085).

[7] The EPA estimates are presented in a range because the Ham 2002 study provided a range of lagoon leakage rates. See Section IX.B for a more detailed discussion.

[8] See footnote 6.

to the concentrations detected in two of the downgradient residential wells. The dairies are a possible source of the tetracycline in the downgradient wells. However, given the concentration in the upgradient well, another source of tetracycline likely exists.

Monensin was detected in two of the downgradient residential drinking water wells, two dairy supply wells, dairy lagoons, manure piles and application fields. The Dairy Cluster is a likely source of monensin because this antibiotic is used in dairy cows but not by people. Monensin was not detected in samples from the WWTP influents which were collected as surrogates for residential septic systems, further supporting that the dairies are the likely source.

The hormone testosterone was detected in downgradient residential drinking water wells and dairy sources. The concentration of testosterone found in the upgradient residential drinking water well is similar to the concentrations detected in the downgradient water wells. The dairies are a possible source of the testosterone in the downgradient wells; however, given the concentration in the upgradient well, another source of testosterone is likely.

The isotopic data provide strong evidence that animal (human or non-human) waste is the likely dominant source of the nitrate in at least two of the residential drinking water wells downgradient of the Dairy Cluster. Because isotopic analysis cannot differentiate between human and non-human waste, both could be sources of the nitrate in this downgradient well.

Several other compounds that are generally less mobile in groundwater than nitrate and some of the major ions, were detected in the Dairy Cluster sources, but not in the residential drinking water wells (for example, the trace organics). Fecal coliform was not detected in any of the residential drinking water wells.

Irrigated Cropland

Nitrogen-rich fertilizers, such as inorganic synthetic fertilizer and manure, are applied to irrigated cropland and are a possible source of nitrate in drinking water wells. In Phase 3, EPA sampled six irrigated crop fields[9] (two mint, two hops, and two corn) and six residential drinking water wells downgradient of these fields.

Irrigated crop field soil samples were analyzed for several forms of nitrogen, pesticides, pharmaceuticals, and hormones. They were not analyzed for major ions, trace inorganic elements, perchlorate, microbiology, trace organics, isotopic analysis, or age dating.

The six water wells downgradient from the irrigated crop fields and sampled by EPA during Phase 3 all had nitrate levels greater than the MCL. Several organic compounds were detected in the crop soil samples, but only bentazon and monensin were detected in a water well and its associated crop soil sample. Bentazon was detected in two water wells and the associated soil samples. These results indicate that bentazon was applied to the crop field and is likely migrating to groundwater and the water wells. Monensin was the only veterinary pharmaceutical detected in one well and also in an associated soil

[9] See footnote 1.

sample collected from a hop field. Possible manure application to the hop field could account for the monensin detected in the downgradient residential well. The isotopic analysis indicated that the dominant source of nitrate for one residential drinking water well was synthetic fertilizer.

Residential Septic Systems

Four residential wells located in Mabton, Harrah, and Sunnyside were selected for evaluation of impacts from septic systems. However, all the residential drinking water wells sampled as part of Phase 3 of this study were analyzed for the same suite of chemicals. EPA also collected influent samples from three WWTPs located in Zillah, Mabton, and Toppenish. These WWTP samples were collected to serve as a surrogate for septic system waste.[10] The WWTP influent had no actual or potential hydrogeological connection with the residential wells. This approach was used to determine whether the same compounds are detected in WWTP influent samples and in water wells with high nitrate concentrations in areas with a high density of septic systems or whether these wells are affected by other sources.

The majority of the trace organics (e.g., personal care products) and wastewater pharmaceuticals were detected in the WWTP influent samples but only two of these compounds were detected in the residential drinking water wells sampled by EPA in Phase 3. Specifically, bis-(2-ethylhexyl) phthalate (DEHP, a plasticizer) was detected in four residential drinking water wells and DEET (an insect repellant) was detected in one residential drinking water well. These results indicate that these compounds are being used and can be found in wastewater, but with a few exceptions are not reaching residential drinking water wells.

Four veterinary pharmaceutical compounds were detected in the WWTP influent samples, three of which were also detected in one or more of the residential drinking water wells in the study. Specifically, sulfamethazine (used for cattle, poultry and swine) was detected in two residential drinking water wells, sulfamethoxazole (used for people) in one residential drinking water well, and tetracycline (used for people, cattle, and several other animals) in six residential drinking water wells.

There were 10 additional veterinary pharmaceuticals detected in residential drinking water wells, but not detected in WWTP influent samples. Monensin (used for cattle and poultry) and virginiamycin (used in poultry and swine) were the most frequently detected veterinary pharmaceuticals: monensin was detected in nine residential drinking water wells and virginiamycin in four. Monensin and virginiamycin were not detected in the WWTP influent samples. Given the results, septic systems are a possible source of tetracycline and sulfamethoxazole in the residential drinking water wells.

Of the 20 hormones analyzed, 14 were detected in at least one WWTP influent sample. Of those 14 hormones, seven were detected in residential drinking water wells. Testosterone and androsterone were the most frequently detected hormones: testosterone was detected in nine wells and androsterone was detected in four wells. Given both testosterone and androsterone are natural sex hormones it is possible they came from septic systems in proximity to the residential drinking water wells.

[10] EPA recognizes that the WWTP influent may contain substances that are not found in residential septic systems (for example they may also receive commercial and industrial waste streams). The WWTPs sampled serve rural communities and are sufficiently similar to residential septic systems for the purpose of EPA's study.

Microbial source tracking was not performed because there were no detectable concentrations of fecal coliform in any of the residential drinking water wells. The isotopic data provide strong evidence that animal (human or non-human) waste is a likely dominant source of the nitrate contamination in at least six residential drinking water wells. Since isotopic analysis cannot differentiate between human and non-human waste, both could be sources of the nitrate in this downgradient well based on the isotopic analysis.

Conclusions

Nitrate levels above EPA's drinking water standard in residential drinking water wells in the Lower Yakima Valley are well documented. The objective of this study was to evaluate the effectiveness of certain chemicals, microbial parameters, or analytical techniques to identify specific sources of the high nitrate levels detected in residential drinking water wells.

Many of the chemicals and microbial parameters evaluated in this study were not detected in the residential drinking water wells. There were no detections of fecal coliform in the Phase 3 residential drinking water wells, although high concentrations were found in the dairy sources and WWTP influent. There were very few trace inorganic elements, trace organics, or wastewater pharmaceuticals detected in the residential drinking water wells or crop field soil samples, although many of these chemicals were detected in the dairy sources and WWTPs. The isotopic data provide some indication of the likely nitrate sources for seven of the 25 residential wells tested (six animal waste and one synthetic fertilizer). Although the isotopic analysis identified animal waste as the source of the nitrate in six wells, this analytical technique cannot differentiate between human and non-human waste.

There appears to be a correlation between the age dating data and the depths of the wells for which boring logs are available. The water in the dairy supply wells that are known to be screened in the deeper basaltic aquifer is older than in the downgradient residential wells which are commonly screened in the shallower alluvial aquifer. The age dating results were not useful to determine when the nitrate contamination was introduced into the well.

Given the historic and current volumes of wastes generated and stored by dairies, and the application of nitrogen-rich fertilizers including dairy waste in the Lower Yakima Valley, it is expected that dairies are a likely source of high nitrate levels in downgradient drinking water wells. The total nitrogen, major ions, alkalinity and barium data provide strong evidence that the dairies evaluated in this study are likely sources of the high nitrate levels in the drinking water wells downgradient of the dairies. Additional information that supports this conclusion includes: there are few potential sources of nitrogen located upgradient of the dairies; the dairy lagoons are likely leaking large quantities of nitrogen-rich liquid into the subsurface; and Washington State Department of Agriculture inspectors have reported elevated levels of nitrogen in application fields of the dairies in the study.

Given the historic and current application of nitrogen-rich fertilizers in the Lower Yakima Valley, it is expected that irrigated crop fields would be a likely source of high nitrate levels in downgradient drinking water wells. The data collected in this study provide some corroboration that irrigated crop fields are a likely a source of nitrate in groundwater. The data supporting this conclusion is not as strong for the crop fields as it is for the dairies. The reasons for this include: lack of upgradient well data; the irrigated crop fields sampled are situated amongst other agricultural uses, including upgradient dairy operations; fewer

analytes detected in both the crop field samples and the corresponding downgradient wells; more limited information about crop field operations; and the crop fields' positions on the landscape relative to other potential sources.

While septic systems could be a source of nitrate in drinking water wells, there is insufficient information from this study to support this conclusion.

The high nitrate levels in residential drinking water wells in the Lower Yakima Valley are likely coming from several sources. This study attempted to identify those sources. In some cases it was possible to identify likely or possible sources of the nitrate contamination.

Evaluating actions to reduce nitrate concentrations in residential drinking water wells to safe levels is beyond the scope of this report. Although actions to reduce nitrate are needed, it may take many years to reduce the nitrate levels in residential drinking water wells to safe levels because of the extent of the nitrate contamination in the Lower Yakima Valley and the persistence of nitrate in the environment.

Table ES-1: Overview of the Study Design to Investigate Suspected Sources of Nitrate in Water Wells Near Dairies, Irrigated Cropland, and Septic Systems

Source Type	Sampling Area	Upgradient Well Sample	Supply Well Sample	Potential Sources of Nitrate	Downgradient Well Sample	Study Design [c,d]
Dairies	Haak Dairy	WW-01	WW-02	Lagoons (LG-01 to LG-03) Manure Piles (SO-01) Application Fields (SO-02)	WW-03 to WW-05	Compare chemicals and microbiology in upgradient wells with sources and downgradient wells. Conduct isotopic analyses for water wells and lagoons and age dating for water wells.
	Dairy Cluster	WW-06[a]	WW-07, WW-08, and WW-09	Lagoons (LG-04 to LG-15) Manure Piles (SO-03, SO-05, SO-07, and SO-09) Application Fields[b] (SO-04, SO-06, SO-08, and SO-10)	WW-10 to WW-17	
Irrigated Croplands	Schilperoort Farm	NA	NA	SO-11 (Mint)	WW-23	Compare chemicals in downgradient wells with soil samples from associated crop fields.
	Havilah Farm	NA	NA	SO-12 (Mint)	WW-24	
	Wheeler Farm	NA	NA	SO-13 (Corn)	WW-25	
	Sunny Dene Ranch	NA	NA	SO-14 (Corn)	WW-28	
	Golden Gate Hops	NA	NA	SO-15 (Hops)	WW-26	
	Golden Gate Hops	NA	NA	SO-16 (Hops)	WW-27	
Septic Systems	Mabton	NA	NA	Septic Systems	WW-21	Compare chemicals in water wells with influent from 3 wastewater treatment plants (Zillah, Mabton, and Toppenish).
	Harrah	NA	NA	Septic Systems	WW-19	
	Sunnyside	NA	NA	Septic Systems	WW-20 and WW-22	

[a]As noted above, in footnote 2 of the text, EPA collected samples from other wells located upgradient of the Dairy Cluster which were also below the MCL for nitrate during Phase 2. That data is included in this report in Table C1 in Appendix C (sample location WW-22103 and WW-22085).

[b]Thirty soil samples per application field or crop field were collected at a depth of 1 inch and composited to obtain a representative sample.

[c]Two additional residential wells, WW-18 and WW-30, were sampled during this study, but were not included in the original study design or listed in this table. The results for these two wells are documented in Section IX.E of this report.

[d]See Table C2 in Appendix C and Table ES-2 for a description of the analytes for each source.

NA – not applicable.

Table ES-2: Summary of the Chemical Groups and Media Included in Phase 3 of the Study

Compound or Analytical Technique (Number of Compounds Analyzed)	Water Wells	Dairy Lagoons	Dairy Manure Piles	Dairy Application Fields	WWTP Influent[c]	Crop Soils
General Chemistry						
Nitrate (1)	X		X	X		X
Other Nitrogen Forms[a]	X	X	X	X	X	X
Major Ions (9)	X	X			X	
Trace Elements (12)	X	X			X	
Perchlorate (1)	X					
Microbiology						
Bacteria (3)	X	X			X	
Microbial Source Tracking[b]	X	X			X	
Organic compounds						
Pesticides (50)	X	X[d]	X	X	X[d]	X
Trace Organics (69)	X	X			X	
Pharmaceuticals (31)	X	X	X	X	X	X
Hormones (20)	X	X	X	X	X	X
Analytical Techniques						
Isotopic Analysis (2)	X	X			X	
Age Dating (NA)	X					

[a]Other nitrogen forms for water wells and lagoons include ammonia, TKN, and nitrate plus nitrite. Other forms of nitrogen for manure piles, dairy application fields, and crop samples include extractable nitrate, extractable ammonia, and total nitrogen by combustion.

[b] Microbial source tracking was conducted only if there was an indication of fecal contamination detected in the sample.

[c]Majority of influent from households but contribution from businesses and industry also expected.

[d]Because of matrix interference, results for pesticide analysis for lagoon and wastewater treatment influent samples were not useable.

X – the compound or analytical technique was analyzed.

NA – not applicable

I. INTRODUCTION

This report presents the results for sampling conducted from February through April 2010 by the U.S. Environmental Protection Agency (EPA) in the Lower Yakima Valley in central Washington State. The primary purpose of this study was to investigate the contribution of various sources from nearby land uses to the high nitrate levels in groundwater and residential drinking water wells. The study looked at three likely sources of nitrate: dairies; irrigated cropland; and residential septic systems.

EPA used standard investigation and analytical methods as well as several research methods. The sampling was conducted as part of an EPA Regionally Applied Research Effort (RARE)[11] grant (EPA 2009). Funding was also provided by EPA's regional and national Offices of Compliance and Enforcement including the Environmental Justice (EJ) Showcase Community pilot program.[12] Yakima is one of ten communities in the nation to receive focused attention on disproportionate environmental health burdens.

EPA's sampling effort in the Lower Yakima Valley was partially in response to concerns raised by several agencies and community members who participated in the EPA Community Action for a Renewed Environment (CARE) cooperative agreement with the Northwest Communities Education Center (NCEC) in Yakima County, Washington. The objective of the cooperative agreement was to assist the Yakima Valley community to establish its priorities for environmental health concerns. Numerous meetings were held over a 2-year period from 2007 to 2009. One of the outcomes from the cooperative agreement was that community members identified their top three environmental health priorities as groundwater contamination, asthma, and children's exposure to pesticides.

In October 2008, the *Yakima Herald Republic* ran a series of articles titled "Hidden Wells, Dirty Water" that examined a long history of groundwater contamination affecting public and private drinking water wells, primarily in the Lower Yakima Valley. According to the Herald, following the series, the reporter received a number of inquiries from citizens asking whether EPA could take action under the Safe Drinking Water Act (SDWA). These inquiries prompted the reporter to send a letter to EPA asking whether the agency would consider invoking emergency authority under Section 1431 of the SDWA to address the problem. Section 1431 (42 U.S.C. § 300i) authorizes EPA to take action when, among other things, a contaminant is present or may enter a public water system or underground source of drinking water that may present an imminent and substantial endangerment to human health.

EPA facilitated the formation of a workgroup consisting of representatives from state and local agencies, EPA, and the community. The workgroup released a report in February 2010 entitled, "Lower Yakima Valley Groundwater Quality: Preliminary Assessment and Recommendations" (Ecology 2010) ("February 2010 Report"). One of the recommendations identified in the February 2010 Report was to conduct an investigation to gather information to try to link high nitrate levels in drinking water wells with specific sources.

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[11] The purpose of the RARE program is to provide EPA Regional Offices with support for near-term applied research projects and enhance interactions and connections between regional staff and EPA's Office of Research and Development.

[12] The EJ showcase projects focus on low income and minority communities experiencing disproportionate impacts from environmental health burdens.

The February 2010 Report documented that groundwater data collected in the Lower Yakima Valley from 1990 to 2008 indicated that as many as 12 percent of private wells had nitrate levels above EPA's drinking water standard for nitrate (10 mg/L) and about 20 percent of private wells demonstrated bacterial contamination (Ecology 2010).

II. PURPOSE AND SCOPE

As discussed above, the primary purpose of this study was to collect data to investigate the contribution of various sources from nearby land uses to the high nitrate levels in groundwater and residential drinking water wells. To accomplish this, EPA sampled and analyzed sources of nitrate (dairies, irrigated croplands, and residential septic systems) and private residential drinking water wells for a variety of chemicals to evaluate whether chemicals, including nitrate, could be used to link the nitrate contamination in groundwater and drinking water wells to the sources. The analysis included chemicals that are expected to be associated with one or more of the likely sources, such as pharmaceuticals (both veterinary and human medications), personal care products, steroids and hormones, pesticides and herbicides, as well as other indicators of water quality such as nitrogen and major ions such as chloride and calcium.

EPA also used microbial analysis to determine whether the water wells, lagoons and WWTP influent samples exhibited fecal contamination. If the samples were found to have fecal contamination, then microbial source tracking (MST) was performed to identify the source of the fecal contamination (in this case, human or ruminant). In addition, EPA performed isotopic analysis for the water wells to identify the possible origin of the nitrate in water wells. Finally, an age dating analysis was completed for the water wells to estimate the time since water infiltrated from the surface to the aquifer. A data usability review and validation independent of the laboratories were conducted by EPA and are discussed in Appendix E.

Figure 1 provides a conceptual site model for the project. The conceptual site model (in conjunction with Figure 2 – Nitrogen Cycle) provides a graphic description of how nitrate from various sources can reach groundwater and eventually drinking water wells. This study evaluated three likely sources of the nitrate contamination in drinking water wells (dairies, irrigated cropland, and residential septic systems). The main sources of nitrogen from the dairies include dairy waste lagoons; manure piles; and manure and synthetic fertilizers applied to application fields on land controlled by the dairies. For irrigated crop fields[13], the main source is the synthetic fertilizers and manure[14] applied to the land to promote plant growth. For septic systems, it is the human waste that can migrate from septic systems into nearby drinking water wells.

As described in Figure 2 (Nitrogen Cycle), nitrogen is applied to the land from different sources. The different forms of nitrogen typically migrate through the unsaturated silts, sands, and gravels and arrive at the water table via preferential pathways. The nitrogen is converted to nitrate through chemical and biological processes. Groundwater contaminated with nitrate can be pumped up in drinking water wells

[13] In this report, "application field" refers to fields owned or leased by the dairies and "crop field" or "cropland" refers to fields owned or leased by other farmers. Both application fields and crop fields could receive applications of manure and/or synthetic fertilizer.

[14] Although initially EPA considered irrigated cropland to be a potential source of nitrate because of synthetic fertilizer application, through this study, it became clear that several of the irrigated crop fields sampled had also received manure applications.

where people consume the water. Groundwater contaminated with nitrate can also migrate to surface water such as the Yakima River.

The scope of this study consists of an area approximately 40 miles long and ranging between 10 and 25 miles wide. The study area includes parts of Yakima County and the Confederated Tribes and Bands of the Yakama Nation Reservation (Yakama Reservation). EPA identified areas with some of the highest nitrate concentrations to conduct additional sampling to evaluate whether other chemicals are traveling with the nitrate from the sources to the groundwater and drinking water wells. This report includes the results for the sampling of 331 wells for nitrate and bacteria, and multi-parameter analysis of 29 wells (25 residential wells and four dairy supply wells), 12 dairy lagoons (15 samples), 11 soil samples (five at dairy application fields and six at irrigated and fertilized crop fields), five dairy manure samples, and three wastewater treatment plant (WWTP) influent samples. The sampling was conducted from February through April 2010.

Several limitations in the study are important to note. First, water well samples were collected from existing wells. No new wells were installed for this study. Information on the depths and screened intervals of the water wells is known for about a third of the wells that were sampled. In this report, designations of upgradient and downgradient are based on regional groundwater flow data from the United States Geological Survey (USGS). Lack of complete well information limits our ability to verify if the wells upgradient and downgradient of the sources draw water from the same water bearing zone.

In addition, EPA lacks complete information regarding the dairies in this study. EPA requested information on specific aspects of the dairy operations and the physical setting; however, the dairies in this study did not provide this information. This information would have contributed to a more complete understanding of the dairy facilities, practices, and use of specific chemicals. It would have allowed EPA to provide actual values, or narrower ranges of estimates, for certain parameters in this report (for example, numbers of animals, quantities of nitrogen, estimates of lagoon leakage). EPA has, however, referenced general information regarding dairy operations, and specific information regarding the dairies in the Yakima Valley to the extent it was available and the ranges stated in the report are based on actual data.

Finally, EPA has limited information about the irrigated crop fields in this study. Verifiable, detailed crop production data, in terms of nutrients applied (the likely source of nitrate associated with irrigated crops), were not available and no irrigation data were available. EPA has included information about the crop fields to the extent it was available. In addition, the irrigated crop fields are surrounded by similar agricultural uses, and many are situated downgradient of dairies, making more difficult EPA's ability to discern the source of nitrate in drinking water wells downgradient of the irrigated crop fields.

III. BACKGROUND

Nitrate is an inorganic compound that is a naturally occurring form of nitrogen. On a national scale, nitrate is typically found in unimpacted shallow groundwaters at concentrations of up to 1.1 mg/L (Nolan and Hitt 2003). Nitrate concentrations higher than this range typically indicate that human activities have contributed nitrate to the groundwater. Nitrate is highly soluble in water and mobile in soil, which makes it relatively easy for nitrogen from a variety of point and non-point sources to move through the soil and into the groundwater as nitrate.

Nitrate is an acute contaminant, which means an immediate (within hours or days) health effect may result from exposure. EPA has established a maximum contaminant level (MCL) for nitrate in drinking water of 10 mg/L under the SDWA. EPA and state agencies regulate nitrate in public drinking water systems because nitrate concentrations greater than the MCL may cause a number of health problems. Exposure to excess nitrate can result in methemoglobinemia (blue-baby syndrome) in infants and susceptible individuals, which can lead to death in extreme cases (Ward 2005). Methemoglobinemia is caused by the reduction of nitrate to nitrite in the body. Nitrite binds to hemoglobin and lowers the body's ability to carry oxygen in the blood. Some studies have shown a positive association between long-term exposure to nitrate in drinking water and risk of cancer and certain reproductive outcomes, while other studies have shown no association (Ward 2005).

Numerous water quality investigations have been conducted regarding nitrate over the last 30 years in the Lower Yakima Valley, including a 2002 investigation by the Valley Institute for Research and Education (VIRE). All of these studies were summarized in the February 2010 Report prepared by the Washington State Departments of Agriculture, Ecology and Health; Yakima County Public Works Department; and EPA (Ecology 2010). The February 2010 Report found nitrate levels above the EPA MCL of 10 mg/L in about 12 percent of private wells. More than 2,000 people in the study area have private wells that exceed the MCL (Ecology 2010).

Nitrate contamination in groundwater is primarily a health risk for rural populations in the Lower Yakima Valley who rely on private unregulated wells for drinking water. Systems that meet the definition of "public water system" fall under state or federal drinking water regulations. Public water systems are required to test regularly for nitrate, and the data are reported to the Washington State Department of Health. EPA defines a "public water system" under Section 1401(4) of the SDWA, as amended in 1996, 42 U.S.C. § 300f, as:

> "…a system for the provision to the public of water for human consumption through pipes or other constructed conveyances, if such has at least fifteen service connections or regularly serves at least twenty-five people."

The State of Washington has established requirements for systems serving between three and fewer than 15 connections and fewer than 25 people. These water systems are called Group B (Chapter 246-291 of the Washington Administrative Code), and the state Department of Health (DOH) and local health jurisdictions share responsibility for administrating Group B requirements. The DOH does not regulate wells with just one or two connections that are residential systems, but some local jurisdictions regulate these systems. In 2009, the governor and state legislature set a new direction for regulating Group B systems, however, by eliminating all state funding for this program. Users of Group B systems therefore may be at risk.

Owners of drinking water wells that have fewer than three service connections (for example, a single, residential well) are not required to test their drinking water for contaminants. However, EPA and the Washington State Departments of Ecology and Health recommend that rural residents test their well water regularly. If residents choose to test and find contamination levels that exceed the MCL, they are not required to take action to address the situation.

IV. NITROGEN CYCLE

Nitrogen is an essential nutrient that is critical to plant growth. It aids in the formation and function of cellular tissue, proteins, and reproductive structures. Nitrogen can be supplied to plants through the organic decomposition of plants or animal waste products or by the application of synthetic fertilizers. It is present in many chemical forms in the environment, including organic nitrogen, ammonium (NH_4), nitrite (NO_2-), nitrate (NO_3-), and nitrogen gas (N_2). Nitrogen gas composes about 78 percent of the atmosphere. Atmospheric nitrogen must be processed, or fixed, to be used by plants. Some fixation is done by lightning strikes, but the majority of fixation occurs by bacteria. Additional small quantities of nitrate may wash out of the atmosphere from aerosol salt particles from the ocean or dusts from arid regions, or from fossil fuel combustion.

Figure 2 shows the nitrogen cycle (adapted from Pidwirny 2006). The processes of the nitrogen cycle transform nitrogen from one chemical form to another. Important processes in the nitrogen cycle include nitrogen fixation, mineralization, nitrification, and denitrification. The mobility of nitrogen is highly dependent on its form and the matrix it moves through.

In human-influenced systems, there are significant increases in the amount of nitrogen released to the soil, which frequently leaches into groundwater from various land uses, including application of synthetic fertilizers or animal waste. While many fertilizers may be composed of nitrate, urea or ammonia are often used. The urea and ammonia are ultimately converted to nitrate by soil bacteria. Animal wastes are another source of nitrogen frequently applied to the land or directly deposited by animals, and then often managed by people, for example, in lagoons or manure piles at dairies. Infiltrating rain or irrigation water can push excess nitrogen into groundwater from each of these sources, unless it is taken up by plants while still in the shallow subsurface.

Organic nitrogen is nearly immobile. Mineralization occurs when organic nitrogen in the soil is converted by bacteria into ammonium (NH_4). The ammonium is then converted to nitrite and then nitrate by bacteria through nitrification. The ammonium ion, while much less mobile than nitrate due to its positive charge, can be converted to nitrate as it moves through the vadose zone and oxygenated aquifer surfaces.

In soils, nitrate is the most mobile form of nitrogen in both the unsaturated zone and the saturated zone. In the saturated zone, it moves at nearly the speed of the migrating groundwater. The mobility of the nitrate ion is enhanced by the action of negatively charged soil particles, which repel the negatively charged nitrate (Frans 2000). The nitrate can then be converted back into nitrogen gas (N_2) by bacteria through denitrification. Denitrification, a process which can convert nitrate into nitrogen gas by bacteria, can occur in low oxygen environments. In the absence of denitrification, nitrate moves with the groundwater until the groundwater is discharged to surface water, or extracted from a well. For additional information on the nitrogen cycle, see Stumm and Morgan 1996.

V. STUDY AREA

The broad Yakima Basin is bounded by basalt ridgelines to the north and south, the Cascade Mountains to the west. The Yakima Basin is a watershed of great diversity in climate, vegetation, and land use. More than 30 percent of the Yakima Basin is forested, about 30 percent is shrub-steppe rangeland, and about 28

percent is in agricultural production (USGS 2009). The Yakima River flows from its headwaters near the Cascade Mountains crest to its mouth where it joins the Columbia River, 160 miles to the east. Precipitation diminishes to less than 9 inches annually in the rain shadow of the Cascades (Yakima County 2011), and irrigation plays a key role in the viability of agriculture. A series of high mountain reservoirs captures snowmelt, which is released through the Yakima River into a complex set of irrigation diversions and canals throughout the basin. Irrigation is supplied to fields during the March through October growing season in a variety of methods, including flood, furrow, sprinkler, and drip systems.

The study area included a portion of the Yakima Valley, referred to as the Lower Yakima Valley encompassing portions of the Toppenish Basin (western area) and the Benton Basin (eastern area) along the Yakima River (Figure 3). Together, both areas cover approximately 368,600 acres within Yakima County. The Lower Yakima Valley has about 75,000 people, of which about 24,000 use private, unregulated residential wells (Ecology 2010).

In Yakima County, more than 20 percent of the population is at or below the poverty level (less than $17,050 for a family of four in 2000) and a little more than 30 percent of adults have less than a high school diploma. Approximately 41 percent of the population is Hispanic/Latino, which is more than four times the state average of approximately 10 percent. American Indians and Alaskan Natives make up slightly more than 5 percent of the county's population, which is three times the state average of almost 2 percent. English is not the primary language (written or spoken) in many households in Yakima County (U.S. Census 2000). Economic viability depends on high-value agricultural production, irrigation, and a reliable supply of farm laborers. Yakima County leads the nation in production of milk per cow and is a top producer of apples, pears, sweet cherries, mint, and hops in the country (USDA 2007).

A. Western Study Area - The Toppenish Basin

Much of the Toppenish Basin is within the boundaries of the Yakama Indian Reservation. Land ownership in the major floodplain of the Toppenish Basin is a checkerboard of Indian trust, Indian fee, and deeded (privately held) parcels. Land use in this area is mixed, with open range and agriculture predominating. The basin is bordered on the north by the Ahtanum Ridge and on the south by the Toppenish Ridge.

B. Eastern Study Area – The Benton Basin

The Benton Basin includes some reservation lands and the non-reservation lands along the river and on the southeast side of the valley. Approximately 60 percent of the valley population resides in this area, which includes the Yakima County communities of Sunnyside, Granger, Grandview, and Mabton.

The Benton Basin lies in the southeastern part of the Lower Yakima Valley. The western boundary of the basin abuts the eastern boundary of the Toppenish Basin. The southern boundary is bordered by the Horse Heaven Hills, and the northeastern boundary generally follows the northern flank of the Cold Creek Syncline.

C. Geology, Hydrogeology, and Geochemistry of the Study Area

The information presented below, unless otherwise noted, is summarized from the U.S. Geological Survey (USGS) publication "Hydrogeologic Framework of the Yakima River Basin Aquifer System, Washington (USGS 2009).

The Toppenish and Benton Basins consists of fine- and coarse-grained sediments overlying a sequence of three major basalt flows. (See Figure 4 and Figure 5 for a general overview of the hydrogeology for the Toppenish and Benton Basins.) The structural setting for the study area is created by bounding ridges such as the Rattlesnake Mountains, Ahtanum Ridge, Toppenish Ridge, and Horse Heaven Hills. The uppermost basalts of the Saddle Mountain Unit of the Columbia River Basalt Group are typically exposed in these upland ridges. This unit averages more than 500 feet thick. The underlying Wanapum unit averages 600 feet thick. These units are separated by the Mabton Interbed, with an average thickness of 70 feet.

The valley is filled with a variety of sediments that pinch out along the flanks of the ridges. These sediments include Touchet Beds, loess and thick alluvial sands and gravels, and significant thickness of Ellensburg Formation. The thickness of these sedimentary units decreases from an average of more than 500 feet in the Toppenish Basin to less than 200 feet in the lower Benton Basin.

Water is found in fractures and interbeds formed of clinkers, permeable lava, lake deposits or paleo-soils and may occur at significant depths in the upland ridges, such as Horse Heaven Hills, and especially in the basalts. The water table is found at shallower depths as the valley is approached from these ridges. Near the Yakima River, it may be less than 10 feet to water, especially during the irrigation season.

There are two main aquifer types underlying the study area. They include a surficial unconfined to semi-confined alluvial aquifer and an extensive basalt aquifer of great thickness underlying the sedimentary deposits. The basalt aquifer is believed to be semi-isolated from the surficial aquifer and stream systems. Groundwater flow within the surficial aquifer generally follows topography, with natural recharge occurring within the headlands and on the sides of the valley and discharge occurring to the Yakima River. Flow within the uppermost portions of the underlying basaltic aquifer also generally follows this pattern.

However, since the basalts extend to great depths, those deeper basaltic layers may convey waters across local flow divides to more regionally significant discharge locations such as the Columbia River. This pattern produces a major flow direction from northwest to southeast as water moves down the valley parallel to the course of the Yakima River. Other, more localized directions of flow, typically at shallower depths in the uppermost sediments, tend to flow toward the Yakima River. Locally, the flow direction may be modified by geologic structures and by irrigation practices, drains, ditches, canals, and other hydrologic features.

The Lower Yakima Valley is filled with sediments shed by the ridges at the margins of the study area and those deposited in the valley bottom by the Yakima River. These sediments have an internal structure that strongly controls groundwater movement. As the water moves through these sediments, it tends to follow preferential flow paths composed of coarser sediments.

Very frequently, there are 10- to 100-fold differences in groundwater velocities among aquifer materials of such contrasting grain size (Freeze and Cherry 1979). These different preferential flow paths can have different water chemistry, depending on their location below a source of contamination. A well that is located along a preferential flow path may draw a substantial portion of its water from a particular source. A well located on an adjacent, but different, preferential flow path may have markedly different chemistry. For this reason, it is anticipated that upgradient sources of nitrate could produce different downgradient effects in groundwater (such as nitrate in water wells), even in wells from neighboring homes.

Shallower wells in the study area are more likely to be contaminated with nitrate than deeper wells because the sources of most of the nitrogen are anthropogenic activities on the land surface (for example, dairy lagoons and application of synthetic fertilizer). Well depths for about two thirds of the wells used in this study are not known, but the well depths that are known confirm that nitrate concentrations tend to be higher in shallower wells (See Appendix A2). The higher nitrate values in shallower wells were also documented in the February 2010 Report (Ecology 2010). Some of the wells sampled in the study may tap water from the deeper basalts. As water carries nitrogen from the surface through the soil column to the water table, oxygenated conditions in the vadose zone and the aquifer facilitate the formation of nitrate (See Figure 2).

The highest levels of nitrate generally occur in the shallow alluvial aquifer (Ecology 2010). Water-bearing zones in the upper basaltic layers that underlie the alluvial aquifer may be vulnerable to contamination from the shallow aquifer. Basaltic layers develop significant fracture permeability as they cool after volcanic eruption. They are often referred to as "fractured basalts."

Examination of available well logs in the vicinity of the dairies that EPA studied, Haak Dairy and the Dairy Cluster[15], indicates that residential wells are typically screened in the shallow alluvial aquifer or in the upper basalt layers (Appendix A2). Wells screened in these zones are vulnerable to anthropogenic contamination. The fractured condition of the shallow basalts often means the water-bearing layers between the shallow basaltic layers are likely to be in communication with the shallow aquifer. A well pump set in a shallow basaltic water-bearing zone could, depending on conditions, pull contaminated water down through the shallow upper layers.

A brief discussion of the subsurface soil types for the dairies and irrigated cropland is included in the results section. A more detailed soil discussion of soil types for the dairies and irrigated croplands is presented in Appendix B. A complete soil report for each dairy and irrigated crop field was compiled by EPA (EPA 2012a) from the Natural Resources Conservation Service (NRCS) soil data mart (NRCS 2012).

In addition to the variability caused by the physical characteristics of the aquifer, many compounds react with the silts, sands, and gravels of the aquifer in a way that slows their transport. Some compounds, such as nitrate and ions like chloride, tend to minimally adsorb and are transported nearly as fast as the water flows in the aquifer. Nitrate does not break down unless it encounters denitrifying bacteria and

[15] The "Dairy Cluster" refers to a group of dairies, including George DeRuyter & Son Dairy, D and A Dairy, Cow Palace 1 and 2, Liberty Dairy, and Bosma Dairy, situated north of the Yakima River. The Dairy Cluster is located about 2 miles north of the town of Liberty, near the northern edge of the irrigated area in the Yakima Valley.

organic carbon, resulting in a low oxygen or anoxic environment. Other compounds, such as iron or manganese, often participate in chemical reactions and can create relatively immobile minerals, which can change their concentrations as measured in water wells (Fetter 1980).

Organic compounds, which are any gaseous, liquid, or solid chemical compounds containing carbon, are typically less mobile in water than inorganic compounds. Organic compounds tend to adsorb to organic carbon in the aquifer and may be degraded by bacteria and either disappear entirely or may be greatly reduced in concentrations. Even if not broken down, most organic compounds will move much slower than nitrate because they tend to adsorb to other organic matter in the aquifer. As a result, in general, they are unlikely to be transported as far or as fast as the nitrate (Stumm and Morgan 1996).

VI. THREE STUDY PHASES

Several sampling efforts conducted to date in the Lower Yakima Valley by various agencies and groups have focused on nitrate. Although these studies have been useful to document the problem of high nitrate levels in groundwater and private wells, they did not evaluate the link between the various sources and the high nitrate levels. The objective of this study was to conduct sampling to evaluate whether chemicals other than nitrate that are associated with specific sources can be used to link the nitrate contamination in groundwater and drinking water wells to those sources. In addition, the study used several other analytical techniques (microbial source tracking, isotopic analysis, and age dating) to evaluate the contribution of various sources to high nitrate levels in drinking water wells.

To accomplish these objectives, EPA designed a three-phased study within two contiguous segments of the Yakima River Basin extending approximately 40 miles from the town of Union Gap to the Yakima County line near the town of Byron. The upper segment comprises the entire Toppenish Basin, and the lower segment comprises the northern portion of the Benton Basin. The width of the study area was defined by the width of the Toppenish and Benton Basins along the selected segment, which varies between approximately 10 and 25 miles (Figure 3).

The main focus of this report is the Phase 3 sampling. Phase 1 and Phase 2 of the study are summarized below to provide context for the Phase 3 sampling. The purpose of Phase 1 was to identify the major sources of nitrate in the study area, based on historical records. In Phase 2, the residential wells in closest proximity to the potential sources were identified, sampled, and the samples analyzed for nitrate using screening-level analytical protocols and confirmatory laboratory analysis.

Phase 3 involved using the results of Phases 1 and 2 to identify residential wells with high nitrate concentrations and locate potential upgradient nitrogen sources. Once these source areas were selected, Phase 3 involved the collection and analyses of numerous samples from the potential source areas, downgradient wells, and upgradient wells near the dairies. The following subsections provide details about each phase of the study.

A. Phase 1: Geographic Information System (GIS) Tool Development and Screening Analysis for Nitrogen Sources

The purpose of Phase 1 was to identify the major sources of nitrate in the study area based on historical records. Phase 1 included the development of a Geographic Information System (GIS) tool to organize a large amount of historical information and allow the examination of the landscape for spatial patterns in

the data. EPA used the GIS tool to identify sites to be sampled in Phases 2 and 3 of the project. The tool incorporates information from the Lower Yakima Valley about known nitrate, bacteria, and general chemistry data. It also includes information on locations of wells, land ownership, parcels with septic systems, land elevation, depth to groundwater, crop type, estimated fertilizer application rates, dairy and animal feeding operation locations, roads, and an aerial photo layer.

Phase 1 included a screening analysis to identify the potential major sources of nitrogen in Yakima County. The estimates for the different sources were used as a relative value to compare with other source estimates to assist in the study design.

The screening analysis, described below, combined information on land use with some simple calculations to estimate the amount of potential nitrogen loading from several sources that can be applied to the land. The estimates indicate three sources — livestock with dairy cattle as the largest contributor, irrigated cropland, and septic and biosoilds — account for as much as 98 percent of the nitrogen available for application to the land and potentially delivered to the aquifer (EPA 2012b). Livestock are prevalent throughout the Yakima Valley study area and accounted for about 65% of the nitrogen. Of this, dairy cows accounted for 89% of the nitrogen produced by livestock, while beef cattle were estimated at 9% and all other livestock (sheep, goats) at less than 1% each (EPA 2012b). The estimates were used as guidelines for the screening and do not account for losses of nitrogen from various biological, physical, and chemical processes. Based on this screening, EPA focused the Phase 3 sampling on three sources: dairies, irrigated cropland, and residential septic systems. Although there are other sources of nitrogen in the Lower Yakima Valley, EPA focused on the three sources believed to contribute the largest quantities of nitrogen (See Figure 6).

EPA is working to further refine these estimates and further evaluate nitrogen fate and transport in a collaborative project between EPA and the USGS. A report is due in the winter of 2012. The project focuses on better characterizing the sources of nitrogen applied to the land and the relationship between changes in nitrogen loading on the land and levels of nitrate in drinking water wells.

1. DAIRIES

As a result of economies of scale, the total number of dairy operations in the United States has been declining over time[16] while the average number of cows per dairy operation has been increasing (EPA 1998 and USDA 2010). In Yakima County, the number of dairies has decreased from 71 dairies in 1998 to 67 dairies in 2010 (WSDA 2010).

For the Phase 1 analysis, EPA used the 2008 Washington State Department of Agriculture (WSDA) estimates of the number of dairies, number of animals per dairy, and total nitrogen produced. In 2008, there were 69 dairies in Yakima County (Figure 7) registered with the WSDA (WSDA 2009). These facilities had over 130,000 animals (WSDA 2009), an average of almost 2,000 milking animal units per dairy. Modern dairies generate large quantities of animal wastes, which must be managed appropriately to prevent pollution, including pollution of surface and groundwater. Greater concentrations of animals and competition for available land have made it increasingly challenging to effectively manage animal wastes to prevent adverse impacts to public resources (Harner and others 2007).

[16] http://www.ers.usda.gov/publications

In addition to generating large quantities of manure, dairies also generate large amounts of liquid waste from flushing waste from pens and parlors to collection sites. Liquid wastes are typically stored in a series of lagoons before they are sprayed on nearby fields as fertilizer.

Dairy wastes contain key components of fertilizer, including nitrogen, phosphorous, and potassium. When used as a fertilizer, dairy wastes are often supplemented with synthetic fertilizer to meet specific nutrient needs of the crop being grown. In the lower parts of the Yakima Valley, dairies are concentrated around the cities of Sunnyside, Grandview, Mabton and Granger, although some are in more sparsely populated areas of the valley and on the Yakama Indian Reservation.

The total annual nitrogen production associated with dairies in Yakima County in 2008, without accounting for estimated losses, is approximately 36 million pounds per year. This amount was calculated by multiplying the number of dairy cows by the estimated nitrogen production rate per cow provided by the WSDA (WSDA 2009).

In addition to the animal waste lagoons, manure piles, and application fields that EPA sampled for this study, there are other potential sources on a dairy that could contribute to groundwater nitrogen loading. Other potential nitrogen sources include, but are not limited to: silage leachate, cow pens, dry wells, and ditches and pipelines between lagoon solids separators.

Large dairies employ many workers – the Cow Palace has more than 85 employees, for example.[17] Presumably the dairies in the study have substantial human waste septic systems because the area is unsewered.

Ponded water on soils mixed with manure could result in infiltration of nitrogen into the soil column. WSDA inspection reports for some dairies indicate that roof runoff is generally not directed away from areas contaminated with manure (WSDA 2012), so roof runoff could flush nitrogen into the soil column during rain or snowmelt events.

Some of the dairies in the study may be a source of inorganic nitrogen from synthetic fertilizer. WSDA inspection reports indicate the George DeRuyter & Sons Dairy, D and A Dairy, and the Liberty and Bosma Dairies use synthetic fertilizer to supplement manure applications (WSDA 2012).

2. IRRIGATED CROPLAND

Yakima County is one of the world's most fertile growing regions, with more than 240,000 acres of cropland. Agriculture is the primary economic activity in Yakima County, accounting for approximately 70 to 80 percent of land use. Most of the cropland in the area is irrigated. The major irrigation districts include Roza, Sunnyside Valley, Wapato Irrigation Project, Grandview, and Zillah. Major commodities grown in the valley include apples, alfalfa, corn for silage and grain, grapes, hops, cherries, and mint (see Figure 8).

Inorganic fertilizers can contain high amounts of nitrogen. Nitrogen application is essential to crop growth and development. Application of nutrients or water at rates greater than plant demand can result in excess nitrogen infiltrating through the soil below the root zone into the groundwater. Also, nitrogen

[17] Cow Palace website - http://cowpalacedairy.com/index.cfm?pid=inc_management

applied at appropriate rates but with high irrigation rates can move rapidly through the vadose zone, prior to full crop uptake. The amount, timing, frequency, and type of fertilizer, as well as the timing and amount of irrigation relative to the application of fertilizer and plant water demand affect the contribution to groundwater from fertilizer. Other factors such as denitrification in the soil by microorganisms, soil type, and volatilization to the atmosphere, also affect the amount of nitrate in groundwater.

EPA estimates that about 18.5 million pounds of nitrogen are applied to irrigated cropland each year in Yakima County. This estimate was derived by taking the total acreage for each crop in Yakima County in 2007 and multiplying the acreage by the Washington State University recommended average nitrogen application rate for each crop (EPA 2012b). With this methodology, EPA estimated that corn, mint and hops in Yakima County receive about 6.0, 2.1, and 1.6 million pounds of nitrogen per year respectively. Irrigated crop fields accounted for approximately 30% of the all nitrogen available for application to the land in Yakima County. These rates are general and the specific application rates and management practices by farmers could vary greatly.

3. SEPTIC SYSTEMS AND WASTEWATER

Septic systems and domestic wastewater account for about three percent of the total amount of nitrogen applied to the land in Yakima County. Domestic wastewater is managed by city wastewater treatment plants in Yakima County, but a large percentage of the rural population relies on septic systems (see Figure 9). As of 2009, there were about 22,000 septic systems registered with Yakima County (EPA 2012b). Septic systems in Yakima County are generally designed for an average number of occupants per home based on the square footage.

There are 16 permitted wastewater treatment facilities in Yakima County (EPA 2012b). As wastewater treatment facilities process and treat wastewater, they produce biosolids, which are nutrient-rich organic material. After the solids have been processed and treated, they are recycled as fertilizer and soil amendment. Biosolids land application requires a permit from Washington State Department of Ecology. About 200,000 pounds of nitrogen in biosolids are applied in Yakima County per year, which includes biosolids imported from metropolitan municipalities in Western Washington State (EPA 2012b).

An estimated 1.4 million pounds per year of potential nitrogen from human waste was calculated by multiplying the 2007 population in Yakima County (234,564) by the rate of 6 pounds of nitrogen per person per year (EPA 2012b). This approach provides an overall estimate of 1.6 million pounds per year of nitrogen from biosolids and septic systems combined.

4. CONCLUSION AND OTHER SOURCES

This screening analysis showed that about 65 percent of the nitrogen generated in Yakima County comes from livestock predominantly as dairy cattle, about 30 percent from fertilizers applied to irrigated crops, about 3 percent from septic and wastewater systems, and the rest, less than two percent, from other relatively minor sources.

These minor sources include nitrogen deposited by precipitation and non-cropland application of fertilizer to lawns, public parks, and golf courses. Application of nitrogen fertilizers was not estimated for dryland wheat crops grown in the valley because they are not irrigated and the low natural precipitation for the area limits the leaching potential of nitrate.

B. Phase 2: Identification of Wells with High Nitrate Concentrations

The objective of Phase 2 was to sample wells that were downgradient of the potential nitrogen sources identified in Phase 1, to assist in identifying sampling locations for Phase 3 sampling, and to provide residents with information on the nitrate levels in their drinking water wells. The GIS tool developed in Phase 1 was used to help identify sampling locations for Phase 2. EPA conducted the Phase 2 sampling between February 22 and March 6, 2010. Figure 10 provides a map of the locations and nitrate concentrations for the Phase 2 sampling, Table C1 in Appendix C contains a summary of the results for the compounds evaluated in Phase 2.

EPA developed a Quality Assurance Project Plan (QAPP) for Phase 2 (EPA 2010a). It identifies the data quality objectives, sampling process design, sample collection procedures, sample handling and custody requirements, analytical methods, instrument calibration, data management, and standard operating procedures for instrument calibration, shipping container preparation, and chain-of-custody process. The Center for Hispanic Health Promotion (CHHP), a local bilingual, bicultural organization affiliated with the Fred Hutchinson Cancer Research Center, was contracted to assist in recruiting residences for sampling, scheduling, and Spanish interpretation assistance.

A series of public meetings, newspaper articles, and radio announcements notified the community of EPA's Phase 2 work. Samples were collected by two-person teams trained for the project. Sample teams verified consent for access from the homeowner, collected a global positioning system (GPS) location at the well, and completed a data collection form developed by EPA. Each sampling team maintained a field logbook to document sampling activities. Water quality parameters were measured in the field using a Horiba multi-parameter probe for each well.

The parameters measured included dissolved oxygen, oxidation/reduction potential, total dissolved solids, pH, and temperature. The sampling team also used nitrate colorimetric test strips (Hach® test strips) as a field screening tool to provide an indication of whether the water exceeded the MCL of 10 mg/L for nitrate. The Hach® test strips measure nitrate concentrations in increments of 0, 1, 2, 5, 10, 20, and 50 mg/L**.** If the Hach® test strip indicated the water may exceed the MCL (10 mg/L), samples were collected for analysis by EPA's Manchester Environmental Laboratory ("EPA's Manchester Laboratory").

Samples submitted to the laboratory were also analyzed for enumeration and quantification of total coliform using EPA's mobile microbiology laboratory. If total coliform bacteria were present, the samples were also analyzed for *Escherichia coli* ***(****E. coli)* and fecal coliform bacteria.

During the two weeks EPA was in the field, 331 homes were visited and all were screened for nitrate levels using the Hach® test strips. EPA's Manchester Laboratory received 189 samples for analysis. Of these 189 samples, 102 were analyzed for nitrate and chloride, two were analyzed for nitrate and nitrite, and 123 were analyzed for total Kjeldahl nitrogen (TKN). Samples for 67 of those homes, or about 20 percent, were found to exceed the MCL of 10 mg/L for nitrate (Figure 10).

The percentage of homes with nitrate levels in wells above the MCL in this study were higher than the 12 percent from earlier studies because the homes sampled in Phase 2 were selected based on their proximity to likely sources. This method of selection would be expected to bias the results compared with a study where the sampling locations were selected randomly. If potential upgradient sources such as dairy lagoons, dairy application fields, irrigated crop fields, or septic systems were likely sources of nitrate to

the aquifer, this would help explain the higher percentage of residences with nitrate levels over the MCL. Another possible explanation for the higher percentages of water wells with nitrate levels above the MCL in this study is that the previous studies were completed several years ago and the areas with nitrate levels above the MCL may have increased in size.

Eight wells, or 2 percent, were found to have fecal coliform bacterial contamination or contamination with *E. coli.* This result is less than the 20 percent frequency found in past studies.

Residents were informed of the nitrate results from the Hach® test strips immediately. Residents of all of the homes with nitrate levels greater than 10 mg/L or with bacterial contamination were provided with written laboratory results.

The Phase 2 sampling was informative in several ways. The results confirmed that nitrate concentrations in many residential drinking water wells were above the EPA drinking water standard of 10 mg/L and provided information to the residents on the levels of nitrate in their wells. In addition, the Phase 2 results were used to identify the Phase 3 sampling locations.

C. Phase 3: Investigating Source Contributions to High Nitrate Concentrations in Drinking Water Wells

The objective of Phase 3 was to investigate the contribution of various sources from nearby land uses to high nitrate levels found in water wells using a wide array of sampling and analysis techniques. The water wells shown in Figure 10 with the highest nitrate concentrations were selected for more extensive Phase 3 sampling and analyses.

Drinking water samples were collected from existing wells. No new wells were installed for this study. Available information on well depths is summarized in Appendix A1.

EPA evaluated three types of sources (dairies, irrigated cropland, and residential septic system) (See Figure 11). The three source types and sampling areas are shown in Table 1. Table 1 also illustrates how the study design varied, depending on the waste source type (dairy, irrigated cropland, or septic systems). EPA also collected and analyzed representative residential drinking water wells upgradient of the dairies. No drinking water wells upgradient of the crop fields or septic systems were sampled.

In general:

- Investigation of each of the two dairy areas (Haak Dairy and the Dairy Cluster) included sampling a number of downgradient wells, dairy animal waste lagoons, dairy manure piles, and dairy application fields. In addition one upgradient well was sampled in each dairy area. The well and waste samples were analyzed for many different chemicals and microbes using several analytical techniques. The data for the downgradient wells were compared to the data for the upgradient wells and the various waste sources to show the relative nitrate contamination and to determine if any of the different compounds could be used to identify specific sources.[18]

[18] Note that during Phase 2, for both the Haak Dairy and the Dairy Cluster focus areas, nitrate data was collected from additional downgradient residential drinking water wells and, for the Dairy Cluster, nitrate data was collected from two additional upgradient drinking water wells (see Appendix C1 for results from sample locations WW-22103 and WW-22085).

Table 1: Overview of the Study Design to Investigate Potential Sources of Nitrate in Water Wells Near Dairies, Irrigated Cropland, and Septic Systems

Source Type	Sampling Area	Upgradient Well Sample	Supply Well Sample	Potential Sources of Nitrate	Downgradient Well Samples	Study Design[c,d]
Dairies	Haak Dairy	WW-01	WW-02	Lagoons (LG-01 to LG-03) Manure Piles (SO-01) Application Fields (SO-02)	WW-03 to WW-05	Compare chemicals and microbiology in upgradient wells and sources with downgradient wells. Conduct isotopic analyses for water wells and lagoons and age dating for water wells.
	Dairy Cluster	WW-06[a]	WW-07, WW-08, and WW-09	Lagoons (LG-04 to LG-15) Manure Piles (SO-03, SO-05, SO-07, and SO-09) Application Fields[b] (SO-04, SO-06, SO-08, and SO-10)	WW-10 to WW-17	
Irrigated Croplands	Schilperoort Farm	NA	NA	SO-11 (Mint)	WW-23	Compare chemicals in downgradient wells with soil samples from associated crop fields.
	Havilah Farm	NA	NA	SO-12 (Mint)	WW-24	
	Wheeler Farm	NA	NA	SO-13 (Corn)	WW-25	
	Sunny Dene Ranch	NA	NA	SO-14 (Corn)	WW-28	
	Golden Gate Hops	NA	NA	SO-15 (Hops)	WW-26	
	Golden Gate Hops	NA	NA	SO-16 (Hops)	WW-27	
Septic Systems	Mabton	NA	NA	Septic Systems	WW-21	Compare chemicals in water wells with influent from 3 wastewater treatment plants (Zillah, Mabton, and Toppenish).
	Harrah	NA	NA	Septic Systems	WW-19	
	Sunnyside	NA	NA	Septic Systems	WW-20 and WW-22	

[a]As noted above, in footnote 2 of the text, EPA collected samples from other wells located upgradient of the Dairy Cluster which were also below the MCL for nitrate during Phase 2. That data is included in this report in Table C1 in Appendix C (sample location WW-22103 and WW-22085).

[b]Thirty soil samples per application field or crop field were collected at a depth of 1 inch and composited to obtain a representative sample.

[c]Two additional residential wells, WW-18 and WW-30, were sampled during this study, but were not included in the original study design or listed in this table. The results for these two wells are documented in Section IX.E of this report.

[d]See Table C2 in Appendix C and Table C ES-2 for a description of the analytes for each source.

NA – not applicable.

- The investigation of six irrigated crop fields (two hops, two mint, and two corn) included sampling six downgradient wells, one downgradient of each crop field. A soil sample was collected from each of the six irrigated crop fields. The chemicals detected in each downgradient well were compared with the chemicals detected in the corresponding soil sample from each of the six crop fields.
- The investigation of the three septic waste areas included sampling residential wells downgradient from septic systems. The chemicals detected in the downgradient wells were compared to samples collected from the influent to wastewater treatment plants (WWTPs) located in Toppenish, Mabton and Zillah. These WWTP influent samples were selected to be representative of the types of chemicals that could be released from residential septic systems, while recognizing that these WWTPs also may receive commercial and industrial waste streams.

The water well, dairy lagoon, dairy manure pile, dairy application field, crop field, and WWTP influent samples were evaluated for several general water chemistry parameters, microbiology parameters, and organic chemicals. Not all samples were evaluated for all of the general chemistry, microbiology parameters, or organic chemicals. The water well, dairy lagoons, and WWTP influent samples were evaluated using isotopic analysis and the water well samples were evaluated using age dating techniques (See Section VII).

1. PHASE 3 SAMPLING LOCATIONS

EPA used the Phase 1 GIS tool, Phase 2 sampling results, and a set of selection criteria to identify 63 sampling locations for Phase 3. (See Figure 11 for the location for each of the sampling sites). Table C2 in Appendix C provides the sample location, sample location type, description of the sample medium, and a summary of analytes at each location. For more information on the sampling locations and sampling procedures see the Quality Assurance Project Plan for the Yakima Basin Nitrate Study, Phase 3 – Comprehensive Analytical Source Tracer Sampling, April 2010 (EPA 2010b).

Criteria for Selection of Dairies and Associated Sampling Locations

EPA collected samples at several dairies. Dairies were selected based on data from Phases 1 and 2 of the project, considering the following criteria:

- High concentration of animals per acre.
- Indication of over-application of nutrients to fields associated with the dairies based on information contained in WSDA inspection reports. (WSDA 2012).
- Relatively consistent direction of groundwater flow from season to season.
- Minimal upgradient nitrate sources to the extent possible.
- Existence of private drinking water wells along the downgradient side, or sides, of the dairy.
- History of nitrate levels above the MCL in downgradient drinking water wells.

Samples were collected from dairy animal waste lagoons, dairy manure piles, dairy application fields, and supply wells associated with the dairies. In general, one sample was collected at the influent to the lagoon system, and two samples were collected at the outlet from the lagoon system. The dairy manure pile

samples were collected on site at each dairy. The dairy application field samples were collected where lagoon waste had recently been applied. Residential drinking water wells upgradient and downgradient of the dairies were also sampled.

Selection of upgradient and downgradient wells for this study was based on groundwater flow direction and gradient data compiled by USGS. According to USGS, the generalized direction of groundwater flow in the study area in both the shallow sedimentary hydrogeologic unit and the deeper basalts is toward the Yakima River (USGS 2009). Flow directions can vary locally due to canal/lateral leakage, irrigation, drains, streams, pumpage, variations in recharge, spatially varying hydraulic characteristics, and topographic setting (USGS 2009). Groundwater flow directions were determined by USGS by measuring depth to water and reflecting these localized influences at the time it was measured. In this study, EPA sampled residential drinking water from a tap and depth to water was not measured.

Criteria for Selection of Irrigated Cropland Areas and Associated Sampling Locations

Soil samples were collected from two fields each of corn, hops, and mint.[19] These crops were selected because they require significant quantities of nitrogen to produce the large amounts of plant biomass for yield in contrast with other crops such as tree fruit. Thirty shallow soil samples per field were collected at a depth of 1 inch and composited to obtain a representative soil sample. One well situated downgradient of each crop field was selected for sampling. The criteria used for selection of the six crop fields were as follows:

- History of high fertilizer application rates, use of agricultural chemicals, and irrigation water applied for crop growth.
- Relatively consistent direction of groundwater flow from season to season.
- Minimal upgradient nitrate sources.
- History of nitrate levels above the MCL in downgradient drinking water wells.

Criteria for Selection of Residential Septic System Areas and Associated Sampling Locations

Samples were collected from four private drinking water wells that had high nitrate concentrations in Phase 2 and were located downgradient of areas with a high density of residential septic systems. Additionally, samples were collected from the influent to three small wastewater treatment plants in the Lower Yakima Valley (Zillah, Mabton, and Toppenish) to serve as a surrogate for septic system influent and to characterize compounds found in rural septic systems. The criteria used to select the water well sampling locations in the residential septic system areas included:

- High density of homes not served by sanitary sewers.
- Relatively consistent direction of groundwater flow from season to season.
- Minimal upgradient nitrate sources other than septic.

[19] The owners of the six crop fields sampled are indicated in Table 1.

VII. PHASE 3: COMPOUNDS AND ANALYTICAL TECHNIQUES

EPA analyzed for nearly 200 chemicals and used several analytical techniques to investigate the source of high levels of nitrate in water wells. The chemical analyses and analytical techniques were grouped as follows: general chemistry; microbial data; organic compounds; isotopic analysis; and age dating. The data for each of the analytical techniques are evaluated independently in an effort to identify the specific sources of the high nitrate concentrations found in residential drinking water wells. Table 2 summarizes the chemicals analyzed and the techniques used to analyze the samples collected from the water wells, dairy sources (dairy lagoons, dairy manure piles, and dairy application fields), wastewater treatment plants and irrigated crop fields.

This section describes the analyses that make up each of the five groups, the rationale for performing each of the analyses, and the issues or challenges associated with specific analyses and techniques. The analytical results are summarized in Appendix C and a discussion of the results is provided in Section IX.

A. General Chemistry

The study evaluated four areas of general chemistry: nitrate and other forms of nitrogen; major ions; minor and trace inorganic elements; and perchlorate. Each is discussed below.

1. NITRATE AND OTHER FORMS OF NITROGEN

Water well samples were analyzed for nitrate, nitrate plus nitrite, ammonia, and TKN. TKN is the total concentration of organic nitrogen and ammonia. TKN was analyzed to ensure all major forms of nitrogen were quantified. Samples from the dairy lagoons and WWTP influent were analyzed for nitrate plus nitrite, ammonia, and TKN. Nitrate alone was not analyzed in the lagoon and WWTP influent samples because nitrate would not be expected to be present in these media because of the anoxic (lack of oxygen) conditions.

In addition, the total nitrogen concentration for each sample was calculated by summing the concentrations of nitrate, nitrite, and TKN. These values were used to compare total nitrogen concentrations in upgradient and downgradient water wells with total nitrogen concentrations in sources, such as dairy lagoons, dairy manure piles, and dairy application fields, located between the up- and down-gradient wells, and to evaluate whether patterns exist. The results for the water wells, dairy lagoons, and WWTP influent samples are summarized in Table C3 in Appendix C.

Dairy manure piles, dairy application field, and crop field samples were analyzed for extractable nitrate (reported as Nitrate-N/Nitrite), extractable ammonia (reported as Ammonium-N), and total nitrogen by combustion (reported as Total Nitrogen/Solid). These analyses were conducted to provide an indication of the total nitrogen concentration in the dairy manure piles, dairy application field, and crop field samples. The results for the dairy manure piles, dairy application field samples, and crop field samples are included in Table C4 in Appendix C. Nitrate was analyzed at three different laboratories using different methods. Cascade Analytical Laboratory in Union Gap analyzed the water wells samples for nitrate using EPA Method 300.0 because this method is specified for evaluating nitrate concentrations in drinking water. Method 300.0 provides for measurement of nitrate alone. Method 300.0 requires the

Table 2: Summary of the Chemical Groups and Media Included in Phase 3 of the Study

Compound or Analytical Technique (Number of Compounds Analyzed)	Water Wells	Dairy Lagoons	Dairy Manure Piles	Dairy Application Fields	WWTP Influent[c]	Crop Soils
General Chemistry						
Nitrate (1)	X		X	X		X
Other Nitrogen Forms[a]	X	X	X	X	X	X
Major Ions (9)	X	X			X	
Trace Elements (12)	X	X			X	
Perchlorate (1)	X					
Microbiology						
Bacteria (3)	X	X			X	
Microbial Source Tracking[b]	X	X			X	
Organic compounds						
Pesticides (50)	X	X[d]	X	X	X[d]	X
Trace Organics (69)	X	X			X	
Pharmaceuticals (31)	X	X	X	X	X	X
Hormones (20)	X	X	X	X	X	X
Analytical Techniques						
Isotopic Analysis (2)	X	X			X	
Age Dating (NA)	X					

[a]Other nitrogen forms for water wells and lagoons include ammonia, TKN, and nitrate plus nitrite. Other forms of nitrogen for manure piles, dairy application fields, and crop samples include extractable nitrate, extractable ammonia, and total nitrogen by combustion.

[b] Microbial source tracking was conducted only if there was an indication of fecal contamination detected in the sample.

[c]Majority of influent from households but contribution from businesses and industry also expected.

[d]Because of matrix interference, results for pesticide analysis for lagoon and wastewater treatment influent samples were not useable.

X – the compound or analytical technique was analyzed.

NA – not applicable

sample to be analyzed within 48 hours after it is collected; therefore, samples were shipped to Cascade Analytical Laboratory because of its proximity to the study area.

EPA's Manchester Laboratory analyzed the water well samples for nitrate using Method 353.2. Method 353.2 measures nitrate plus nitrite. Finally, the University of Nebraska – Lincoln Water Sciences Laboratory ("UNL" or "UNL Laboratory"), also analyzed the water well samples for nitrate as part of the isotopic analysis. The UNL Laboratory used *Distillation and Determination of Ammonium and Nitrate Nitrogen in Water for Nitrogen Isotope Analysis* (SOP# Analyte-DISTN15-004) for their analysis.

Table C5 in Appendix C provides a summary of the nitrate concentrations reported by each of the three laboratories for the water wells sampled in Phase 3. The results for the nitrate analysis are similar among the three laboratories, with one exception: sample WW-18 where there was good agreement between two of the three results.

2. MAJOR IONS

All water wells, dairy lagoons, and WWTP influent samples were analyzed for the major ions by EPA's Manchester Laboratory. The major ions were not analyzed in the soil and manure samples because, in general, the purpose for analyzing the major ions is to track the chemical evolution of migrating groundwater.

An ion is an electrically charged species consisting of a single atom or a group of atoms. It is formed when a neutral atom or group of atoms either gains or loses electrons. The major ions evaluated included calcium, chloride, fluoride, iron, magnesium, nitrate, potassium, sodium, and sulfate. The results for the major ions are included in Table C6 in Appendix C.

Different ions have different chemistries and transport mechanisms. For example, chloride does not generally sorb to particles or participate in reactions with the aquifer material. Other ions, such as potassium and sodium, are much more likely to react with minerals and sorb to aquifer materials.

For this study, the results for major ions in the various samples were compared to determine whether a spatial pattern was observed in the concentrations. If the concentrations of specific ions in the downgradient wells are higher than in the upgradient wells, and those same ions are abundant in a specific source then the source is a likely contributor to those higher levels. For example, if chloride is detected at high levels in a dairy lagoon and the concentrations of chloride in a water well downgradient of the dairy lagoon are higher than in a well upgradient of the dairy lagoon, it indicates the dairy lagoon is a likely source of chloride to the downgradient well.

3. MINOR AND TRACE INORGANIC ELEMENTS

EPA's Manchester Laboratory analyzed the samples from all water wells, dairy lagoons, and WWTP influents for minor and trace inorganic elements. Twelve minor and trace inorganic elements were evaluated: arsenic, barium, bromide, cadmium, chromium, copper, lead, manganese, mercury, selenium, silver, and zinc. Minor and trace inorganic elements were not analyzed in the samples from crop fields or manure piles. The results for the minor and trace inorganic elements are included in Table C6 in Appendix C.

The trace inorganic elements were included in this study to evaluate the potential influence of organic carbon sources. The mobility of certain metals is controlled by oxidation/reduction potential (how oxygen rich the waters are), which in turn is controlled by the amount of organic carbon consumed in microbial reactions. For example, if the metal concentrations in downgradient water wells are elevated compared with the upgradient wells, it may indicate the influence of an organic carbon source such as a dairy lagoon.

4. PERCHLORATE

All wells were tested for perchlorate and analyzed by the EPA's Robert S. Kerr Environmental Research Center in Ada, Oklahoma ("EPA's Ada Laboratory" or "Ada"). The results for perchlorate are in Table C7 in Appendix C. Perchlorate is the most highly oxidized form of chlorine and tends to accumulate in caliche-associated soils in arid regions such as Eastern Washington and Oregon (Rao and others 2007). In this study, it was used as an indicator for potential naturally occurring nitrate.

There is a very slight, but steady, deposition of nitrate and perchlorate from the atmosphere. Much of the deposition starts as aerosol salt particles released from combustion in transportation or power generation or carried off the oceans as aerosols or dust particles from deserts by winds (Prospero and Lamb 2003). In this region, the National Atmospheric Deposition Program (http://nadp.sws.uiuc.edu/) calculates aerial deposition of atmospherically derived nitrate at approximately 0.9 pound per acre per year. Perchlorate accumulates at much lower rates but has not been studied to the same extent, so data are lacking.

This accumulation of nitrate and perchlorate has been occurring since the end of the last glacial period, approximately 10,000 years ago. In areas of higher rainfall, both these compounds are sufficiently soluble to be carried into the subsurface and potentially into groundwater. However, these compounds can build up in the shallow subsurface with the calcium carbonate that forms the cement-like caliche layer in arid regions such as the Lower Yakima Valley. The same conditions that would wash the nitrate out of a caliche soil horizon (the first application of irrigation water to a new field converted from sage habitat) would flush out perchlorate as well.

B. Microbiology

All water wells, dairy lagoons, and WWTP influent samples were analyzed for either total coliform, fecal coliform, or *E. coli* as an indicator of fecal contamination. The results for microbiology are in Table C8 in Appendix C. EPA's mobile microbiology laboratory from its Manchester Laboratory or Cascade Analytical Laboratory in Union Gap conducted the analysis. MST was performed for nine of the dairy lagoons and all three of the WWTP influent samples because they tested positive for fecal contamination. Six of the lagoons were not tested for MST, even though they tested positive for fecal contamination, because of limited resources. MST was not conducted for the Phase 3 water well samples because fecal coliform was not detected.

MST is a means of identifying the source of the fecal contamination in a water sample. The method used in this study is genotypic and is used to detect the presence of host-specific Bacteroides species shed in the fecal material of humans or ruminants. This method allows a presence or absence reporting format for these two sources. A common way of referring to the host-specific genetic identifier for each of these species is a "biomarker."

Because the MST method used in this case is limited to presence or absence reporting only for human and ruminant sources, the data cannot be used to: (1) identify the quantity or proportional levels of contamination from either source; (2) identify specific sources other than human or ruminant; or (3) differentiate between the various kinds of ruminants — cattle, goats, sheep, deer, or elk.

However, the data can be used to: (1) identify the frequency of identification of either of the sources from a particular sampling site if more than one set of samples is collected from the same site; (2) identify human or ruminant source contamination; and (3) confirm that recent fecal contamination has occurred.

C. Organic Compounds

The study looked at four groups of organic compounds: pesticides; trace organics; pharmaceuticals; and hormones. Organic compounds are subject to a number of factors that affect their fate and transport properties and would cause them to travel differently from nitrate in groundwater. Organic molecules are much more likely to sorb to materials in the aquifer, which could retard their migration compared to nitrate. In addition, organic compounds are subject to microbial degradation, which would reduce their concentration in groundwater over time.

1. PESTICIDES

Fifty pesticides were analyzed in water wells, dairy lagoons, WWTP influents, dairy manure piles, dairy application field samples, and crop soil samples by EPA's Manchester Laboratory. The term "pesticide" refers to insecticides, herbicides, fungicides, and various other substances used to control pests. The pesticide analysis conducted as part of this investigation included insecticides and herbicides. The results for the pesticides are included in Table C9 in Appendix C.

The pesticides selected for analysis were those that USGS reported had been used in the Yakima Valley and are considered mobile in groundwater, persistent, or both (Nakagaki and Wolock 2005). Many of the pesticides are used on specific crops and during specific times of the year. This pattern of usage can be an advantage, as it can assist to identify the specific crop where the pesticide was applied. At the same time, it is possible that a particular pesticide, though used in the area, was not applied before the time of sample collection and may not have been detected in the soil samples collected by EPA.

EPA's Manchester Laboratory reported that the sample matrices provided significant interferences that made pesticide analysis difficult for dairy lagoons and WWTP influent samples. Because of this problem, the pesticide concentrations could not be quantified in the dairy lagoons or WWTP influent samples. The laboratory attempted to develop an extraction and cleanup procedure for the dairy lagoon and WWTP sample matrix; however, a procedure to resolve the matrix interference could not be developed within the maximum holding time specified for these samples. The maximum sample holding times would have been exceeded by the time the laboratory could have developed and tested an effective and reliable procedure. Therefore, the pesticide results for the dairy lagoon and WWTP samples are considered unusable for all purposes.

2. TRACE ORGANICS

Each water well, dairy lagoon, and WWTP influent sample was tested for 69 trace organic compounds by the USGS National Water Quality Laboratory in Denver ("USGS NWQ Laboratory"). The trace organics

were not analyzed in soil or manure samples because the USGS NWQ Laboratory was not equipped for this type of analysis and the methods for extraction of such samples are complex. The results for the trace organics and a description of their main use are included in Table C10 in Appendix C.

The USGS developed a method for analyzing a large number of trace organics because USGS and other researchers had found them in domestic and industrial wastewater (Zaugg and others 2006) as well as groundwater and surface waters (Kolpin and others 2002, Barnes and others 2008). EPA believed the trace organics would help to differentiate water wells affected by septic systems (humans) from water wells influenced by other sources such as dairy lagoons or irrigated cropland. The compounds analyzed include many that can be associated with human usage, including caffeine, bisphenol A, cholesterol, menthol, phenol, various flame retardants, acetophenone (fragrance in detergent), benzophenone (fixative for perfumes), camphor (flavor, oxidant), isoborneol (fragrance in perfume), and many others.

3. WASTEWATER AND VETERINARY PHARMACEUTICALS

The sample from each water well, dairy lagoon, WWTP influent, dairy manure pile, dairy application field, and crop sample was analyzed for 14 wastewater pharmaceuticals (Table 3). UNL performed the analysis. The results are included in Table C11 in Appendix C.

Table 3: Wastewater Pharmaceuticals Analyzed and a Description of their Uses

Compound Name[a]	Description
Acetaminophen	Pain reliever (Tylenol)
Amphetamine	Psychostimulant (Dexedrine)
Azithromycin	Antibiotics (Zithromax)
Caffeine	Stimulant
Carbamazepine	Anticonvulsant
Cotinine	Metabolite of nicotine
DEET	Insect repellent
Diphenhydramine	Antihistamine
Ibuprofen	Pain reliever
Methamphetamine	Psychostimulant
Naproxen	Pain reliever (Aleve)
Paraxanthine	Stimulant (metabolite of caffeine)
Thiabendazole	Parasiticide (mintezol)
Triclosan	Antibacterial

[a]The University of Nebraska – Lincoln Water Sciences Laboratory (UNL) conducted the analyses for these compounds.

The group is identified as "wastewater pharmaceuticals" because they are generally used by people for therapeutic reasons and have been detected in municipal wastewater (Ternes and others 2004), surface waters (Kolpin and others 2002), groundwater (Barnes and others 2008), and drinking water (Benotti and others 2009). Many of the compounds are for over-the-counter use (for example, acetaminophen and ibuprofen) and are ingested, but a few are applied topically (DEET and triclosan). Two of the compounds may be used in other animals (thiabendazole and DEET).

People typically excrete 50 to 90 percent of the active ingredients in ingested drugs, either as unmetabolized pharmaceuticals or as metabolites (McGovern and McDonald 2003). These excreted compounds can enter a municipal WWTP or a septic system. Detection of these compounds in water wells may provide evidence that septic systems are a likely source of nitrate. If detected in the influent to the WWTPs, it can establish whether these compounds are being excreted by humans and ending up in municipal sewage waste. If the compounds are detected in the WWTP influent, they can be compared with detected compounds in water wells to evaluate whether septic systems may contribute to the presence of these compounds in well water.

In addition, the sample from each water well, dairy lagoon, WWTP influent, dairy manure pile, dairy application field, and crop sample was analyzed for 17 additional pharmaceuticals and classified as "veterinary pharmaceuticals" for this study. Table 4 lists the compounds and the current U.S. Food and Drug Administration (FDA) approved uses (FDA 2011a and FDA 2011b). Many of the pharmaceuticals shown in Table 4 do not require a veterinarian's prescription and are available for over-the-counter purchase (FDA 2011a and FDA 2011b).[20] The majority of the over-the-counter pharmaceuticals are included in animal feed. The UNL Laboratory also conducted these analyses. The results are included in Table C12 in Appendix C.

Detections of the compounds in Table 4 in water wells would provide evidence that dairy cattle or other animals are a likely source of those compounds. For example, if monensin is detected in water wells, then it is coming from a source other than people (monensin is not approved for use in humans). If the compounds are detected in dairy lagoons, dairy manure piles, or dairy application fields, it is a good indication that the dairy is using the compound.

The UNL Laboratory analyzed the compounds in Table 4 because they are used in livestock production at therapeutic doses to treat and prevent disease and at sub-therapeutic doses as prophylactics and growth promoters (Meyer 2004) and have been found at low levels in various environmental media: groundwater (Barnes and others 2008 and Kummerer 2009); surface water (Koplin and others 2002; Christina and others 2003; and Kummerer, 2009); and wastewater treatment facilities (Ternes and others 2004; and Lubliner and others 2010). More specifically, several of the compounds have been found in dairy lagoons (Watanabe and others 2008 and Watanabe and others 2010); soil and surface samples from dairies (Watanabe and others 2010); private wells nearby a beef cattle operation (Batt and others 2006); and in groundwater underlying swine and beef cattle facilities (Bartlet-Hunt and others 2011). Some of the compounds in Table 4 (such as tetracycline and erythromycin) are also used by people (Kummerer 2009).

The U.S. Department of Agriculture's (USDA's) National Animal Health Monitoring System conducted a survey to evaluate the use of antibiotics in dairy operations for disease prevention, disease treatment, and growth promotion in pre-weaned heifers, weaned heifers, and mature cows (USDA 2008). The survey represented 17 of the nation's major dairy states (Washington was included) and represented about 82 percent of the U.S. dairy cows. The results indicate that the majority of dairy operations use antibiotics to

[20] Compounds that can be obtained over-the-counter include chlortetracycline; erythromycin; lincomycin; monensin; ractopamine; sulfadimethoxine; sulfamethazine; sulfathiazole; tetracycline; tiamulin; trenbolone; tylosin; and virginiamycin.

treat for diarrhea, digestive problems, respiratory problems, mastitis, reproductive disorders, and lameness.

Table 4: Veterinary Pharmaceuticals Analyzed and their FDA Approved Uses

Compound Name[a]	Current FDA Approved Use[b]
Chlortetracycline (total)	Cattle (beef, dairy), poultry, swine, and sheep
Erythromycin	Cattle (beef, dairy) and humans
Lincomycin	Swine, poultry, and humans
Monensin	Cattle (beef, dairy), and poultry
Oxytetracycline	Cattle (beef, dairy), poultry, sheep, and humans
Ractopamine	Cattle (beef), swine, and poultry.
Sulfachloropyridazine	Cattle (beef), swine, and sheep
Sulfadimethoxine	Cattle (beef, dairy), and poultry
Sulfamerazine	Poultry
Sulfamethazine	Cattle (beef, dairy), poultry, and swine
Sulfamethizole	Dogs and cats
Sulfamethoxazole	Humans
Sulfathiazole	Swine
Tetracycline	Cattle (beef, dairy), poultry, sheep, swine, and humans
Tiamulin	Swine
Tylosin	Cattle (beef, dairy), poultry, and swine
Virginiamycin	Swine and poultry

[a]The University of Nebraska – Lincoln Water Sciences Laboratory (UNL) conducted the analyses for these compounds.

[b]Approved as of November 2011.

EPA requested information from the dairies on the use of pharmaceuticals in their operations to identify which of the pharmaceuticals might be used by the dairies in this study. The dairies declined to provide this information to EPA; therefore, there is no specific information from the dairies on their use of these compounds.

4. HORMONES

Each water well, lagoon, and WWTP influent sample was analyzed for five estrogen hormones (17-α-estradiol, 17-α-ethynyl-estradiol; 17-β-estradiol; estriol; and estrone) by EPA's Robert S. Kerr Environmental Research Center in Ada, Oklahoma. The results for these hormones are in Table C13 in Appendix C.

In addition, each water well, dairy lagoon, WWTP influent, dairy manure pile, dairy application field sample, and crop sample was tested for 20 estrogen, androgen, and progestin hormones by the UNL Laboratory, including the five estrogen hormones analyzed by EPA's Ada Laboratory. The results for these analytes are in Table C14 in Appendix C. Table 5 shows all the compounds

evaluated and their natural source or general use. The table also provides information on the FDA approved uses for certain of the analytes as of November 1, 2011 (FDA 2011a and FDA 2011b).

Table 5: Hormonally Active Compounds Analyzed and Descriptions of their Origins and Current FDA Approved Uses

Compound Name[a]	Description (Current FDA Approved Use)
Analyzed at both EPA's Ada Laboratory and the UNL Laboratory	
17-β-Estradiol	Estrogen, natural female sex hormone - many animals
17-α-Estradiol	Estrogen, natural isomer of 17- β-estradiol - many animals
Estriol	Estrogen, natural female sex hormone - many animals
Estrone	Estrogen, natural female sex hormone - many animals
17-α-Ethynyl Estradiol	Estrogen, synthetic analogue of estradiol used for birth control (human)
Analyzed at the UNL Laboratory Only	
11-Keto Testosterone	Androgen, oxidized metabolite of natural testosterone - many animals
17-α-Hydroxyprogesterone	Inactive metabolite of natural progesterone - many animals
4-Androstenedione	Androgen, natural precursor in producing testosterone and estrogens - many animals
Androsterone	Androgen, natural metabolite of testosterone - many animals
Epitestosterone	Inactive isomer of natural testosterone - many animals
Progesterone	Progestin, natural female sex hormone - many animals; also used as a growth promoter (beef cattle)
Testosterone	Androgen, natural male sex hormone - many animals
17-α-trenbolone	Androgen, synthetic growth promoter (beef cattle)
17-β-trenbolone	Androgen, synthetic growth promoter (beef cattle)
Androstadienedione	Androgen, metabolite of natural progesterone and testosterone - many animals; also used as precursor for producing synthetic boldenone, a growth promoter (horse)
α-Zearalanol	Estrogen, naturally produced by plant fungi and found in pasture animals - many animals; also produced synthetically as a growth promoter (beef cattle and sheep)
α-Zearalenol	Estrogen, precursor of natural α-zearalanol- many animals
β-Zearalanol	Estrogen, isomer of α-zearalanol naturally produced by plant fungi and found in pasture animals - many animals
β-Zearalenol	Estrogen, precursor of natural β-zearalanol- many animals
Melengesterol Acetate	Progestin, synthetic growth promoter (beef cattle)

[a]EPA's Robert S. Kerr Environmental Research Center (EPA's Ada Laboratory) and the University of Nebraska – Lincoln Water Sciences Laboratory (UNL Laboratory) both conducted the analyses for these compounds.

Analytes were selected both as a result of laboratory method development showing success at analysis and because of the frequent detections in the environment. Most of these hormones are produced naturally by humans and other animals (Williams and Stancel, 1996; Wilson, 1996; Lange and others, 2002;

Johnson and others, 2006), and some are even produced by plants or fungi (Carson and others, 2008). Many of these hormones can be used as pharmaceuticals in human and veterinary clinical practices (Zheng and others 2008).

Many of the compounds have been detected at low levels in various environmental media or sources, including surface waters (Kolpin and others 2002); dairy lagoons (Kolodziej and others 2004; Arnon and others 2008; Hutchins and others 2007, and Zheng and others 2008); groundwater associated with dairies (Kolodziej and others 2004, Arnon and others 2008); and manure at dairy facilities (Raman and others 2004).

Some of the synthetic hormones analyzed could be indicative of specific animal sources. For example, 17-α-ethynyl-estradiol is a synthetic analogue of 17-α-estradiol and is used in hormonal contraception exclusively in humans. This compound would not be expected to be found in dairy lagoons, unless the lagoons also receive human waste, but could be found in WWTP influent and septic systems.

Another example includes the synthetic growth hormones trenbolone and melengesterol acetate, which are used to promote growth in beef cattle. These compounds are not approved for use in dairy cows, and would not be expected to be detected in dairy lagoons, dairy manure piles, or dairy application fields. If these compounds are detected in water wells, it is an indication that there is a source other than dairy cows or people.

In addition to these compounds, there are some hormones that might indicate a specific animal source, but are not necessarily conclusive. For example, 17-α-estradiol is predominantly produced by dairy cows and could be useful for source tracking (Hanselman and others, 2003), but it is also found in smaller amounts in other animals and in fact can be produced during biotransformation of other natural hormones (Czajka and Londry, 2006). Another example is α-zearalanol and its isomers and precursors; this is produced synthetically as a growth promoter for sheep and beef cattle, but is also produced naturally by plant fungi and can be found in pasture-grazed animals not subject to hormone treatment (Erasmuson and others, 1994).

D. Isotopic Analysis

Samples from all the water wells, dairy lagoons, and WWTPs were submitted to the UNL Laboratory for isotopic analysis. The results of the isotopic analyses are presented in Table C15 in Appendix C. A detailed discussion regarding the interpretation of the isotopic data can be found in Appendix D.

Stable isotopes of the various nitrogen species that make up dissolved inorganic nitrogen (nitrate, nitrite, and ammonium) in water can indicate the general source, or combination of sources, or dominant processes acting on nitrogen in groundwater (Kendall 1998; Kendall and Aravena 1999; Michener and Lajtha 2007). Stable isotopes of nitrate and ammonium can explain the possible origin and process that formed the dissolved inorganic nitrogen in water wells. The ability to attribute nitrate in water wells to specific sources using isotopic analysis maybe a useful supplement to other methods used to identify possible sources.

The interpretation of isotopic data is complex. Multiple studies have shown that different nitrate sources can have overlapping isotopic composition (Kendall and others 2007). In many cases, it is not possible to distinguish the different nitrate sources using isotopic analysis alone if the isotopic ranges overlap.

Extensive sampling within a specific study area is needed to allow different nitrate sources to be identified with more confidence.

Isotopes are forms of the same element that have a different number of neutrons and thus a different mass. As an example, the atomic weight of nitrogen is 14.0067 because the most common isotope of nitrogen is the form with seven neutrons and seven protons and a mass number of 14, written as ^{14}N. ^{14}N makes up 99.636 percent of the total nitrogen in the atmosphere and is referred to as the "light isotope" because it has a lower atomic weight than ^{15}N. Nitrogen 15 consists of seven protons and eight neutrons and, written as ^{15}N, makes up the rest of the total nitrogen in the atmosphere at 0.364 percent and is referred to as the "heavy" isotope."

Isotopic values are reported as the ratio of the heavy isotope (in this case, ^{15}N) to the light isotope (in this case, ^{14}N) in the sample compared with that ratio in a chosen standard. For nitrogen, the standard is the pool of nitrogen in the earth's atmosphere, referred to as the atmospheric standard. Nitrogen isotopic composition is expressed in terms of "delta ^{15}N," which is written as $\delta^{15}N$ and is expressed as parts per thousand differences from the atmospheric standard stated as, "per mil" or written as ‰.

$$\delta^{15}N\ (‰) = \frac{(^{15}N/^{14}N)_{sample} - (^{15}N/^{14}N)_{standard}}{(^{15}N/^{14}N)_{standard}} * 1000$$

$\delta^{15}N$ will be positive (for example, +6.1‰) and therefore heavier if there is more of the ^{15}N compared with the atmospheric standard in the sample. $\delta^{15}N$ will be negative (for example, -0.2‰), or lighter, if there is less of ^{15}N in the sample compared with the atmospheric standard. The $\delta^{15}N$ values are reported as either $\delta^{15}N\text{-}NO_3$ (for nitrate) or $\delta^{15}N\text{-}NH_4$ (for ammonium).

Isotopes of oxygen (^{18}O) have also been used to provide information on the source of nitrate in a sample. The standard for ^{18}O is "Standard Mean Ocean Water," or SMOW. The $\delta^{18}O$ of O_2 gas in the atmosphere is 23.5‰, which is heavier than the $\delta\ ^{18}O\text{-}NO_3$ typically found in nitrate sources without atmospheric influence. Nitrate derived from atmospheric deposition has much heavier $\delta^{18}O\text{-}NO_3$ values in comparison to other nitrate sources of 60‰ to 95‰ (Kendall and others 2007). The ^{18}O values are reported as $\delta\ ^{18}O\text{-}NO_3$ (for nitrate).

E. Age Dating

Several methods are available to measure the age of groundwater in a well, meaning the amount of time that has elapsed between the initial infiltration of the water into the ground and when it was sampled in the well. The measured age of the water may be useful in determining whether the nitrate in water wells is associated with either past or current practices. For this study, EPA used a method involving the analysis of sulfur hexafluoride (SF_6). SF_6 is used for age dating because it has been steadily increasing in the atmosphere as it is released by human activities. To determine the age of the water, the laboratory measures the concentration of SF_6 in the water sample and compares it to measured atmospheric concentrations of SF_6 over time.

SF_6 is a liquid at room temperature and can occur naturally in igneous formations. Industrial production began in the early 1950s. Significant production of SF_6 began in the 1960s for use in high-voltage electrical switches as a replacement for polychlorinated biphenyls (PCBs). SF_6 is extremely stable, with

an estimated atmospheric lifetime of 800 years (Morris and others 1995) to 3,200 years (Ravishankara and others 1993). As more of it is produced, more of it is found in the atmosphere. SF_6 is very persistent in the atmosphere, so the concentration has been steadily increasing. The SF_6 age dating method used in this study can estimate the age of water up to about 40 years, since approximately 1970.

All water wells samples were analyzed for SF_6. The analysis was completed by the USGS laboratory in Reston, Virginia ("USGS Reston Laboratory"). The USGS Reston Laboratory was selected because this laboratory has developed a method that had been used successfully by USGS in Washington State. This analysis is not conducted by commercial laboratories.

In addition to the SF_6 analysis, five gas studies were conducted. These studies involved filling containers with water for the analysis of nitrogen and argon gas to measure the temperature and elevation of the recharge zone for the groundwater. These data are used to correct the SF_6 measurement for excess nitrogen, which can be dissolved when groundwater elevations fluctuate rapidly. It also provides a means to determine if nitrogen gas has been added to the sample from denitrifying bacteria breaking down nitrate in an anoxic setting. None of the EPA samples showed evidence of denitrification based on measured nitrogen to argon ratios. A summary of the results for the age dating is in Table C16 in Appendix C.

SF_6 values were not reported for WW-01, WW-11, WW-12, WW-23, WW-27, and WW-28 (Table C16 in Appendix C). Values were not reported for these samples because the concentration of SF_6 in the groundwater exceeded the highest expected concentration based on average atmospheric concentrations of SF_6. These samples may indicate areas where localized human-caused releases of SF_6 occurred. For example, there could have been an accidental release during servicing of high-voltage equipment or the intentional introduction of SF_6 into water for localized fate and transport studies or for tracing leaking pipes. Based on USGS SF_6 age dating research, the high values of SF_6 observed in certain samples are likely from anthropogenic sources and not related to background levels seen in some volcanic regions.

VIII. QUALITY ASSURANCE AND QUALITY CONTROL

As discussed previously, the project was implemented in three phases. In Phase 1, a GIS screening application was developed and used to identify potential sample locations and sites in the Lower Yakima Valley for Phase 2 sampling. Phase 1 also developed estimates of the nitrogen available for application to the land from different sources. Phase 2 and Phase 3 involved sampling and analysis as described in Sections V, VI, and VII. A discussion of the QA/QC procedures followed in Phase 2 and Phase 3 and a summary of the data validation process conducted by EPA QA chemists are presented in Appendix E. All of the chemical analyses conducted for the Phase 3 study met project data quality goals and criteria and are useable for all purposes, except as noted in Appendix E.

IX. ANALYTICAL RESULTS AND DISCUSSION

The following subsections present the analytical results for the Phase 3 sampling and are organized by the type and location of the source area. The three types of source areas include: dairies; irrigated cropland; and residential septic systems. In addition, one well was sampled that was not related to a specific dairy or crop field (WW-18) and one well was sampled that was not included in the QAPP (WW-30). The locations sampled are illustrated on Figure 11 and include the following:

- Haak Dairy.
- Dairy Cluster (composed of a group of dairies in close proximity).
- Irrigated and fertilized crop fields (three locations: Mabton [three separate crops], Harrah [one crop], and Sunnyside [two separate crops]).
- Septic Systems (four downgradient wells: one in Mabton; one in Harrah; and two in Sunnyside; plus influent from the WWTPs located in Zillah, Mabton, and Toppenish).
- Two residential drinking water wells (WW-18 and WW-30) not associated with a specific dairy or irrigated cropland.

The analytical data for each of the five locations listed above are presented according to the analytical groups described in Section VII: general chemistry; microbiology; organic chemicals; isotopic analyses, and age dating. Each section provides a summary of all of the results for each location.

A data usability review and validation independent of the laboratories were conducted by EPA and are discussed in Appendix E. Data usability is indicated in the data summary tables by inclusion of data qualifiers. The data qualifiers are defined in the footnotes of the data summary tables and further explained in Appendix E. A discussion of data bias, where it could be determined, also is included in Appendix E.

A. R&M Haak Dairy

The R&M Haak Dairy (Haak Dairy) is located in an agricultural area north of the Yakima River, about four miles north of the community of Sunnyside. It is in the Benton groundwater basin, which includes the communities of Sunnyside, Grandview, Satus, Kiona, Prosser, Mabton, and Richland. A ditch runs from north to south through the Haak Dairy. Cow pens, a milking parlor, and three animal waste lagoons lie west of the ditch. There are several large structures where cows are kept. East of the ditch, a center-pivot irrigation system is installed on a large application field that the dairy uses to apply animal waste.

EPA selected this dairy for this study because it generally met the criteria identified in the study plan (see Section VI.C.1). Specifically, the Haak Dairy has: a high concentration of animals per acre; WSDA inspectors noted in their reports for the Haak Dairy that elevated levels of nitrogen were detected in its application fields in the past (WSDA 2012); the Haak Dairy is located near the northern edge of cultivated land use and in a location with relatively few upgradient potential sources of nitrogen; and drinking water wells downgradient of the Haak Dairy showed nitrate levels above the MCL.

NUMBERS OF ANIMALS AND AMOUNT OF WASTE GENERATED

In the past 30 years, the average U.S. dairy herd has increased from 29 to 139 head per farm (USDA 2009). While this is a sizable increase, the dairies in this study are considerably larger. In general, the WSDA is prohibited by state law from providing information to the public identifying the number of animals; the volume of livestock nutrients generated; the number of acres covered by a Nutrient Management Plan (NMP) or used for land application of livestock nutrients; quantities of livestock nutrients transferred to other persons; and crop yields in plans, records, and reports obtained by the state and local agencies from dairies, Animal Feeding Operations (AFOs) or Concentrated Animal Feeding Operations (CAFOs). They can provide some of this information in ranges (WSDA 1996 and WSDA 2010). Table 6 provides information on the number of animals and the amount of dairy waste generated

at the Haak Dairy before and after factoring in estimated losses during storage from volatilization or denitrification.

Table 6: Haak Dairy – Approximate Numbers of Dairy Cattle, Annual Manure Production, and Annual Nitrogen Production

Mature Dairy Cattle	Heifers/ Calves	Annual Manure Production[a] (tons)	Annual Nitrogen Production as Excreted[b] (tons)	Annual Nitrogen After 35% Losses Occur[c] (tons)
700 to 1,699	300 to 399	20,573 – 52,220	129 – 323	84 – 210

[a]Annual manure production is calculated using the following formula: [((# of milking cows)*1.4*108) + ((# of dry cows)*1.4*51) + ((# of heifers)*0.97*56) + ((# of calves *0.33*83)]*365/2000 (WSDA 2010)

[b]Nitrogen production is calculated using the following formula: [((# of milking cows)*1.4*.71) + ((# of dry cows)*1.4*.3) + ((# of heifers)*0.97*.27) + ((# of calves *0.33*.42)]*365/2000 (WSDA 2010)

[c]Losses due to volatilization or denitrification during storage are estimated at 35%. This does not include application losses.

A farm with 2500 dairy cattle is similar in waste load to a city of 411,000 people (EPA 2004). A difference lies in the fact that human waste is treated before discharge into the environment, but animal waste is either not treated at all or minimally treated before discharge into the environment (EPA 2004). Applying this estimate to the range of 700 to 1,699 mature dairy cattle, the Haak Dairy produces an amount of waste similar to a community of 115,000 to 278,000 people.[21] This estimate is based only upon the numbers of mature dairy cattle. It does not include the additional waste load of heifers and calves. For comparison, the human population of Yakima County in 2010 was 243,231.[22]

Sizable amounts of nitrogen, a component of manure, are generated by the Haak Dairy. Nitrogen production can be roughly estimated by applying the ranges of the numbers of animals to formulas used by the WSDA to estimate manure and nitrogen production. The WSDA estimates that during storage at a typical dairy, about 35 percent of the nitrogen in dairy waste is "lost" through the process of volatilization or denitrification (WSDA 2010). The formula does not assume any leakage into the subsoils from the lagoons or other structures or conveyances. If the remaining nitrogen is not taken up by crops or is transported off site to another location, it can migrate to groundwater after being mobilized by irrigation water or precipitation.

WASTE MANAGEMENT

The Haak Dairy uses a variety of animal waste storage methods, including a solids separator, a lagoon system, and dry stacking. The surface area of the Haak Dairy's lagoons is approximately 269,000 square feet, which is equivalent to about 5 football fields (assumes a football field is 57,600 square feet). EPA estimated the surface area of the lagoon system using aerial photographs. The storage capacity of the Haak Dairy's lagoon systems was derived from WSDA inspection reports (WSDA 2012). The Haak

[21] Calculations: 411,000 persons divided by 2500 dairy cows equals 164 persons per cow. 700 cows times 164 persons per cow equals 115,000 persons. 1.699 cows times 164 persons per cow equals 278,000 persons.

[22] U.S. Census Bureau: http://quickfacts.census.gov/qfd/states/53/53077.html

Dairy's lagoon system storage capacity is 9,400,000 gallons which is equivalent to the volume of about 14 Olympic-size swimming pools (assumes the capacity of an Olympic-size swimming pool is 660,000 gallons).

NRCS Washington recommends avoiding the use of "agricultural waste storage ponds" (lagoons), unless no reasonable alternative exists, at locations like the Haak Dairy where there is an aquifer that serves as a domestic water supply (NRCS Washington 2004). If no reasonable alternative exists, consideration should be given to the following: 1) a clay liner designed in accordance with procedures of Agricultural Waste Management Field Handbook Appendix 10D ("NRCS Appendix 10D") with a thickness and coefficient of permeability so that specific discharge is less than 1×10^{-6} cm/sec; 2) a flexible membrane liner over a clay liner; 3) a geosynthetic clay liner (GCL) flexible membrane liner; or 4) a concrete liner designed in accordance with slab on grade criteria for fabricated structures requiring water tightness."

EPA estimated the seepage from lagoons for the Haak Dairy using unit seepage rates from NRCS Appendix 10D and from a field study by Ham and DeSutter (Ham 2002). Lagoon design should consider unit seepage rates in addition to other factors such as state and local requirements and site-specific conditions (e.g., groundwater flow and depth to groundwater) (NRCS 2008). State regulations for specific discharge range from about 500 gallons per acre per day (1/56 inch or 0.45 mm per day) to about 6,800 gallons per acre per day (1/4 inch or 6.35 mm per day) (NRCS 2008). Applying a unit seepage rate of 500 gallons per acre per day to the surface area of the Haak Dairy lagoons equates to an approximate seepage volume of 1,080,000 gallons per year, the equivalent of about 1.6 volumes of an Olympic-size swimming pool annually (Table 7).

Table 7: Haak Dairy – Lagoon System Surface Area, Storage Capacity, and Estimated Leakage Rate

Approximate Lagoon System Liquid Surface Area (square feet)	Lagoon System Storage Capacity (gallons)[23]	Estimated Lagoon System Leakage, Based on Unit Seepage Rate of 500 Gallons per Acre per Day (gallons per year)	Estimated Range of Lagoon System Leakage, Based on Ham Seepage Rate Range (gallons per year)
269,000	9,400,000	1,080,000	482,000 to 5,873,000

Leakage rates of lagoon systems with compacted soil liners were estimated in the field by Ham and DeSutter (Ham 2002). The leakage rates they derived were based on field measurements of animal waste lagoons lined with compacted soil liners with an average hydraulic conductivity of 1.8×10^{-7} centimeters per second. Based on field observations, they concluded that lined dairy lagoons leak at a rate of 0.2 to 2.4 millimeters per day (Ham 2002). Applying the Ham and DeSutter rates to the surface area of the Haak Dairy lagoons, leakage rates can be estimated and are presented in Table 7.

[23] Lagoon systems are generally designed to hold about one third of a dairy's annual liquid waste generation (the amount that would be generated over a four month time period).

Based on the liner infiltration rates developed by the Ham and DeSutter study (Ham 2002), a lined lagoon system of the size of the Haak Dairy's would release approximately 482,000 to 5,873,000 gallons per year into the underlying soils and could threaten groundwater. This amount is the equivalent of about 1 to 9 volumes of Olympic-size swimming pools annually.

The seepage rate of 0.45 mm per day falls within the Ham and DeSutter range of 0.2 to 2.4 mm per day. Leakage rates for the Haak Dairy lagoons would likely be greater than the above estimates if the lagoons are unlined. If the lagoons are lined with a plastic liner, the actual leakage rates could be lower, although plastic liners can be punctured during construction and lagoon maintenance, especially during periodic dredging activities.

EPA requested information from the Haak Dairy about how its lagoons were constructed, but the Dairy declined to provide this information. EPA has asked Yakima County, the WSDA, the Washington Department of Ecology, and the NRCS if any of the Haak lagoons have engineered liners, but none of the agencies could affirm that they do. Many states require lagoons to meet permeability requirements. However, EPA is unaware of any state or local requirements that would compel dairies in Yakima County to construct lagoons to any specific level of permeability.

Utilization rates of the lagoon systems (the percent of lagoon capacity occupied by liquid waste) at the time of the inspection are also provided in the inspection reports. Lagoon utilization rates tend to vary throughout the year. One purpose of the lagoons is to provide storage of liquid dairy waste during the winter months. Such storage is needed to avoid applying dairy wastes to fields during the winter, which can result in the contamination of groundwater if there are no plants growing to take up the nutrients in the waste. Dairy operators generally try to pump out their lagoons toward the end of the growing season so they have sufficient lagoon capacity to store waste through the winter months. Lagoon utilization rates noted in recent inspection reports for the Haak Dairy are summarized in Table 8. A dashed line indicates there was no entry in the report for that particular data element.

SURFACE SOILS

Surface soils in Yakima County have been characterized and mapped by the U.S. NRCS (NRCS 2012). A soil report has been developed for the Haak Dairy (EPA 2012a) and is summarized in Appendix B. All of the surface soils underlying the Haak Dairy have a "well drained" classification, which means water moves readily through the soil.

Most of the surface soils on which the Haak Dairy operates have a high saturated hydraulic conductivity. The percentage of surface soils with a "high" saturated hydraulic conductivity at the Haak Dairy is 82 percent while the percent of surface soils with a "low" saturated hydraulic conductivity is 18 percent. The permeability of the surface soils at the Haak Dairy is more fully described in Appendix B.

Table 8: Haak Dairy – Washington State Department of Agriculture Inspection Dates and Reported Values for Lagoon Capacity

Date of Inspection	Lagoon Capacity (gallons)	Number of Days of Lagoon Capacity[24]	Percent of Lagoon Capacity Utilized at Time of Inspection
3/25/2010	9,400,000	4 months plus	75%
12/18/2008	-----	-----	60%
7/7/2008	9,400,000	4 months plus	80%
9/5/2006	9,400,000	120 days	100%

Animal waste applied to crop fields can be a significant source of nitrogen loading to the soil, groundwater and surface water. Applying large quantities of animal wastes on highly permeable surface soil (i.e., soil with a high hydraulic conductivity) increases the risk of groundwater contamination because water from irrigation or precipitation can readily infiltrate the soil and carry nitrogen past the root zone before it can be taken up by plants (EPA 2004). "Agronomic" nitrogen application rates are typically based on soil types and crop yield goals. However, agronomic nitrogen application rates are not necessarily protective of drinking water. Even with agronomic application rates, mismanagement of irrigation water can move nitrogen through the vadose zone.

APPLICATION FIELDS

The Haak Dairy applies animal wastes as fertilizer onto between 121 and 300 acres of application fields that it owns or leases (WSDA 2010). The WSDA does not disclose exact acreages of the application fields to the public. Corn and triticale (a cross of wheat and rye) are grown in these fields. These crops have relatively high nitrogen needs and can be used as feed. At the time of inspection, WSDA inspectors documented in inspection reports that animal wastes were applied to six fields using a spreader "honey wagon", a sprinkler irrigation system, and a dry spreader (WSDA 2012). Because the Haak Dairy did not provide the information EPA requested about its operations, it is unknown how much manure or liquid dairy lagoon waste the Haak Dairy applies to its fields. However, WSDA inspectors documented that the Haak Dairy measured and recorded elevated levels of nitrogen on some of the its application fields (WSDA 2012). State records also indicate the Haak Dairy exported some of its animal waste to other landowners.

Figure 11 and Figure 12 show the Phase 3 sample locations associated with the Haak Dairy. The sampling locations include:

[24] "Number of Days of Lagoon Capacity" is an estimate of the maximum number of days a lagoon system could accept liquid dairy waste under normal operating conditions without having to be pumped out. It is intended to assess whether a lagoon system is sufficiently large enough to hold liquid waste generated by the dairy throughout the winter months, without having to be pumped out to the waste application fields when there are no crops growing that could take up the nutrients in the waste. It assumes the lagoon system was completely pumped out at the beginning of the time period.

- One residential drinking water well upgradient of the dairy (WW-01);
- One dairy supply well (WW-02);
- One dairy manure pile located on the dairy (SO-01);
- Two dairy lagoons from which three samples were collected (LG-01, LG-02, and LG-03). Lagoon samples LG-02 and LG-03 are from the same lagoon;
- One dairy application field sample (SO-02) and;
- Three downgradient residential drinking water wells (WW-03, WW-04, and WW-05).

1. HAAK DAIRY: GENERAL CHEMISTRY

The four types of general chemistry data collected at the Haak Dairy were: nitrate and other forms of nitrogen; major ions; minor ions and trace inorganic elements; and perchlorate. The results for each of these analyses are discussed below.

Haak Dairy: Nitrate and Other Forms of Nitrogen

Five water well samples, three dairy lagoon samples, one dairy manure pile sample, and one dairy application field sample were analyzed for several forms of nitrogen. The water wells and lagoons were analyzed for nitrate, nitrate plus nitrite, ammonia or ammonium (if in an aqueous solution), and TKN. The dairy manure pile and the dairy application field samples that were receiving dairy waste were analyzed for extractable nitrate-N (Nitrate-N Solid), extractable ammonia-N (Ammonia-N Solid), and total nitrogen by combustion (Total Nitrogen Solid).

In addition, the total nitrogen was calculated for each sample. Total nitrogen is the sum of nitrate, nitrite, and TKN. Using total nitrogen values allows a comparison between different locations. These calculated values are presented as "Calculated Total Nitrogen" in Table 9. The manure sample, SO-01, contained only 22 percent solids and was analyzed for TKN rather than total nitrogen by combustion. For SO-02, the total nitrogen equals the nitrate plus the TKN value. The total nitrogen for all other solid samples equals the nitrogen by combustion result.

Organic forms of nitrogen were not detected in the five water wells and therefore the total nitrogen values in Table 9 for the water wells are the sum of the nitrate plus nitrite concentrations. Nitrate and nitrite were not detected in the lagoon samples LG-01 or LG-03 and therefore the total nitrogen values in Table 9 for the two dairy lagoons are reflected by the TKN values. There is an increase in concentrations of total nitrogen between the upgradient well and the downgradient wells (Figure 12 and Table 9).

The dairy lagoons, dairy manure piles, and dairy application fields at the Haak Dairy are located between the upgradient and downgradient wells sampled and are a likely source of the increased nitrogen levels in the downgradient residential water wells. A WSDA inspection report indicates the Haak Dairy has used inorganic fertilizer on its application fields, in addition to animal wastes (WSDA 2012). In addition, the alkalinity concentrations are greater in the downgradient wells compared to the upgradient well, with the highest concentrations in the dairy lagoons.

Available information about the construction and depth of WW-03 and WW-04, the downgradient wells, suggest they are completed in the alluvial aquifer at depths of 95 feet and 88 feet. Information about the upgradient well, WW-01, is limited. Information on the construction of the dairy lagoons (if they are lined, and if so, with what material) would be useful to determine the extent to which they may be

contributing to the increase in nitrogen concentrations. EPA formally requested this information from the Haak Dairy, but the information was not provided.

Table 9: Haak Dairy – Distribution of Total Nitrogen in Wells, Lagoons, a Manure Pile, and an Application Field.

Sample Location	Nitrate as N (ppm)	Nitrate + Nitrite as N (ppm)	Ammonia as N (ppm)	TKN as N (ppm)	Calculated Total Nitrogen (ppm)
Water Wells and Lagoons					
WW-01: Upgradient Well	0.38	0.39	ND	ND	0.39
WW-02: Dairy Supply Well	3.1	3.4	ND	ND	3.4
LG-01: Dairy Lagoon	NA	ND	1000 (J)	1200 (J)	1200
LG-02: Dairy Lagoon	NA	1.2 (J)	870 (J)	1400 (J)	1401
LG-03: Dairy Lagoon	NA	ND	870 (J)	1400 (J)	1400
WW-03: Downgradient Well	33.1	35.5	ND	ND	35.5
WW-04: Downgradient Well	51.9	55.0	ND	ND	55.0
WW-05: Downgradient Well	12.8	13.4	ND	ND	13.4

Dairy Manure Pile				
Sample Location	**Ammonia-N Solid (ppm)**	**Nitrate-N Solid (ppm)**	**Total Nitrogen Solid (ppm)**	**Total Nitrogen (ppm)**
SO-01: Dairy Manure Pile	10,100	ND	29,700 (as TKN)	29,700

Dairy Application Field				
Sample Location	**Ammonium as N (ppm)**	**Nitrate + Nitrite as N (ppm)**	**Total Nitrogen Solid (ppm)**	**Total Nitrogen (ppm)**
SO-02: Dairy Application Field	4.6	71.7	2760	2760

NA – Not analyzed.

ND – Not detected.

J – the analyte was positively identified, but the associated numerical value is an estimate.

Haak Dairy: Major Ions

Five wells and three dairy lagoon samples were analyzed for the major ions. Figure 13 shows the concentrations of six major ions (calcium, chloride, magnesium, potassium, sodium, and sulfate) in the upgradient well, the dairy lagoons, and the downgradient wells. The concentrations of these six ions all have higher concentrations in the downgradient wells and one or more of the lagoons than the upgradient well. Alkalinity shows a similar pattern.

The difference in concentrations from the upgradient well to downgradient wells ranges from up to a 3-fold increase for potassium; an 8–fold increase for magnesium; more than a 10-fold increase for calcium and sodium; more than a 30-fold increase for chloride and more than a 65-fold increase for sulfate.

Chloride is considered a conservatively transported ion (Freeze and Cherry 1979; Gooddy and others 2002), meaning that it typically flows with the groundwater unchanged and is unlikely to participate in reactions or be electrically attracted to minerals making up the aquifer matrix. Based on the observed concentrations, chloride and other ions are being introduced to the aquifer between the upgradient and downgradient wells at the Haak Dairy. One explanation for the observed increase in these major ions is that the dairy lagoons are introducing these ions to the groundwater. As with total nitrogen, this indicates that the Haak Dairy is a likely source of the major ions in the three downgradient residential drinking water wells at the Haak Dairy.

Haak Dairy: Minor and Trace Inorganic Elements

Five water well and three dairy lagoon samples were analyzed for minor and trace inorganic elements. Two metals, barium and zinc, which may be used at dairies, were detected in both the water wells and dairy lagoons (Table 10). There is an increase in the concentrations from the upgradient to the downgradient wells for both barium and zinc, with the highest concentrations in the lagoons. Other metals (chromium, copper, iron, and manganese) were detected in dairy lagoons, but were not found in the water wells. The dairy manure pile and dairy application field samples were not analyzed for minor or trace inorganic elements.

Table 10: Haak Dairy – Concentrations of Barium and Zinc in Wells and Lagoons

Location	Barium (µg/L)	Zinc (µg/L)
WW-01 – Upgradient Well	13.5	Not detected
WW-02 – Dairy Supply Well	32.7	5.4
LG-01 – Dairy lagoon	297	1790
LG-02 – Dairy lagoon	931	5410
LG-03 – Dairy lagoon	907	5260
WW-03 – Downgradient Well	135	21
WW-04 – Downgradient Well	178	12
WW-05 – Downgradient Well	164	15

Haak Dairy: Perchlorate

Perchlorate was analyzed only in the water well samples (Table C7 in Appendix C). The concentrations ranged from 0.14 micrograms per liter (µg/L) (WW-01) to 1.96 µg/L (WW-03). The results for the perchlorate analysis are evaluated together with the isotopic data because perchlorate was used as an indicator of potential accumulation of atmospherically derived nitrate associated with caliche soils (see Appendix D). Perchlorate was not evaluated in the dairy lagoon system because it is not expected to persist in the anoxic environment of a dairy lagoon.

2. HAAK DAIRY: MICROBIOLOGY

The water well samples were analyzed for total coliform and *E. coli* (Table C8 in Appendix C). Only one well (WW-04) had a detectable level of total coliform, but *E. coli* was not detected. MST was not completed for this well because *E. coli*, a form of fecal coliform, was not detected.

Samples from the three dairy lagoons were analyzed for fecal coliform. As would be expected, high concentrations of fecal coliform were found in the dairy lagoons. MST was performed on the samples from the three dairy lagoons. One of the samples (LG-01) indicated a ruminant source, while two of the samples (LG-02 and LG-03) indicated both human and ruminant sources. Lagoon samples LG-02 and LG-03 are collocated, so similar results for these samples are expected; however, it is unknown why the MST results for this dairy lagoon indicate human sources.

3. HAAK DAIRY: ORGANIC COMPOUNDS

The organic compounds evaluated included: pesticides; trace organics; pharmaceuticals; and hormones.

Haak Dairy: Pesticides

All the samples collected at the Haak Dairy were analyzed for pesticides; however, the laboratory was unable to quantify pesticide concentrations in the lagoon samples because of matrix interference (Table C9 in Appendix C).

Atrazine was the only pesticide detected in the water wells. Atrazine also was detected in one of the dairy application field samples. The concentrations of atrazine detected in the water wells and dairy application field sample at the Haak Dairy are summarized in Table 11. None of the water well samples exceeded the MCL for atrazine of 3.0 µg/L.

Table 11: Haak Dairy – Concentrations of Atrazine in Wells, a Manure Pile, and an Application Field

Location	Atrazine
WW-01 – Upgradient Well	0.015 (J) µg/L
WW-02 – Dairy Supply Well	0.041 (J) µg/L
WW-03 – Downgradient Well	Not Detected
WW-04 – Downgradient Well	0.015 (J) µg/L
WW-05 – Downgradient Well	0.11 (J) µg/L
SO-01 – Dairy Manure Pile	Not Detected
SO-02 – Dairy Application Field	1.1 (J) µg/kg

J – the analyte was positively identified, but the associated numerical value is an estimate.

Atrazine is an herbicide commonly used on corn fields and is frequently detected in groundwater beneath both urban and agricultural land uses (Barbash and others 1999). Both grain and silage corn is significant in dairy and other cattle livestock operations. The detection of atrazine at a higher concentration in one of the downgradient wells compared with the upgradient well indicates that there likely is a source from a

crop field associated with the Haak Dairy; however, the presence of atrazine in the upgradient well indicates that the Haak Dairy is not the only source.

Three pesticides (Dicamba, Dacthal-DCPA, and 2,4-D) were found in the dairy manure pile sample from the Haak Dairy (SO-01). In addition to atrazine, five other compounds were detected in the dairy application field sample collected adjacent to the Haak Dairy (SO-02): 4-nitrophenol; pentachlorophenol; endosulfan sulfate; chlorpyrifos ethyl; and diuron. The dairy application field was historically planted with corn and triticale.

Haak Dairy: Trace Organics

Trace organic analysis was performed on the water well and lagoon samples, but not on the manure or soil samples collected at the Haak Dairy (Table C10 in Appendix C). One compound, bis-(2-ethylhexyl) phthalate, (DEHP) was detected in WW-01 (upgradient well) at a concentration of 2.66 µg/L and in WW-03 (downgradient well) at a concentration of 5.26 µg/L. The MCL for DEHP is 6.0 µg/L. Phthalates, such as DEHP, are compounds used in the manufacture of plastics to decrease the brittleness of containers and other objects. They are increasingly ubiquitous in the environment (EPA 2011).

Other trace organics were detected in the three Haak Dairy lagoons but not detected in any of the downgradient wells (Table C10 in Appendix C). Compounds found in all three dairy lagoons included fecal indicators (such as 3-beta-coprostanol and 3-methyl-1h-indole); plant sterols (for example, beta-sitosterol, beta-stigmastanol, and cholesterol); p-creosol; 4-nonylphenol-monoethoxylate; and phenol.

Haak Dairy: Pharmaceuticals

Analyses were conducted for two suites of pharmaceutical chemicals: wastewater pharmaceuticals and veterinary pharmaceuticals. The wastewater pharmaceuticals analyzed in this study are generally used by humans. Veterinary pharmaceuticals are used in veterinary practice and many can also be used to treat people.

There were no wastewater pharmaceuticals detected in the water well, dairy manure pile, or dairy application field samples. Thiabendzadole, which is used to treat worm infections in both livestock and humans and can be used as a pesticide (Mayo Clinic 2011), was detected in one dairy lagoon (LG-01) sample. DEET, an insect repellent, was detected in one dairy lagoon (LG-03) sample. A summary of the wastewater pharmaceutical data is provided in Table C11 in Appendix C.

Three veterinary pharmaceuticals (tetracycline, chlortetracycline, and monensin) were detected in one or more water wells, dairy lagoon, dairy application field or dairy manure pile sample. Detected concentrations for these three compounds are summarized in Table 12. Several additional veterinary compounds were detected in the dairy lagoons: LG-01 (eight compounds); LG-02 (nine compounds), and LG-03 (six compounds). Several compounds were also detected in the manure sample (SO-01: four compounds) and dairy application field sample (SO-02: five compounds). A summary of the veterinary pharmaceutical data is provided in Table C12 in Appendix C.

Tetracycline was detected in two of the downgradient wells (WW-03 and WW-04) and in the dairy lagoon, dairy manure pile, and dairy application field samples. The detections in all the dairy supply

sources provides a good indication that tetracycline is used at the Haak Dairy. These data indicate that the Haak Dairy is a likely source of tetracycline in the two downgradient residential water wells.

Table 12: Haak Dairy – Concentrations of Pharmaceuticals in Wells, Lagoons, a Manure Pile, and an Application Field

Sample Location	Tetracycline	Chlortetracycline	Monensin
WW-01 – Upgradient Well	ND	ND	0.027 µg/L
WW-02 – Dairy Supply Well	ND	ND	ND
LG-01 – Dairy Lagoon	1.96 (J) µg/L	R	45.0 (J) µg/L
LG-02 – Dairy Lagoon	5.83 (J) µg/L	0.067 (J) µg/L	1086 (J) µg/L
LG-03 – Dairy Lagoon	2.88 (J) µg/L	R	420 (J) µg/L
SO-01 –Dairy Manure Pile	178 µg/kg	ND	441 µg/kg
SO-02 – Dairy Application Field	26.9 µg/kg	45.6 µg/kg	2.9 µg/kg
WW-03 – Downgradient Well	0.041 (J) µg/L	ND	0.028 µg/L
WW-04 – Downgradient Well	0.075 (J) µg/L	0.049 µg/L	0.023 µg/L
WW-05 – Downgradient Well	ND	ND	0.022 µg/L

J – the compound was positively identified, but the associated numerical value is an estimate.

ND – Not detected

R – the data is unusable for all purposes because of analytical problems with the sample.

Monensin was detected in the upgradient well (WW-01) and all three of the downgradient wells (WW-03, WW-04, and WW-05). Monensin was also detected in the Haak dairy lagoons, manure sample, and application field sample. The detection of monensin in the upgradient well indicates there is an upgradient source of this compound. The high concentrations of monensin seen in the Haak Dairy lagoon samples, manure pile, and application field sample indicate that it is used at the Haak Dairy. The data indicate that the Haak Dairy is a possible source of monensin in the three downgradient residential drinking water wells. Given the presence of monensin in the upgradient well, another source of monensin is likely.

Haak Dairy: Hormones

Hormone analysis was conducted by two laboratories. EPA's Ada Laboratory, analyzed water well and dairy lagoon samples for five hormones (Table C13 in Appendix C). Solid samples (soil and manure) were not analyzed by EPA's Ada Laboratory because the laboratory specializes in liquid samples and had not developed solid extraction techniques at the time of the study. Hormone analysis also was conducted by the UNL Laboratory. The UNL Laboratory analyzed both the liquid and solid samples, including the samples collected from water wells, dairy lagoons, dairy manure piles, and dairy application fields. The UNL's Laboratory hormone analysis includes 20 compounds (Table C14 in Appendix C), including the five hormones analyzed by EPA's Ada Laboratory.

EPA's Ada Laboratory did not detect hormones in any of the water well samples. EPA's Ada Laboratory detected 17-β-estradiol, 17-α-estradiol, and estrone in the three lagoons at the Haak Dairy, but did not detect 17-α-ethynyl-estradiol or estriol in the dairy lagoons.

The UNL Laboratory did not detect any of the five hormones analyzed by EPA's Ada Laboratory in water well samples. The UNL Laboratory detected testosterone in samples from all five wells and epitestosterone in one well (WW-04). Testosterone also was detected in LG-01 (See Table 13). Epistesterone was not detected in any of the dairy sources. Four hormones were detected in all three dairy lagoons (17-α-estradiol, α-zearalanol, and progesterone) and two hormones were detected in both the dairy manure pile and dairy application field samples (4-androstenedione, 17-α-estradiol) (Table C14 in Appendix C). The concentration of testosterone in the upgradient well (WW-01) was greater than in the downgradient wells (WW-03 to WW-05), although the highest concentrations were in LG-01.

Table 13: Haak Dairy – Concentrations of Testosterone in Wells, Lagoons, a Manure Pile, and an Application Field

Location	Testosterone
WW-01 – Upgradient Well	21 ng/L
WW-02 – Dairy Supply Well	16 ng/L
LG-01 – Dairy Lagoon	32 ng/L
LG-02 – Dairy Lagoon	Not Detected
LG-03 – Dairy Lagoon	Not Detected
SO-01 – Dairy Manure Sample	Not Detected
SO-02 – Dairy Application Field Sample	Not Detected
WW-03 – Downgradient Well	9 ng/L
WW-04 – Downgradient Well	12 ng/L
WW-05 – Downgradient Well	7 ng/L

ng/L – Nanograms per liter

4. HAAK DAIRY: ISOTOPIC ANALYSES

As discussed in Section VII.D, isotopic analysis can indicate the general source, or combination of sources, or dominant processes acting on nitrogen in groundwater (Kendall 1998; Michener and Lajtha 2007). Stable isotopes of nitrate and ammonium can explain the possible origin and process that formed the nitrate in water wells. The ability to attribute nitrate in water wells to specific sources using isotopic analysis may be a useful supplement to other methods used to determine possible sources.

The three main sources of nitrate evaluated for their contribution to water wells using isotopic analysis were animal waste, synthetic fertilizer, and atmospheric deposition. Animal waste can include both human and non-human animal waste. Based on the isotopic results from this study, and the scientific literature, a $\delta^{15}N\text{-}NO_3$ value greater than 8.4‰ indicate that the likely dominant source of nitrate in water wells is animal waste. A $\delta^{15}N\text{-}NO_3$ value less than 2.0‰ indicate that the likely dominant source of nitrate in water wells is synthetic fertilizer. Values of $\delta^{15}N\text{-}NO_3$ between 2.0‰ and 8.4‰ indicate that the nitrate source is animal waste, synthetic fertilizer, or a combination of the two. $\delta^{18}O\text{-}NO_3$ values of 20‰ or higher were interpreted

as evidence of some atmospheric contribution. The rationale for the selection of these values is in Appendix D. Table 14 below provides the specific results for the five water wells.

Table 14: Haak Dairy – Concentration of Nitrate in Wells, Isotopic Signatures, and the Interpreted Dominant Source of the Nitrate

Well Number	Nitrate-N (mg/L)[a]	$\delta^{15}N\text{-}NO_3$ (‰)	$\delta^{18}O\text{-}NO_3$ (‰)	Interpreted Dominant Source(s)[b]
WW-01	0.2	NM	NM	NM
WW-02	3.0	2.7	15	Indeterminate
WW-03	34	2.3	29	Fertilizer and/or Animal Waste[c] with Some Atmospheric Contribution
WW-04	49.9	3.5	-4.5	Fertilizer and/or Animal Waste
WW-05	12.8	9.7	7.1	Animal Waste

[a]The nitrate concentrations are from the UNL isotopic analysis.

[b]Interpretation of dominant sources is based on the following:

- $\delta^{15}N\text{-}NO_3$. Values less than 2.0 = dominated by synthetic fertilizer; values between 2.0 to 8.4 = undetermined mixture of synthetic fertilizer and/or animal waste; values greater than 8.4 = dominated by animal waste.
- $\delta^{18}O\text{-}NO_3$ values greater than 20.0‰ provide evidence for some atmospheric contribution. $\delta^{18}O\text{-}NO_3$ values below 20.0‰ could have an atmospheric contribution, but it becomes indistinguishable from other sources.

[c] Animal waste can be either human or non-human waste

NM – the sample was not measured because of the low nitrate concentrations.

The dominant source of nitrate for WW-05 is likely animal waste based on the interpretation of dominant sources indicated above for animal waste. The dominant sources for WW-02 are indeterminate given the low nitrate value. The dominant sources for WW-03 are likely synthetic fertilizer and/or animal waste with some atmospheric contribution, while the dominant sources for WW-04 are likely synthetic fertilizer and/or animal waste.

5. HAAK DAIRY: AGE DATING

Age dating analysis was conducted on the water well samples to estimate the length of time since the water infiltrated from the surface to the aquifer, including transport time to the wells. The reported ages may not correspond to when the water became contaminated. Two SF_6 samples were collected from each well and the values were averaged (Table 15). The age of the water in the Haak Dairy supply well and the downgradient wells ranged from approximately 16 to 25 years.

Table 15: Haak Dairy – Results of Age Dating Analyses Performed for Wells Reported in Years Since the Water Infiltrated From the Surface to the Aquifer.

Sample Location	Sample Age (years)	Duplicate Age (years)	Average (years)
WW-01: Upgradient Well	Over Value[a]	Over Value	NA
WW-02: Supply Well	15.8	16.3	16.1
WW-03: Downgradient Well	24.8 (J)	25.8 (J)	25.3
WW-04: Downgradient Well	21.8 (J)	23.3 (J)	22.6
WW-05: Downgradient Well	18.3 (J)	20.8 (J)	19.6

[a] Over value means that the sample contained more SF_6 than can be explained by equilibrium with modern air.

J – the analyte was positively identified, but the associated numerical value is an estimate.

6. HAAK DAIRY: SUMMARY OF RESULTS FOR RESIDENTIAL WATER WELLS

Table 16 summarizes the nitrate levels and compounds detected in the water wells upgradient and downgradient of the Haak Dairy and the compounds also detected in the source areas sampled on the dairy along with conclusions from the isotopic analysis. Total coliform, but not *E. coli* or fecal coliform, was detected in WW-04. The age of the water in the Haak Dairy supply well and the downgradient wells ranged from approximately 16 to 25 years.

All of the residential water wells except WW-01, the upgradient well, have nitrate levels that exceed the MCL of 10 mg/L. The concentration of total nitrogen, six major ions (chloride, calcium, magnesium, potassium, sodium, and sulfate), and two metals (barium and zinc) increased from the upgradient well to the downgradient wells at the Haak Dairy, with the highest concentrations detected in the dairy lagoon, dairy manure pile, and dairy application field samples. Alkalinity showed a similar pattern. Sample LG-01 was taken from liquid waste in a ditch just before entering the lagoon system and contained sulfate. Sulfate was not detected in co-located samples LG-02 and LG-03, likely because of anoxic conditions in the lagoon.

EPA evaluated four groups of organic compounds: pesticides; trace organics; pharmaceuticals; and hormones as part of this study. Atrazine was the only pesticide detected in the water well samples. Atrazine is widely used throughout the area, and the source is likely historical and current use of the pesticide, which may or may not be associated with dairy operations. EPA's Manchester Laboratory was unable to quantify the pesticide concentrations in the lagoon samples as a result of matrix interference. Atrazine was detected in the dairy field application sample. Several other pesticides were detected in the manure pile samples and application field samples but were not detected in the water wells.

The only trace organic detected in the water wells was bis-(2-ethylhexyl) phthalate (DEHP). DEHP was not detected in any of the dairy lagoons and was not analyzed for in the dairy manure pile or application field samples. Several trace organics were detected in all three dairy lagoons (for example, beta-sitosterol, beta-stigmastanol, and phenol) but not in the water wells.

Table 16: Haak Dairy – Comparisons of General Chemistry and Organic Compounds Detected in Wells and Dairy Operations and Assessment of Nitrate Sources in the Residential Wells Using Isotopic Analyses

Residential Well Number	Nitrate Concentration (mg/L)[a]	General Chemistry in Well	Organic Compounds Detected in Well	Organic Compounds also Detected in Dairy Sources	Dominant Source(s) of Nitrate Based on Isotopic Analyses
WW-01 Upgradient Well	0.38	No trends in total nitrogen or major ions as this is an upgradient well	Atrazine DEHP Testosterone Monensin	Not applicable. WW-01 is an upgradient well.	Not measured because lack of nitrate in sample
WW-03 Downgradient Well	34	Total nitrogen concentrations increased 90 –fold compared with the upgradient well. Three- to 65-fold increase in concentrations of six major ions compared with the upgradient well.	DEHP Tetracycline, Testosterone Monensin	Tetracycline (all dairy sources) Testosterone (LG-01) Monensin (all dairy sources)	Fertilizer and/or animal waste with some atmospheric contribution
WW-04 Downgradient Well	49.9	Total nitrogen concentrations increased over 100-fold compared with the upgradient well. Four- to 45-fold increase in concentrations of six major ions compared with the upgradient well.	Atrazine Tetracycline Chlortetracycline Testosterone Monensin	Atrazine (S0-02) Tetracycline (all dairy sources) Chlortetracycline (LG-02 and SO-02) Testosterone (LG-01) Monensin (all dairy sources)	Fertilizer and/or animal waste
WW-05 Downgradient Well	12.8	Total nitrogen concentrations increased more than 30-fold compared with the upgradient well. Four- to over 10-fold increase in concentrations of six major ions compared with the upgradient well.	Atrazine Testosterone Monensin	Atrazine (SO-02) Testosterone (LG-01) Monensin (all dairy sources)	Animal waste

[a] Nitrate results are from Cascade Analytical Laboratory

There were no wastewater pharmaceuticals detected in the water wells associated with the Haak Dairy. Thiabendzadole and DEET were each detected in one dairy lagoon while no compounds were detected in the manure pile or application field samples. For the veterinary pharmaceuticals, three compounds were detected in the water wells (chlortetracycline, tetracycline and monensin). Chlortetracycline was detected in one downgradient well and in one dairy lagoon and the application field sample. Tetracycline was detected in two of the three downgradient wells and in all three dairy lagoons, the dairy manure pile, and the dairy application field samples. Monensin was detected in the upgradient well and in the three downgradient wells. Monensin was detected in all the dairy lagoons and the dairy manure pile and dairy application field samples. Several additional compounds were detected in the dairy lagoons, dairy manure pile, and application field samples.

Two hormones were detected in water wells (testosterone and epitestosterone). Testosterone was detected in all five water wells with the highest concentration in the upgradient well, and in one lagoon but not in the manure pile or application field samples. Epitestosterone was detected in one downgradient well but not in any other source.

The isotopic data indicates that the source of nitrate in each of the wells varies. For WW-02, the source is indeterminate given the low nitrate value. The possible likely sources in WW-03 are fertilizer and/or animal waste with an atmospheric contribution. The dominant sources in WW-04 are likely fertilizer and/or animal waste. The likely dominant source in water well WW-05 is animal waste.

In conclusion, all of the residential water wells except WW-01 (the upgradient well as determined by general USGS flow direction) have nitrate levels above the MCL. The total nitrogen and major ions data indicate that the Haak Dairy is likely releasing nitrogen and six major ions to the groundwater and is a likely source of those higher levels in downgradient wells. The metals barium and zinc and alkalinity show a similar pattern. Information on the construction and depth of the upgradient well would be helpful to verify groundwater flow direction and clarify the contributions of sources to the higher concentrations seen from the upgradient well to the downgradient wells.

The Haak Dairy is a likely source of the tetracycline detected in the two downgradient residential water wells. The multiple detections of monensin in the Haak Dairy sources and in the downgradient wells indicates monensin is being used at the Haak Dairy and is a possible source in the downgradient wells. The isotopic data provide good evidence that animal waste (human or non-human) is a dominant contributor to the nitrate contamination for WW-05.

B. Dairy Cluster

The “Dairy Cluster” refers to a group of dairies north of the Yakima River. The Dairy Cluster is located about 2 miles north of the town of Liberty, near the northern edge of the irrigated area in the Yakima Valley. George DeRuyter & Son Dairy and the D and A Dairy are treated as two separate facilities, although they have some common ownership (“DeRuyter Dairy” and “D and A Dairy”- see Figure 14). Cow Palace 1 and 2 comprise a single facility (“Cow Palace” - see Figure

14). Liberty Dairy and Bosma Dairy are adjacent to one another and share some facilities and so are treated as a single facility ("Liberty and Bosma Dairies" - see Figure 14). The facilities generally consist of cow pens, milking parlors, animal waste lagoons, and animal waste application fields. Irrigation ditches run through the dairy properties.

EPA selected these dairies for this study because they met the criteria identified in the study plan (see Section VI.C.1). Specifically, the Dairy Cluster has: high concentration of animals per acre[25]; dairy inspection reports (WSDA 2012) indicate that elevated levels of nitrogen had been measured in dairy application fields in the past; the dairies are located near the northern edge of cultivated land in the Valley with relatively few upgradient potential sources of nitrogen; and drinking water wells downgradient of the dairies showed levels of nitrate significantly elevated above the MCL.

Numbers of Animals and Amount of Waste Generated

The WSDA provides the ranges for the number of animals at the Dairy Cluster facilities and the amount of waste generated including the estimated losses during storage of the waste (WSDA 2010) (See Table 17).

As a group, in 2009 the dairy cluster had more than 17,240 mature dairy cattle, and more than 7,000 heifers/calves. As discussed above, a farm with 2500 dairy cattle is similar in waste load to a city of 411,000 people (EPA 2004). A difference lies in the fact that human waste is treated before discharge into the environment, but animal waste is either not treated at all or minimally treated before discharge into the environment (EPA 2004). Applying this estimate to the Dairy Cluster range of 17,240 to 19,378 mature dairy cattle, the Dairy Cluster produces an amount of waste similar to a community of more than 2,827,000 people.[26] This estimate is based only upon the numbers of mature dairy cattle. It does not include the additional waste load of heifers and calves. For comparison, the human population of Yakima County in 2010 was 243,231.[27]

Sizable amounts of nitrogen, a component of manure, are generated by the dairies. Nitrogen production can be roughly estimated for each dairy by applying the ranges of the numbers of animals to formulas used by the WSDA to estimate manure and nitrogen production (WSDA 2010). As a whole, the Dairy Cluster generates more than 500,000 tons of manure each year equating to more than 3,100 tons of nitrogen.

[25] Cow Palace had 23 cows per acre. The number of cows per acre at specific Yakima County dairies ranged from 1 to 34. Cow Palace had the second-highest ratio in the county (WSDA 2010). Cows per acre ratios are not static and have changed since EPA began this study.

[26] Calculations: "Mature dairy cattle estimate": 5,700 cows + 6,840 cows +4,700 cows = 17,240 cows (low end of range for each dairy). 411,000 persons divided by 2500 dairy cows equals 164 persons per cow. 17,240 cows times 164 persons per cow equals 2,827,360 persons. Rounded off to the nearest thousand equals 2,827,000 persons.

[27] U.S. Census Bureau: http://quickfacts.census.gov/qfd/states/53/53077.html

Table 17: Dairy Cluster – Approximate Numbers of Dairy Cattle, Annual Manure Production, and Annual Nitrogen Production

Mature Dairy Cattle	Heifers and Calves	Annual Manure Production (tons) [a]	Annual Nitrogen Production as Excreted [b] (tons)	Annual Nitrogen After 35% Losses Occur [c] (tons)
Liberty and Bosma Dairies				
5,700 to 6,839	1,000 to 1,999	155,040 to 193,950	984 to 1,220	640 to 793
Cow Palace				
More than 6,840	2,000 to 2,999	More than 188,570	More than 1,200	More than 780
DeRuyter and D and A Dairies				
4,700 to 5,699	More than 4,000	More than 161,460	More than 977	More than 635

[a]Annual manure production is calculated using the following formula: [((# of milking cows)*1.4*108) + ((# of dry cows)*1.4*51) + ((# of heifers)*0.97*56) + ((# of calves *0.33*83)]*365/2000 (WSDA 2010)

[b]Nitrogen production is calculated using the following formula: [((# of milking cows)*1.4*.71) + ((# of dry cows)*1.4*.3) + ((# of heifers)*0.97*.27) + ((# of calves *0.33*.42)]*365/2000 (WSDA 2010)

[c]Losses caused by volatilization or denitrification during storage are estimated at 35%. This estimate does not include application losses.

The WSDA estimates that during storage at a typical dairy, about 35 percent of the nitrogen in dairy waste is "lost" through the process of volatilization or denitrification (WSDA 2010). The formula does not assume any leakage into the subsoils from the lagoons or other structures or conveyances. If the remaining nitrogen is not taken up by crops grown on application fields or transported offsite to another location, it may end up in the groundwater. For the Dairy Cluster as a whole, more than 2,050 tons of nitrogen remain after losses.

WASTE MANAGEMENT

The dairies in the Dairy Cluster use a variety of animal waste storage methods, including lagoon systems, dry stacking, manure pits, composting, above ground tanks, and (at the DeRuyter Dairy) an anaerobic digester.

All the facilities in the Dairy Cluster use their own lagoon systems to store animal wastes. The nitrogen-rich liquids that leak through the bottom and sides of the lagoons can migrate downward through the soil column to the drinking water aquifer. EPA estimated the surface areas of the Dairy Cluster lagoon systems using aerial photographs. The lagoon systems' storage capacities were derived from WSDA inspection reports (Table 18).

Table 18: Dairy Cluster – Lagoon System Surface Area, Storage Capacity, and Approximate Leakage Rate

Dairy	Approximate Lagoon System Liquid Surface Area (square feet)	Lagoon System Storage Capacity (gallons)[28]	Estimated Lagoon System Leakage, Based on Unit Seepage Rate of 500 Gallons per Acre per Day (gallons per year)	Estimated Range of Lagoon System Leakage, Based on Ham Seepage Rate Range (gallons per year)
Liberty and Bosma Dairies	932,600	67,000,000	3,744,000	1,700,000 to 20,000,000
Cow Palace	400,000	40,800,000	1,606,000	720,000 to 8,600,000
DeRuyter and D and A Dairies	508,400	33,000,000	2,041,000	910,000 to 11,000,000

In combination, the Dairy Cluster lagoon systems have a surface area of approximately 1,841,000 square feet (equivalent to about 32 football fields – assumes a football field is 57,600 square feet). The lagoons have a combined maximum storage capacity of about 126,800,000 gallons, the equivalent volume of about 192 Olympic-size swimming pools (assumes the capacity of an Olympic-size swimming pool is 660,000 gallons).

As discussed previously, the NRCS Washington recommends avoiding the use of "agricultural waste storage ponds" (lagoons), unless no reasonable alternative exists, at locations like the Dairy Cluster where there is an aquifer that serves as a domestic water supply (NRCS Washington 2004). Assuming the same unit seepage rate as for the Haak Dairy (500 gallons per acre per day), seepage volume at the Dairy Cluster is approximately 7,391,000 gallons per year. This is the equivalent volume of about 11 Olympic-size swimming pools annually.

Based on the Ham and DeSutter study (Ham 2002), a lined lagoon system with a similar surface area would release approximately 3,330,000 to 39,600,000 gallons per year into the underlying soils, the equivalent of about five to 60 volumes of Olympic-size swimming pools annually.

Leakage rates for the Dairy Cluster lagoons would likely be greater than the above estimates if the lagoons are unlined, especially if they are constructed in well drained, highly permeable soils. If the lagoons are lined with a plastic liner, the actual leakage rates could be lower, although plastic liners are easily punctured during construction and lagoon maintenance and, therefore, also leak. The most effective liner system incorporates both plastic and clay layers.

[28] Lagoon systems are generally designed to hold about one third of a dairy's annual liquid waste generation (the amount that would be generated over a four month time period).

EPA requested information from the Dairy Cluster dairies about how their lagoons are constructed, but they declined to provide the information. EPA has asked Yakima County, the WSDA, the Washington Department of Ecology, and the NRCS if any of the Dairy Cluster lagoons have engineered liners, but none of the agencies could affirm that they do. EPA is unaware of any state or local requirements that would compel dairies in Yakima County to construct lagoons to any specific level of permeability.

Utilization rates of the lagoon systems vary and are indicated in the WSDA inspection reports (WSDA 2012). Table 19 provides a summary of the lagoon system information contained in the inspection reports. A dashed line indicates no information was provided in the reports for a particular data element.

Table 19: Dairy Cluster – Washington State Department of Agriculture Inspection Dates and Reported Values for Lagoon Capacity

Date of Inspection	Lagoon Capacity (gallons)	Number of Days of Lagoon Capacity[a]	Percent of Lagoon Capacity Utilized at Time of Inspection	Number of Lagoons
Liberty and Bosma Dairies				
3/2/1011	67,000,000	-----	-----	17
1/26/2010	67,000,000	120 days plus	60%	13
4/24/2008	67,000,000	120 days plus	60%	-----
7/18/2006	67,000,000	1 year plus	60%	-----
Cow Palace				
3/25/2010	9,400,000	4 months plus	75%	-----
12/18/2008	-----	-----	60%	-----
7/7/2008	9,400,000	4 months plus	80%	-----
9/5/2006	9,400,000	120 days	100%	-----
DeRuyter Dairy				
1/25/2011	25,000,000	-----	-----	4
12/4/2008	19,000,000	4 months plus	30%	-----
1/11/2007	-----	-----	70%	-----
D and A Dairy				
1/25/2011	8,000,000	-----	-----	5
12/4/2008	9,000,000	4 months plus	35%	-----
1/11/2007	-----	-----	60%	-----

[a]"Number of Days of Lagoon Capacity" is an estimate of the maximum number of days a lagoon system could accept liquid dairy waste under normal operating conditions without having to be pumped out. It is intended to assess whether a lagoon system is sufficiently large enough to hold liquid waste generated by the dairy throughout the winter months, without having to be pumped out to the waste application fields when there are no crops growing that could take up the nutrients in the waste. It assumes the lagoon system was completely pumped out at the beginning of the time period.

SURFACE SOILS

Surface soils in Yakima County have been characterized and mapped by the U.S. NRCS (NRCS 2012). A soil report has been developed for each of the dairies (EPA 2012a) and is summarized in Appendix B. Almost all the surface soils underlying the Dairy Cluster have a "well drained" classification, which means water moves readily through the soil.

More than 80 percent of the surface soils underlying the Dairy Cluster have a high saturated hydraulic conductivity. The percentage of surface soils with a "high" saturated hydraulic conductivity at the dairies is approximately: 88 percent at the Liberty and Bosma Dairies; 82 percent at the Cow Palace; and 93 percent at the DeRuyter and D and A Dairies. The permeability of the surface soils at the different dairies is more fully described in Appendix B.

Animal waste applied to crop fields can be a significant source of nitrogen loading to the soil, groundwater, and surface water. Applying large quantities of animal wastes on highly permeable surface soils (i.e., soil with a high hydraulic conductivity) increases the risk of groundwater contamination because water from irrigation or precipitation can readily infiltrate the soil surface and carry nitrogen past the root zone before it can be taken up by plants (EPA 2004). Agronomic nitrogen application rates are typically based on soil types and crop yield goals. However, agronomic nitrogen application rates are not necessarily protective of drinking water.

APPLICATION FIELDS

All the dairies in the Dairy Cluster apply animal wastes as fertilizer onto application fields that they own or lease according to WSDA inspection reports (WSDA 2012). Corn and triticale (a cross of wheat and rye) are typical crops grown by dairies because they have high nitrogen needs and can be used as feed. Animal waste application fields can be a significant source of nitrogen loading to the soil and potentially the groundwater and surface water.

n general, Washington law restricts WSDA ability to disclose to the public the exact size of application fields, but WSDA can release the information in ranges (WSDA 1996). The Liberty Dairy and Bosma Dairy own or lease between 1,800 and 2,500 acres of application fields; the Cow Palace owns or leases between 551 and 900 acres; and the DeRuyter Dairy and D and A Farms Dairy own or lease between 3,201 and 4,000 acres (WSDA 2010).

The dairies employ a variety of animal waste application methods, including spreaders ("honey wagons"), "big gun" sprinklers, sprinkler irrigation systems, dry spreaders, and custom applicators. If a dairy does not have enough land on which to apply the waste within agronomic rates, excess waste may be transferred offsite to another user.

WSDA inspectors noted in their reports for the Dairy Cluster that elevated levels of nitrogen were detected in some of its application fields in the past (WSDA 2012). Excessive amounts of nitrogen on highly permeable, irrigated surface soils pose a threat to groundwater. In addition, WSDA records indicate the dairies in the Dairy Cluster exported some of their animal wastes to other landowners.

For this study, the samples were collected from the following dairies: DeRuyter Dairy; D and A Dairy; Cow Palace; and Liberty and Bosma Dairies. Figures 11 and Figures 15 show the sample locations for the Dairy Cluster. The sampling locations include:

- One upgradient drinking water well (WW-06) located north (upgradient) of the other sample locations in the Dairy Cluster.
- Dairy supply wells located on the DeRuyter Dairy (WW-07); D and A Dairy (WW-08); and Cow Palace (WW-09). The supply well at the Liberty and Bosma Dairies was not sampled because it has a water treatment system.
- One dairy manure pile sample was collected from each of the following dairies: DeRuyter Dairy (SO-03), D and A Dairy (SO-05); Cow Palace (SO-07); and Liberty and Bosma Dairies (SO-09).
- Twelve dairy lagoon samples:
  - DeRuyter Dairy (LG-04, LG-05, and LG-06. These samples were collected from three separate lagoons);
  - D and A Dairy (LG-07, LG-08, and LG-09. LG-08 and LG-09 were collocated);
  - Cow Palace (LG-10, LG-11, and LG-12. LG-11 and LG-12 were collocated); and
  - Liberty Dairy (LG-13 and LG-14) and Bosma Dairy (LG-15). These samples were collected from three separate lagoons.
- Four dairy application field samples;
  - DeRuyter Dairy (SO-04);
  - D and A Dairy (SO-06);
  - Cow Palace (SO-08); and
  - Liberty and Bosma Dairies (SO-10).
- Eight downgradient residential drinking water wells (WW-10 to WW-17).

1. DAIRY CLUSTER: GENERAL CHEMISTRY

The four types of general chemistry data collected at the Dairy Cluster were: nitrate and other forms of nitrogen; major ions; minor ions and trace inorganic elements; and perchlorate. Each of these is discussed below.

Dairy Cluster: Nitrate and Other Forms of Nitrogen

Twelve water well and 12 dairy lagoon samples were analyzed for nitrate, nitrate plus nitrite, ammonia or ammonium, and TKN. The dairy manure pile and dairy application field samples were analyzed for extractable nitrate-N (Nitrate-N Solid), extractable ammonia-N (Ammonia-N Solid), and total nitrogen by combustion (Total Nitrogen Solid). Table 20 summarizes the nitrate and other forms of nitrogen data. In addition, total nitrogen from all forms was calculated for each sample and is presented as "Calculated Total Nitrogen" in Table 20.

Table 20: Dairy Cluster – Distribution of Total Nitrogen in Wells, Dairy Lagoons, Manure Piles, and Application Fields

Location	Nitrate as N (ppm)	Nitrate + Nitrite as N (ppm)	Ammonia as N (ppm)	TKN as N (ppm)	Calculated Total Nitrogen (ppm)
Water Wells and Lagoons					
WW-06: Upgradient Well	0.71	0.73	ND	ND	0.73
WW-07: Supply Well	1.02	1.19	ND	ND	1.19
WW-08: Supply Well	11.7	12.9	ND	ND	12.9
WW-09: Supply Well	ND	ND	ND	ND	ND
LG-04: Lagoon	NA	ND	920 (J)	1600 (J)	1600
LG-05: Lagoon	NA	ND	1200 (J)	1600 (J)	1600
LG-06: Lagoon	NA	ND	1200 (J)	1800 (J)	1800
LG-07: Lagoon	NA	3.1 (J)	950 (J)	1700 (J)	1703
LG-08: Lagoon	NA	ND	730 (J)	1200 (J)	1200
LG-09: Lagoon	NA	ND	760 (J)	1100 (J)	1100
LG-10: Lagoon	NA	ND	190 (J)	380 (J)	380
LG-11: Lagoon	NA	ND	240 (J)	500 (J)	500
LG-12: Lagoon	NA	ND	240 (J)	290 (J)	290
LG-13: Lagoon	NA	2.5 (J)	970 (J)	1700 (J)	1703
LG-14: Lagoon	NA	ND	860 (J)	1400 (J)	1400
LG-15: Lagoon	NA	ND	560 (J)	900 (J)	900
WW-10: Downgradient Well	ND	ND	ND	ND	ND
WW-11: Downgradient Well	22.3	23	ND	ND	23
WW-12: Downgradient Well	45	46.7	ND	ND	46.7
WW-13: Downgradient Well	41.4	44	ND	ND	44
WW-14: Downgradient Well	40.9	43.4	ND	ND	43.4
WW-15: Downgradient Well	29.4	30.2	ND	ND	30.2
WW-16: Downgradient Well	22.3	23.4	ND	ND	23.4
WW-17: Downgradient Well	21.7	22.7	ND	ND	22.7

Dairy Manure Piles				
Location	**Ammonia-N Solid (ppm)**	**Nitrate-N solid (ppm)**	**Total Nitrogen Solid (ppm)**	**Total Nitrogen (ppm)**
SO-03: Manure	1470	32.8	9210	9210
SO-05: Manure	1060	43.1	13600	13600
SO-07: Manure	3600	18.9	16100	16100
SO-09: Manure	1700	5.69	13700	13700

Dairy Application Fields				
Location	**Ammonium as N (ppm)**	**Nitrate + Nitrite as N (ppm)**	**Total Nitrogen Solid (ppm)**	**Total Nitrogen (ppm)**
SO-04: Application field	7.3	247	2110	2110
SO-06: Application field	6.8	45.6	960	960
SO-08: Application field	2.9	84.3	3040	3040
SO-10: Application field	7.1	139	3590	3590

J – the analyte was positively identified, but the associated numerical value is an estimate.

Figure 15 shows the concentration of total nitrogen for the samples collected at the Dairy Cluster. As with the Haak Dairy, the total nitrogen concentrations are higher in the downgradient wells compared with the upgradient well, with several significant sources of nitrogen in between (such as dairy lagoons, dairy manure piles, and dairy application fields). The concentration of nitrate in the upgradient well is within background range. Nitrate concentrations in some downgradient wells are more than four times the MCL. The data suggest that the Dairy Cluster is a likely source of the increased nitrogen levels in the downgradient wells.

Dairy Cluster: Major Ions

Figures 16a, 16b, and 16c shows the concentrations of several major ions in the upgradient water wells, the supply wells, the lagoons, and the downgradient wells. An average concentration for the three lagoon samples collected in each of the four areas was calculated (LG-04, LG-05, and LG-06; LG-07, LG-08, and LG-09; LG-10, LG-11, and LG-12; and LG-13, LG-14, and LG-15). The average concentrations were calculated for the four sets of lagoon samples to allow for easier comparison of the data.

The figures show a similar pattern to that observed at the Haak Dairy, with elevated concentrations in the downgradient wells (WW-10 to WW-17) compared with the upgradient wells (WW-06) and the supply wells (WW-07 to WW-09), with the highest concentrations in the lagoons. Alkalinity also showed a similar pattern. The increase in the concentrations ranges from up to: seven-fold for sodium; nine-fold for magnesium; 10-fold for calcium; and more than 30-fold for chloride. Potassium showed a slight increase. As with the Haak Dairy, sulfate showed the largest increase in concentration between the upgradient and downgradient wells. As with the Haak Dairy, the dairy sources are a likely source of major ions in the downgradient water wells.

Dairy Cluster: Minor Ions and Trace Inorganic Elements

All water well and dairy lagoon samples were analyzed for minor ions and trace elements, but the dairy manure pile and dairy application field samples were not analyzed (Table C6 in Appendix C). The trace inorganic elements found in both the water wells and the dairy lagoons included barium, iron, manganese, mercury, and zinc. Barium was detected in all 11 wells, iron was detected in five wells, manganese was detected in four wells, mercury was detected in one well, and zinc was detected in eight wells. Barium was the only trace inorganic element that increased between the upgradient well and the downgradient wells, with the highest concentrations in the lagoons.

Dairy Cluster: Perchlorate

Perchlorate analysis was performed on all of the water samples collected from wells near the dairies (Table C7 in Appendix C). The concentrations ranged from less than the detection limit (0.003 µg/L) to 3.08 µg/L (WW-17). Perchlorate analysis was conducted to augment the isotopic data as an indicator of potential accumulation of atmospherically derived nitrate associated with caliche soils. The dairy lagoon samples were not analyzed for perchlorate because this compound is rapidly degraded in anoxic environments, such as a dairy lagoon.

2. DAIRY CLUSTER: MICROBIOLOGY

There were no detections of total coliform, fecal coliform, or *E. coli* in the water well or supply well samples associated with the Dairy Cluster with the exception of water well WW-06 which had a detectable level of total coliform. *E. coli* was not detected in WW-06 and therefore MST was not completed for this well or for any of the wells because there was no indication of fecal contamination.

All the dairy lagoons in the Dairy Cluster were analyzed for fecal coliform. Samples LG-04 through LG-09 also were analyzed for *E. coli* and MST was performed. *E. coli* or MST analyses were not performed on the other lagoon samples (LG-10 to LG-15) because EPA's mobile microbiology laboratory was available to participate in the sampling effort for only a limited period of time (Table C8 in Appendix C).

All the dairy lagoons had high levels of fecal coliform. Of the six dairy lagoons evaluated using MST, five indicated a ruminant source (LG-04, LG-05, LG-06, LG-07, and LG-08) while one indicated both a ruminant and a human source (LG-09). It is unknown why human waste was detected in LG-09 at the D and A Dairy, given that this facility likely is on a septic system.

3. DAIRY CLUSTER: ORGANIC COMPOUNDS

Dairy Cluster: Pesticides

Four pesticides (atrazine, bentazon, alachlor, and ioxynil) were detected in the water wells associated with the Dairy Cluster. Atrazine, bentazon, and alachlor are pesticides commonly used in agricultural crop production. Ioxynil is not registered for use in the United States (PAN 2011).

- Atrazine: WW-06 (upgradient well) and downgradient wells WW-12, WW-13, WW-14, WW-15, WW-16, and WW-17
- Bentazon:WW-08 (dairy supply well)
- Alachlor:WW-13 and WW-17
- Ioxynil: WW-13

No results are reported for pesticides in the dairy lagoon samples because the laboratory experienced problems with interferences as a result of the complex nature of the sample media. The four pesticides detected in the water wells were not detected in the dairy manure pile or dairy application field samples.

The concentrations of atrazine found in the water wells ranged from 0.016 µg/L to 0.19 µg/L. None of the samples exceed the MCL for atrazine of 3 µg/L. Alachlor levels found in two water wells were 0.048 µg/L and 0.057 µg/L. None of the samples exceed the MCL for alachlor of 2 µg/L. The concentration of bentazon in water well WW-08 was 0.036 µg/L. The concentration of ioxynil in well sample WW-13 was 0.063µg/L. There are no MCLs established for bentazon or ioxynil.

The four pesticides are not anticipated to be used in animal operations at the dairies for pest control (Pike 2004), but atrazine, alachlor, and bentazon are commonly used in corn production.

Each of the dairies includes crop land where pesticides may have been applied. Given the historical use of these pesticides and the detection of these compounds in other studies, it is likely that these pesticides are from the current and historical use of pesticides for agriculture, which could include application by the dairies on the associated fields. See Table C9 in Appendix C for all the results.

Seven pesticides were detected in one or more of the dairy manure pile samples. These pesticides were not detected in the water well samples. Seven pesticides were also detected in one or more of the field application samples, but they were not detected in the water well samples.

Dairy Cluster: Trace Organics

Three compounds were detected in water well samples associated with the Dairy Cluster:

- Bis-(2-ethylhexyl) phthalate (DEHP) in WW-06 (upgradient well), WW-11, and WW-17
- Naphthalene in WW-07 (supply well)
- Tetrachloroethylene in WW-07 (supply well).

Of the three compounds found in water wells, only DEHP was found in one dairy lagoon sample (LG-10). DEHP is a common plasticizer and could come from a variety of sources. Naphthalene and tetrachloroethylene were not detected in any of the dairy lagoons.

All 12 dairy lagoons associated with the Dairy Cluster had one or more detection of trace organics (Table C10 in Appendix C). Eight compounds were detected in all 12 dairy lagoons associated with the Dairy Cluster. These compounds are generally the same as those detected at the Haak Dairy: 3-beta-coprostanol; 3-methyl-1h-indole (skatol); 4-nonyphenol monoethoxylate; beta-sitosterol; beta-stigmastanol; cholesterol; p-cresol; and phenol. Trace organics were not analyzed in manure or soil samples.

Dairy Cluster: Pharmaceuticals

Only one wastewater pharmaceutical, DEET, was detected in a single downgradient well (WW-10). There were no detections of any of the wastewater pharmaceuticals in the dairy manure pile or dairy field application samples. Three wastewater pharmaceutical compounds were detected in dairy lagoons associated with the Dairy Cluster: DEET (eight dairy lagoons); diphenhydramine (two dairy lagoons); and thiabendazole (three dairy lagoons). The source of the DEET could be its use as an insect repellent. The source of the diphenhydramine in the dairy lagoons is unknown. Diphenhydramine is a common antihistamine used by people and can be used on dogs and cats. Thiabendzadole is a parasiticide that is used to treat worm infections in both livestock and humans and can be used as a pesticide (Mayo Clinic 2011).

Table 21 indicates the veterinary pharmaceuticals that were detected in one or more water well samples and in the dairy lagoons, dairy manure piles, and dairy application field samples. Five veterinary pharmaceuticals were detected in the water wells (chlortetracycline, monensin, tetracycline, tylosin, and virginiamycin). Veterinary pharmaceuticals were not detected in water wells WW-12 and WW-16 and lagoon sample LG-04.

Table 21: Dairy Cluster – Concentrations of Five Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, and Application Fields

Sample Location[a]	Chlortetracycline	Monensin	Tetracycline	Tylosin	Virginiamycin
Upgradient Water Well (reported as µg/L)					
WW-06	ND	ND	0.051 (J)	ND	ND
Dairy Supply Wells (reported as µg/L)					
WW-07	ND	0.109	0.041 (J)	ND	0.023 (J)
WW-08	ND	ND	5.17	ND	ND
WW-09	ND	0.023	ND	ND	ND
Dairy Lagoons (reported as µg/L)					
LG-05	0.075 (J)	430.2 (J)	4.48 (J)	1.7(J)	0.334 (J)
LG-06	ND	463.8 (J)	5.41 (J)	10.22(J)	R
LG-07	R	R	0.442 (J)	0.184 (J)	R
LG-08	R	449.6 (J)	6.07 (J)	R	R
LG-09	R	337.7 (J)	3.6 (J)	1.07 (J)	R
LG-10	0.079 (J)	2.24 (J)	6.55 (J)	R	0.816 (J)
LG-11	R	85 (J)	1.76 (J)	R	0.413 (J)
LG-12	R	135 (J)	1.91 (J)	R	0.314 (J)
LG-13	R	662 (J)	10.3 (J)	0.139 (J)	0.184 (J)
LG-14	R	498 (J)	8.6 (J)	R	R
LG-15	R	426 (J)	7.55 (J)	R	1.0 (J)
Dairy Manure Piles and Dairy Application Fields (reported as µg/kg)					
SO-03	0.7	109	954	14.8	ND
SO-04	0.6	5.1	27.4	2.1	ND
SO-05	17.7	1329	17.9	ND	ND
SO-06	3.0	5.1	16.5	ND	ND
SO-07	2303	283	2484	21.1	ND
SO-08	13.5	7.9	104	ND	ND
SO-09	ND	437	309	ND	ND
SO-10	ND	7	53	ND	ND
Downgradient Water Wells (reported as µg/L)					
WW-10	ND	0.499	ND	ND	ND
WW-11	ND	ND	0.038	0.029	ND
WW-13	ND	ND	ND	ND	0.041
WW-14	ND	0.033	ND	ND	0.024
WW-15	0.119	ND	ND	ND	ND
WW-17	ND	ND	0.049	ND	ND

[a]Water wells WW-12 and WW-16 had no detections and dairy lagoon sample LG-04 had no detections of these five compounds.

J – the compound was positively identified, but the associated numerical value is an estimate.

ND – not detected.

R – the data are unusable for all purposes because of analytical problems with the sample.

Monensin was not detected in the upgradient well. Monensin was detected in WW-10 and WW-14, and was also detected in all the dairy lagoons (exception of LG-07), dairy manure piles, and dairy application field samples. These detections indicate that monensin is likely used at the dairies in the Dairy Cluster. The dairies are a likely source of the monensin in WW-10 and WW-14. This conclusion is reinforced by the isotopic findings, which indicate that the source of nitrate for WW-14 is animal waste (although animal waste can be either human or non-human).

Tetracycline was detected in the upgradient well (WW-06) and in two downgradient wells, which had lower concentrations than the upgradient well (WW-11 and WW-17). Tetracycline was detected in all of the dairy lagoon samples, dairy manure pile samples, and dairy application field samples, indicating that tetracycline is used at the dairies. It is possible that the dairy sources are one of the sources of the tetracycline in the downgradient wells. However, given that the concentrations in the upgradient well are higher than the downgradient wells, another source for the tetracycline is likely.

Tylosin was detected in one downgradient well (WW-11) and five of the dairy lagoons, along with several dairy manure pile and dairy application field samples. Virginiamycin was detected in two downgradient wells (WW-13 and WW-14) and six dairy lagoons but not in any of the dairy manure piles or application field samples. Chlortetracycline was detected in dairy lagoons and manure and soil samples and in one downgradient well (WW-15). The data suggest the dairies are possible sources of these substances in the downgradient wells.

Several other veterinary pharmaceutical compounds (ractopamine, sulfachloropyridazine, sulfadimethoxine, sulfamethazine, and sulfathiazole) were detected in the majority of dairy lagoon, dairy manure pile, and dairy application field samples but were not detected in downgradient water wells. This finding would indicate they are being used by the dairies in the Dairy Cluster.

Dairy Cluster: Hormones

EPA's Ada Laboratory analyzed the liquids samples (water wells and dairy lagoons), but not the solids samples (dairy manure pile and dairy application fields) for five hormones. The laboratory did not detect any of the five hormones in water wells associated with the Dairy Cluster; however three of these five hormones (17-α-estradiol, 17-β-estradiol, and estrone) were detected in all 12 of the dairy lagoons. The hormones 17-α-ethyl-estradiol and estriol were not detected in any of the Dairy Cluster lagoon samples (Table C13 in Appendix C).

The UNL Laboratory analyzed the Dairy Cluster liquids and solids samples for 20 hormones, including the five hormones that the EPA's laboratory analyzed. The UNL Laboratory detected 17-α-estradiol in the upgradient well (WW-06) and in one supply well (WW-08) but not in any of the downgradient wells. The UNL Laboratory also detected 17-β-estradiol and estrone in one supply well (WW-09).

For all the 20 hormones analyzed by UNL, four were detected in an upgradient well or in a downgradient well (17-α-estradiol, androstadienedione, androsterone, and testosterone) (Table 22).

Table 22: Dairy Cluster – Concentrations of Four Hormones in Wells, Lagoons, Manure Piles, and Application Fields

Sample Location[a]	17-α-Estradiol[b]	Androstadienedione[b]	Androsterone[b]	Testosterone[b]
Upgradient Water Well (reported as µg/L)				
WW-06	0.003	ND	ND	0.005
Dairy Supply Wells (reported as µg/L)				
WW-08	0.003	0.002 (J)	ND	0.003
WW-09	ND	ND	0.005 (J)	0.008
Dairy Lagoons (reported as µg/L)				
LG-05	ND	3.50	ND	0.193
LG-06	ND	ND	ND	0.195
LG-07	ND	ND	ND	0.016
LG-08	0.383	ND	ND	0.090
LG-09	0.844	ND	ND	0.007
LG-10	0.459	ND	ND	0.028
LG-11	2.92	0.166	ND	ND
LG-12	3.27	0.20	ND	0.024
LG-13	ND	ND	ND	0.262
LG-14	ND	ND	ND	0.170
LG-15	ND	ND	ND	ND
Dairy Manure Piles and Dairy Application Fields (reported as µg/kg)				
SO-03	34.7	29.4	ND	2.95
SO-05	ND	15.4	ND	ND
SO-06	0.11	ND	ND	ND
SO-07	18.7	13.5	ND	ND
SO-09	16.9	19.3	ND	ND
Downgradient Water Wells (reported as µg/L)				
WW-11	ND	ND	ND	0.004
WW-12	ND	0.004 (J)	0.018 (J)	ND
WW-15	ND	ND	0.019 (J)	ND
WW-17	ND	ND	0.008 (J)	ND

[a]The four hormones were not detected in dairy supply well (WW-07), four downgradient water wells (WW-10, WW-13, WW-14, and WW-16), one dairy lagoon (LG-04) and three dairy application field samples (SO-04, SO-08, and SO-10).

[b] Analyses were conducted by the UNL Laboratory

J – the compound was positively identified, but the associated numerical value is an estimate.

ND – not detected.

The hormone 17-α-Estradiol was detected in the upgradient well and in several of the dairy lagoons and dairy manure pile samples but not in any of the downgradient wells. Androstadienedione was detected in one downgradient water well and several dairy lagoons and

dairy manure pile samples. Androsterone was detected in three downgradient wells but not in any of the dairy sources. Testosterone was detected in the upgradient well and two downgradient wells and in the majority of the dairy lagoons. The concentration in the upgradient well was greater than the downgradient wells. It is possible that the dairies are a source of androstadienedione and testosterone in the downgradient wells; however, given the detection of testosterone in an upgradient well, other sources are likely.

4. DAIRY CLUSTER: ISOTOPIC ANALYSIS

Isotopic analyses were completed for water wells WW-06 to WW-17 (Table 23) by the UNL Laboratory. There was insufficient nitrate in WW-06, WW-09, and WW-10 to complete the analysis. Additional details on the results of isotopic analyses conducted for this study are provided in Appendix D of this report.

Table 23: Dairy Cluster – Concentration of Nitrate in Water Wells, Isotopic Signatures, and the Interpreted Dominant Source of the Nitrate Based on the Observed Values

Location	Nitrate-N (mg/L)[a]	δ^{15}N-NO_3 (‰)	δ^{18}O-NO_3 (‰)	Interpreted Dominant Source(s)[b]
WW-06	0.6	NM	NM	NM
WW-07	1.1	-0.1	NM	Fertilizer
WW-08	11.7	5.3	23	Fertilizer and/or Animal Waste[c] with Some Atmospheric Contribution
WW-09	NM	NM	NM	NM
WW-10	NM	NM	NM	NM
WW-11	21.6	3.0	18	Fertilizer and/or Animal Waste
WW-12	43.6	6.2	-1.4	Fertilizer and/or Animal Waste
WW-13	42	11	16	Animal Waste
WW-14	40.7	10	8.5	Animal Waste
WW-15	27.4	5.2	30	Fertilizer and/or Animal Waste with Some Atmospheric Contribution
WW-16	23	5.9	5.8	Fertilizer and/or Animal Waste
WW-17	23.3	6.9	2.5	Fertilizer and/or Animal Waste

[a] The nitrate concentrations are from the UNL isotopic analysis.

[b] Interpretation of dominant sources is based on the following:

- δ^{15}N-NO_3. Values less than 2.0 = dominated by synthetic fertilizer; values between 2.0 to 8.4 = undetermined mixture of synthetic fertilizer or animal waste; values greater than 8.4 = dominated by animal waste.
- δ^{18}O-NO_3 values greater than 20.0‰ provide evidence for some atmospheric contribution. δ^{18}O-NO_3 values below 20.0‰ could have an atmospheric contribution, but it becomes indistinguishable from other sources.

[c] Animal waste can include both human and non-human waste

NM – the sample was not measured because of the low nitrate concentrations.

The dominant source of nitrate for WW-13 and WW-14 is likely animal waste while the dominant source of nitrate for WW-07 is likely fertilizer. The dominant sources of nitrate for WW-11, WW-12, WW-16, and WW-17 is likely a combination of synthetic fertilizer and/or

animal waste while the dominant sources for WW-08 and WW-15 is likely a combination of synthetic fertilizer and/or animal waste with some atmospheric contributions.

5. DAIRY CLUSTER: AGE DATING

Table 24 presents the age dating data and, similar to the Haak Dairy, two samples were collected for each water well.

Table 24: Dairy Cluster – Results of Age Dating Analyses Performed for Wells Reported in Years Since the Water Infiltrated From the Surface to the Aquifer

Location	Sample Age	Duplicate Age	Average of Samples	Average of Group
WW-06 – Upgradient	16.3 (J)	15.8 (J)	16.1	16.1
WW-07 – Supply Well	36.3 (J)	32.8 (J)	34.6	42.5
WW-08 – Supply Well	35.3 (J)	40.8 (J)	38.1	
WW-09 – Supply Well	58.3 (J)	51.3 (J)	54.8	
WW-10 – Downgradient Well	44.3 (J)	44.8 (J)	44.6	31.6
WW-11 – Downgradient Well	Over Value[a]	Over Value[a]	NA	
WW-12 – Downgradient Well	Over Value[a]	Over Value[a]	NA	
WW-13 – Downgradient Well	24.3 (J)	23.8 (J)	24.1	
WW-14- Downgradient Well	30.8	29.3	30.1	
WW-15 – Downgradient Well	27.8 (J)	28.3 (J)	28.1	
WW-16 – Downgradient Well	29.8 (J)	28.8 (J)	29.3	
WW-17 – Downgradient Well	33.3 (J)	33.8 (J)	33.6	

[a] "Over value" means that the sample contained more SF_6 than can be explained by equilibrium with modern air.

J – the compound was positively identified, but the associated numerical value is an estimate.

Averages were calculated for the upgradient well (WW-06), three supply wells (WW-07, WW-08, and WW-09), and the six downgradient wells with reported values (WW-10, WW-13, WW-14, WW-15, WW-16, and WW-17). The results indicate the youngest water was sampled in the upgradient well, with an average age of 16.1 years, which suggests that it is a relatively shallow well and is consistent with its upgradient location. The reported ages may not correspond to when the water became contaminated. The oldest waters were in supply wells associated with the Dairy Cluster, with an average age greater than 40 years. The average age of the waters in the downgradient wells was 31.6 years. These relative ages are generally consistent with available well log information indicating that the dairy supply wells are typically screened in the basaltic aquifer, and the downgradient residential wells are commonly screened in the shallower alluvial aquifer.

6. DAIRY CLUSTER: SUMMARY OF RESULTS FOR RESIDENTIAL WATER WELLS

Table 25 provides a summary of the groups of compounds (general chemistry and organic compounds) and analytical techniques (isotopic analyses) that provide information useful to address the question of the likely sources of the nitrate for the nine residential water wells associated with the Dairy Cluster. No microbial contamination was found in the downgradient wells. There appears to be a correlation between the age dating data and the well depths for those water wells that have well depth information (see Appendix A3).

As with the Haak Dairy, the nitrate levels in residential wells downgradient of the Dairy Cluster are greater than EPA's MCL for nitrate with the exception WW-10. Nitrate levels in the Dairy Cluster supply wells were generally low, with the exception of WW-08. This well serves the DeRuyter Dairy and D and A Dairy and was measured at 11.7 mg/L, which exceeds the MCL for nitrate. The well is located immediately downgradient of one of the DeRuyter Dairy's waste application fields.

The total nitrogen data show increasing concentrations from the upgradient well, past several sources of nitrogen, and to the downgradient wells. The downgradient wells contain substantially more nitrogen than is present in the upgradient well. The major ion concentrations, especially for calcium and chloride, increase between the dairy sources (dairy lagoons, dairy manure piles, and dairy application fields) and the downgradient wells with high nitrate. This pattern was also seen for barium and alkalinity.

For the organic compounds, four pesticides were detected in the water wells associated with the Dairy Cluster. However, none of these pesticides was detected in the dairy manure pile or dairy application field samples and as stated above the lagoon samples could not be quantified because of matrix interference problems.

Three trace organics were detected in water wells (DEHP, naphthalene, and tetrachloroethylene). Naphthalene and tetracycline were detected in a dairy supply well, while DEHP was detected in one downgradient well. Several of the trace organic compounds were found in all of the 12 dairy lagoons (for example, 3-beta-coprostanol; beta-sitosterol, and phenol).

For the wastewater pharmaceuticals, one water well had a detected level of DEET while there were three compounds detected in dairy lagoons (DEET; diphenhydramine; and thiabendazole). There were no detected levels in the dairy manure piles or application field samples.

Veterinary pharmaceuticals were detected in 10 water wells. Chlortetracycline was detected in one downgradient well, two dairy lagoons, and six manure pile or application field samples. Monensin was detected in two supply wells and two downgradient wells and in all but one of the dairy sources. Tetracycline was detected in the upgradient water well, two supply wells, and two downgradient wells and all of the dairy sources. Tylosin was detected in one downgradient well and several dairy sources while virginiamycin was detected in one supply well and two downgradient wells and several dairy lagoon samples.

Table 25: Dairy Cluster – Comparisons of Major Ions and Organic Compounds Detected in Samples from Wells and Dairy Operations and Assessment of Nitrate Sources in the Wells Using Isotopic Analyses

Residential Well Number	Nitrate Concentration (mg/L)[a]	General Chemistry in Well	Organic Compounds Detected in Well	Organic Compounds also Detected in Dairy Sources	Dominant Source(s) of Nitrate Based on Isotopic Analyses
WW-06 Upgradient Well	0.6	No trends in total nitrogen or major ions as this is an upgradient well	Atrazine, DEHP Tetracycline α-Estradiol testosterone	Not applicable. WW-06 is an upgradient well.	Not measured because lack of nitrate in sample
WW-10 Downgradient Well	Not Detected	No large trends in total nitrogen or major ions between WW-06 and WW-10	DEET Monensin	DEET (8 lagoons) Monensin (all the dairy sources except LG-07)	Not measured because lack of nitrate in sample
WW-11 Downgradient Well	21.6	Total nitrogen concentration increased 30-fold compared with the upgradient well Three to 25-fold increase in concentration of five major ions compared with the upgradient well.	DEHP Tetracycline Tylosin Testosterone	DEHP (LG-10) Tetracycline (all dairy sources) Tylosin (5 lagoons, 2 manure pile, and one application field sample) Testosterone (9 lagoons and one manure pile sample)	Fertilizer and/or animal waste
WW-12 Downgradient Well	43.6	Total nitrogen concentration increased more than 60-fold compared with the upgradient well Five to almost 20-fold increase in concentration of five major ions compared with the upgradient well.	Atrazine Androstadienedione Androsterone	Androstadienedione (three lagoons and 4 manure samples)	Fertilizer and/or animal waste

Residential Well Number	Nitrate Concentration (mg/L)[a]	General Chemistry in Well	Organic Compounds Detected in Well	Organic Compounds also Detected in Dairy Sources	Dominant Source(s) of Nitrate Based on Isotopic Analyses
WW-13 Downgradient Well	42.0	Total nitrogen concentration increased more than 60-fold compared with the upgradient well Six to more than 35-fold increase in concentration of five major ions compared with the upgradient well.	Alachlor Atrazine Ioxynil Virginiamycin	Virginiamycin (6 lagoons)	Animal waste
WW-14 Downgradient Well	40.7	Total nitrogen concentration increased almost 60-fold compared with the upgradient well. Two to almost 50-fold increase in concentration of six major ions compared with the upgradient well.	Atrazine Monensin	Monensin (All the dairy sources except LG-07)	Animal waste
WW-15 Downgradient Well	27.4	Total nitrogen concentration increased more than 40-fold between compared with the upgradient well. Two to more than 20-fold increase in concentration of six major ions compared with the upgradient well.	Atrazine Chlortetracycline Androsterone	Chlortetracycline (2 lagoons, all manure and application fields except SO-09 and SO-10)	Fertilizer and/or animal waste with some atmospheric contribution
WW-16 Downgradient Well	23.0	Total nitrogen concentration increased more than 30-fold compared with the upgradient well. Three to almost 30-fold increase in concentration of five major ions compared with the upgradient well.	Atrazine		Fertilizer and/or animal waste
WW-17 Downgradient Well	23.3	Total nitrogen concentration increased more than 30-fold compared with the upgradient well. Four to almost 30-fold increase in concentration of five major ions compared with the upgradient well.	Alachlor Atrazine DEHP Tetracycline Androsterone	DEHP (LG-10) Tetracycline (all dairy sources)	Fertilizer and/or animal waste

[a]Nitrate results are from Cascade Analytical Laboratory

ND – Not Detected

Four hormones were detected in either the upgradient well or downgradient water wells and in a dairy source. The hormone 17-α-Estradiol was detected in the upgradient well and in several of the dairy sources but not in the downgradient wells. Androstadienedione was detected in one supply well, one downgradient well, and several dairy sources. Androsterone was detected in one supply well and three downgradient wells but not in any dairy sources. The concentration of testosterone was higher in the upgradient well than in the one downgradient well where testosterone was detected. The majority of dairy lagoons had testosterone detections.

The isotopic analysis indicates that the dominant nitrogen source for two downgradient wells is animal waste (WW-13 and WW-14) while the dominant source for dairy supply well WW-07 is fertilizer. The other wells show a mixture of animal waste and fertilizer as a source. Wells WW-08 and WW-15 have some atmospheric nitrogen contribution in addition to animal waste and fertilizer.

In conclusion, all the downgradient residential water wells (with the exception of WW-10) associated with the Dairy Cluster have nitrate levels greater than the MCL. The data for total nitrogen and major ions indicate an increase in concentrations from the upgradient well to the downgradient wells, with the dairy lagoons, dairy manure piles, or dairy application fields likely sources. Barium and total alkalinity also show similar patterns.

Monensin and tetracycline were detected in the majority of dairy sources and in downgradient wells. Tetracycline was detected in two of the downgradient residential water wells and at a similar concentration in the upgradient well. It is possible that the dairies are sources of tetracycline, but given the concentration of tetracycline in the upgradient well was higher than the concentrations in the downgradient residential water wells, another source of tetracycline is likely. The dairy sources are a likely source of the monensin detected in the downgradient wells. These compounds were not detected in samples from the wastewater treatment plants influents, which suggests septic systems are not a likely source.

The hormone testosterone was detected in downgradient residential drinking water wells and dairy sources, although the concentration in the upgradient well is similar to the concentrations in the downgradient wells. It is possible that the dairies are a source of testosterone, but given the concentration of testosterone in the upgradient well, another source is likely.

C. Irrigated Cropland

Another likely source of nitrate in drinking water wells is nitrogen-rich fertilizers, such as inorganic synthetic fertilizer and manure applied to irrigated crops. As part of this study EPA looked at two fields each for three crops: mint, hops, and corn. EPA collected soil samples from six fields that were located upgradient from six residential drinking water wells which had been tested and found to exceed the MCL for nitrate. In each field, thirty soil subsamples at a depth of approximately one inch were collected and composited for analysis. Each downgradient water well and its associated soil sample is shown in Figure 11 and Table 26 along with the USDA NRCS soil type.

Table 26: Irrigated Cropland –Well Sample Locations and Associated Soil Samples, Crop Types and Soil Types

Water Well Sample	Associated Soil Sample	Crop Owner	Crop Type	USDA NRCS Soil Type
WW-23	SO-11	Schilperoort Farm	Mint	Warden Silty Loam
WW-24	SO-12	Havilah Farm	Mint	Warden Silty Loam
WW-25	SO-13	Wheeler Farm	Corn	Warden Silty Loam
WW-28	SO-14	Sunny Dene Ranch	Corn	Hezel Loamy Fine Sand & Cleman Very Fine Sandy Loam
WW-26	SO-15	Golden Gate Hops	Hops	Hezel Loamy Fine Sand
WW-27	SO-16	Golden Gate Hops	Hops	Warden Silty Loam

EPA contacted the cropland owners about crop history and fertilizer use. Information about the corn and mint fields is presented in Table 27; however, the hop field owners did not respond. All farmers stated that the application of fertilizer was determined by periodic crop or soil sampling. In addition, one of the corn field owners (SO-14) identified his field as an application field for waste from his dairy.

Table 27: Irrigated Cropland – Crop Field History and Fertilizer Use

Soil Sample ID	Current Crop	Crop Field History	Fertilizer History
SO-11	Mint	Planted with mint for past 23 years.	Synthetic fertilizer only.
SO-12	Mint	Planted with mint for past 4 years.	Mix of compost and synthetic fertilizer.
SO-13	Corn	Planted with corn for at least the past 5 years.	Synthetic fertilizer only.
SO-14	Corn	Planted with corn since 2010. Planted with alfalfa in 2008 and 2009. Planted with hops prior to 2008.	Manure in the fall and synthetic fertilizer during the growing season.
SO-15	Hops	No information was provided by the crop field owner.	No information was provided by the crop field owner.
SO-16	Hops	No information was provided by the crop field owner.	No information was provided by the crop field owner.

Soil types in the parcels selected for sampling in this study were from two USDA NRCS soil units. Warden soils are silt loams which are wind deposited silts, which lie on terraces of the Yakima River or on lake sediments deposited during the last glacial period. Warden soils are deep and well drained with little likelihood to retain nutrients which infiltrate beyond the root zone. Hezel soil is loamy fine sand. Hezel soils are formed in lacustrine sediment and have a mantel of eolian sand. Hezel soils are well drained with rapid permeability in the upper loamy fine sand part, dropping to moderately slow in the underlying stratified material. The rapid infiltration provides little opportunity for attenuation of any excess nutrients moving beyond the root zone. (See EPA 2012a for detailed soil reports for the six crops.)

The soil samples were analyzed for several forms of nitrogen, pesticides, pharmaceuticals, and hormones. They were not analyzed for major ions, trace inorganic elements, perchlorate, microbiology, trace organics, isotopic analysis, or age dating analysis.

1. IRRIGATED CROPLAND: GENERAL CHEMISTRY

Irrigated Cropland: Nitrate and Other Forms of Nitrogen

All of the water wells sampled downgradient of the irrigated cropland had nitrate levels greater than the MCL of 10 mg/L. Soil samples were analyzed for several forms of nitrogen, including extractable nitrate (nitrate-N), extractable ammonium (ammonia-N), and total nitrogen by combustion. Table 28 shows the measured values for these forms of nitrogen in these crop soils. If irrigation is applied above crop demand the levels of nitrate in the soils, if not reduced either by uptake by growing plants, volatilization, or denitrification, could ultimately move out of the root zone and become a source of groundwater contamination.

Table 28: Irrigated Cropland – Concentrations of Nitrogen in Soil Samples Collected From Mint, Corn, and Hop Fields Near Wells WW-23 to WW-28

Soil Sample/Crop	Nitrate-N (ppm)	Ammonium-N (ppm)	Total N by Combustion (ppm)
SO-11/Mint	245	210	3330
SO-12/Mint	191	8.2	2350
SO-13/Corn	24.3	7.5	1100
SO-14/Corn	6.3	12	1180
SO-15/Hops	83.5	21	2210
SO-16/Hops	26.5	7.7	3000

2. IRRIGATED CROPLAND: MICROBIOLOGY

There were no detections of total coliform, fecal coliform, or *E. coli* in the six water wells. The crop samples were not evaluated for microbiology.

3. IRRIGATED CROPLAND: ORGANIC COMPOUNDS

Irrigated Cropland: Pesticides

Atrazine and bentazon were the only pesticides detected in the water wells. Atrazine was detected in WW-24 and WW-26 and bentazon was detected in WW-23 and WW-24. Atrazine was not detected in any of the crop soil samples, while bentazon was detected in SO-11 (mint field) and SO-12 (mint field). Bentazon is used for selective control of weeds in beans, rice, corn, peanuts, and mint (ETN 1993). Bentazon was detected in two water wells and crop soil samples associated with each other (WW-23 and SO-11 and WW-24 and SO-12) (Table 29). This result indicates that the bentazon applied to the mint fields is likely migrating to groundwater and the water wells. Fifteen other pesticides were detected in crop soil samples, but not detected in the associated water wells (Table C9 in Appendix C).

Table 29: Irrigated Cropland – Concentrations of Atrazine and Bentazon in Wells WW-23 to WW- 28 and in Nearby Crop Soil Samples

Water Well and Soil Sample Location (Crop)	Concentration of Atrazine	Concentration of Bentazon
WW-23 SO-11 (Mint)	ND ND	0.028 (J) µg/L 38 µg/kg
WW-24 SO-12 (Mint)	0.017 (J) µg/L ND	0.033 (J) µg/L 2 (J) µg/kg
WW-25 SO-13 (Corn)	ND 1.6 (J) µg/kg	ND ND
WW-26 SO-15 (Hops)	0.025 (J) µg/L ND	ND ND
WW-27 SO-16 (Hops)	ND ND	ND ND
WW-28 SO-14 (Corn)	ND 0.7 (J) µg/kg	ND ND

J – the compound was positively identified, but the associated numerical value is an estimate.

Irrigated Cropland: Pharmaceuticals

There were no detections of wastewater pharmaceuticals in the water wells or the crop soil samples.

Nine veterinary pharmaceuticals were detected in one well (WW-26). Monensin was the only compound detected in a water well (WW-26 at 0.319 µg/L) and its associated soil sample (SO-15 at 4.5 µg/kg). The other compounds detected in water well WW-26 (erythromycin, lincomycin, ractopamine, sulfamethazine, sulfamethoxazole, sulfathiazole, tiamulin, and virginiamycin) were not detected in the associated crop soil sample. There were no detections of any veterinary pharmaceuticals in any of the other water wells.

Four veterinary pharmaceuticals were detected in the crop soil samples.

- SO-11: Oxytetracycline
- SO-12: Oxytetracycline
- SO-13: No detections
- SO-14: Oxytetracycline
- SO-15: Monensin, oxytetracycline, and tetracycline
- SO-16: Monensin, oxytetracycline, tylosin, and tetracycline.

Irrigated Cropland: Hormones

EPA's Ada Laboratory analyzed the six water well samples for five hormones (17-α-estradiol, 17-β-estradiol, estrone, 17-α-ethyl-estradiol and estriol). The laboratory did not detect any of the five hormones in the water wells.

The UNL Laboratory analyzed the water wells and associated soil samples for 20 hormones, including the five hormones that the EPA's Ada Laboratory analyzed. The UNL Laboratory detected six hormones in one well WW-27 (17-α-estradiol, androstadienedione, 17-β-trenbolone, androsterone, epitestosterone, and testosterone). These six compounds were not detected in the crop soil sample (SO-16) associated with WW-27. The UNL Laboratory did not detect any hormones in the other five water wells.

Five hormones were detected in crop soil samples (Table C14 in Appendix C).

- SO-11: Androstadienedione and progesterone
- SO-12: 4-androstenedione, 17-α-estradiol, and progesterone
- SO-13: Melengesterol acetate
- SO-14: No detections
- SO-15: 4-androstenedione, androstadienedione, and progesterone
- SO-16: 4-androstenedione and progesterone

4. IRRIGATED CROPLAND: ISOTOPIC ANALYSES

An isotopic analysis was performed for six wells associated with the irrigated croplands. Table 30 provides the results for these six wells. Additional details on the results of isotopic analyses conducted for this study are provided in Appendix D of this report.

The dominant source for WW-24 is fertilizer, while the dominant source for WW-27 is animal waste. For the other water wells, the potential sources are likely to be a combination of fertilizer and animal waste for WW-23, WW-25, and WW-26 and a combination of fertilizer and animal waste with some atmospheric contribution for WW-28.

Table 30: Irrigated Cropland - Concentration of Nitrate in Wells, Isotopic Signatures, and the Interpreted Dominant Source(s) of the Nitrate Based on Observed Values

Location	Nitrate-N (mg/L)[a]	δ^{15}N-NO_3 (‰)	δ^{18}O-NO_3 (‰)	Interpreted Dominant Source(s)[b]
WW-23 (Mint)	17.3	2.2	18.0	Fertilizer and/or Animal Waste
WW-24 (Mint)	14	-0.3	12	Fertilizer
WW-25 (Corn)	32.9	2.4	15	Fertilizer and/or Animal Waste
WW-26 (Hops)	15.1	7.5	6.3	Fertilizer and/or Animal Waste
WW-27 (Hops)	19.9	8.8	17	Animal Waste
WW-28 (Corn)	69.6	5.5	44	Fertilizer and/or Animal Waste with Some Atmospheric Contribution

[a]The nitrate concentrations are from the UNL isotopic analysis.

[b]Interpretation of dominant sources is based on the following:

- δ^{15}N-NO_3. Values less than 2.0 = dominated by synthetic fertilizer; values between 2.0 to 8.4 = undetermined mixture of synthetic fertilizer and/or animal waste; values greater than 8.4 = dominated by animal waste.
- δ^{18}O-NO_3 values greater than 20.0‰ provide evidence for some atmospheric contribution. δ^{18}O-NO_3 values below 20.0‰ could have an atmospheric contribution, but it becomes indistinguishable from other sources.

5. IRRIGATED CROPLAND: AGE DATING

The age dating data for the six wells associated with the irrigated crops is presented in Table 31. The values for the water wells are younger than for any other group of samples in the study. The reported ages may not correspond to when the water became contaminated.

Table 31: Irrigated Cropland – Results of Age Dating Analyses Performed for Wells Reported in Years Since the Water Infiltrated From the Surface to the Aquifer

Location	Sample Age	Duplicate Age	Average
WW-23 (Mint)	Over Value[a]	Over Value	NA
WW-24 (Mint)	14.8 (J)	15.8 (J)	15.3
WW-25 (Corn)	10.3	9.8	10.1
WW-26 (Hops)	12.8 (J)	11.8 (J)	12.3
WW-27 (Hops)	Over Value	14.3 (J)	14.3
WW-28 (Corn)	Over Value	Over Value	NA

[a]"Over Value" means that the sample contained more SF_6 than can be explained by equilibrium with modern air.
J – the analyte was positively identified, but the associated numerical value is an estimate.

6. IRRIGATED CROPLAND: SUMMARY OF RESULTS FOR RESIDENTIAL WELLS

Table 32 summarizes information on the nitrate concentrations in the water wells along with any organic compounds detected in the water wells and the associated crop soil samples and the dominant source of nitrate based on the isotopic analysis. No microbial contamination was found in the downgradient wells.

Bentazon and atrazine were the only pesticides detected in the water wells associated with the six crop field soil samples. Bentazon was detected in the soil samples associated with water wells at two sites: SO-11/WW-23 and SO-12/WW-24. Atrazine was detected in two of the wells, but not in the associated soil samples.

Nine veterinary pharmaceuticals were detected in one well (WW-26). Monensin was the only veterinary pharmaceutical detected in the associated soil sample (SO-15) which was collected from a hop field. There were no detections of any veterinary pharmaceuticals in the other five water wells. Three hormones were detected in one well (WW-27) but were not detected in the associated soil sample (SO-16). Of these three hormones, 17- β-trenbolone is a synthetic growth hormone used exclusively in beef cattle (not dairy cows), while the other two hormones are natural compounds. The source of the 17- β-trenbolone is unknown. There were no detections in any hormones in the other five water wells.

The isotopic data indicate that fertilizer is a dominant source of nitrate in water well WW-24 which is downgradient of a mint field. The dominant source of nitrate in water well WW-27 which is downgradient of a hops field is animal waste (human or non-human).

Table 32: Irrigated Cropland – Comparisons of Organic Compounds Detected in Samples from Wells and Croplands and Assessment of Nitrate Sources in the Wells Using Isotopic Analyses

Water Well Location	Nitrate Concentration in Wells (mg/L)[a]	Summary of Organic Compounds Detected in Water Wells	Associated Crop Location	Summary of Organic Compounds Detected in Wells and Associated Crop Fields	Dominant Source(s) of Nitrate in Wells Based on Isotopic Analyses
WW-23	16.0	Bentazon	SO-11 (mint)	Bentazon	Fertilizer and/or Animal Waste
WW-24	13.8	Atrazine Bentazon	SO-12 (mint)	Bentazon	Fertilizer
WW-25	33.4	No detects	SO-13 (corn)	Nothing to compare	Fertilizer and/or Animal Waste
WW-26	15.3	Atrazine, erythromycin, lincomycin, monensin, ractopamine, sulfamethazine, sulfathiazole, tiamulin, and virginiamycin	SO-15 (hops)	Monensin only compound also detected in soil sample	Fertilizer and/or Animal Waste
WW-27	19.8	17-a-estradiol, androstadienedione 17- β-trenbolone, testosterone, androsterone, and epitestosterone	SO-16 (hops)	These compounds were not detected in soil samples	Animal Waste
WW-28	71.2	No detects	SO-14 (corn)	Nothing to compare	Fertilizer and/or Animal Waste with Atmospheric Contribution

[a]Nitrate results are from Cascade Analytical Laboratory.

In conclusion, the nitrate levels in all the water wells associated with the crop samples were above the nitrate MCL. Bentazon and monensin were the only compounds detected in water wells and the associated crop soil samples. This finding suggests that bentazon and monensin detected in the crop field soil are likely migrating to groundwater and nearby water wells. Possible manure application to the hop field could account for the monensin detected in the downgradient residential well.

Some of the cropland soils are well drained and highly permeable. High nitrogen crops planted on such soils and especially those that utilize rill irrigation may pose a threat to the aquifer (see Appendix G, Figure 1).

D. Residential Septic Systems

Four residential water wells (WW-19, WW-20, WW-21, and WW-22) were identified to evaluate whether high nitrate concentrations could be coming from septic systems (Figure 11). These wells were selected because they are in residential areas served by septic systems, but are not located near dairies or crop fields. To conduct this evaluation, samples were collected from the wastewater entering the treatment plants located in Zillah (SP-01), Mabton (SP-02), and Toppenish (SP-03 and SP-04). Sample SP-04 was collected because additional sample volume was requested for SP-03 by EPA's Manchester Laboratory. Sample SP-04 was collected on a different day and was assigned a different sample number. The laboratory did not need the extra volume to supplement sample SP-03 so sample SP-04 was analyzed for the same compounds as SP-03. Samples SP-03 and SP-04 are not duplicate samples because they were collected at different times.

The treatment plant influent samples were collected to serve as surrogates for septic systems by providing a characterization and quantification of compounds that are found in rural septage. EPA recognizes that these WWTPs may receive substances that are not found in residential septic systems (for example they may also receive commercial and industrial waste streams). The WWTPs sampled serve rural communities and are sufficiently similar to residential septic systems for the purposes of this study. This approach was used to determine whether the compounds detected in wells with high nitrate concentrations in areas with a high density of septic systems are similar to the compounds detected in WWTP influent or whether these wells are affected by other sources.

Samples collected from the WWTPs were analyzed for the same compounds as the water well samples, excluding the analysis for nitrate, pesticides, perchlorate, and age dating (Table C2). Nitrate was not analyzed in the WWTP influent samples as there would be very little formation of nitrate from the organic nitrogen in the waste because of the low oxygen environment of the sewer system. EPA's Manchester Laboratory attempted to analyze the pesticides in the WWTPs influent samples. However, the laboratory reported that because of significant interferences from the large number of organic compounds present in the waste, the pesticide concentrations could not be quantified. Perchlorate and age dating analyses were not conducted because the influent was composed of water co-mingled from many sources.

Although four wells were selected for this evaluation, all of the residential wells were compared with the WWTP data to determine whether septic systems are a likely source of the nitrate found in any Phase 3 well in the study.

1. SEPTIC SYSTEMS: GENERAL CHEMISTRY

The WWTP influent samples were collected to serve as surrogates for septic system influent and to characterize compounds found in rural septic systems. While the major ions and trace elements were measured for the WWTP and water wells, the results are not summarized here as there are no upgradient wells that can be used to compare the results.

Septic Systems: Nitrate and other Forms of Nitrogen

The nitrate levels in the four water wells were all greater than the MCL of 10 mg/L. The water wells also were evaluated for different forms of nitrogen. Ammonium and TKN were not detected in any of these wells indicating all detectable nitrogen was in the form of nitrate. No analysis similar to that conducted for the Haak Dairy and Dairy Cluster is possible because no upgradient wells were sampled for comparison.

2. SEPTIC SYSTEMS: MICROBIOLOGY

As found with other water wells in the study, neither total coliform, fecal coliform nor *E. coli* were detected in the four selected water wells. The WWTP influent samples were analyzed for fecal coliform and *E. coli*. (Table C8 in Appendix C). As expected, very high concentrations of both fecal coliform and *E. coli* were found in the influent to the WWTPs. Samples were also analyzed using MST to identify the source of the fecal contamination. Three of the samples indicated human sources, while one sample indicated both human and ruminant sources.

3. SEPTIC SYSTEMS: ORGANIC COMPOUNDS

Septic Systems: Pesticides

Atrazine and bentazon were detected in one well (WW-20). There were no pesticides detected in the other three water wells (WW-19, WW-21, and WW-22).

EPA's Manchester Laboratory attempted to analyze the pesticides in the WWTPs influent samples; however, the laboratory reported that the WWTP sample matrix was too difficult to analyze because of significant interferences from the large number of organic compounds present in the waste. Therefore, the pesticide concentrations could not be quantified from the WWTP influent samples.

Septic Systems: Trace Organics

The trace organics analysis includes compounds such as caffeine, fragrances, and disinfectants, which would be expected to be found in domestic wastewater. Trace organics were not detected in any of the four selected water wells. For the entire study, four residential wells had detectable levels of DEHP. Thirty-seven trace organics were detected in the WWTP influents (Table C10 in Appendix C). Nineteen of the trace organics were detected in all of the WWTP influent samples. This indicates that trace organics are being used and can be found in wastewater entering WWTP, but with a few exceptions these compounds were not detected in residential water wells.

Septic Systems: Pharmaceuticals

No wastewater pharmaceutical compounds were detected in the four selected water wells. For the entire study one wastewater pharmaceutical (DEET) was detected in one residential water well. Nine wastewater pharmaceuticals compounds were detected in at least one WWTP influent sample, with six of the compounds detected in all three WWTP influent samples (acetaminophen, cotinine, DEET, ibuprofen, naproxen, and triclosan) (Table C11 in Appendix C). As with the trace organics, the wastewater pharmaceuticals were detected in the WWTP influent, but not in the residential water wells.

Table 33 shows the veterinary pharmaceuticals detected in three water wells and the WWTP influent samples. Water well WW-22 contained no detected veterinary pharmaceuticals.

Table 33: Septic Systems – Concentrations of Veterinary Pharmaceutical Detected in Wells and WWTP Influents

Compound	Wells[a]			WWTP Influent[b]		
	Units: µg/L					
	WW-19	WW-20	WW-21	SP-01	SP-02	SP-03
Erythromycin	ND	ND	0.11	ND	R	ND
Lincomycin	ND	ND	0.371	ND	R	ND
Monensin	1.62	ND	0.194	ND	R	ND
Ractopamine	ND	ND	0.079	ND	R	ND
Sulfamethazine	ND	ND	0.053	ND	R	0.086
Sulfamethoxazole	ND	ND	0.04	ND	0.106 (J)	0.662
Sulfathiazole	ND	ND	0.051	ND	R	ND
Tetracycline	ND	0.04 (J)	ND	0.55 (J)	ND	ND
Tiamulin	ND	ND	0.05	ND	R	ND
Virginiamycin	ND	ND	0.162	ND	R	ND

[a]Water well WW-22 had no detected veterinary pharmaceuticals.

[b]Sample SP-04 was not analyzed for veterinary pharmaceuticals.

J – the compound was positively identified, but the associated numerical value is an estimate.

ND – not detected.

R – the sample was unusable.

Three compounds were detected in the water wells and in at least one WWTP influent sample (sulfamethazine, sulfamethoxazole, and tetracycline). Eight compounds were detected in the water wells, but not in the WWTPs. Nine compounds were detected in WW-21. Water well WW-21 is surrounded by possible septic sources; it is also downgradient from several hop yards and at a greater distance, downgradient from several large dairies. The residents raise poultry and beef cattle. Many of the compounds detected in WW-21 were not found in the WWTP influent samples. The data suggest that septic systems are not the source of many of the compounds detected in this well.

For the entire study, four veterinary pharmaceuticals were detected in the WWTP influent samples with three of those also detected in one or more residential water wells: sulfamethazine (two water wells); sulfamethoxazole (one water wells); and tetracycline (five water wells). Sulfamethoxazole and tetracycline are used by humans and it is possible that septic systems could be a source of these compounds in the residential wells.

Septic Systems: Hormones

EPA's Ada Laboratory analyzed the four water well samples and the WWTP influent samples for five hormones (17-α-estradiol, 17-β-estradiol, estrone, 17-α-ethyl-estradiol and estriol). The laboratory did not detect any of the five hormones in the water wells, but detected three of the hormones in all three of WWTP influent samples (17-β-estradiol, estriol, and estrone) (Table C13 in Appendix C).

The UNL Laboratory analyzed samples from the same four water wells and the WWTP influent samples for 20 hormones, including the same five hormones as the EPA's Ada Laboratory (Table C14 in Appendix C). The UNL Laboratory detected 17-α-estradiol, 17-β-estradiol, and estrone in water well WW-22 along with several other compounds. Androsterone was the only other hormone detected in any of the four water wells (WW-20).

Table 34 shows the concentrations of the compounds detected in water wells WW-20 and WW-22 and the corresponding concentrations in WWTP influent samples. No hormones were detected in water wells WW-19 and WW-21.

Table 34: Septic Systems – Hormone Concentrations in Wells and WWTP Influents

Compound	WW-20	WW-22	SP-01	SP-02	SP-03
	(Units: µg/L)				
17-β-estradiol	ND	0.006 (UNL)	0.021 (Ada)	0.035 (Ada)	0.034 (Ada)
Estrone	ND	0.004 (UNL)	0.077 (Ada)	0.096 (Ada)	0.073 (Ada)
Estriol	ND	ND	1.030 (Ada)	0.863 (Ada)	0.640 (Ada)
17-α-estradiol	ND	0.005 (UNL)	0.263 (UNL)	ND	ND
Androsterone	0.004(J) (UNL)	ND	5.049(J) (UNL)	2.137(J) (UNL)	3.187(J) (UNL)
Androstadienedione	ND	0.003 (UNL)	0.255(J) (UNL)	0.614(J) (UNL)	14.1 (J) (UNL)
β-Zearalanol	ND	0.003 (UNL)	ND	ND	ND
Testosterone	ND	0.01 (UNL)	0.053 (UNL)	0.059 (UNL)	0.045 (UNL)
11-Keto Testosterone	ND	0.005 (UNL)	0.1 (UNL)	0.043 (UNL)	ND
Epitestosterone	ND	0.004 (UNL)	ND	0.06 (UNL)	ND

J – the compound was positively identified, but the associated numerical value is an estimate.

ND – not detected.

Androsterone was detected in water well WW-20 and in the three WWTP influent samples. Eight compounds were detected in water well WW-22. It is possible that septic systems are a source of several of the compounds found in WW-22 and the androsterone in WW-20. Many of these compounds are naturally produced by humans (for example 17-β-estradiol, estrone, estriol, androsterone, and testosterone). All of these compounds were detected in the WWTP influent samples.

For the entire study, 14 hormones were detected in WWTP influent samples with seven of those detected in residential water wells. Testosterone and androsterone were the most frequently detected hormones: testosterone in nine water wells and androsterone in four water wells. Given that both of these compounds are natural sex hormones, the septic systems are a possible source of the hormones detected in the residential water wells.

4. SEPTIC SYSTEMS: ISOTOPIC ANALYSIS

Isotopic analysis was performed for wells WW-19 to WW-22 by the UNL Laboratory. Table 35 provides the results for these four wells. Additional details on the results of isotopic analysis conducted for this study are provided in Appendix D of this report.

Table 35: Septic Systems – Concentration of Nitrate in Wells, Isotopic Signatures, and the Interpreted Dominant Source(s) of the Nitrate Based on Observed Values

Location	Nitrate-N (mg/L)[a]	δ^{15}N-NO_3 (‰)	δ^{18}O-NO_3 (‰)	Interpreted Dominant Source(s)[b]
WW-19	36.4	8.7	15.4	Animal Waste[c]
WW-20	15	6.3	52.9	Fertilizer and/or Animal Waste with Some Atmospheric Contribution
WW-21	36.5	7.7	12.2	Fertilizer and/or Animal Waste
WW-22	16.6	10	11.0	Animal Waste

[a]The nitrate concentrations are from the UNL isotopic analysis.

[b]Interpretation of dominant sources is based on the following:

- δ^{15}N-NO_3. Values less than 2.0 = dominated by synthetic fertilizer; values between 2.0 to 8.4 = undetermined mixture of synthetic fertilizer and/or animal waste; values greater than 8.4 = dominated by animal waste.
- δ^{18}O-NO_3 values greater than 20.0‰ provide evidence for some atmospheric contribution. δ^{18}O-NO_3 values below 20.0‰ could have an atmospheric contribution, but it becomes indistinguishable from other sources.

[c] Animal waste can be either human or non-human waste

The dominant source of nitrate for WW-19 and WW-22 appears to be animal waste (human or non-human). For WW-20 the dominant sources are likely a combination of synthetic fertilizer and/or animal waste with some atmospheric contribution for WW-20. The likely source of nitrate in well WW-21 is a combination of synthetic fertilizer and/or animal waste. The probable sources of nitrate for these water wells match the variety of land uses surrounding these highly scattered water wells.

5. SEPTIC SYSTEMS: AGE DATING

Table 36 provides the age dating results for the four selected water wells. There is a wide scatter of ages in the water wells, with age measurements ranging from 14.3 years to 44.3 years. As previously discussed, the age dating indicates the number of years since the water infiltrated from the surface to the aquifer, not the time that has elapsed since the water became contaminated. The method used in this study can determine the age of water up to about 40 years, or approximately 1970. Beginning in the 1960s, SF_6 concentrations in the environment began increasing as a result of its use in electrical equipment as a replacement for PCBs. Prior to 1970, atmospheric concentrations of SF_6 were generally below the analytical method detection limit. Ages older than 40 years are considered approximations.

Table 36: Septic Systems – Results of Age Dating Analyses Performed for Wells Reported in Years Since the Water Infiltrated from the Surface to the Aquifer

Location	Sample Age	Duplicate Sample Age	Average
WW-19	44.3 (J)	34.3 (J)	39.3
WW-20	14.3 (J)	14.3 (J)	14.3
WW-21	31.3	28.8	30.1
WW-22	29.3 (J)	29.3 (J)	29.3

J – the analyte was positively identified, but the associated numerical value is an estimate.

6. SEPTIC SYSTEMS: SUMMARY OF RESULTS FOR RESIDENTIAL WATER WELLS

Table 37 summarizes the nitrate concentrations for the four water wells along with a summary of the organic compounds detected in both the four water wells and the WWTP influents. The dominant sources of nitrate based on the isotopic data are also included in Table 37. Although microbial contamination is often observed in situations where septic systems contaminate residential wells, no microbial contamination was found in the downgradient wells. There appears to be a correlation between the age dating data and the well depths for those water wells that have well depth information (see Appendix A3). Older water suggests a deeper well.

All four water wells had nitrate concentrations greater than the nitrate MCL. These four water wells were sampled in isolation – that is, without a pairing with an upgradient well with a specific source separating them. For this reason, no chemical or temporal evolution along a flow path can be demonstrated from these data.

The pesticides atrazine and bentazon were detected in WW-20; however, the WWTP influent samples could not be analyzed for pesticides because of matrix interference so there are no wastewater data with which to compare these results.

There were no detections of any trace organics for the water wells selected for the septic systems. WWTP influent had detections of multiple trace organics. Nineteen of the trace organics were detected in all of the WWTP influent samples.

Table 37: Septic Systems – Comparisons of Organic Compounds Detected in Wells and WWTP Influent, and an Assessment of Dominant Source(s) of Nitrate in the Wells Based on Isotopic Analyses

Sample Location	Nitrate Concentration in Water Wells (mg/L)[a]	Summary of Organic Compounds Detected in Well	Summary of Organic Compounds Detected in Well and WWTPs Influent	Dominant Source of Nitrate Based on Isotopic Analyses
WW-19	38.2	Monensin	None.	Fertilizer and/or Animal Waste
WW-20	15	Atrazine and bentazon Tetracycline Androsterone	(Atrazine and bentazon not analyzed) Tetracycline (SP-01) Androsterone (All WWTPs)	Animal Waste and/or Fertilizer with Some Atmospheric Contribution
WW-21	38	Sulfamethazine Sulfamethoxazole Erythromycin, lincomycin, monensin, ractopamine, sulfathiazole, tiamulin, and virginiamycin	Sulfamethazine (SP-03) Sulfamethoxazole (SP-02 and SP-03) Other organics detected in wells were not detected in WWTP influents	Fertilizer and/or Animal Waste
WW-22	16.4	11-keto testosterone 17-β-estradiol 17-α-estradiol Androstadienedione β-zearalanol Estrone Testosterone Epitestosterone	11-keto testosterone (SP-01and SP-02) 17-α-estradiol (SP-01) Androstadienedione (All WTPs) Testosterone (All WWTPs) Epitestosterone (SP-02)	Animal waste

[a]Nitrate results are from Cascade Analytical Laboratory

No wastewater pharmaceuticals were detected in the four water wells, while several of the wastewater pharmaceuticals were detected in the WWTP influent samples. Three water wells had veterinary pharmaceuticals detected. Water well WW-21 had nine detected compounds. Veterinary pharmaceuticals that were detected in the water wells and one or more WWTP influent samples were sulfamethazine (WW-21 and SP-03), sulfamethoxazole (WW-21 and SP-02 and SP-03), and tetracycline (WW-20 and SP-01).

Eight hormones were detected in water well WW-22 and each of those hormones was detected in one or more WWTP influent samples, except for β-Zearalanol. All of these hormones can be produced naturally by many different animals, and the detections in the water well could therefore arise from a variety of sources.

The isotopic data indicate that the dominant source of nitrate for WW-19 and WW-22 is animal waste (human or non-human) while the dominant sources for WW-20 is a combination of fertilizer, animal waste and/or atmospheric. The dominant source for WW-21 is fertilizer and/or animal waste.

In conclusion, the four water wells had nitrate levels greater than the MCL of 10 mg/L. Drinking water well WW-21 had nine pharmaceuticals detected, is surrounded by possible septic sources, and the family raises cattle and poultry on their parcel. Well WW-21 is also downgradient from several hop yards and at a greater distance downgradient from a dairy. Well WW-22 is not in close proximity to a current livestock operation. It is also possible that the detections for WW-22 are from a septic system.

E. Water Wells WW-18 and WW-30

Two other residential water wells were evaluated: WW-18 and WW-30. These water wells were not in the original study design. Water well WW-18 was sampled because the owner was aware of the study and volunteered his property for sampling. Water well WW-30 was sampled because it is located in an area not otherwise sampled, was high in nitrate, and the homeowner was willing to participate in the study.

Water well WW-18 was analyzed for all the compounds, including an isotopic and age dating analysis. Sample WW-30 was not evaluated for hormones, pharmaceuticals, isotopic, or age dating as the location was added later in the study. The summary results for the two wells are included in Table 38.

Table 38: WW-18 and WW-30 – Summary of Results Related to Nitrate Concentrations, Microbiology Evaluation, Detected Organic Compounds, Isotopic Analysis, and Age Dating Analysis

Compounds	WW-18	WW-30
Nitrate[a]	72.2 µg/L	23.4 µg/L
Microbiology	No detects	No detects
Organic Compounds	Atrazine, tetracycline, and testosterone	Atrazine, bentazon, and phenol
Isotopic Analysis	Fertilizer and/or Animal Waste with Some Atmospheric Contribution	Not conducted
Age Dating	28.1 years	Not conducted

[a]Nitrate results are from Cascade Analytical Laboratory

While the major ions and different nitrogen forms were measured for both of these samples, the results are not included here as there were no upgradient wells or potential sources sampled that could be used for comparison.

Neither fecal coliform nor *E. coli* was detected in the WW-18 or WW-30. Atrazine, tetracycline, and testosterone were detected in WW-18. Atrazine, bentazon, and phenol were detected in WW-30. Phenol was abundant in the dairy lagoons sampled and can also be found in household wastewater. Sample WW-30 is not located in the vicinity of a dairy. Sample WW-30 was not analyzed for wastewater pharmaceuticals because of its late addition at the end of the study.

X. STUDY LIMITATIONS AND UNCERTAINTIES

Several limitations in the study are important to note. First, water well samples were collected from existing wells. No new wells were installed for this study. Information on the depths and screened intervals of the water wells is known for about a third of the wells that were sampled. In this report, designations of upgradient and downgradient are based on regional groundwater flow data from the USGS. Lack of complete well information limits our ability to verify if the wells upgradient and downgradient of the sources draw water from the same water bearing zone.

A discussion of the QA/QC procedures and a summary of the data validation process are presented in Appendix E. Uncertainties and limitations with analytical data were noted in Appendix E and described in detail in the data validation memoranda. Data usability is also indicated in the data summary tables by inclusion of data qualifiers.

In addition, EPA lacks complete information regarding the dairies in this study. EPA requested information on specific aspects of the dairy operations and the physical setting; however, the dairies in this study did not provide this information. This information would have contributed to a more complete understanding of the dairy facilities, practices, and use of specific chemicals. It would have allowed EPA to provide actual values, or narrower ranges of estimates, for certain parameters in this report (for example, numbers of animals, quantities of nitrogen, estimates of lagoon leakage). EPA has, however, referenced general information regarding dairy operations, and specific information regarding the dairies in the study to the extent it was available.

Finally, EPA has limited information about the irrigated crop fields in this study. Verifiable, detailed crop production data, in terms of nutrients applied (the likely source of nitrate associated with irrigated crops), were not available and no irrigation data were available. EPA has included information about the crop fields to the extent it was available. In addition, the irrigated crop fields are surrounded by similar agricultural uses, and many are situated downgradient of dairies, making more difficult EPA's ability to discern the source of nitrate in drinking water wells downgradient of the irrigated crop fields.

XI. CONCLUSIONS

Nitrate levels above EPA's drinking water standard in residential drinking water wells in the Lower Yakima Valley are well documented. The objective of this study was to evaluate the effectiveness of certain chemicals, microbial parameters, or analytical techniques to identify specific sources of the high nitrate levels detected in residential drinking water wells.

Many of the chemicals and microbial parameters evaluated in this study were not detected in the residential drinking water wells. There were no detections of fecal coliform in the residential drinking water wells, although high concentrations were found in the dairy sources and WWTP influent. There were very few trace inorganic elements, trace organics, or wastewater pharmaceuticals detected in the residential drinking water wells or crop field soil samples, although many of these chemicals were detected in the dairy sources and WWTPs. The isotopic data provide some indication of the likely nitrate sources for seven of the 25 residential wells tested (six animal waste and one synthetic fertilizer). Although the isotopic analysis identified animal waste as the source of the nitrate in six wells, this analytical technique cannot differentiate between human and non-human waste.

There appears to be a correlation between the age dating data and the depths of the wells for which boring logs are available. The water in the dairy supply wells that are known to be screened in the deeper basaltic aquifer is older than in the downgradient residential wells which are commonly screened in the shallower alluvial aquifer. The age dating results were not useful to determine when the nitrate contamination was introduced into the well.

Haak Dairy

There are large quantities of nitrogen-rich materials on the Haak Dairy that could serve as sources of nitrate in groundwater and residential drinking water wells. The dairy lagoons are likely leaking nitrogen-rich wastewater into the underlying soils. Also, WSDA inspection reports show that the Haak Dairy has reported elevated nitrogen levels in some of their application fields. This poses a threat to groundwater because irrigation water or precipitation can carry excess nitrogen through the soil and into the aquifer. The prevalence of highly permeable surface soils at the Haak Dairy increases the risk of nitrogen migrating past the crop root zone to the aquifer resulting in groundwater contamination.

All three residential drinking water wells downgradient of the Haak Dairy that were sampled have nitrate levels greater than the MCL. Samples collected at the Haak Dairy show that the concentrations of total nitrogen and several of the major ions increase between the upgradient and downgradient wells, with the highest concentrations detected in the samples collected from the dairy lagoons, dairy manure pile, and dairy application fields. Barium, zinc and alkalinity show a similar pattern. These data indicate that the Haak Dairy is a likely source of the nitrate contamination in the three downgradient residential drinking water wells. Inorganic fertilizer used on the Haak Dairy's application fields also could be a source of nitrate observed in the downgradient wells.

Two pharmaceuticals, tetracycline and monensin, were detected in all of the dairy source samples collected at the Haak Dairy, indicating that these compounds are used by the dairy. Tetracycline was detected in two of the three downgradient residential water wells, but not in the upgradient well, indicating the Haak Dairy is a likely source.

Monensin was detected in the upgradient well and in the three downgradient residential water wells, although the upgradient residential drinking water well had a higher concentration than two of the downgradient wells. It is possible that the Haak Dairy is a possible source of the monensin detected in the downgradient residential drinking water wells. Given the presence of monensin in the upgradient well, another source of monensin is likely. Additional information that supports that the dairy source is a

possible source of monensin is that it was not detected in samples collected from the WWTP influents that were collected as surrogates for rural septic systems.

The isotopic data provide strong evidence that animal waste (human or non-human) is the likely dominant source of the nitrate contamination in at least one of the residential water wells (WW-05) downgradient of the Haak Dairy. However, since isotopic analysis cannot differentiate between human and non-human waste, both could be sources of the nitrate in the downgradient well. Isotopic data for the other two residential drinking water wells downgradient of the Haak Dairy indicate that the source of the nitrate could be animal waste, fertilizer, derived from the atmosphere, or some combination of these sources.

Several other compounds that tend to be less mobile in groundwater were detected in the Haak Dairy lagoon, manure pile, and application field samples, but not detected in the downgradient water wells (for example trace organics and hormones). Fecal coliform was not detected in any of the wells downgradient of the Haak Dairy.

Dairy Cluster

Similar to the Haak Dairy, the Dairy Cluster has large quantities of nitrogen-rich materials that could serve as sources of the nitrate found in the groundwater and residential drinking water wells. The lagoons at the Dairy Cluster are likely leaking nitrogen-rich wastewater into the underlying soils. WSDA inspection reports show that the Dairy Cluster dairies have reported elevated nitrogen levels in some of their application fields. This poses a threat to groundwater because irrigation water or precipitation can carry excess nitrogen through the soil and to the aquifer.

Similar to the Haak Dairy, the results from the sampling indicate that the concentration of total nitrogen and several of the major ions increase between the upgradient and downgradient wells, with the highest concentrations detected in the samples collected from the dairy lagoons, dairy manure piles, and dairy application fields. Barium and alkalinity showed a similar pattern. These data indicate the Dairy Cluster is a likely source of the nitrate contamination in the downgradient residential drinking water wells.

The pharmaceuticals tetracycline and monensin were detected in all but one of the dairy sources samples, which indicates they are used by the dairies at the Dairy Cluster. Tetracycline was detected in two of the downgradient residential drinking water wells, two dairy supply wells, dairy lagoons, manure pile, and application fields. The concentration of tetracycline in the upgradient well was similar to the concentrations detected in the two downgradient residential wells. The dairies are a possible source of the tetracycline in the downgradient residential water wells. However, given the concentration in the upgradient well, another source of the tetracycline likely exists.

Monensin was detected in two of the downgradient residential water wells, two dairy supply wells, dairy lagoons, manure piles, and application fields. The Dairy Cluster is a likely source of monensin because this antibiotic is used in dairy cows but not people. Monensin was not detected in samples from the WWTP influent samples that were collected as surrogates for residential septic systems, providing further support that the dairies are a likely source.

The hormone testosterone was detected in downgradient residential drinking water wells and dairy sources. The concentration of testosterone detected in the upgradient residential water well is similar to

the concentrations detected in the downgradient water wells. The dairies are a possible source of the testosterone in the downgradient wells; however, given the concentration in the upgradient well, another source for the testosterone is likely.

The isotopic data provide strong evidence that animal waste (human or non-human) is the likely dominant source of the nitrate in at least two of the residential water wells downgradient of the Dairy Cluster. Because isotopic analysis cannot differentiate between human and non-human waste, both could be sources of the nitrate in these downgradient wells. Isotopic data for the other residential drinking water wells downgradient of the Dairy Cluster indicate that the source of the nitrate could be animal waste, fertilizer, or derived from the atmosphere, or some combination of these sources.

Several other compounds that are generally less mobile in groundwater than nitrate and some of the major ions, were detected in the Dairy Cluster sources (for example, the trace organics), but not in the downgradient residential water wells. Fecal coliform was not detected in any of the residential water wells.

Given the historic and current volumes of wastes generated and stored by dairies, and the application of nitrogen-rich fertilizers including dairy waste in the Lower Yakima Valley, it is expected that dairies are a likely source of high nitrate levels in downgradient drinking water wells. The total nitrogen, major ions, alkalinity and barium data provide strong evidence that the dairies evaluated in this study are likely sources of the high nitrate levels in the drinking water wells downgradient of the dairies. Additional information that supports this conclusion includes: there are few potential sources of nitrogen located upgradient of the dairies; the dairy lagoons are likely leaking large quantities of nitrogen-rich liquid into the subsurface; and Washington State Department of Agriculture inspectors have reported elevated levels of nitrogen in application fields of the dairies in the study.

Irrigated Cropland

Nitrogen-rich fertilizers, such as inorganic synthetic fertilizer and manure, are applied to irrigated crop fields and are a possible source of nitrate in drinking water wells. In Phase 3, EPA sampled six irrigated crop fields (two mint, two hops, and two corn) and six residential water wells downgradient of these fields**.** The six water wells downgradient from the irrigated crop fields and sampled by EPA during Phase 3 all had nitrate levels greater than the MCL. Several organic compounds were detected in the crop soil samples but only bentazon and monensin were detected in a water well and its associated crop field soil sample. Bentazon was detected in two water wells and the associated mint field soil samples. These results indicate that bentazon was applied to the crop field and is likely migrating to the groundwater and water wells. Monensin was the only veterinary pharmaceutical detected in one well and also in an associated soil sample collected from a hop field. Possible manure application to the hop field could account for the monensin detected in the downgradient residential well.

The isotopic data provide strong evidence that synthetic fertilizer is a dominant source in one residential drinking water well downgradient of a mint field and that animal waste (human and non-human) is a dominant source of the nitrate in one well downgradient of a hops field. Isotopic analysis cannot differentiate between human and non-human waste. Isotopic data for the other residential drinking water wells downgradient of the crop fields indicate that the source of the nitrate could be animal waste or fertilizer, with some contribution from the atmosphere.

Given the historic and current application of nitrogen-rich fertilizers in the Lower Yakima Valley, it is expected that irrigated crop fields would be a likely source of high nitrate levels in downgradient drinking water wells. The data collected in this study provide some corroboration that irrigated crop fields are a likely a source of nitrate in groundwater. The data supporting this conclusion is not as strong for the crop fields as it is for the dairies. The reasons for this include: lack of upgradient well data; the irrigated crop fields sampled are situated amongst other agricultural uses, including upgradient dairy operations; fewer analytes detected in both the crop field samples and the corresponding downgradient wells; more limited information about crop field operations; and the crop fields' positions on the landscape relative to other potential sources.

Residential Septic Systems

Four residential water wells were identified for evaluation of impacts from septic systems. However, all of the residential drinking water wells sampled as part of Phase 3 of this study were analyzed for the same suite of chemicals. Although all the residential water wells were evaluated to determine if septic systems could be a likely source of the nitrate in water wells, the four wells identified to evaluate the potential contribution from septic systems were selected because they are in residential areas served by septic systems, but are not located near dairies or crop fields. EPA also collected influent samples from three WWTP located in Zillah, Mabton, and Toppenish.

The WWTP influent had no actual or potential hydrogeological connection with the residential wells. These treatment plant influent samples were collected to serve as surrogates for septic systems by providing a characterization and quantification of compounds that are found in rural septage, while recognizing that these WWTPs also may receive commercial or and industrial waste streams. The WWTP and residential drinking water well data were compared to determine whether the drinking water wells contained the same compounds as the WWTP influent samples which could indicate that the septic systems are a source of nitrate in the residential drinking water wells.

The majority of the trace organics (for example personal care products) and wastewater pharmaceuticals were detected in the WWTP influent samples, but only two of these compounds were detected in the residential drinking water wells sampled by EPA in Phase 3. Specifically, DEHP was detected in four residential drinking water wells and DEET was detected in one residential water well. This indicates the trace organics are being used and can be found in wastewater, but with a few exceptions are not reaching residential drinking water wells.

Four veterinary pharmaceutical compounds were detected in the WWTP influent samples, three of which were also detected in one or more residential water wells. Specifically, sulfamethazine (used for cattle, poultry, and swine) was detected in two residential water wells, sulfamethoxazole (used for people) in one residential drinking water well, and tetracycline (used for people, cattle, and several other animals) in six residential drinking water wells.

There were 10 additional veterinary pharmaceuticals detected in residential water wells, but not detected in WWTP influent samples. Monensin (used for cattle and poultry) and virginiamycin (used in poultry and swine) were the most frequently detected veterinary pharmaceuticals: monensin was detected in nine residential water wells and virginiamycin in four. Monensin and virginiamycin were not detected in the

WWTP influent samples. Given the results, septic systems are a possible source of tetracycline and sulfamethoxazole, both of which can be used by humans, in the residential drinking water wells.

Of the 20 hormones analyzed, 14 were detected in at least one WWTP influent sample. Of those 14 hormones, seven were detected in residential water wells. Testosterone and androsterone were the most frequently detected hormones: testosterone was detected in nine wells and androsterone was detected in four wells. Given both testosterone and androsterone are natural sex hormones it is possible they came from septic systems in proximity to the residential water wells, but these compounds were also detected in wells downgradient of the dairies.

While the septic systems could be a source of nitrate in drinking water wells, there is insufficient information from this study to support this conclusion.

The high nitrate levels in residential drinking water wells in the Lower Yakima Valley are likely coming from several sources. This study attempted to identify those sources. In some cases it was possible to identify likely or possible sources of the nitrate contamination.

Evaluating actions to reduce nitrate concentrations in residential drinking water wells to safe levels is beyond the scope of this report. Although actions to reduce nitrate are needed, it may take many years to reduce the nitrate levels in residential drinking water wells to safe levels because of the extent of the nitrate contamination in the Lower Yakima Valley and the persistence of nitrate in the environment.

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FIGURES

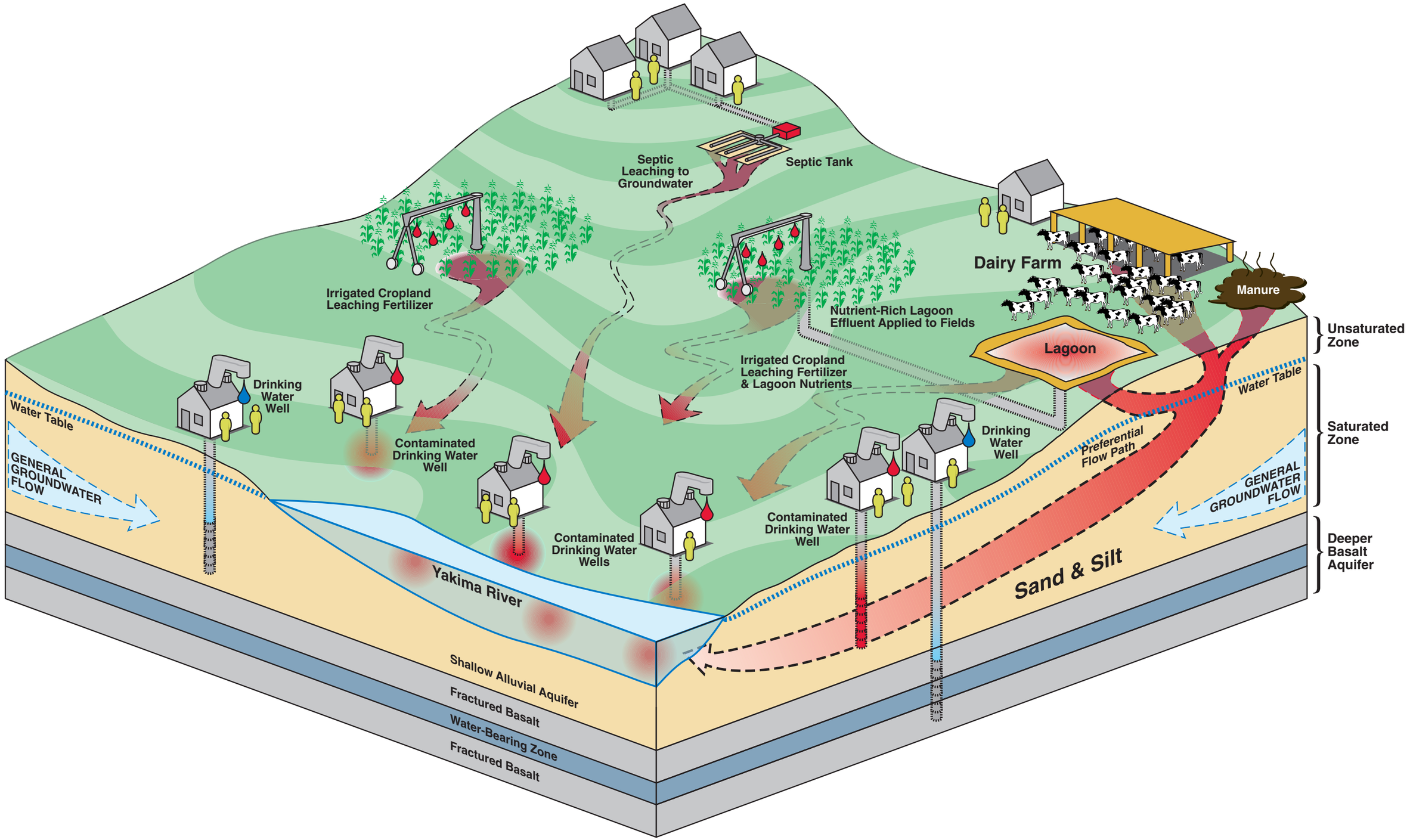


Figure 1: Conceptual Site Model for Lower Yakima Valley Project

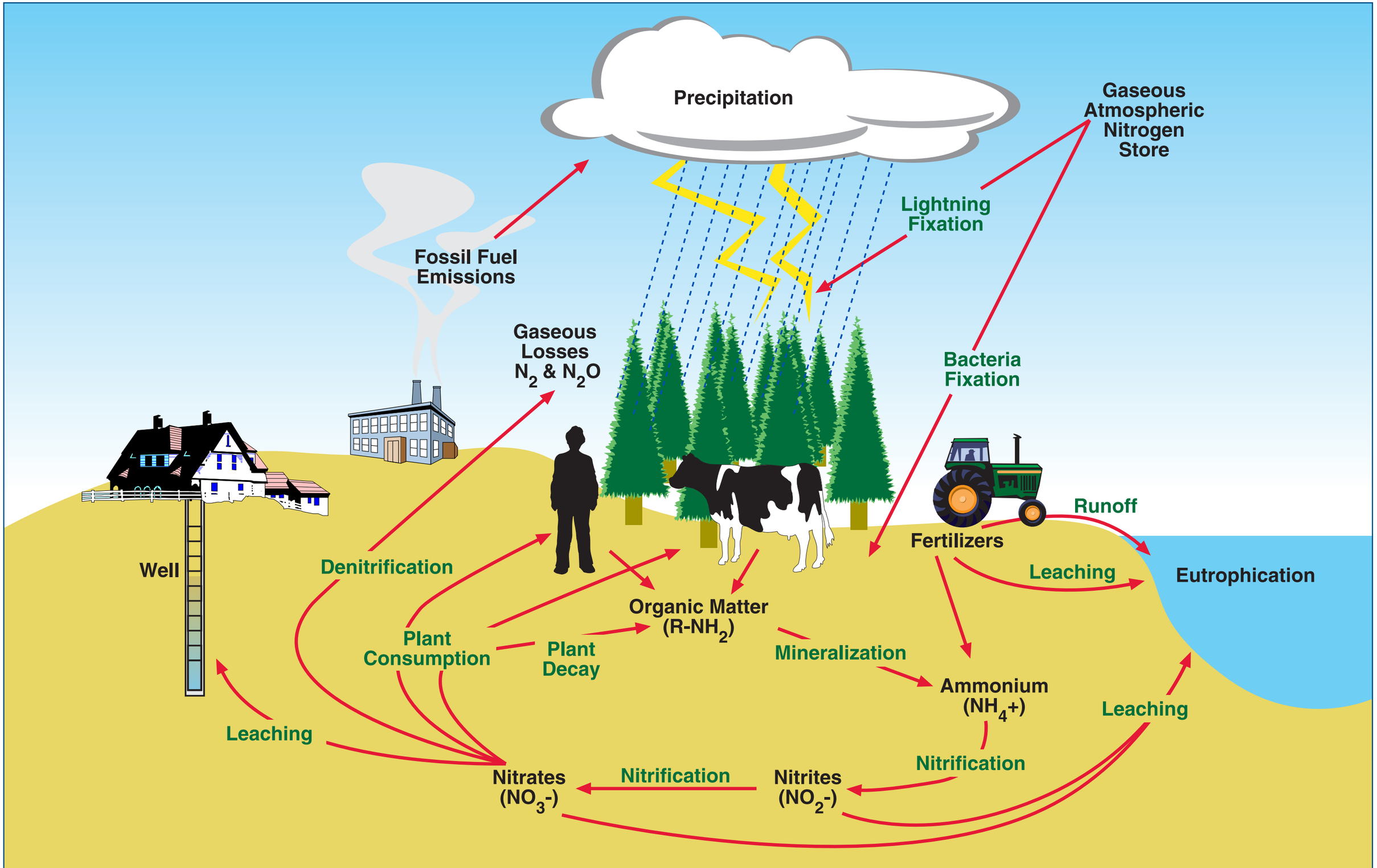


Figure 2: Nitrogen Cycle

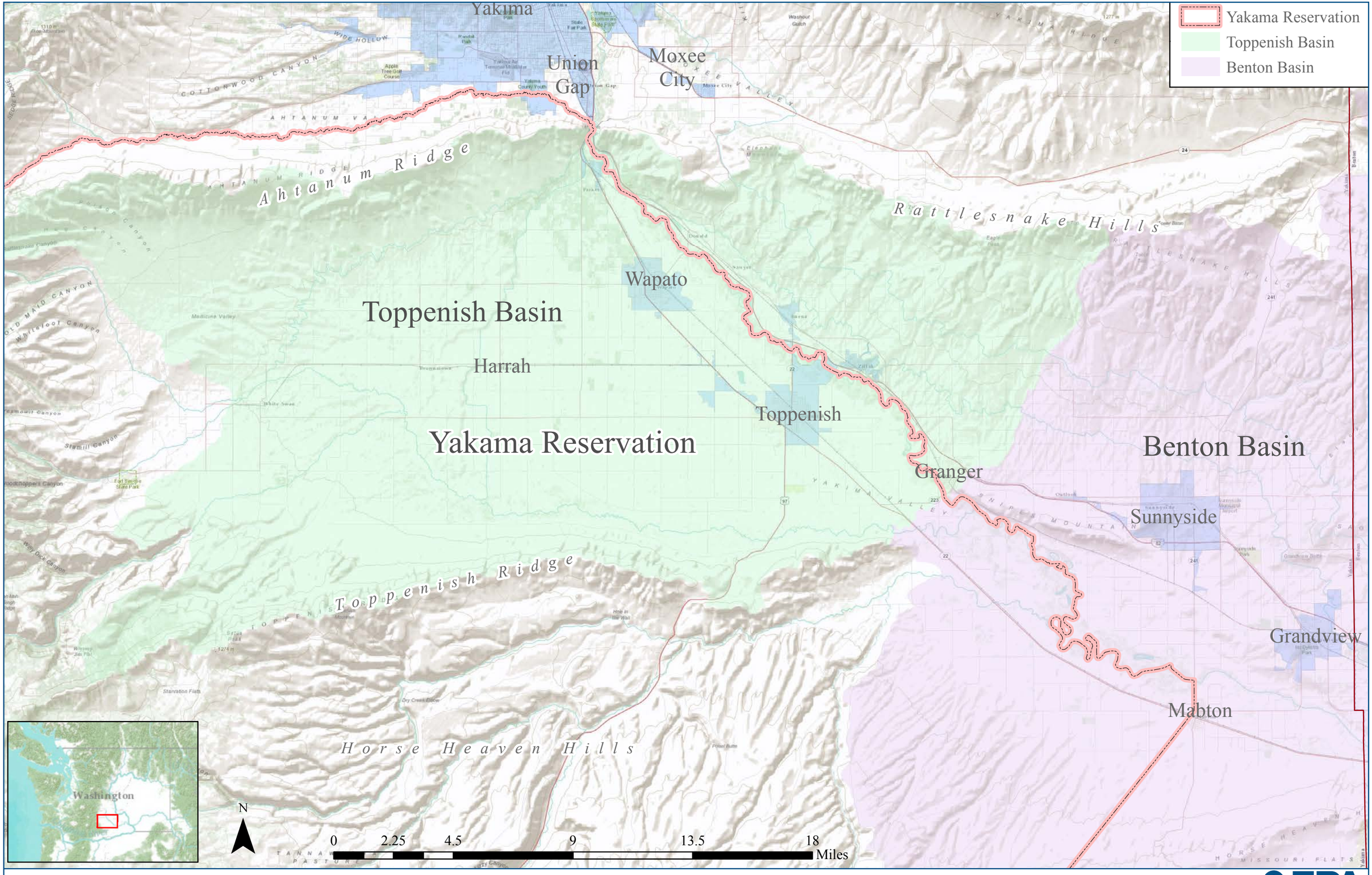
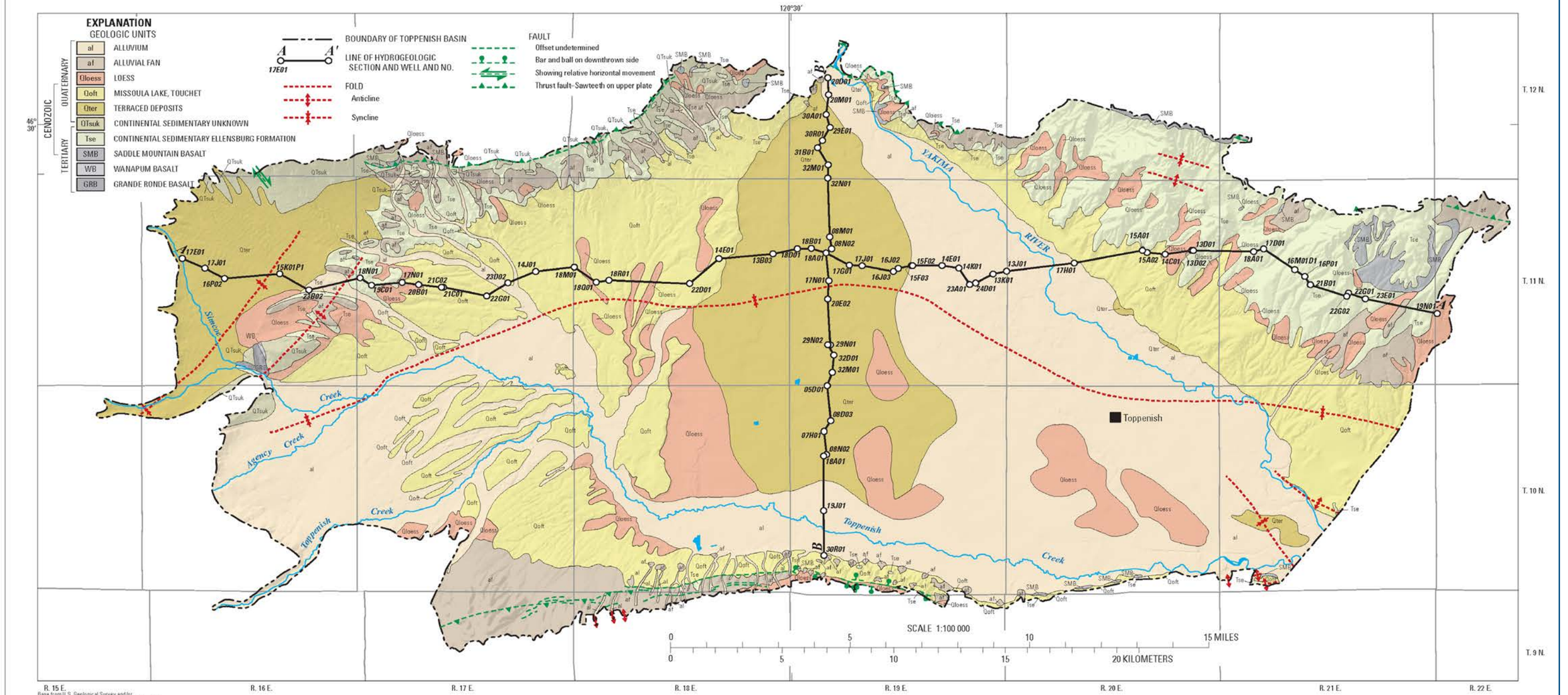


Figure 3: Study Area for EPA Lower Yakima Valley Project

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY
science for a changing world

Prepared in cooperation with the
BUREAU OF RECLAMATION, WASHINGTON STATE DEPARTMENT OF ECOLOGY, AND THE YAKAMA NATION



Base from U.S. Geological Survey and/or Washington Division of Geology and Earth Resources digital data, 1983, 1:100,000
Universal Transverse Mercator projection, Zone 10
Horizontal Datum: North American Datum of 1927 (NAD 27)

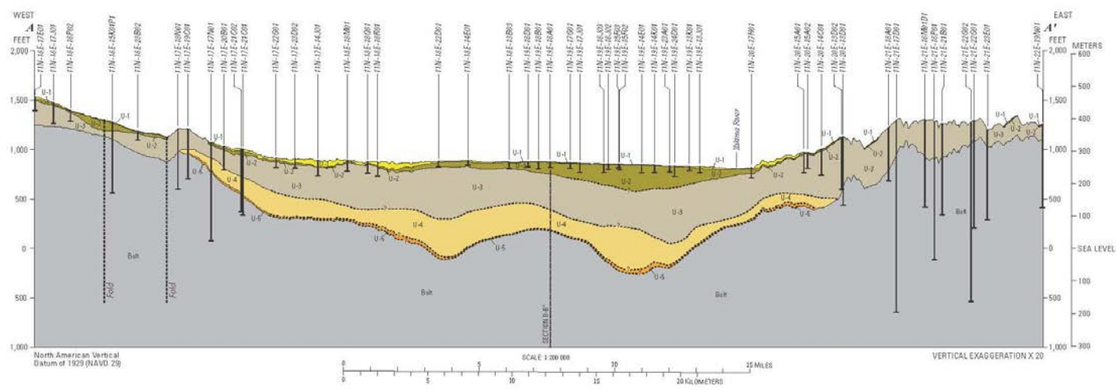
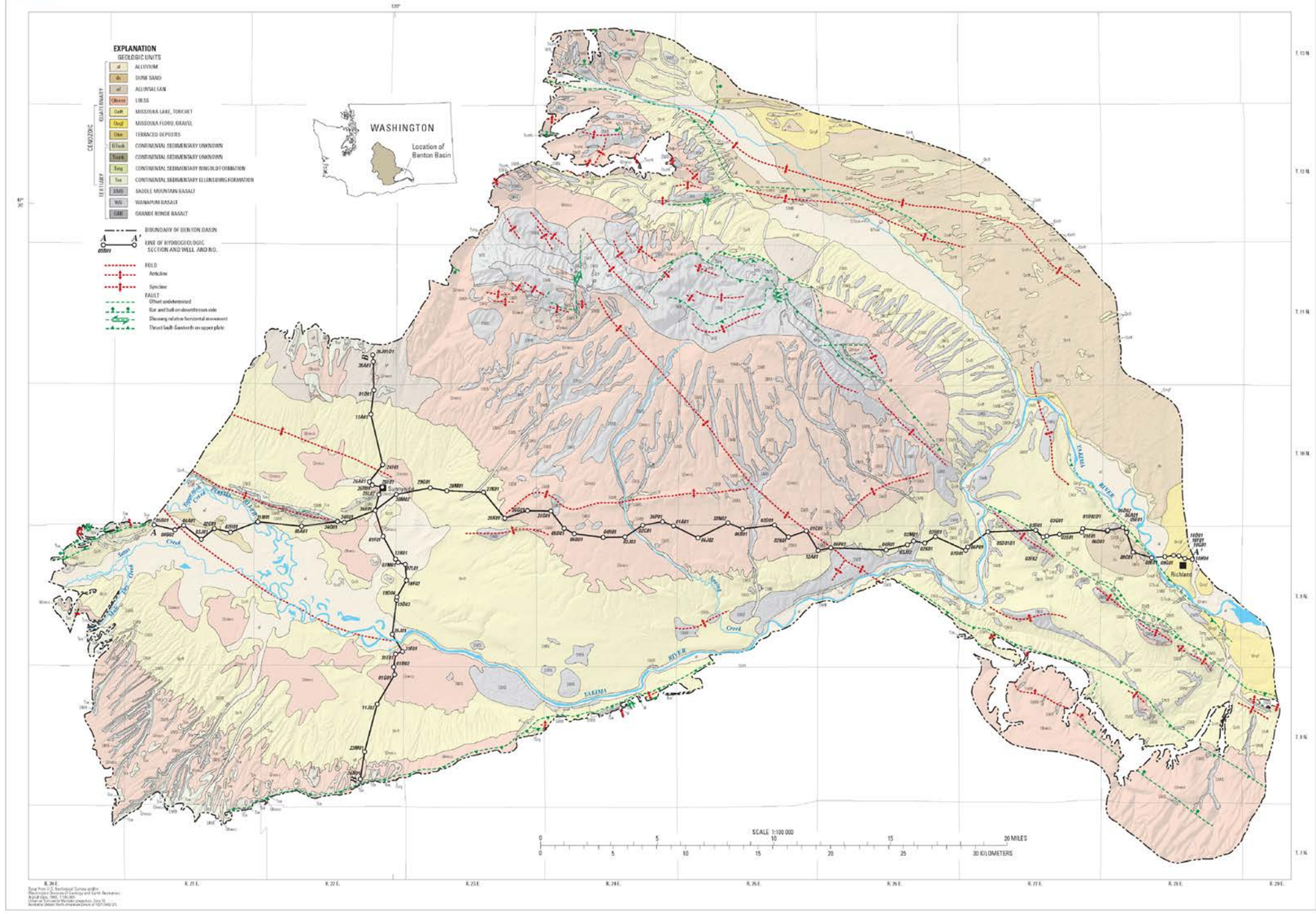


Figure 4: Hydrogeology of Toppenish Basin

EPA



Map Showing Surficial Geology and Locations of Selected Wells in the Benton Basin, Yakima River Basin, Washington

By
Myrtle A. Jones, John Vaccaro, and Anni M. Watkins
2006

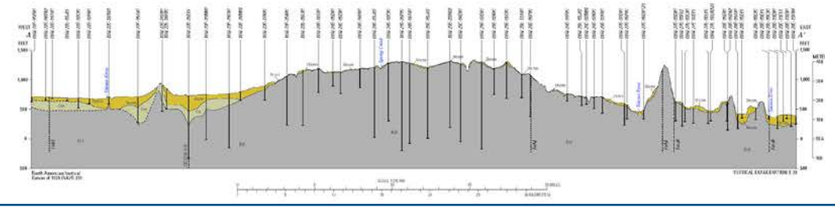


Figure 5: Hydrogeology of Benton Basin

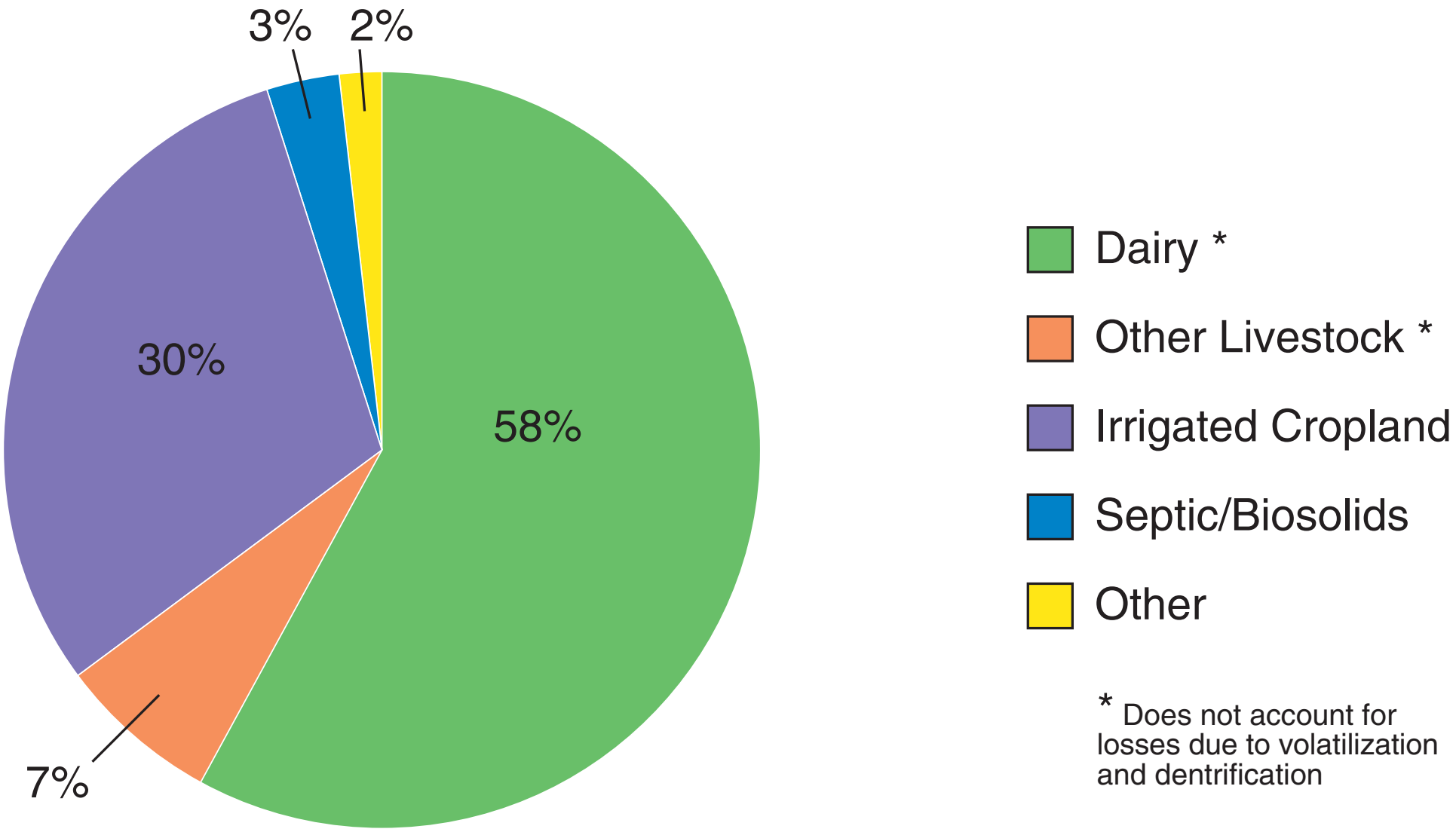


Figure 6: Nitrogen Generated by Major Sources in Yakima County

Dairy

Dairy in Study

Yakama Reservation

Source: Washington State Department of Agriculture

Yakima

Union Gap

Moxee City

Wapato

Harrah

Yakama Reservation

Toppenish

Granger

Sunnyside

Grandview

Mabton

Liberty Dairy

Cow Palace1 and 2 Dairy

DeRuyter Dairy

R & M Haak Dairy

Bosma Dairy

D & A Dairy

Ahtanum Ridge

Rattlesnake Hills

Toppenish Ridge

Horse Heaven Hills

Washington

N

0 2.25 4.5 9 13.5 18

Miles

Figure 7: Lower Yakima Valley Dairy Locations

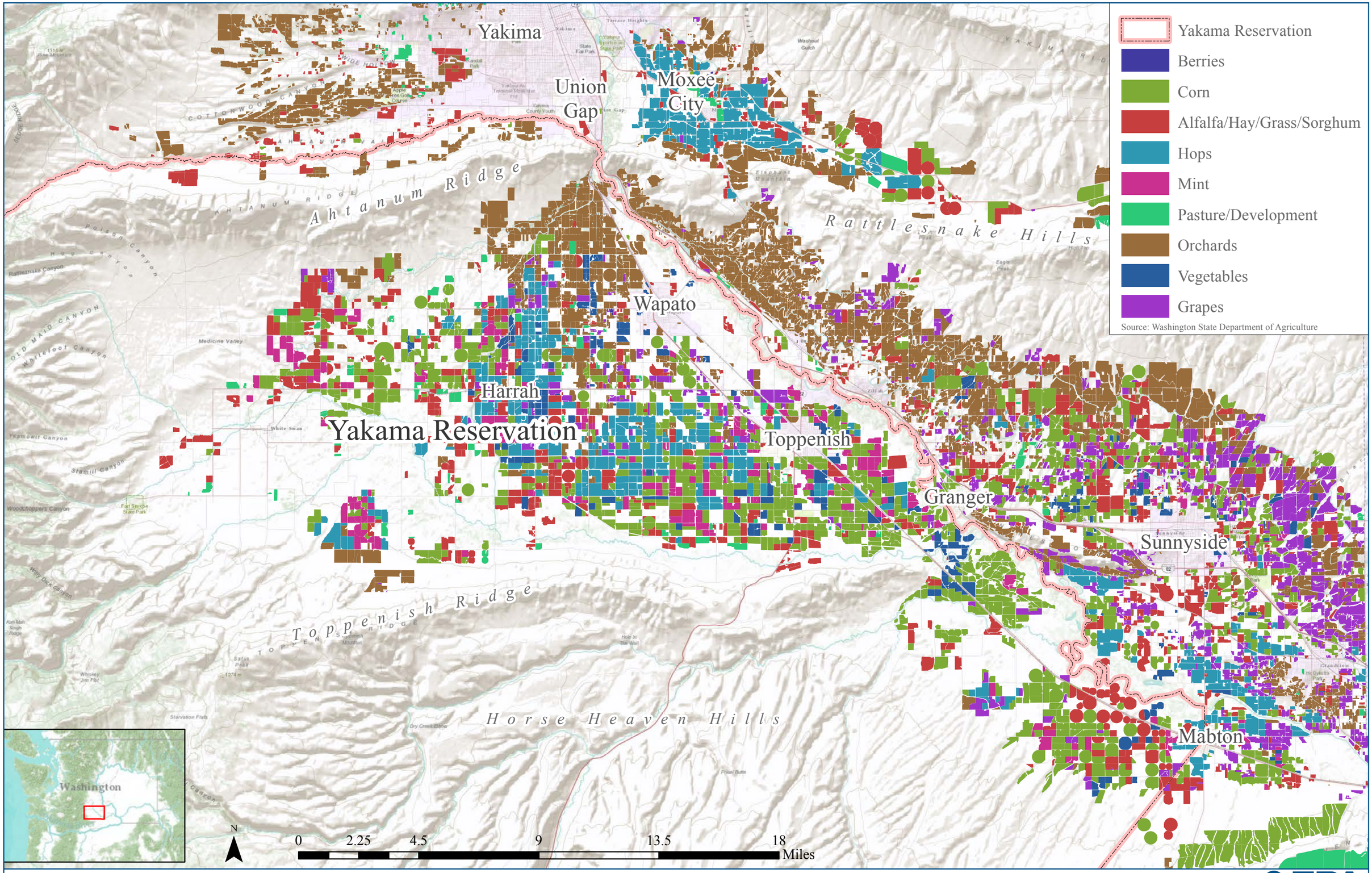


Figure 8: Lower Yakima Valley Crop Inventory

Septic Systems

Yakama Reservation

Source: Yakima County GIS Department

Union Gap

Moxee City

Wapato

Harrah

Toppenish

Yakama Reservation

Granger

Sunnyside

Grandview

Mabton

Ahtanum Ridge

Rattlesnake Hills

Toppenish Ridge

Horse Heaven Hills

Washington

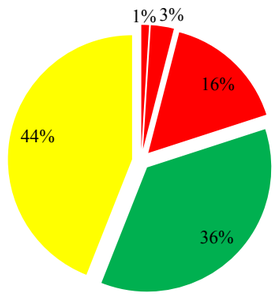
N

0 2.25 4.5 9 13.5 18

Miles

Figure 9: Lower Yakima Valley Septic System Distribution

Phase 2 Results (331 water wells sampled)



Phase 2 Nitrate Results

- < 5 mg/L
- 5 ≤ 10 mg/L
- 10≤ 25 mg/L
- 25≤ 50 mg/L
- > 50 mg/L
- Yakama Reservation

Yakima
Terrace Heights
Yakima Sportsman State Park
Yakima Air Terminal/Mcallister Fld
Union Gap
Moxee City
Parker
Donald
Sawyer
Wapato
Buena
Harrah
Brownstown
White Swan
Toppenish
Yakama Reservation
Granger
Outlook
Sunnyside
Grandview
Mabton
Washington
WIDE HOLLOW
AHTANUM VALLEY
RIDGE
YAKIMA RIDGE
YAKIMA VALLEY
Washout Gulch
1277 m
Rattlesnake Hills
CAMAS PATCH
TANNAWASHA PASTURE
Horse Heaven Hills
MISSOURI FLATS
N
0 2.75 5.5 11 16.5 22
Miles

Figure 10: Lower Yakima Valley Phase 2 Nitrate Sampling Locations and Results

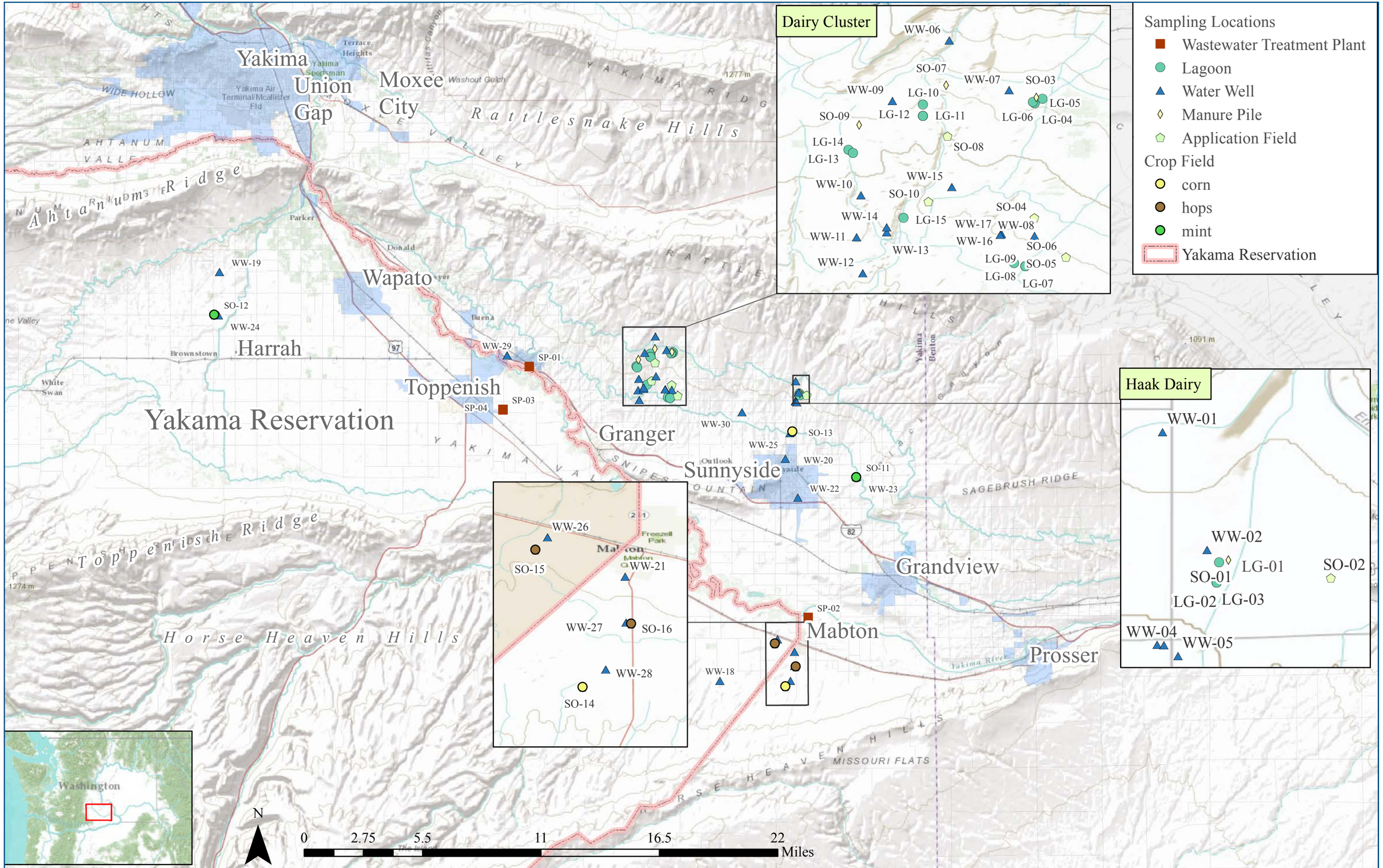


Figure 11: Lower Yakima Valley Phase 3 Sampling Locations

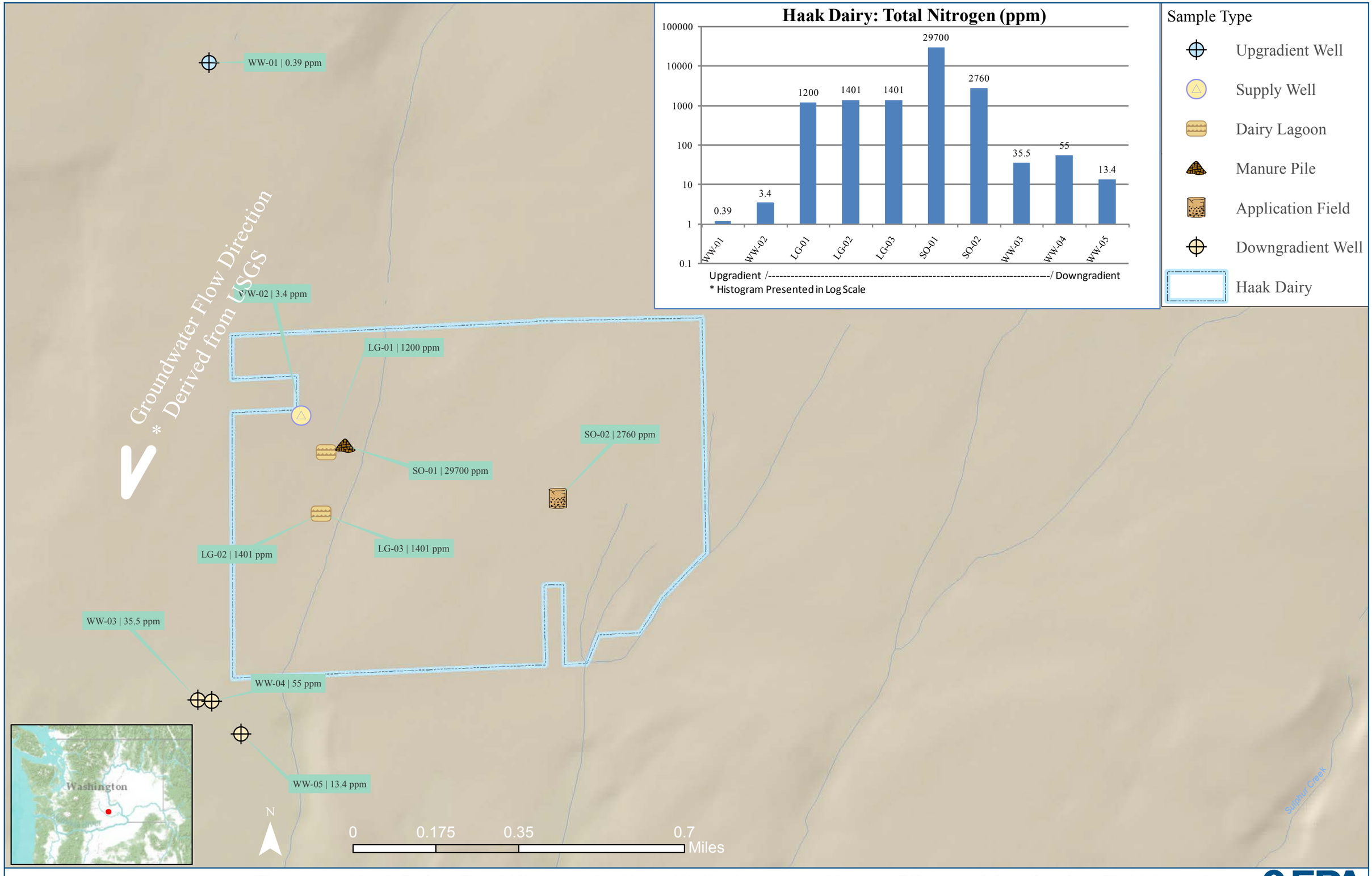
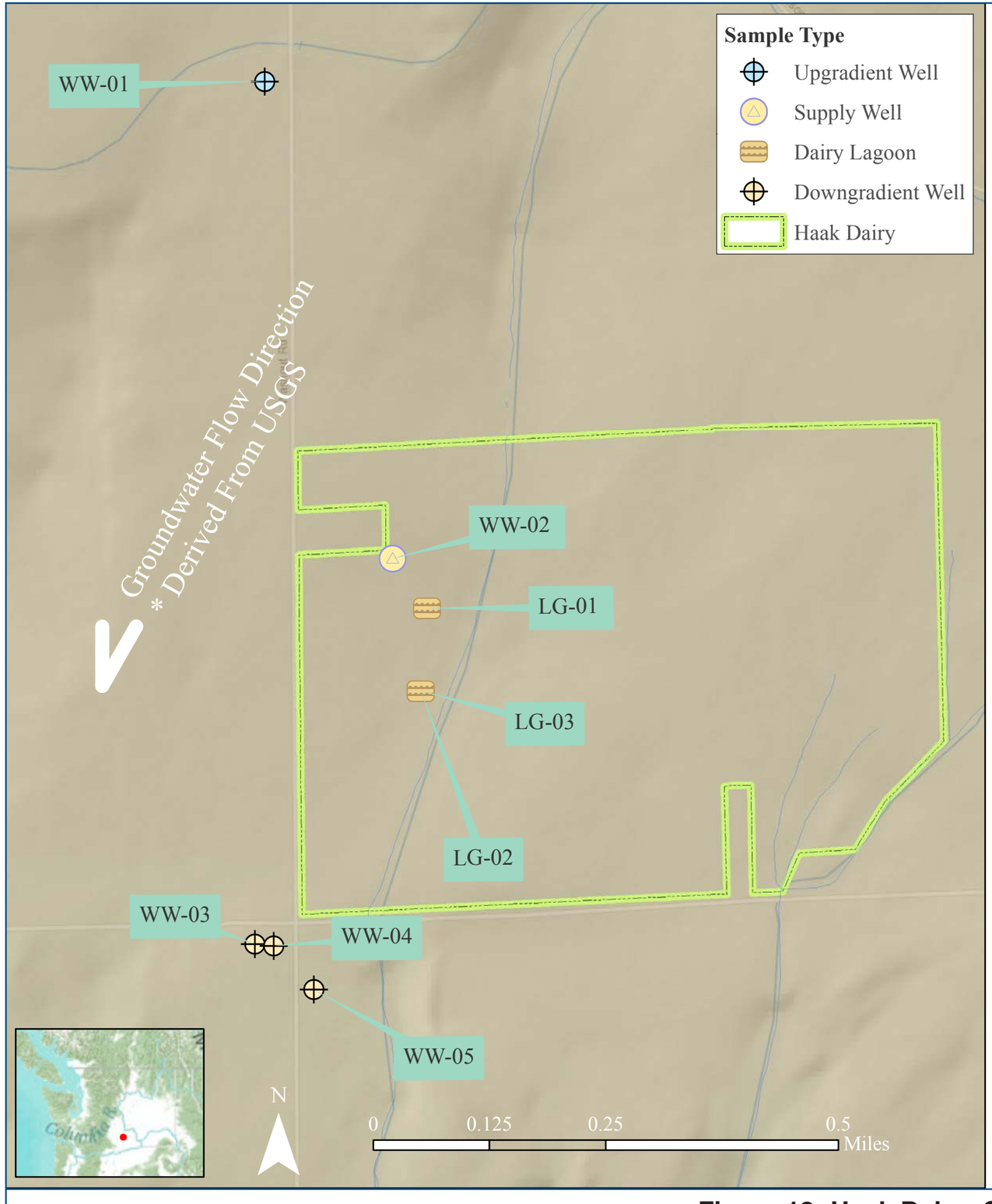
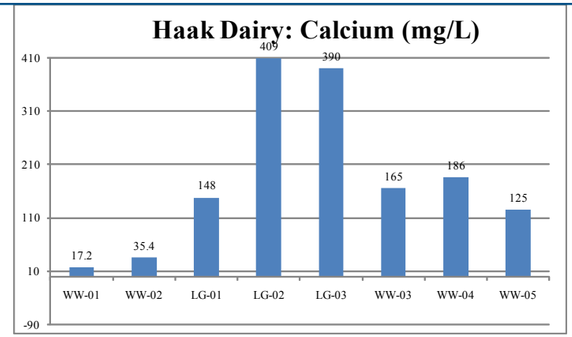
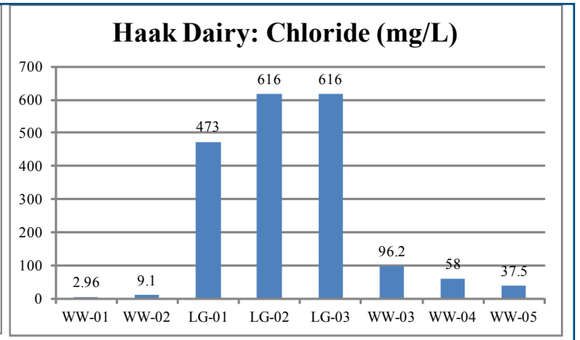
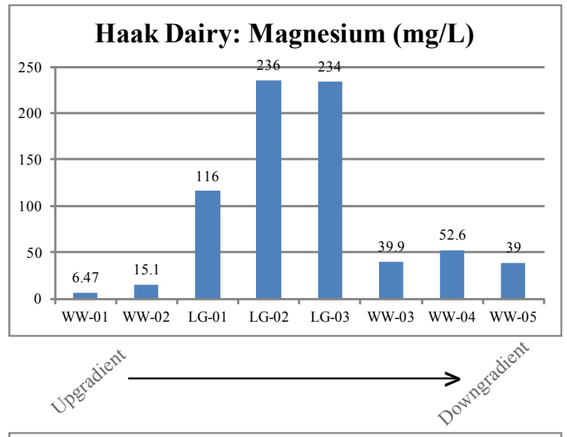


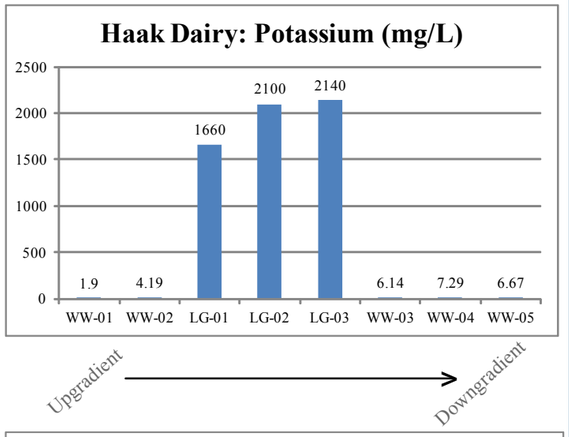
Figure 12: Haak Dairy: Total Nitrogen in Water Wells, Lagoons, Manure Piles, and Application Field Samples

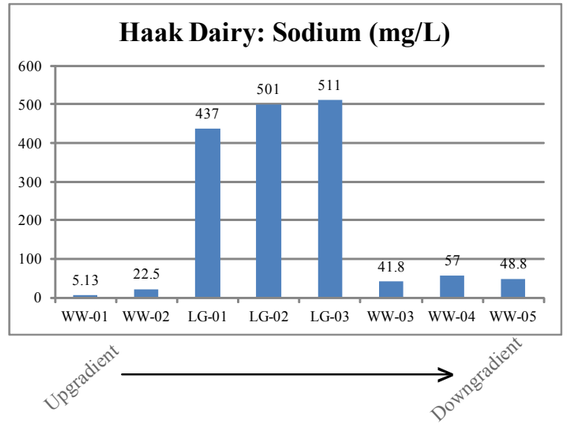












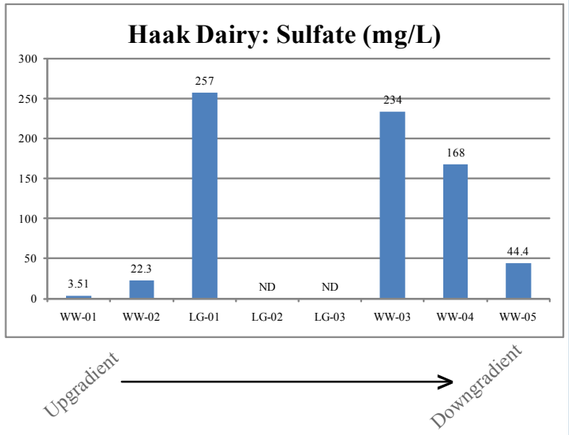


Figure 13: Haak Dairy: Concentration of Major Ions in Water Wells and Lagoons

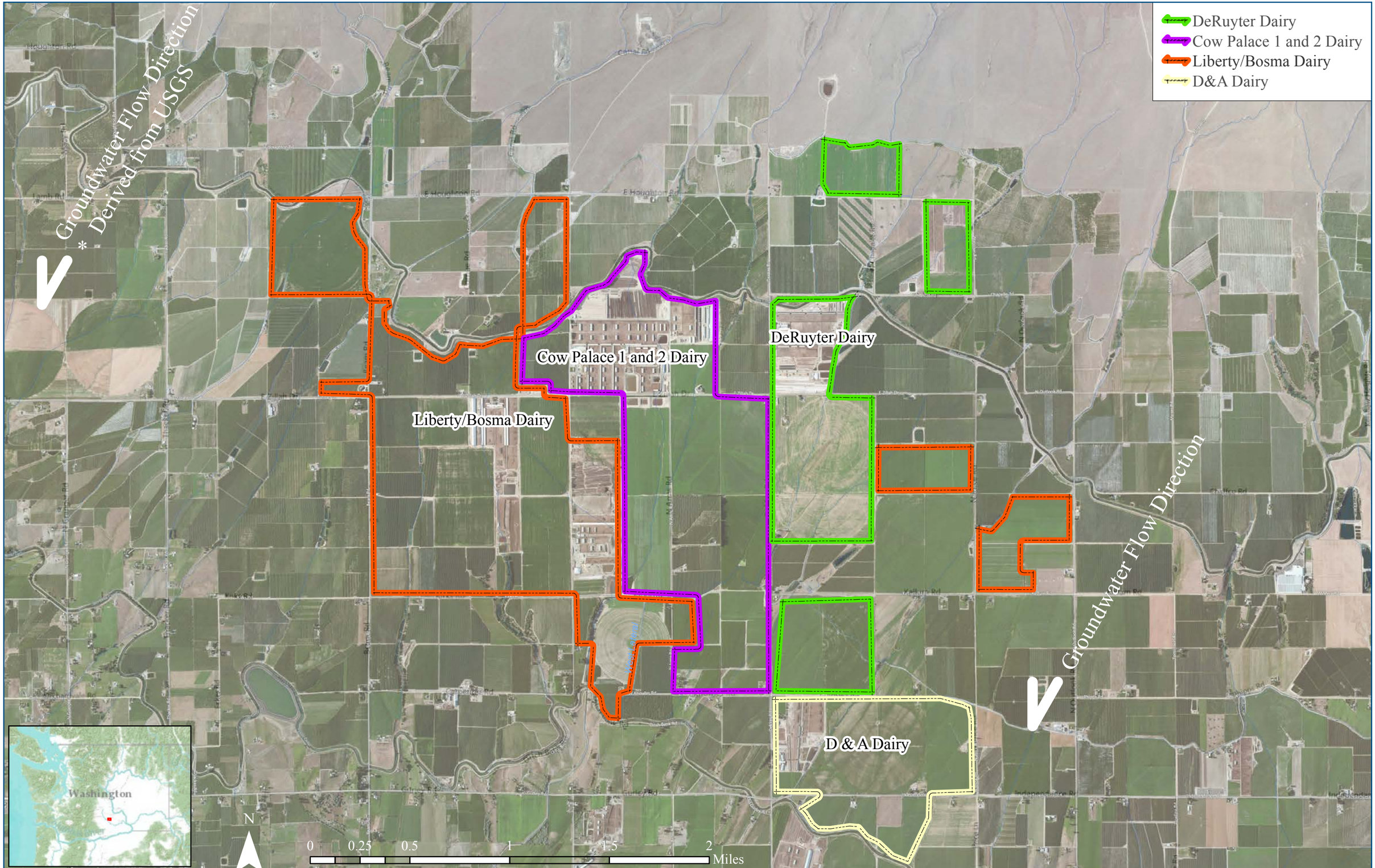


Figure 14: Dairy Cluster: Dairy Property Boundaries

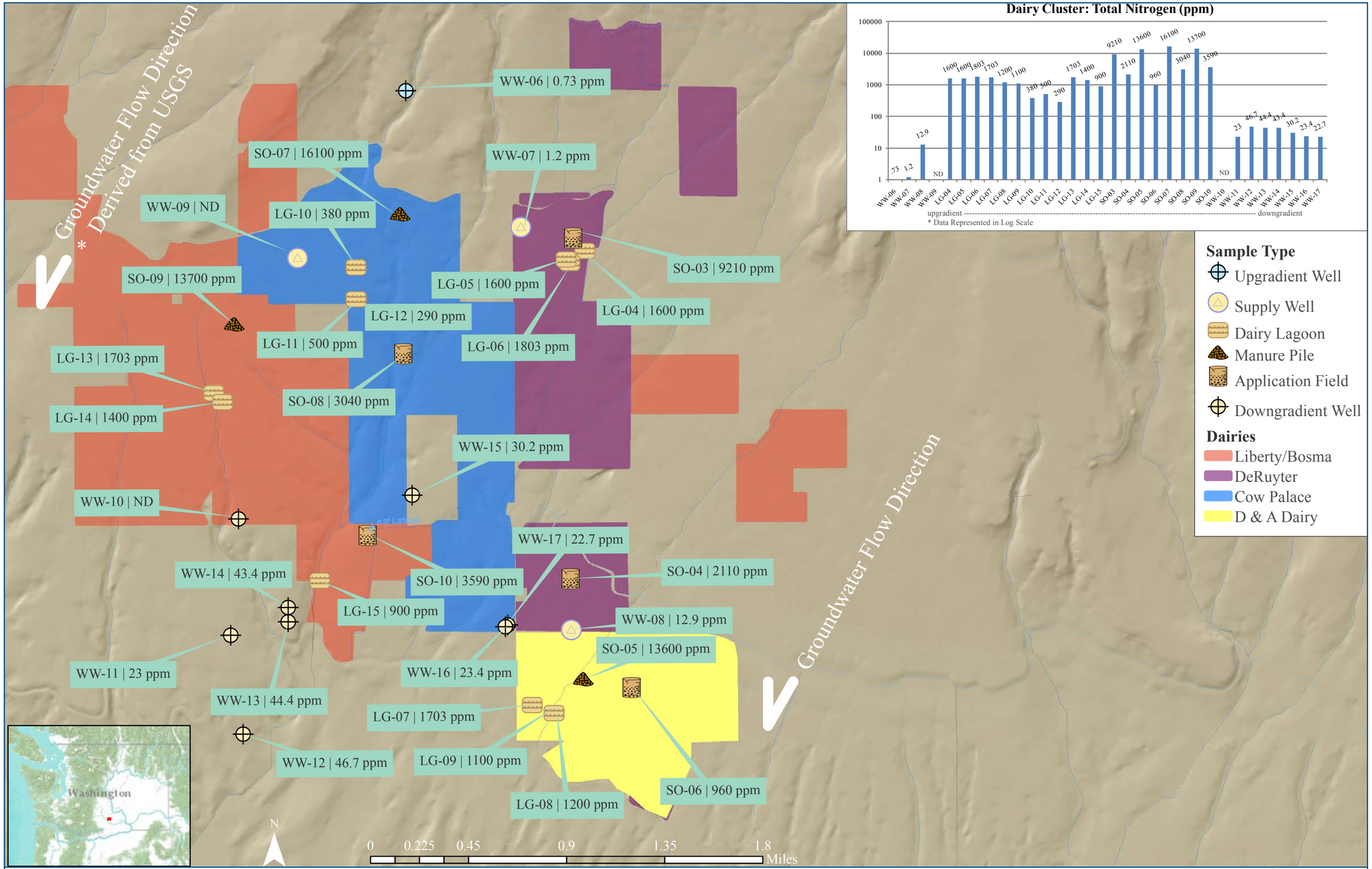


Figure 15: Dairy Cluster: Total Nitrogen Concentrations in Water Wells, Lagoons, Manure Piles, and Application Fields

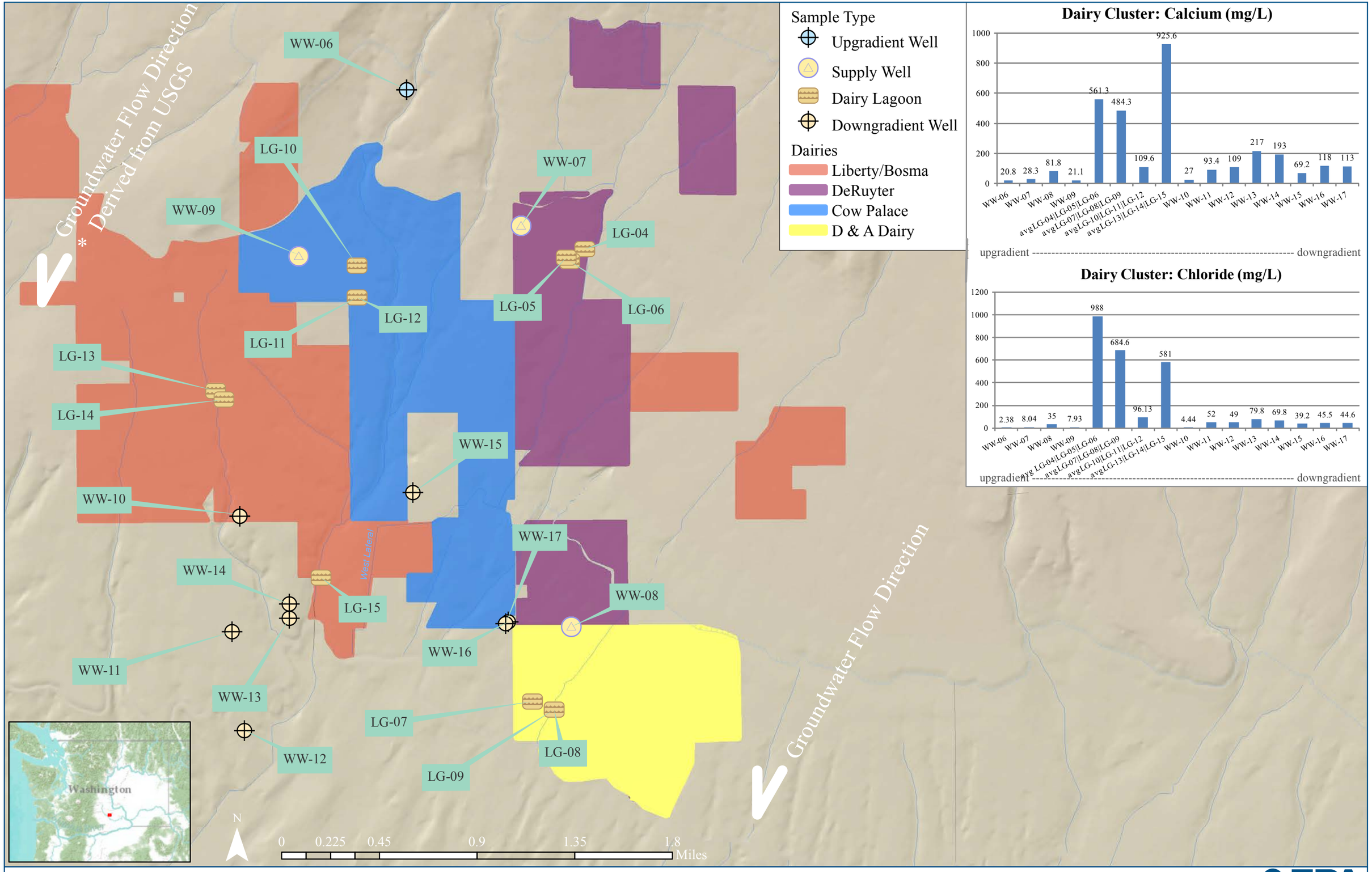


Figure 16a: Dairy Cluster: Calcium and Chloride Concentrations in Water Wells and Lagoons

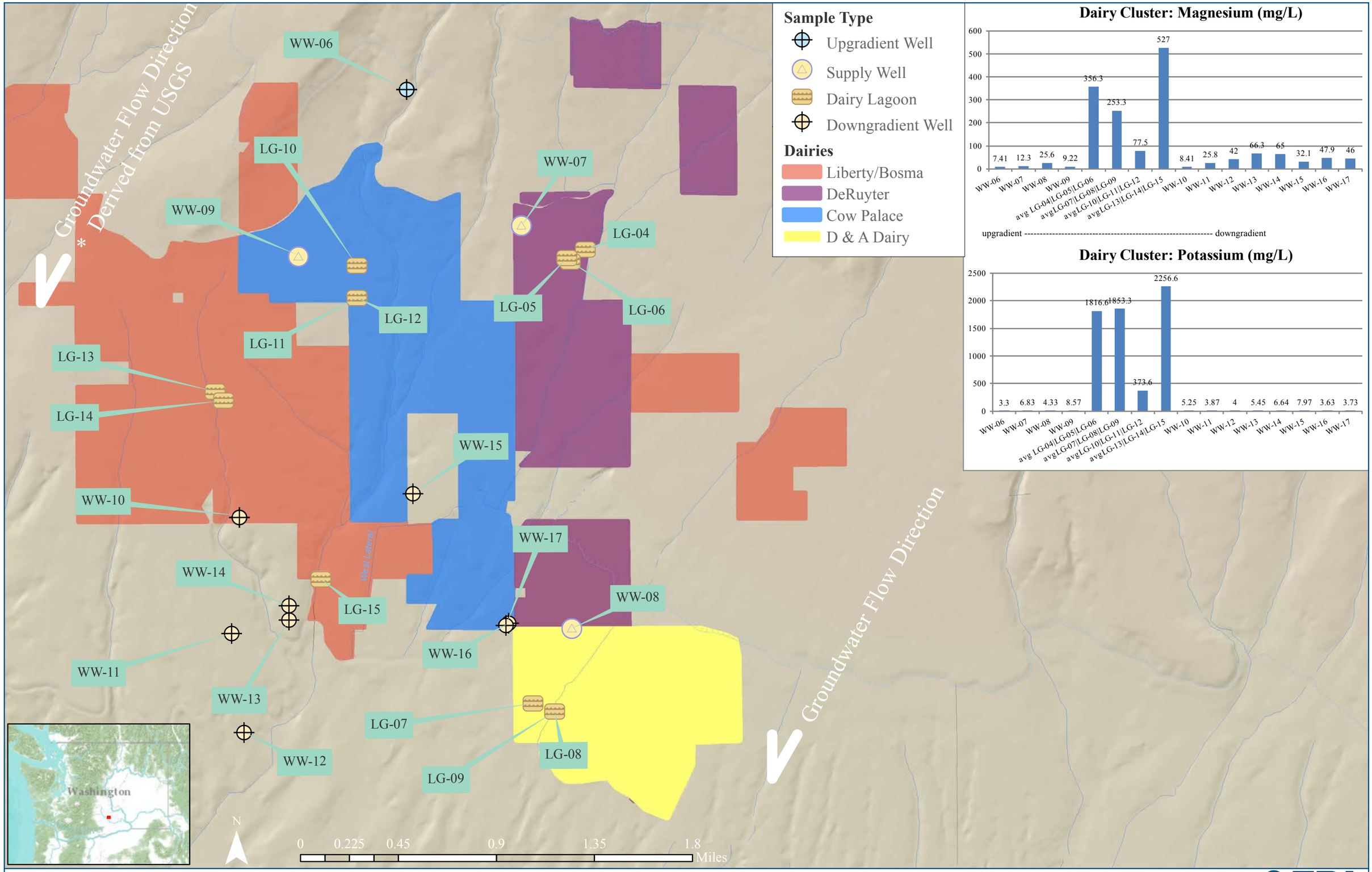


Figure 16b: Dairy Cluster: Magnesium and Potassium Concentrations in Water Wells and Lagoons.

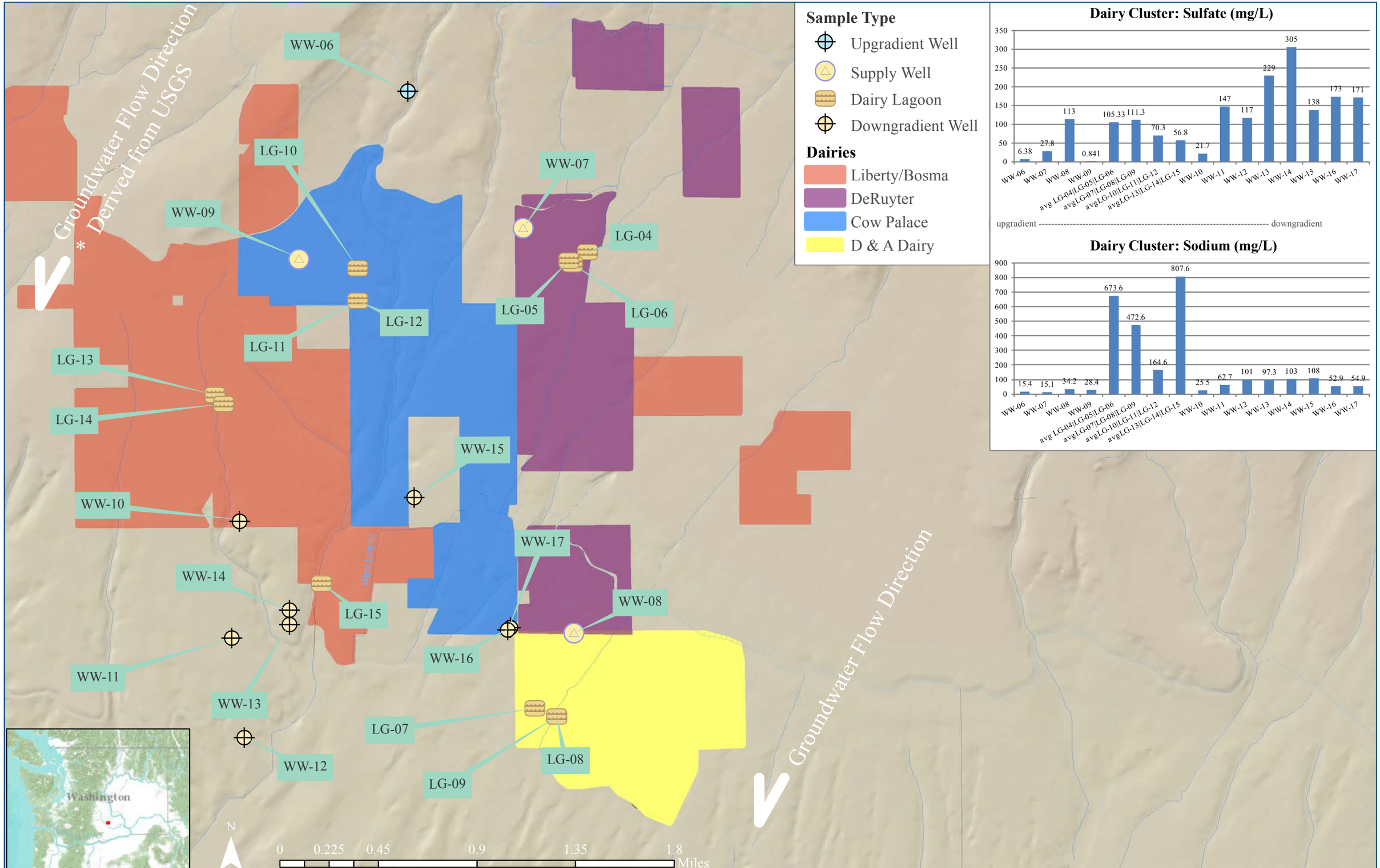


Figure 16c: Dairy Cluster: Sulfate and Sodium Concentrations in Water Wells and Lagoons

APPENDIX A

WATER WELL INFORMATION

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Table A1: Phase 3 - Water Well Information

Location ID	Sample ID	Sample Type	Nitrate Concentration[a] (units: mg/L)	Well depth (ft) from Phase 2 (reported by owners)	Well depth (ft) from Phase 3 (reported by owners)	Well depth (ft) from WSDA (reported by the dairy)	Well depth (ft) from WDOE well report (total depth/ static level)
WW-01	10154201	Upgradient well – Dairy	0.38				
WW-02	10154202	Supply well – Dairy	3.12			80	210 / 70
WW-03	10154203	Downgradient well – Dairy	33.1	330			95/25
WW-04	10154204	Downgradient well – Dairy	51.9				88/20
WW-05	10154205	Downgradient well – Dairy	12.8	220			
WW-06	10154206	Upgradient – Dairy	0.71				
WW-07	10154207	Supply well – Dairy	1.02			200	470 / 220
WW-08	10154208	Supply well – Dairy	11.7			200	220 / 73
WW-09	10164209	Supply well – Dairy	0.05			430	482 / 201
WW-10	10164210	Downgradient well – Dairy	0.05			300	345 / 185
WW-11	10154211	Downgradient well – Dairy	22.3				
WW-12	10154212	Downgradient well – Dairy	45	158			158 / 50
WW-13	10154213	Downgradient well – Dairy	41.4	120			
WW-14	10154214	Downgradient well – Dairy	40.9				
WW-15	10154215	Downgradient well – Dairy	29.4	230	126		
WW-16	10154216	Downgradient well – Dairy	22.3				
WW-17	10154217	Downgradient well – Dairy	21.7	96			105 / 64
WW-18	10154218	Residential well	72.2				
WW-19	10154219	Downgradient well – Septic	38.2				
WW-20	10154220	Downgradient well – Septic	15.0				
WW-21	10154221	Downgradient well – Septic	38				
WW-22	10164222	Downgradient well – Septic	16.4				
WW-23	10154223	Downgradient well – Mint	16	50			
WW-24	10154224	Downgradient well – Mint	13.8				
WW-25	10154225	Downgradient well – Corn	33.4				192 / 67
WW-26	10154226	Downgradient well – Hops	15.3	90			
WW-27	10154227	Downgradient well – Hops	19.8				
WW-28	10154228	Downgradient well – Corn	71.2				120 / ?
WW-30	10164230	Residential well	23.4				

[a]Phase 3 nitrate concentrations reported by Cascade Analytical Laboratory.

Figure A1: Phase 3 - Relationship Between Water Well Depth and Nitrate Concentrations

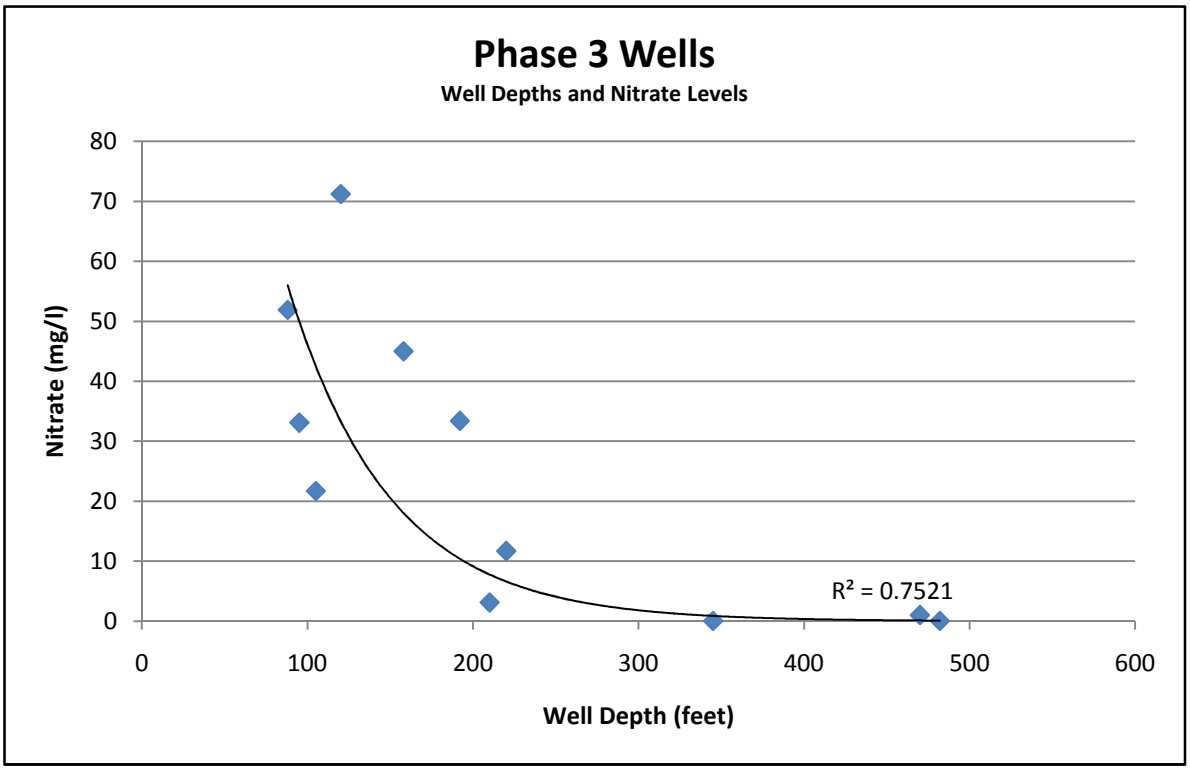


Figure A1 Supporting Data

EPA Phase 3 Well Number	Well Depth from WADOE Well Report (Total Depth)	Nitrate (mg/l)	Well Completed in Alluvial Aquifer or in Basalt	Well Type
WW-04	88	51.9	Alluvial	Domestic
WW-03	95	33.1	Alluvial	Domestic
WW-17	105	21.7	Alluvial	Domestic
WW-28	120	71.2	Unknown	Domestic
WW-12	158	45	Alluvial	Domestic
WW-25	192	33.4	Alluvial	Domestic
WW-02	210	3.12	Basalt	Dairy/Domestic
WW-08	220	11.7	Alluvial	Dairy
WW-10	345	0.05	Alluvial	Domestic
WW-07	470	1.02	Basalt	Dairy
WW-09	482	0.05	Basalt	Dairy

Notes:

Well logs are probable matches based on available information.

WW-28 information based on well owner interview.

The WW-02 well log may be for one of two wells that feed into the Haak dairy water supply.

"Well Type" is based on EPA's understanding of the current use of the well.

WADOE = Washington State Department of the Ecology

Figure A2: Phase 3 - Relationship Between Water Well Depth and Age Dating Data

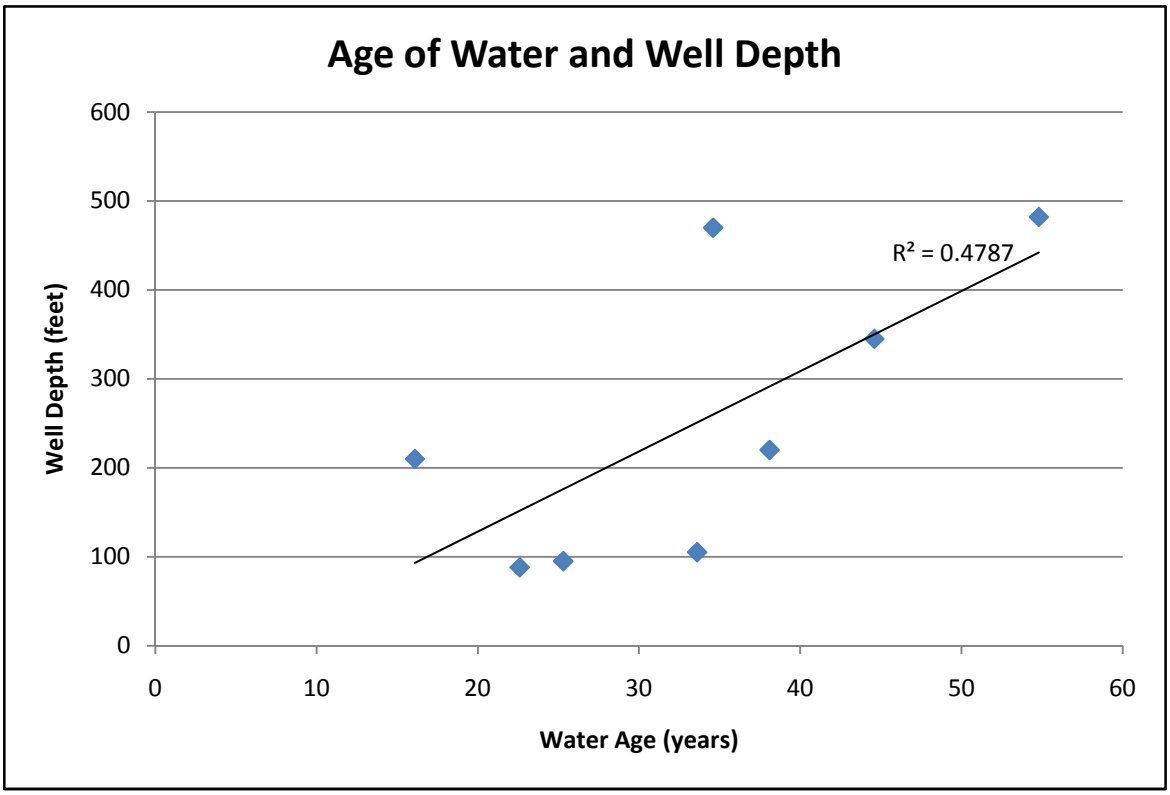


Figure A2 Supporting Data

Well No.	Water Age	Well Depth
WW-03	25.3	95
WW-04	22.6	88
WW-17	33.6	105
WW-02	16.1	210
WW-08	38.1	220
WW-10	44.6	345
WW-07	34.6	470
WW-09	54.8	482

Notes:
Water in wells WW-09 and WW-10 may be older than indicated.

APPENDIX B
SURFACE SOIL CHARACTERISTICS OF THE STUDY AREA

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Appendix B: Surface Soil Characteristics of the Study Area

Surface soils in Yakima County have been characterized and mapped by the Natural Resources Conservation Service (NRCS 2012). A soil report was generated from the NRCS database for each dairy and irrigated crop field in the study and EPA compiled the soil reports (EPA 2012). A summary of surface soil characterization for each of the dairies and irrigated crop field is presented below.

HAAK DAIRY

Within the Haak Dairy property boundary, five soil units have been mapped by the NRCS. All five soil units have a silt loam texture with a "well-drained" classification. Three of the soil units (Scooteney, Sinloc, and Warden) represent 82 percent of the surface area. They have a saturated hydraulic conductivity in the range of 1.1 to 4.0 feet per day, which is characterized as "moderately high to high" in their capacity to transmit water. Saturated hydraulic conductivity is a measure of soil permeability and describes how quickly water moves through soil under saturated conditions. Likewise the other two soil units (Burke and Scoon) have a moderately high to high capacity to transmit water to a depth of 2 to 3 feet below ground surface; however, a cemented layer is present below this depth with a saturated hydraulic conductivity in the "very low to moderately low" range of 0.0 to 0.10 feet per day. The Burke and Scoon units are located in the northwest portion of the Haak Dairy property and account for 18 percent of the surface area.

DAIRY CLUSTER

Almost all the surface soils underlying the Dairy Cluster have a "well drained" classification, which means water moves readily through the soil.

More than 80 percent of the surface soils underlying the Dairy Cluster are highly permeable. Highly permeable is defined here to mean having a high hydraulic conductivity. The prevalence of highly permeable surface soils is significant because it increases the risk of groundwater contamination due to water carrying nitrogen into the ground more readily than if the soils were of lower permeability.

Within the approximate boundary of the Liberty Dairy and Bosma Dairy, 10 soil units have been mapped by NRCS. Most all of them are characterized by a silt loam texture and are classified as "well drained", except for two (Outlook and Sinloc) which have a "somewhat poorly drained" classification. Six of the soil units (Outlook, Scooteney, Shano, Sinloc, Warden, and Esquatzel) represent approximately 87 percent of the surface area. The soil units have a saturated hydraulic conductivity in the range of 1.1 to 4.0 feet per day, which is characterized as "moderately high to high". Three of the soil units (Burke, Moxee, and Scoon) have a saturated hydraulic conductivity in the range of 0.0 to 0.10 feet per day, which is characterized as "very low to moderately low." One of the soil units (Finlay) has a saturated hydraulic conductivity of 1.98 to 5.95 feet per day, which is characterized as "high".

Within the approximate property boundary of the Cow Palace, six soil units have been mapped by the NRCS. All six soil units have a silt loam texture with a "well-drained" classification. Three of the soil units (Esquatzel, Shano, and Warden) represent approximately 81 percent of the surface area. These units have a saturated hydraulic conductivity in the range of 1.1 to 4.0 feet per day, which is characterized as "moderately high to high" in their capacity to transmit water. Two of the soil units (Burke and Scoon) represent approximately 19 percent of the surface area and have a saturated hydraulic conductivity in the range of 0.0 to 0.12 feet per day, which is characterized as "very low to moderately low." One of the soil

units (Finlay) represents less than 1 percent of the surface area and has a saturated hydraulic conductivity of 4 to 11.9 feet per day, which is characterized as "high."

Within the approximate boundary of the DeRuyter Dairy and the D and A Dairy, five soil units have been mapped by the NRCS. All five soil units have a silt loam texture with a "well drained" classification. Three of the soil units (Scooteney, Esquatzel, and Warden) represent 92 percent of the surface area. They have a saturated hydraulic conductivity in the range of 1.1 to 4.0 feet per day, which is characterized as "moderately high to high" in their capacity to transmit water. One of the soil units (Scoon) represents approximately 7 percent of the surface area, and has a saturated hydraulic conductivity of 0.0 to 0.12 feet per day, which is described as "very low to moderately low." Another soil unit (Finley) represents just over 1 percent of the land surface area and has a saturated hydraulic conductivity in the range of 4.0 to 11.9 feet per day, which is described as "high."

Irrigated Crop Fields

There were six crop fields sampled in this study: two mint fields (soil samples SO-11 and SO-12); two corn fields (soil samples SO-13 and SO-14); and two hop fields (soil samples SO-15 and SO16). Soil samples SO-11, SO-12, and SO-13 were collected from the same type of soil unit – Warden - which is classified as being "well drained" with a saturated hydraulic conductivity in the range of 1.1 to 4.0 feet per day, which is characterized as "moderately high to high".

Soil sample SO-14 is composed of three soil units – Cleman, Hezel, and Warden. The Cleman unit is well drained and is characterized as having a saturated hydraulic conductivity of "moderately high to high." The Hezel is classified as being "somewhat excessively drained" with a "moderately high" saturated hydraulic conductivity. The Warden soil is also "somewhat excessively drained" with a "moderately high to high" saturated hydraulic conductivity.

Soil sample SO-15 is composed of three soil units – Esquatzel, Hezel, and Warden. The Esquatzel and Warden units are classified as well drained with a "moderately high to high" saturated hydraulic conductivity. The Hezel soil unit is classified as being "somewhat excessively drained" with a "moderately high" saturated hydraulic conductivity.

Soil sample SO-16 is composed of two soil units – Esquatzel and Warden. Both of these units are classified as well drained with a "moderately high to high" saturated hydraulic conductivity.

References Appendix B

Natural Resources Conservation Service (NRCS). 2012. Soil survey staff, U.S. Department of Agriculture, Soil Survey Geographic (SSURGO) Database for Yakima County. Available online at http://soildatamart.nrcs.usda.gov. Accessed January 2012.

U.S. Environmental Protection Agency (EPA). 2012. Soil reports for dairies and irrigated crop fields associated with Phase 3 sampling for EPA Lower Yakima Valley Study. February 2012.

APPENDIX C

DATA SUMMARY TABLES

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Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-11007	10086001f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086001	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-11008	10086002f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086002	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	1		#/100ml	SM 9222-B
			Chloride	49.7		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	21.1		mg/L	300.0
WW-11009	10086003f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11010	10086004f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086004	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11011	10086005f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-11012	10086006f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11013	10086007f	Field Measurement	Nitrate as N	50	J	mg/L	
	10086007	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	112		mg/L	300.0
			Total Kjeldahl Nitrogen	50	U	mg/L	351.2
			Nitrate as N	53.5		mg/L	300.0
	10086008	Duplicate Sample (10086007)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	114		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	54.6		mg/L	300.0
WW-11014	10086009f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086009	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-11015	10086010f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11016	10086011f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11017	10086012f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11018	10086013f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086013	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
	10086015	Duplicate Sample (10086013)	Nitrate+Nitrite as N	13.1		mg/L	353.2
WW-11020	10086014f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-11022	10086016f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086016	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-11023	10086017f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11024	10086018f	Field Measurement	Nitrate as N	0		mg/L	
	10086018	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11025	10086020f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086020	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-11026	10086021f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086021	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	9.47		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	6.84		mg/L	300.0
WW-11027	10086022f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11028	10086023f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11030	10086024f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086024	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13.9		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	8.52		mg/L	300.0
WW-11031	10086025f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086025	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11032	10086026f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11033	10086027f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086027	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	23.6		mg/L	300.0
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
			Nitrate as N	3.02		mg/L	300.0

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-11034	10086028f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086028	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	11.9		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	8.71		mg/L	300.0
WW-11035	10086029f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086029	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13.4		mg/L	300.0
			Nitrate as N	17.4		mg/L	300.0
WW-11036	10086030f	Field Measurement	Nitrate as N	0		mg/L	
	10086030	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11037	10086031f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11039	10086032f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086032	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11040	10086033f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11041	10086034f	Field Measurement	Nitrate as N	50	J	mg/L	
	10086034	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	32.7		mg/L	300.0
			Nitrate as N	20.8		mg/L	300.0
WW-11042	10086035f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11043	10086036f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086036	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	28.8		mg/L	300.0
			Nitrate as N	6.72		mg/L	300.0
WW-11044	10086037f	Field Measurement	Nitrate as N	0		mg/L	
	10086037	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
	10086038	Duplicate Sample (10086037)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-11045	10086039f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086039	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	68.5		mg/L	300.0
			Nitrate as N	17.7		mg/L	300.0
	10086040	Duplicate Sample (10086039)	Chloride	68.6		mg/L	300.0
			Nitrate as N	17.4		mg/L	300.0
WW-11046	10086041f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086041	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11047	10086043f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086043	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11048	10086042f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086042	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11049	10086044f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086044	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	34.6		mg/L	300.0
			Nitrate as N	17.5		mg/L	300.0
	10086045	Duplicate Sample (10086044)	Chloride	35		mg/L	300.0
			Nitrate as N	17.4		mg/L	300.0
WW-11050	10086046f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11051	10086047f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086047	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-11052	10086048f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086048	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11053	10086049f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11054	10086050f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086050	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-11055	10086051f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086051	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11056	10086052f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086052	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	14.5		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	8.93		mg/L	300.0
WW-11057	10086053f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086053	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-11058	10086054f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086054	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11059	10086055f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086055	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11060	10086056f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-11061	10086057f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086057	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-11062	10086058f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-11063	10086059f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086059	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-11064	10086060f	Field Measurement	Nitrate as N	n/a		mg/L	
WW-11065	10086061f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12066	10096301f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096301	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-12068	10096302f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12069	10096303f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096303	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12071	10096304f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12072	10096305f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096305	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12074	10096306f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096306	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12075	10096307f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096307	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-12076	10096308f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096308	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	60		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	52.6		mg/L	300.0
	10096309	Duplicate Sample (10096308)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	59.4		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	52.1		mg/L	300.0
WW-12078	10096310f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12079	10096311f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096311	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12080	10096312f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12081	10096314f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12083	10096315f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12084	10096316f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12085	10096317f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-12086	10096318f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12087	10096319f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096319	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12089	10096320f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096320	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	12.5		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	9.75		mg/L	300.0
WW-12090	10096323f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096323	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12091	10096321f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096321	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	16.7		mg/L	300.0
			Nitrate as N	17.1		mg/L	300.0
WW-12092	10096322f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096322	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-12094	10096324f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096324	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	19.2		mg/L	300.0
			Nitrate as N	9.71		mg/L	300.0
	10096325	Duplicate Sample (10096324)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	19.1		mg/L	300.0
			Nitrate as N	9.66		mg/L	300.0
WW-12095	10096326f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096326	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12096	10096328f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12097	10096329f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096329	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13.2		mg/L	300.0
			Nitrate as N	11		mg/L	300.0
	10096330	Duplicate Sample (10096329)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13.2		mg/L	300.0
			Nitrate as N	11		mg/L	300.0
WW-12099	10096331f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096331	Laboratory Sample	Chloride	18.1		mg/L	300.0
			Nitrate as N	16.6		mg/L	300.0
WW-12100	10096332f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096332	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12101	10096333f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096333	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12102	10096334f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096334[b]	Laboratory Sample	Escherichia coli	>120		#/100ml	SM 9221-F
			Fecal Coliform	>120		#/100ml	SM 9221-E
			Total Coliform	>200		#/100ml	SM 9222-B
WW-12109	10096336f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096336	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	5		#/100ml	SM 9222-B
			Chloride	9.81		mg/L	300.0
			Nitrate as N	11.1		mg/L	300.0
WW-12111	10096337f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12114	10096338f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12115	10096339f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-12116	10096340f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12117	10096341f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096341	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12118	10096342f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-12119	10096343f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-12120	10096344f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12121	10096345f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096345	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12122	10096346f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096346	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12127	10096347f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12130	10096348f	Field Measurement	Nitrate as N	n/a		mg/L	
	10096348	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12131	10096349f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096349	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12132	10096350f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12133	10096351f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-12134	10096352f	Field Measurement	Nitrate as N	n/a		mg/L	
	10096352	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12135	10096353f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096353	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12136	10096354f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096354	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.3		mg/L	300.0
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
			Nitrate as N	1.2	U	mg/L	300.0
WW-12137	10096355f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-12138	10096356f	Field Measurement	Nitrate as N	0		mg/L	
	10096356	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-12139	10096357f	Field Measurement	Nitrate as N	0		mg/L	
	10096357	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12140	10096358f	Field Measurement	Nitrate as N	0		mg/L	
	10096358	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12141	10096359f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096359	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-12142	10096360f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096360	Laboratory Sample	Escherichia coli	12		#/100ml	SM 9221-F
			Fecal Coliform	12		#/100ml	SM 9221-E
			Total Coliform	12		#/100ml	SM 9222-B
WW-12143	10096361f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-12144	10096362f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096362	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	5.02		mg/L	300.0
			Nitrate as N	2.79		mg/L	300.0
WW-12145	10096363f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096363	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	14.8		mg/L	300.0
			Nitrate as N	19.9		mg/L	300.0
WW-12146	10096364f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096364	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	10.1		mg/L	300.0
			Nitrate as N	10.7		mg/L	300.0
WW-12147	10096366f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096366	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12148	10096367f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12149	10096368f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096368	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	16.3		mg/L	300.0
			Nitrate as N	10.3		mg/L	300.0
WW-12150	10096369f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-12151	10096370f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-12153	10096371f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096371	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12281	10096313f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096313	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12296	10096327f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096327	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-12354	10096372f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21009	10086101f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086101	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	7.82		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	11.4	J	mg/L	300.0
WW-21010	10086102f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086102	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21013	10086103f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086103	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21014	10086104f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086104	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-21015	2101501f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21016	10086106f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086106	Laboratory Sample	Chloride	38.7		mg/L	300.0.0
			Nitrate as N	27.6		mg/L	300.0.0
WW-21017	2101702f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21018	2101803f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21019	10086108f	Field Measurement	Nitrate as N	0		mg/L	
	10086108	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-21020	2102004f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-21021	2102105f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21022	2102206f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-21023	10086112f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086107	Duplicate Sample (10086112)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
	10086109	Duplicate Sample (10086112)	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
	10086112	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21024	10086113f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086113	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	18.9		mg/L	300.0.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	18.9		mg/L	300.0.0
WW-21025	10086114f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086114	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	>60		#/100ml	SM 9222-B
WW-21026	10086115f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086115	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21027	2102707f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21028	10086117f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086117	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-21029	2102908f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-21030	2103009f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21035	10086120f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086119	Duplicate Sample (10086120)	Chloride	35.2		mg/L	300.0.0
			Nitrate as N	11.9		mg/L	300.0.0
	10086120	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	10		#/100ml	SM 9222-B
			Chloride	36.1		mg/L	300.0.0
			Nitrate as N	12.1		mg/L	300.0.0
WW-21036	10086122f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086122	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	25.6		mg/L	300.0.0
			Nitrate as N	29.1		mg/L	300.0.0

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-21037	10086123f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086123	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21038	2103810f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21039	10086124f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086124	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-21040	2104011f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21041	10086127f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086127	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	10.2		mg/L	300.0.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	12.1		mg/L	300.0.0
WW-21042	10086129f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086129	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.4		mg/L	300.0.0
			Nitrate as N	12.1		mg/L	300.0.0
WW-21043	10086130f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086130	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-21044	10086131f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086131	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	21.6		mg/L	300.0.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	16.6		mg/L	300.0.0
WW-21045	10086132f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086132	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	51.3		mg/L	300.0.0
			Nitrate as N	25.2		mg/L	300.0.0
WW-21046	2104612f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21047	2104713f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21048	2104814f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-21049	10086136f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086136	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	40		mg/L	300.0.0
			Nitrate as N	18.1		mg/L	300.0.0
WW-21050	10086138f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086138	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	17.6		mg/L	300.0.0
			Nitrate as N	6.06		mg/L	300.0.0
WW-21051	10086139f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086139	Laboratory Sample	Chloride	21.6		mg/L	300.0.0
			Nitrate as N	14		mg/L	300.0.0
WW-21052	10086140f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086140	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-21053	10086141f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086141	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	57.3		mg/L	300.0.0
			Nitrate as N	27.6		mg/L	300.0.0
WW-21054	2105415f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21055	10086143f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086143	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	20.2		mg/L	300.0.0
			Nitrate as N	12.8		mg/L	300.0.0
WW-21056	2105616f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21057	2105717f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-21058	2105818f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-21059	10086147f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086147	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13.3		mg/L	300.0.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	10		mg/L	300.0.0
WW-21142	10086128f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086126	Duplicate Sample (10086128)	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
	10086128	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-21150	10086137f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086135	Duplicate Sample (10086137)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	17		mg/L	300.0.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	18.2		mg/L	300.0.0
	10086137	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	16.8		mg/L	300.0.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	18		mg/L	300.0.0
WW-22060	10096401f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096401	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-22061	2206119f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-22062	2206220f	Field Measurement	Nitrate as N	0	J	mg/L	
WW-22063	10096404f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096404	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	17.3		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	10.8		mg/L	300.0
WW-22064	10096405f	Field Measurement	Nitrate as N	20	J	mg/L	
	10090060	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
	10096405	Laboratory Sample	Chloride	45.8		mg/L	300.0
			Nitrate as N	21.1		mg/L	300.0
WW-22065	10096406f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096406	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	44.5		mg/L	300.0
			Nitrate as N	20.3		mg/L	300.0
WW-22066	10096407f	Field Measurement	Nitrate as N	20	J	mg/L	
	10090061	Duplicate Sample (10096407)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
	10096407	Laboratory Sample	Chloride	79.9		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	41.1		mg/L	300.0
WW-22067	10096408f	Field Measurement	Nitrate as N	50	J	mg/L	
	10090062	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
	10096408	Laboratory Sample	Chloride	70		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	39.8		mg/L	300.0
WW-22068	2206821f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-22069	2206922f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22070	10096411f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096411	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	52.1		mg/L	300.0
			Nitrate as N	21.4		mg/L	300.0
WW-22071	2207123f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22072	2207224f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22073	2207325f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22074	2207426f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22075	2207527f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22076	10096412f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096412	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22078	2207828f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22079	10096413f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096413	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22080	2208029f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22082	2208230f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22083	10096423f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096423	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-22084	2208431f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22085	2208532f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22086	10096426f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096426	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
	10096427	Duplicate Sample (10096426)	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22087	10096428f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096428	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	45		mg/L	300.0
			Nitrate as N	14.3		mg/L	300.0
	10096429	Duplicate Sample (10096428)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	44.8		mg/L	300.0
			Nitrate as N	14.9		mg/L	300.0
WW-22088	10096431f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096431	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22089	2208933f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22090	10096433f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096433	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	72		mg/L	300.0
			Nitrate as N	11.3		mg/L	300.0

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-22091	10096434f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096434	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	37.9		mg/L	300.0
			Nitrate as N	12.2		mg/L	300.0
WW-22092	10096435f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096435	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	7.89		mg/L	300.0
			Nitrate as N	8.57		mg/L	300.0
WW-22093	10096436f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096436	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22094	2209434f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22096	2209635f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22098	10096439f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096439	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-22099	2209936f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22100	2210037f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22101	2210138f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-22102	2210239f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-22103	2210340f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22104	10096445f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096445	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22105	2210541f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22106	10096446f	Field Measurement	Nitrate as N	0		mg/L	
	10096446	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-22107	2210742f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-22108	2210843f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22109	10096450f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096450	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	53.3		mg/L	300.0
			Nitrate as N	46.4		mg/L	300.0
	10096451	Duplicate Sample (10096450)	Chloride	51.3		mg/L	300.0
			Nitrate as N	44.6		mg/L	300.0
WW-22110	2211044f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22111	10096452f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096452	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-22112	10096453f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096453	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-22113	2211345f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-22114	10096455f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096455	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	30.7		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	22.8		mg/L	300.0
WW-22115	10096456f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096456	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	34.8		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	23.8		mg/L	300.0
WW-22116	2211646f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22117	10096459f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096459	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	50.8		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	37		mg/L	300.0
WW-22118	10096461f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096461	Laboratory Sample	Chloride	13.3		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	12.5		mg/L	300.0
WW-22201	2220147f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22202	2220248f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22203	2220349f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-22204	2220450f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-22205	2220551f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-22206	2220652f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-22207	2220753f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-22208	10096465f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096465	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	21.9		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	20.1		mg/L	300.0
WW-31011	3101154f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-31012	10086201f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086201	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-31013	3101355f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-31014	3101456f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31016	3101657f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31017	3101758f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31018	3101859f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31019	10086202f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086202	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-31020	3102060f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31022	10086203f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086203	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31024	10086204f	Field Measurement	Nitrate as N	50	J	mg/L	
	10086204	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	62.6		mg/L	300.0
			Nitrate as N	38.2		mg/L	300.0
	10086205	Duplicate Sample (10086204)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	63.4		mg/L	300.0
			Nitrate as N	38.1		mg/L	300.0
	10097002	Laboratory Sample	Nitrate+Nitrite as N	40.6		mg/L	353.2
	10107004	Laboratory Sample	Nitrate+Nitrite as N	40.6		mg/L	353.2
	10117006	Laboratory Sample	Nitrate+Nitrite as N	40.3		mg/L	353.2
	10127008	Laboratory Sample	Nitrate+Nitrite as N	39.3		mg/L	353.2
	10137010	Laboratory Sample	Nitrate+Nitrite as N	41.1		mg/L	353.2
	10157014	Laboratory Sample	Nitrate+Nitrite as N	41	J	mg/L	353.2
	10167016	Laboratory Sample	Nitrate+Nitrite as N	41	J	mg/L	353.2
	10177018	Laboratory Sample	Nitrate+Nitrite as N	41	J	mg/L	353.2
WW-31025	10086206f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086206	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	41.5		mg/L	300.0
			Nitrate as N	18.4		mg/L	300.0
	10097001	Laboratory Sample	Nitrate+Nitrite as N	20.6		mg/L	353.2
	10107003	Laboratory Sample	Nitrate+Nitrite as N	20.6		mg/L	353.2
	10117005	Laboratory Sample	Nitrate+Nitrite as N	20.7		mg/L	353.2
	10127007	Laboratory Sample	Nitrate+Nitrite as N	20.4		mg/L	353.2
	10137009	Laboratory Sample	Nitrate+Nitrite as N	40.4		mg/L	353.2
	10147011	Laboratory Sample	Nitrate+Nitrite as N	40.8		mg/L	353.2
	10147012	Laboratory Sample	Nitrate+Nitrite as N	44		mg/L	353.2
	10157013	Laboratory Sample	Nitrate+Nitrite as N	24	J	mg/L	353.2
	10167015	Laboratory Sample	Nitrate+Nitrite as N	22	J	mg/L	353.2
	10177017	Laboratory Sample	Nitrate+Nitrite as N	22	J	mg/L	353.2
WW-31029	3102961f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-31030	10086207f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086207	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31031	10086208f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086208	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31032	10086209f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086209	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-31034	3103462f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31035	10086211f	Field Measurement	Nitrate as N	10	J	mg/L	
	10086211	Laboratory Sample	Chloride	10.5	J	mg/L	300.0
			Nitrate as N	12.9	J	mg/L	300.0
WW-31036	3103663f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-31038	10086212f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086212	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31039	10086213f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086213	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Total Coliform	<1		#/100ml	SM 9221-E
			Fecal Coliform	<1		#/100ml	SM 9222-B
			Chloride	24.2		mg/L	300.0
			Nitrate as N	15		mg/L	300.0
WW-31040	10086214f	Field Measurement	Nitrate as N	1	J	mg/L	
	10086214	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31041	10086215f	Field Measurement	Nitrate as N	0		mg/L	
	10086215	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
	10086216	Duplicate Sample (10086215)	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-31045	3104564f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-31046	10086217f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086217	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	18.2		mg/L	300.0
			Nitrate as N	14.8		mg/L	300.0
WW-31047	10086218f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086218	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.7		mg/L	300.0
			Nitrate as N	16.2		mg/L	300.0
WW-31048	3104865f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31050	3105066f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31051	10086219f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086219	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	8.03		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	12.1		mg/L	300.0
WW-31052	10086221f	Field Measurement	Nitrate as N	2	J	mg/L	
	10086221	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-31054	10086222f	Field Measurement	Nitrate as N	20	J	mg/L	
	10086222	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	34.4		mg/L	300.0
			Nitrate as N	22		mg/L	300.0
WW-31056	10086223f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086223	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-31057	10086224f	Field Measurement	Nitrate as N	0		mg/L	
	10086224	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
	10086225	Duplicate Sample (10086224)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-31058	3105867f	Field Measurement	Nitrate as N	1	J	mg/L	
WW-31059	10086226f	Field Measurement	Nitrate as N	5	J	mg/L	
	10086226	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
	10086227	Duplicate Sample (10086226)	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-31060	3106068f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31064	3106469f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-31355	10086220f	Field Measurement	Nitrate as N	0		mg/L	
	10086220	Laboratory Sample	Nitrate+Nitrite as N	0.05	U	mg/L	353.2
WW-31356	3135670f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-32068	10096501f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096501	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	40.2		mg/L	300.0
			Nitrate as N	27.1		mg/L	300.0
WW-32069	10096502f	Field Measurement	Nitrate as N	0		mg/L	
	10096502	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-32070	10096503f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096503	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	104		mg/L	300.0
			Nitrate as N	31.4		mg/L	300.0
WW-32071	10096504f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096504	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	37.2		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	12.7		mg/L	300.0
WW-32072	10096505f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096505	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.8		mg/L	300.0
			Nitrate as N	12.4		mg/L	300.0
WW-32073	10096506f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096506	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	28.5		mg/L	300.0
			Nitrate as N	16.1		mg/L	300.0
WW-32074	10096507f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096507	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	47.8		mg/L	300.0
			Nitrate as N	10.5		mg/L	300.0
WW-32075	3207572f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32076	3207673f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32079	3207974f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32080	10096508f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096508	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	15.8		mg/L	300.0
			Total Kjeldahl Nitrogen	1.15		mg/L	351.2
			Nitrate as N	8.65		mg/L	300.0

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-32081	10096509f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096509	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-32082	10096594f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096594	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	34.3		mg/L	300.0
			Nitrate as N	8.06		mg/L	300.0
	10096595	Duplicate Sample (10096594)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	34.6		mg/L	300.0
			Nitrate as N	8.05		mg/L	300.0
WW-32083	10096596f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096596	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	21.1		mg/L	300.0
			Nitrate as N	6.53		mg/L	300.0
WW-32084	3208475f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-32085	3208576f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-32086	3208677f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-32087	3208778f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32091	10096597f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096597	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	35.6		mg/L	300.0
			Nitrate as N	3.76		mg/L	300.0
WW-32092	3209279f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32093	3209380f	Field Measurement	Nitrate as N	10	J	mg/L	
WW-32094	3209481f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32095	3209582f	Field Measurement	Nitrate as N	2	J	mg/L	
WW-32096	3209683f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32097	3209784f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32098	3209885f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32100	10096599f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096599	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	13		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	15.8		mg/L	300.0
WW-32101	10096598f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096598	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-32102	10096510f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096510	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-32103	3210386f	Field Measurement	Nitrate as N	5	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-32104	10096511f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096511	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.99	U	mg/L	351.2
WW-32105	10096512f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096512	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
WW-32106	10096513f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096513	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	9.23		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	12		mg/L	300.0
WW-32107	10096514f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096514	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.2		mg/L	300.0
			Nitrate as N	11.6		mg/L	300.0
WW-32108	10096515f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096515	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	26.2		mg/L	300.0
			Nitrate as N	9.51		mg/L	300.0
WW-32109	10096516f	Field Measurement	Nitrate as N	1	J	mg/L	
	10096516	Laboratory Sample	Total Kjeldahl Nitrogen	0.5	U	mg/L	351.2
WW-32110	3211087f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32111	10096517f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096517	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	9.9		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	9.29		mg/L	300.0
	10096518	Duplicate Sample (10096517)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	9.87		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	9.29		mg/L	300.0
WW-32112	10096519f	Field Measurement	Nitrate as N	0		mg/L	
	10096519	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-32113	10096520f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096520	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	45.9		mg/L	300.0
			Nitrate as N	21.3		mg/L	300.0
WW-32114	10096521f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096521	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-32115	10096522f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096522	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	17.2		mg/L	300.0
			Nitrate as N	9.61		mg/L	300.0
WW-32116	10096523f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096523	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	14.1		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	9.01		mg/L	300.0
WW-32117	10096524f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096524	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	9.08		mg/L	300.0
			Nitrate as N	14.2		mg/L	300.0
WW-32118	10096525f	Field Measurement	Nitrate as N	2	J	mg/L	
	10096525	Laboratory Sample	Total Kjeldahl Nitrogen	0.51	U	mg/L	351.2
WW-32119	3211988f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32120	10096526f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096526	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-32122	10096527f	Field Measurement	Nitrate as N	10	J	mg/L	
	10096527	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	16.6		mg/L	300.0
			Total Kjeldahl Nitrogen	1	U	mg/L	351.2
			Nitrate as N	8.98		mg/L	300.0
WW-32123	3212389f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32124	3212490f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32125	3212591f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32126	10096528f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096528	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-32127	3212792f	Field Measurement	Nitrate as N	2	J	mg/L	

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method
WW-32128	10096529f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096529	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	23.8		mg/L	300.0
			Nitrate as N	14.4		mg/L	300.0
	10096530	Duplicate Sample (10096529)	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	23.8		mg/L	300.0
			Nitrate as N	14		mg/L	300.0
WW-32129	10096531f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096531	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	51.1		mg/L	300.0
			Total Kjeldahl Nitrogen	5.1	U	mg/L	351.2
			Nitrate as N	18.9		mg/L	300.0
	10096532	Duplicate Sample (10096531)	Total Kjeldahl Nitrogen	5	U	mg/L	351.2
WW-32130	10096533f	Field Measurement	Nitrate as N	20	J	mg/L	
	10096533	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	125		#/100ml	SM 9222-B
			Chloride	27.9		mg/L	300.0
			Nitrate as N	20.6		mg/L	300.0
WW-32131	10096534f	Field Measurement	Nitrate as N	50	J	mg/L	
	10096534	Laboratory Sample	Escherichia coli	<1		#/100ml	SM 9221-F
			Fecal Coliform	<1		#/100ml	SM 9221-E
			Total Coliform	<1		#/100ml	SM 9222-B
			Chloride	71.5		mg/L	300.0
			Total Kjeldahl Nitrogen	5	U	mg/L	351.2
			Nitrate as N	20.6		mg/L	300.0
WW-32132	3213293f	Field Measurement	Nitrate as N	5	J	mg/L	
WW-32133	10096535f	Field Measurement	Nitrate as N	5	J	mg/L	
	10096535	Laboratory Sample	Total Kjeldahl Nitrogen	1	U	mg/L	351.2
WW-32135	3213571f	Field Measurement	Nitrate as N	10	J	mg/L	

Units

mg/L = milligrams per liter

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

U = The analyte was not detected at or above the reported value.

< = The level of the target organism present in the sample is less than the detection limit. The reported value is the detection limit.

> = The level of the target organism present in the sample exceeds the upper limit for microbial estimates. The reported value is the

Table C1: Phase 2 Field Measurements and Laboratory Analytical Results

Location ID	Sample ID	Sample Type[a]	Compound	Result	Qualifier	Units	Analytical Method

Notes:

[a]Samples submitted to the laboratory were analyzed by the EPA Manchester Environmental Laboratory.

[b]Sample No. 10096334 was submitted to the laboratory for microbial source tracking (MST) analysis. Results are presented below.

Biomarker	Result
BAC-32	Present
CF-128	Absent
CF-193	Absent
MST-	General Bacteriodes Present
HF-183	Absent
HF-134	Absent

BAC32: This is the screening Bacteroides biomarker. If it is present, further testing is done to determine the specific source. If the test is negative, nothing more is done.

CF128 and CF193: These are two separate biomarkers that identify the presence of ruminant fecal source. Between the two of them, they comprise most of the biomarkers that would be found in ruminants. There may be other biomarkers that could exist in very isolated populations of ruminants, but these two will identify the majority. A "P" would identify detection of the biomarker in the particular sample, an "A" indicates absence of that biomarker in the sample.

HF134 and HF183: These are two separate biomarkers that identify the presence of human fecal source. As above, between the two of these biomarkers, the majority of human source will be detected. Again, a very isolated community might develop a different biomarker. A "P" would identify detection of the biomarker in the particular sample, an "A" indicates absence of that biomarker in the sample.

MST- Microbial Source Tracking. MST contaminants: This identifies by two letter code the kind of fecal source was identified in the particular sample.GB indicates that although Bacteroides DNA was present, the source was neither human nor ruminant. An "A" indicates that no Bacteroides DNA was present in the sample. H indicates human source; R indicates ruminant; H/R indicates that both were found in that sample. To be noted, where there is a species identification, there may be fecal contamination from other species present as well, but due to method limitations is not identified.

Table C2: Phase 3 Summary of Sampling Locations and Laboratory Analyses

				Laboratory Analyses														
				Nitrate	Other forms of Nitrogen[1]	Major Ions and Alkalinity	Trace Inorganic Elements	Perchlorate	Pesticides[2]	Pathogens[3]	Hormones (EPA Laboratory)	Hormones (U. of Nebraska - Lincoln Laboratory)	Veterinary Pharmaceuticals	Wastewater Pharmaceuticals	Isotopic Analysis	Trace Organics	Age Dating and Gas Study
			Number of Analytes	1	4	9	12	1	50	Varies	5	20	17	14	NA	69	NA
Location ID	**Sample ID**	**Sample Type**	**Sample Media**														
WW-01	10154201	Upgradient Well – Haak Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-02	10154202	Supply Well – Haak Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-03	10154203	Downgradient Well – Haak Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-04	10154204	Downgradient Well – Haak Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-05	10154205	Downgradient Well – Haak Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-06	10154206	Upgradient – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-07	10154207	Supply Well – DeRuyter Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-08	10154208	Supply Well – D and A Dairy	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-09	10164209	Supply Well – Cow Palace	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-10	10164210	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-11	10154211	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-12	10154212	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-13	10154213	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-14	10154214	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-15	10154215	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-16	10154216	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-17	10154217	Downgradient Well – Dairy Cluster	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-18[4]	10154218	Residential Well	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-19	10154219	Downgradient Well – Septic	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-20	10154220	Downgradient Well – Septic	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-21	10154221	Downgradient Well – Septic	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-22	10164222	Downgradient Well – Septic	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-23	10154223	Downgradient Well – Mint	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-24	10154224	Downgradient Well – Mint	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-25	10154225	Downgradient Well – Corn	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-26	10154226	Downgradient Well – Hops	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-27	10154227	Downgradient Well – Hops	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-28	10154228	Downgradient Well – Corn	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-29	10154229	Field Blank	Water	X	X	X	X	X	X	X	X	X	X	X	X	X	X
WW-30[5]	10164230	Residential well	Water	X	X	X	X	X	X	X	X					X	
LG-01	10154251	Dairy Lagoon - Haak Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-02	10154252	Dairy Lagoon - Haak Dairy[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-03	10154253	Dairy Lagoon - Haak Dairy[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-04	10154254	Dairy Lagoon - DeRuyter Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-05	10154255	Dairy Lagoon - DeRuyter Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-06	10154256	Dairy Lagoon - DeRuyter Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-07	10154257	Dairy Lagoon - D and A Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-08	10154258	Dairy Lagoon - D and A Dairy[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-09	10154259	Dairy Lagoon - D and A Dairy[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-10	10164260	Dairy Lagoon - Cow Palace	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-11	10164261	Dairy Lagoon - Cow Palace[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-12	10164262	Dairy Lagoon - Cow Palace[6]	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-13	10164263	Dairy Lagoon - Bosma Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-14	10164264	Dairy Lagoon - Bosma Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	
LG-15	10164265	Dairy Lagoon - Bosma Dairy	Dairy Lagoon		X	X	X			X	X	X	X	X		X	

Table C2: Phase 3 Summary of Sampling Locations and Laboratory Analyses

				Laboratory Analyses														
				Nitrate	Other forms of Nitrogen[1]	Major Ions and Alkalinity	Trace Inorganic Elements	Perchlorate	Pesticides[2]	Pathogens[3]	Hormones (EPA Laboratory)	Hormones (U. of Nebraska - Lincoln Laboratory)	Veterinary Pharmaceuticals	Wastewater Pharmaceuticals	Isotopic Analysis	Trace Organics	Age Dating and Gas Study
			Number of Analytes	1	4	9	12	1	50	Varies	5	20	17	14	NA	69	NA
Location ID	**Sample ID**	**Sample Type**	**Sample Media**														
SO-01	10154231	Manure - Haak Dairy	Solid		X				X			X	X	X			
SO-02	10154232	Soil – Haak Dairy Application Field	Solid		X				X			X	X	X			
SO-03	10154233	Manure - DeRuyter Dairy	Solid		X				X			X	X	X			
SO-04	10154234	Soil – DeRuyter Dairy Application Field	Solid		X				X			X	X	X			
SO-05	10154235	Manure - D and A Dairy	Solid		X				X			X	X	X			
SO-06	10154236	Soil – D and A Dairy Application Field	Solid		X				X			X	X	X			
SO-07	10164237	Manure - Cow Palace	Solid		X				X			X	X	X			
SO-08	10164238	Soil – Cow Palace Application Field	Solid		X				X			X	X	X			
SO-09	10164239	Manure - Bosma Dairy	Solid		X				X			X	X	X			
SO-10	10164240	Soil – Bosma Dairy Application Field	Solid		X				X			X	X	X			
SO-11	10154241	Soil – Mint	Solid		X				X			X	X	X			
SO-12	10154242	Soil- Mint	Solid		X				X			X	X	X			
SO-13	10154243	Soil – Corn	Solid		X				X			X	X	X			
SO-14	10154244	Soil – Corn	Solid		X				X			X	X	X			
SO-15	10154245	Soil – Hops	Solid		X				X			X	X	X			
SO-16	10154246	Soil – Hops	Solid		X				X			X	X	X			
SP-01	10154271	Zillah Wastewater Treatment Plant Influent	Water		X	X	X			X	X	X	X	X		X	
SP-02	10154272	Mabton Wastewater Treatment Plant Influent	Water		X	X	X			X	X	X	X	X		X	
SP-03	10154273	Toppenish Wastewater Treatment Plant Influent[7]	Water		X	X	X			X	X	X	X	X		X	
SP-04	10154274	Toppenish Wastewater Treatment Plant Influent[7]	Water		X	X	X			X							

Abbreviations

NA- Not applicable

Notes

[1]The other nitrogen compounds evaluated included: total Kjeldahl Nitrogen (TKN); extractable nitrate, extractable ammonia and total nitrogen by combustion.

[2]Lagoon samples were evaluated but it was determined that because of matrix interferences it was not possible to reliably quantify the compounds..

[3]The specific analysis depended on which laboratory analyzed the sample. The analysis included either total coliform, fecal coliform, and/or E Coli. Microbial source tracking was performed for 9 lagoons and all wastewater treatment plant influent samples.

[4]Sample WW-18 collected at the owner's request.

[5]Sample WW-30 was collected because this residential well is located in an area not otherwise sampled and is high in nitrate. WW-30 was not evaluated for hormones, pharmaceuticals, isotopic, or age dating as the location was added later in the study.

[6]Co-located samples: LG-02 and LG-03; LG-08 and LG-09; and LG-11 and LG-12.

[7]Samples SP-03 and SP-04 were collected at the same wastewater treatment plant at different times. Sample SP-04 was submitted to EPA's Manchester Laboratory only and was analyzed for a subset of compounds as identified in the table.

Table C3: Phase 3 Analytical Results for Nitrogen Compounds in Wells, Lagoons and Wastewater Treatment Influents

Location ID	Sample ID	Sample Type	Sample Media	Compound	Result	Units	Analytical Laboratory	Analytical Method
WW-01	10154201	Upgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.39	mg/L	MEL	353.2
				Nitrate-N	0.38	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.5 U	mg/L	MEL	351.2
WW-02	10154202	Supply Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	3.4	mg/L	MEL	353.2
				Nitrate-N	3.12	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.5 U	mg/L	MEL	351.2
WW-03	10154203	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	35.5	mg/L	MEL	353.2
				Nitrate-N	33.1	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-04	10154204	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	55	mg/L	MEL	353.2
				Nitrate-N	51.9	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-05	10154205	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	13.4	mg/L	MEL	353.2
				Nitrate-N	12.8	mg/L	Cascade	300
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-06	10154206	Upgradient – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.73	mg/L	MEL	353.2
				Nitrate-N	0.71	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.5 U	mg/L	MEL	351.2
WW-07	10154207	Supply Well - Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	1.19	mg/L	MEL	353.2
				Nitrate-N	1.02	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.51 U	mg/L	MEL	351.2
WW-08	10154208	Supply Well - Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	12.9	mg/L	MEL	353.2
				Nitrate-N	11.7	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-09	10164209	Supply Well - Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.05 U	mg/L	MEL	353.2
				Nitrate-N	0.05 U	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.51 U	mg/L	MEL	351.2
WW-10	10164210	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.05 U	mg/L	MEL	353.2
				Nitrate-N	0.05 U	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.5 U	mg/L	MEL	351.2

Table C3: Phase 3 Analytical Results for Nitrogen Compounds in Wells, Lagoons and Wastewater Treatment Influents

Location ID	Sample ID	Sample Type	Sample Media	Compound	Result	Units	Analytical Laboratory	Analytical Method
WW-11	10154211	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	23	mg/L	MEL	353.2
				Nitrate-N	22.3	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-12	10154212	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	46.7	mg/L	MEL	353.2
				Nitrate-N	45	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-13	10154213	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	44	mg/L	MEL	353.2
				Nitrate-N	41.4	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-14	10154214	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	43.4	mg/L	MEL	353.2
				Nitrate-N	40.9	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-15	10154215	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	30.2	mg/L	MEL	353.2
				Nitrate-N	29.4	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-16	10154216	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	23.4	mg/L	MEL	353.2
				Nitrate-N	22.3	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-17	10154217	Downgradient Well – Dairy	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	22.7	mg/L	MEL	353.2
				Nitrate-N	21.7	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-18	10154218	Residential Well	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	16.1	mg/L	MEL	353.2
				Nitrate-N	72.2	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-19	10154219	Downgradient Well – Septic	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	41.1	mg/L	MEL	353.2
				Nitrate-N	38.2	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-20	10154220	Downgradient Well – Septic	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	16	mg/L	MEL	353.2
				Nitrate-N	15	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2

Table C3: Phase 3 Analytical Results for Nitrogen Compounds in Wells, Lagoons and Wastewater Treatment Influents

Location ID	Sample ID	Sample Type	Sample Media	Compound	Result	Units	Analytical Laboratory	Analytical Method
WW-21	10154221	Downgradient Well – Septic	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	40.5	mg/L	MEL	353.2
				Nitrate-N	38	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-22	10164222	Downgradient Well – Septic	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	17.3	mg/L	MEL	353.2
				Nitrate-N	16.4	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-23	10154223	Downgradient Well – Mint	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	17.2	mg/L	MEL	353.2
				Nitrate-N	16	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-24	10154224	Downgradient Well – Mint	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	14.9	mg/L	MEL	353.2
				Nitrate-N	13.8	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-25	10154225	Downgradient Well – Hops	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	35.5	mg/L	MEL	353.2
				Nitrate-N	33.4	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-26	10154226	Downgradient Well – Hops	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	16.7	mg/L	MEL	353.2
				Nitrate-N	15.3	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-27	10154227	Downgradient Well – Corn	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	21.8	mg/L	MEL	353.2
				Nitrate-N	19.8	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2
WW-28	10154228	Downgradient Well – Corn	Water	Ammonia (NH3+NH4) as N	0.3 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	76	mg/L	MEL	353.2
				Nitrate-N	71.2	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	5.1 U	mg/L	MEL	351.2
WW-29	10154229	Field Blank	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.05 U	mg/L	MEL	353.2
				Nitrate-N	0.05 U	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	0.51 U	mg/L	MEL	351.2
WW-30	10164230	Residential Well	Water	Ammonia (NH3+NH4) as N	0.05 U	mg/L	MEL	350.1
				Nitrate+Nitrite as N	24.5	mg/L	MEL	353.2
				Nitrate-N	23.4	mg/L	Cascade	300.0
				Total Kjeldahl Nitrogen	2.5 U	mg/L	MEL	351.2

Table C3: Phase 3 Analytical Results for Nitrogen Compounds in Wells, Lagoons and Wastewater Treatment Influents

Location ID	Sample ID	Sample Type	Sample Media	Compound	Result	Units	Analytical Laboratory	Analytical Method
LG-01	10154251	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	1000 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1200 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-02	10154252	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	870 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1400 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1.2 J	mg/L	MEL	353.2
LG-03	10154253	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	870 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1400 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-04	10154254	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	920 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1600 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-05	10154255	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	1200 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1600 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-06	10154256	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	1200 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1800 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-07	10154257	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	950 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1700 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	3.1 J	mg/L	MEL	353.2
LG-08	10154258	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	730 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1200 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-09	10154259	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	760 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1100 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-10	10164260	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	190 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	380 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-11	10164261	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	240 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	500 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-12	10164262	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	240 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	290 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
LG-13	10164263	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	970 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1700 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	2.5 J	mg/L	MEL	353.2
LG-14	10164264	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	860 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	1400 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2

Table C3: Phase 3 Analytical Results for Nitrogen Compounds in Wells, Lagoons and Wastewater Treatment Influents

Location ID	Sample ID	Sample Type	Sample Media	Compound	Result	Units	Analytical Laboratory	Analytical Method
LG-15	10164265	Dairy Lagoon	Liquid	Ammonia (NH3+NH4) as N	560 J	mg/L	MEL	350.1
				Total Kjeldahl Nitrogen	900 J	mg/L	MEL	351.2
				Nitrate+Nitrite as N	1 UJ	mg/L	MEL	353.2
SP-01	10154271	WWTP	Liquid	Ammonia (NH3+NH4) as N	26.6	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.942	mg/L	MEL	353.2
				Total Kjeldahl Nitrogen	46.8	mg/L	MEL	351.2
SP-02	10154272	WWTP	Liquid	Ammonia (NH3+NH4) as N	25.2	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.05 U	mg/L	MEL	353.2
				Total Kjeldahl Nitrogen	46.7	mg/L	MEL	351.2
SP-03[1]	10154273	WWTP	Liquid	Ammonia (NH3+NH4) as N	38.4	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.05 U	mg/L	MEL	353.2
				Total Kjeldahl Nitrogen	53.8	mg/L	MEL	351.2
SP-04[1]	10154274	WWTP	Liquid	Ammonia (NH3+NH4) as N	35.1	mg/L	MEL	350.1
				Nitrate+Nitrite as N	0.1	mg/L	MEL	353.2
				Total Kjeldahl Nitrogen	57	mg/L	MEL	351.2

Abbreviations

LG - lagoon

MEL - EPA Manchester Environmental Laboratory

SP - wastewater treatment plant influent

WW - water well

WWTP - wastewater treatment plant

Units

mg/L = milligrams per liter

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Notes

[1]Samples SP-03 and SP-04 were collected at the same wastewater treatment plant at different times. Sample SP-04 was submitted to EPA's Manchester Laboratory only and was analyzed for a subset of compounds as identified in the table.

Table C4: Phase 3 Analytical Results for Nitrogen Compounds in Manure Piles, Application Fields, and Crop Soils

Location ID	Sample ID	Sample Type	Compound	Result	Units	Analytical Method
SO-01	10154231	Manure	Ammonia Solid	10100	mg/kg	4500-NH3
			Kjedahl Nitrogen/Solid	29700	mg/kg	4500N-ORG-C
			NO3N/Total Solid	0.32 U	mg/kg	4500
SO-02	10154232	Soil	Ammonium-N	4.6	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	71.7	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	2760	mg/kg	993.13
SO-03	10154233	Manure	Ammonia Solid	1470	mg/kg	4500-NH3
			NO3N/Total Solid	32.8	mg/kg	4500-NO3 E
			Total Nitrogen/Solid	9210	mg/kg	993.13
SO-04	10154234	Soil – Dairy Application Field	Ammonium-N	7.3	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	247	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	2110	mg/kg	993.13
SO-05	10154235	Manure	Ammonia Solid	1060	mg/kg	4500-NH3
			NO3N/Total Solid	43.1	mg/kg	4500-NO3 E
			Total Nitrogen/Solid	13600	mg/kg	993.13
SO-06	10154236	Soil – Dairy Application Field	Ammonium-N	6.8	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	45.6	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	960	mg/kg	993.13
SO-07	10164237	Manure	Ammonia Solid	3600	mg/kg	4500-NH3
			NO3N/Total Solid	18.9	mg/kg	4500-NO3 E
			Total Nitrogen/Solid	16100	mg/kg	993.13
SO-08	10164238	Soil – Dairy Application Field	Ammonium-N	2.9	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	84.3	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	3040	mg/kg	993.13
SO-09	10164239	Manure	Ammonia Solid	1700	mg/kg	4500-NH3
			NO3N/Total Solid	5.69	mg/kg	4500-NO3 E
			Total Nitrogen/Solid	13700	mg/kg	993.13
SO-10	10164240	Soil – Dairy Application Field	Ammonium-N	7.1	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	139	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	3590	mg/kg	993.13
SO-11	10154241	Soil - Mint Field	Ammonium-N	210	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	245	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	3330	mg/kg	993.13

Table C4: Phase 3 Analytical Results for Nitrogen Compounds in Manure Piles, Application Fields, and Crop Soils

Location ID	Sample ID	Sample Type	Compound	Result	Units	Analytical Method
SO-12	10154242	Soil - Mint Field	Ammonium-N	8.2	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	191	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	2350	mg/kg	993.13
SO-13	10154243	Soil - Corn Field	Ammonium-N	7.5	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	24.3	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	1100	mg/kg	993.13
SO-14	10154244	Soil - Corn Field	Ammonium-N	12	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	6.3	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	1180	mg/kg	993.13
SO-15	10154245	Soil -Hops Field	Ammonium-N	21	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	83.5	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	2210	mg/kg	993.13
SO-16	10154246	Soil -Hops Field	Ammonium-N	7.7	mg/kg	4500-NH4 H
			Nitrate-N/Nitrite	26.5	mg/kg	4500-NO3 F
			Total Nitrogen/Solid	3000	mg/kg	993.13

Samples were analyzed by Cascade Analytical Laboratory.

Abbreviations

SO - solid

Units

mg/kg = milligrams per kilogram

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in

Table C5: Comparison of Phase 3 Analytical Results for Nitrate Levels in Wells

Location ID	Sample ID	Sample Type	Cascade Analytical Laboratory[1]	Manchester Environmental Laboratory[2]	Univeristy of Nebraska Water Sciences Laboratory[3]
			Maximum Contaminant Level = 10 mg/L		
			Units: mg/L		
WW-01	10154201	Upgradient Well	0.38	0.391	0.2
WW-02	10154202	Dairy Supply Well	3.12	3.4	3
WW-03	10154203	Downgradient Well	33.1	35.5	34
WW-04	10154204	Downgradient Well	51.9	55	49.9
WW-05	10154205	Downgradient Well	12.8	13.4	12.8
WW-06	10154206	Upgradient Well	0.71	0.73	0.6
WW-07	10154207	Dairy Supply Well	1.02	1.19	1.1
WW-08	10154208	Dairy Supply Well	11.7	12.9	11.7
WW-09	10164209	Dairy Supply Well	<0.05U	0.05U	NM
WW-10	10164210	Downgradient Well	<0.05U	0.05U	NM
WW-11	10154211	Downgradient Well	22.3	23	21.6
WW-12	10154212	Downgradient Well	45	46.7	43.6
WW-13	10154213	Downgradient Well	41.4	44	42
WW-14	10154214	Downgradient Well	40.9	43.4	40.7
WW-15	10154215	Downgradient Well	29.4	30.2	27.4
WW-16	10154216	Downgradient Well	22.3	23.4	23
WW-17	10154217	Downgradient Well	21.7	22.7	23.3
WW-18	10154218	Residential Well	72.2	16.1	72.3
WW-19	10154219	Downgradient Well	38.2	41.1	36.4
WW-20	10154220	Downgradient Well	15	16	15
WW-21	10154221	Downgradient well	38	40.5	36.5
WW-22	10164222	Downgradient Well	16.4	17.3	16.6
WW-23	10154223	Downgradient Well	16	17.2	17.3
WW-24	10154224	Downgradient Well	13.8	14.9	14
WW-25	10154225	Downgradient Well	33.4	35.5	32.9

Table C5: Comparison of Phase 3 Analytical Results for Nitrate Levels in Wells

Location ID	Sample ID	Sample Type	Cascade Analytical Laboratory[1]	Manchester Environmental Laboratory[2]	Univeristy of Nebraska Water Sciences Laboratory[3]
			Maximum Contaminant Level = 10 mg/L		
WW-26	10154226	Downgradient Well	15.3	16.7	15.1
WW-27	10154227	Downgradient Well	19.8	21.8	19.9
WW-28	10154228	Downgradient Well	71.2	76	69.6
WW-29	10154229	Field Blank	<0.05U	0.05U	NM
WW-30	10164230	Residential Well	23.4	24.5	NA

Abbreviations

NM = Insufficient Nitrate to complete analysis.
NA = Not analyzed.

Notes

[1]Cascade used Method 300.0 to analyze the samples.

[2]Manchester conducted the nitrate analysis as part of the general water chemistry using Method 353.2.

[3]UNL conducted the nitrate analysis as a part of their isotopic analysis.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07	WW-08	WW-09
		Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207	10154208	10164209
		Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well	Dairy Supply Well	Dairy Supply Well
		Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound	**Method No.**	**Units**									
Alkalinity as $CaCO_3$	2320B	mg/L	78.4	165	181	394	454	119	129	178	155
Arsenic	200.7	ug/L	45 U	45 U	45 U	45 U	45 U	45 U	45 U	45 U	45 U
Barium	200.7	ug/L	13.5	32.7	135	178	164	11.2	10	30.7	15.1
Bromide	300.0	mg/L	0.2 U	0.2 U	0.873	0.39	0.2 U	0.2 U	0.2 U	0.336	0.2 U
Cadmium	200.7	ug/L	3 U	3 U	3 U	3 U	3 U	3 U	3 U	3 U	3 U
Calcium	200.7	ug/L	17200	35400	165000	186000	125000	20800	28300	81800	21100
Chloride	300.0	mg/L	2.96	9.11	96.2	58	37.5	2.38	8.04	35	7.93
Chromium	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Copper	200.7	ug/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Fluoride	300.0	mg/L	0.113	0.528	0.307	0.319	0.332	0.416	0.298	0.257	0.405
Iron	200.7	ug/L	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U	20 U
Lead	200.7	ug/L	25 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U
Magnesium	200.7	ug/L	6470	15100	39900	52600	39000	7410	12300	25600	9220
Manganese	200.7	ug/L	2 U	2 U	2 U	2 U	2 U	2 U	3.4	2 U	37.7
Mercury	245.1	ug/L	0.05 U	0.05 U	0.05 U	0.05 U	0.077	0.05 U	0.05 U	0.05 U	0.05 U
Phosphorus, total	365.1	mg/L	0.0292	0.0926	0.0327	0.0439	0.0606	0.0664	0.0299	0.0271	0.0304
Potassium	200.7	ug/L	1900	4190	6140	7290	6670	3300	6830	4330	8570
Selenium	200.7	ug/L	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Silver	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Sodium	200.7	ug/L	5130	22500	41800	57000	48800	15400	15100	34200	28400
Sulfate	300.0	mg/L	3.51	22.3	234	168	44.4	6.38	27.8	113	0.841
Zinc	200.7	ug/L	5 U	5.4	21	12	15	471	5 U	12	5 U

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	WW-10	WW-11	WW-12	WW-13	WW-14	WW-15	WW-16	WW-17	WW-18
		Sample ID	10164210	10154211	10154212	10154213	10154214	10154215	10154216	10154217	10154218
		Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well
		Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound	**Method No.**	**Units**									
Alkalinity as $CaCO_3$	2320B	mg/L	141	178	350	604	502	240	318	316	280
Arsenic	200.7	ug/L	45 U	45 U	45 U	45 U	45 U	45 U	45 U	45 U	45 U
Barium	200.7	ug/L	63.8	34	14.7	8.7	35.9	47.8	25.4	39.2	70.5
Bromide	300.0	mg/L	0.2 U	0.333	0.237	0.428	0.389	0.246	0.418	0.406	0.522
Cadmium	200.7	ug/L	3 U	3 U	3 U	3 U	3 U	3 U	3 U	3 U	3 U
Calcium	200.7	ug/L	27000	93400	109000	217000	193000	69200	118000	113000	210000
Chloride	300.0	mg/L	4.44	52	49	79.8	69.8	39.2	45.5	44.6	39.7
Chromium	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Copper	200.7	ug/L	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U	5 U
Fluoride	300.0	mg/L	0.328	0.282	0.285	0.132	0.106	0.363	0.205	0.205	0.439
Iron	200.7	ug/L	550	91	20 U	20 U	20 U	194	27	135	33
Lead	200.7	ug/L	25 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U	25 U
Magnesium	200.7	ug/L	8410	25800	42000	66300	65000	32100	47900	46000	67100
Manganese	200.7	ug/L	89.9	2 U	2 U	2 U	2 U	2 U	2 U	2.1	2 U
Mercury	245.1	ug/L	0.05 U	0.05 U	0.05 U	0.106	0.05 U	0.05 U	0.05 U	0.05 U	0.084
Phosphorus, total	365.1	mg/L	0.0477	0.0204	0.0201	0.02 U	0.02 U	0.0272	0.0213	0.023	0.0443
Potassium	200.7	ug/L	5250	3870	4000	5450	6640	7970	3630	3730	5610
Selenium	200.7	ug/L	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Silver	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Sodium	200.7	ug/L	25500	62700	101000	97300	103000	108000	52900	54900	48800
Sulfate	300.0	mg/L	21.7	147	117	229	305	138	173	171	361
Zinc	200.7	ug/L	8.3	66.9	5 U	9.7	17	53.8	5 U	8.5	5 U

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	WW-19	WW-20	WW-21	WW-22	WW-23	WW-24	WW-25
		Sample ID	10154219	10154220	10154221	10164222	10154223	10154224	10154225
		Sample Type	Downgradient - Septic	Downgradient well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
		Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound	**Method No.**	**Units**							
Alkalinity as $CaCO_3$	2320B	mg/L	111	359	178	136	251	259	388
Arsenic	200.7	ug/L	45 U	45 U	45 U	45 U	45 U	45 U	45 U
Barium	200.7	ug/L	243	94.4	107	184	121	27.8	106
Bromide	300.0	mg/L	0.761	0.2 U	0.737	0.415	0.2 U	0.2 U	0.2 U
Cadmium	200.7	ug/L	3 U	3 U	3 U	3 U	3 U	3 U	3 U
Calcium	200.7	ug/L	79200	96500	111000	79300	92000	70600	95100
Chloride	300.0	mg/L	60	24.9	51.2	26.8	23.1	10.5	23.6
Chromium	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Copper	200.7	ug/L	5 U	5 U	5 U	5 U	5 U	5 U	32.8
Fluoride	300.0	mg/L	0.216	0.352	0.462	0.239	0.251	0.385	0.364
Iron	200.7	ug/L	35	259	67	112	20 U	89	44
Lead	200.7	ug/L	25 U	25 U	25 U	25 U	25 U	25 U	25 U
Magnesium	200.7	ug/L	29800	29700	35700	19600	24600	22700	27200
Manganese	200.7	ug/L	2 U	22.4	3.1	4.8	2 U	2 U	2 U
Mercury	245.1	ug/L	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U
Phosphorus, total	365.1	mg/L	0.041	0.0745	0.101	0.0399	0.078	0.0961	0.0769
Potassium	200.7	ug/L	5280	5370	4590	4180	6160	6510	4680
Selenium	200.7	ug/L	50 U	50 U	55	50 U	50 U	50 U	50 U
Silver	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Sodium	200.7	ug/L	37400	49700	55800	18000	23900	44000	112000
Sulfate	300.0	mg/L	63.4	63.6	164	69.8	51.9	29.8	45.6
Zinc	200.7	ug/L	51.2	10	5 U	5 U	9	53.4	55.4

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	WW-26	WW-27	WW-28	WW-29	WW-30	LG-01	LG-02	LG-03	LG-04	LG-05
		Sample ID	10154226	10154227	10154228	10154229	10164230	10154251	10154252	10154253	10154254	10154255
		Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
		Sample Matrix	Water	Water	Water	Water	Water	Liquid	Liquid	Liquid	Liquid	Liquid
Compound	**Method No.**	**Units**										
Alkalinity as $CaCO_3$	2320B	mg/L	352	180	237	5 U	255	3820	6340	6320	6110	8920
Arsenic	200.7	ug/L	45 U	45 U	45 U	45 U	45 U	180 U	170 U	160 U	170 U	180 U
Barium	200.7	ug/L	102	56.6	89.6	1 U	57.5	297	931	907	2480	722
Bromide	300.0	mg/L	0.2 U	0.3	1.36	0.2 U	0.248	10 U	10 U	10 U	10 U	10 U
Cadmium	200.7	ug/L	3 U	3 U	3 U	3 U	3 U	12 U	11 U	11 U	12 U	12 U
Calcium	200.7	ug/L	83200	88600	238000	30 U	99300	148000	409000	390000	1010000	351000
Chloride	300.0	mg/L	12.7	22.4	130	0.06 U	33.1	473	616	616	684	1140
Chromium	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	40 U	88	85	203	44
Copper	200.7	ug/L	5 U	5 U	5 U	5 U	5 U	575	1850	1810	3110	1030
Fluoride	300.0	mg/L	0.378	0.721	0.574	0.04 U	0.258	2 U	2 U	2 U	2 U	2 U
Iron	200.7	ug/L	115	20 U	20 U	20 U	100	9000	16700	15800	205000	15500
Lead	200.7	ug/L	25 U	25 U	25 U	25 U	25 U	100 U	95 U	89 U	97 U	99 U
Magnesium	200.7	ug/L	32100	28600	85000	50 U	24700	116000	236000	234000	514000	281000
Manganese	200.7	ug/L	2 U	2 U	2 U	2 U	2 U	1370	3970	3950	14800	4420
Mercury	245.1	ug/L	0.05 U	0.05 U	0.05 U	0.05 U	0.05 U	0.25 UJ	0.25 UJ	0.25 UJ	0.387 J	0.25 UJ
Phosphorus, total	365.1	mg/L	0.0855	0.0406	0.0367	0.02 U	0.0204	39.6	118	126	354	103
Potassium	200.7	ug/L	11700	3650	4790	700 U	2900	1660000	2100000	2140000	2160000	2590000
Selenium	200.7	ug/L	50 U	50 U	72	50 U	50 U	200 U	190 U	180 U	190 U	200 U
Silver	200.7	ug/L	10 U	10 U	10 U	10 U	10 U	40 U	38 U	35 U	39 U	40 U
Sodium	200.7	ug/L	58500	40400	53800	100 U	107000	437000	501000	511000	517000	751000
Sulfate	300.0	mg/L	64.9	124	386	0.3 U	176	257	15 U	15 U	286	15 U
Zinc	200.7	ug/L	9.3	47.6	26.3	5 U	22	1790	5410	5260	11000	3720

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	LG-06	LG-07	LG-08	LG-09	LG-10	LG-11	LG-12	LG-13	LG-14	LG-15
		Sample ID	10154256	10154257	10154258	10154259	10164260	10164261	10164262	10164263	10164264	10164265
		Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
		Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound	**Method No.**	**Units**										
Alkalinity as $CaCO_3$	2320B	mg/L	8700	6210	5280	5280	1170	2060	2060	11300	9490	5640
Arsenic	200.7	ug/L	160 U	190 U	190 U	160 U	160 U	170 U	160 U	180 U	150 U	160 U
Barium	200.7	ug/L	683	1080	720	720	220	259	240	3160	2350	803
Bromide	300.0	mg/L	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U	10 U
Cadmium	200.7	ug/L	10 U	13 U	13 U	11 U	11 U	11 U	11 U	22	10 U	11 U
Calcium	200.7	ug/L	323000	578000	433000	442000	103000	124000	102000	1210000	1180000	387000
Chloride	300.0	mg/L	1140	633	699	722	62.4	113	113	661	558	524
Chromium	200.7	ug/L	46	70	42 U	37	37 U	38 U	36 U	180	130	36 U
Copper	200.7	ug/L	989	1850	1290	1290	193	148	157	2870	2090	743
Fluoride	300.0	mg/L	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U	2 U
Iron	200.7	ug/L	13900	53000	23600	23600	5960	1560 J	1470 J	208000	152000	20300
Lead	200.7	ug/L	86 U	100 U	100 U	90 U	91 U	94 U	90 U	100 U	84 U	91 U
Magnesium	200.7	ug/L	274000	358000	202000	200000	63100	84500	85000	707000	580000	294000
Manganese	200.7	ug/L	4070	7780	3990	4010	660	793	673	11100	9810	2410
Mercury	245.1	ug/L	0.25 UJ	0.25 UJ	0.25 UJ	0.25 UJ	0.065 J	0.05 UJ	0.05 UJ	0.707 J	0.495 J	0.25 UJ
Phosphorus, total	365.1	mg/L	111	221	90.8	89.8	57.1	82.9	58.5	297	239	74
Potassium	200.7	ug/L	3E+06	2E+06	1820000	1810000	327000	394000	400000	2650000	2290000	1830000
Selenium	200.7	ug/L	170 U	210 U	210 U	180 U	180 U	190 U	180 U	200 U	170 U	180 U
Silver	200.7	ug/L	34 U	42 U	42 U	36 U	37 U	38 U	36 U	41 U	34 U	36 U
Sodium	200.7	ug/L	753000	443000	488000	487000	142000	175000	177000	906000	830000	687000
Sulfate	300.0	mg/L	15 U	304	15 U	15 U	181	15 U	15 U	96	59.6	15 U
Zinc	200.7	ug/L	3470	6080	4160	4290	926	496	377	8470	8650	2920

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

		Location ID	SP-01	SP-02	SP-03[1]	SP-04[1]
		Sample ID	10154271	10154272	10154273	10154274
		Sample Type	WWTP	WWTP	WWTP	WWTP
		Sample Matrix	Liquid	Liquid	Liquid	Liquid
Compound	**Method No.**	**Units**				
Alkalinity as $CaCO_3$	2320B	mg/L	444	307	257	255
Arsenic	200.7	ug/L	45 U	45 U	45 U	45 U
Barium	200.7	ug/L	107	65.3	64.1	30.7
Bromide	300.0	mg/L	0.213	0.2 U	0.2 U	0.2 U
Cadmium	200.7	ug/L	3 U	3 U	3 U	3 U
Calcium	200.7	ug/L	71000	36500	58900	24500
Chloride	300.0	mg/L	67.6	42.8	489	40.1
Chromium	200.7	ug/L	10 U	10 U	10 U	10 U
Copper	200.7	ug/L	34.1	51.5	63.1	81
Fluoride	300.0	mg/L	0.184	0.784	0.534	0.614
Iron	200.7	ug/L	268	1300	674	555
Lead	200.7	ug/L	25 U	25 U	25 U	25 U
Magnesium	200.7	ug/L	24600	11200	19400	10700
Manganese	200.7	ug/L	29.6	75.6	36.2	26.4
Mercury	245.1	ug/L	0.05 UJ	1.21 J	0.152 J	0.072 J
Phosphorus, total	365.1	mg/L	6.87	6.14	8.4	8.37
Potassium	200.7	ug/L	21800	20800	19100	15700
Selenium	200.7	ug/L	50 U	50 U	50 U	50 U
Silver	200.7	ug/L	10 U	10 U	10 U	10 U
Sodium	200.7	ug/L	114000	72300	230000	50300
Sulfate	300.0	mg/L	88.2	13.5	15.9	21
Zinc	200.7	ug/L	130	193	172	121

See Table C6 notes on page 7 of 7.

Table C6: Phase 3 Analytical Results for Major Ions and Trace Inorganic Elements in Wells, Lagoons, and Wastewater Treatment Plant Influents

Samples were analyzed by the EPA Manchester Environmental Laboratory

Abbreviations

LG - Dairy waste lagoon
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter
mg/L = milligrams per liter

Data Qualifiers

< = less than

R = The data are unusable for all purposes.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Notes

[1]Samples SP-03 and SP-04 were collected at the same wastewater treatment plant at different times. Sample SP-04 was submitted to EPA's Manchester Laboratory only and was analyzed for a subset of compounds as identified in the table.

Table C7: Phase 3 Analytical Results for Perchlorate in Wells

Location ID	Sample ID	Sample Type	Result
WW-01	10154201	Upgradient Well	0.135
WW-02	10154202	Dairy Supply Well	0.493
WW-03	10154203	Downgradient Well	1.96
WW-04	10154204	Downgradient Well	1.38
WW-05	10154205	Downgradient Well	0.547
WW-06	10154206	Upgradient Well	0.06
WW-07	10154207	Dairy Supply Well	0.231
WW-08	10154208	Dairy Supply Well	1.4
WW-09	10164209	Dairy Supply Well	0.003 U
WW-10	10164210	Downgradient Well	0.003 U
WW-11	10154211	Downgradient Well	0.915
WW-12	10154212	Downgradient Well	1.68
WW-13	10154213	Downgradient Well	1.17
WW-14	10154214	Downgradient Well	1.84
WW-15	10154215	Downgradient Well	1.76
WW-16	10154216	Downgradient Well	3.08
WW-17	10154217	Downgradient Well	2.9
WW-18	10154218	Residential Well	2.3
WW-19	10154219	Downgradient Well	3.25
WW-20	10154220	Downgradient Well	1.31
WW-21	10154221	Downgradient well	0.978
WW-22	10164222	Downgradient Well	1.74
WW-23	10154223	Downgradient Well	1.36
WW-24	10154224	Downgradient Well	3.42
WW-25	10154225	Downgradient Well	1.98
WW-26	10154226	Downgradient Well	1.44
WW-27	10154227	Downgradient Well	0.556
WW-28	10154228	Downgradient Well	4.69
WW-29	10154229	Field Blank	0.003 U
WW-30	10164230	Residential Well	1.07

Robert S. Kerr Environmental Research Center.

Abbreviations

WW - water well

Units

ug/L = micrograms per liter

Data Qualifiers

U = The analyte was not detected at or above the reported value.

Analytical Method

SW846 Method 6850, "*Perchlorate in Soils, Water and Wastes Using High performance Liquid Chromatography/Electrospray/Ionization (ESI) Mass Spectroscopy (MS) or Tandem Mass Spectroscopy (MS/MS)* .

Table C8: Phase 3 Analytical Results for Total Coliform, E. Coli, Fecal Coliform, and Microbial Source Tracking in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	Sample ID	Sample Type	Sample Media	Total Coliform	Laboratory	Units	Fecal Coliform	Laboratory	Units	E.Coli	Laboratory	Units	BAC-32	CF-128	CF-193	MST-Contaminants	HF-183	HF-134
WW-01	10154201	Upgradient Well – Dairy	Water	<1	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-02	10154202	Supply Well – Dairy	Water	<1	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-03	10154203	Downgradient Well – Dairy	Water	<1	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-04	10154204	Downgradient Well – Dairy	Water	23.8	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-05	10154205	Downgradient Well – Dairy	Water	<1	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-06	10154206	Upgradient – Dairy	Water	2	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-07	10154207	Supply Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-08	10154208	Supply Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-09	10164209	Supply Well – Dairy	Water	<1	Cascade	#/100ml	0	Cascade	CFU/100ml	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-10	10164210	Downgradient Well – Dairy	Water	<1	Cascade	#/100ml	0	Cascade	CFU/100ml	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-11	10154211	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-12	10154212	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-13	10154213	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-14	10154214	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-15	10154215	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-16	10154216	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-17	10154217	Downgradient Well – Dairy	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-18	10154218	Residential Well	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-19	10154219	Downgradient Well – Septic	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-20	10154220	Downgradient Well – Septic	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-21	10154221	Downgradient Well – Septic	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-22	10164222	Downgradient Well – Septic	Water	<1	Cascade	#/100ml	0	Cascade	CFU/100ml	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
WW-23	10154223	Downgradient Well – Mint	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-24	10154224	Downgradient Well – Mint	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-25	10154225	Downgradient Well – Corn	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-26	10154226	Downgradient Well – Hops	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-27	10154227	Downgradient Well – Hops	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-28	10154228	Downgradient Well – Corn	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-29	10154229	Field Blank	Water	<1	Manchester	#/100ml	<1	Manchester	#/100ml	<1	Manchester	#/100ml	NA	NA	NA	NA	NA	NA
WW-30	10164230	Residential Well	Water	<1	Cascade	#/100ml	NA	NA	NA	<1	Cascade	#/100ml	NA	NA	NA	NA	NA	NA
LG-01	10154251	Dairy Lagoon	Liquid	NA	NA	NA	TNTC	Cascade	CFU/100ml	NA	NA	NA	P	P	ND	R	P	A
LG-02	10154252	Dairy Lagoon	Liquid	NA	NA	NA	TNTC	Cascade	CFU/100ml	NA	NA	NA	P	P	ND	H/R	ND	P
LG-03	10154253	Dairy Lagoon	Liquid	NA	NA	NA	TNTC	Cascade	CFU/100ml	NA	NA	NA	P	P	ND	H/R	P	A
LG-04	10154254	Dairy Lagoon	Liquid	NA	NA	NA	> 16 million	Manchester	#/100ml	>16 million (J)	Manchester	#/100ml	P	P	ND	R	A	A
LG-05	10154255	Dairy Lagoon	Liquid	NA	NA	NA	2000	Manchester	#/100ml	2000 (J)	Manchester	#/100ml	P	P	ND	R	A	A
LG-06	10154256	Dairy Lagoon	Liquid	NA	NA	NA	1800	Manchester	#/100ml	1800 (J)	Manchester	#/100ml	P	P	ND	R	A	A
LG-07	10154257	Dairy Lagoon	Liquid	NA	NA	NA	5.4 million	Manchester	#/100ml	5.4 million (J)	Manchester	#/100ml	P	P	ND	R	A	A

Table C8: Phase 3 Analytical Results for Total Coliform, E. Coli, Fecal Coliform, and Microbial Source Tracking in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	Sample ID	Sample Type	Sample Media	Total Coliform	Laboratory	Units	Fecal Coliform	Laboratory	Units	E.Coli	Laboratory	Units	BAC-32	CF-128	CF-193	MST-Contaminants	HF-183	HF-134
LG-08	10154258	Dairy Lagoon	Liquid	NA	NA	NA	130,000	Manchester	#/100ml	130,000 (J)	Manchester	#/100ml	P	P	ND	R	A	A
LG-09	10154259	Dairy Lagoon	Liquid	NA	NA	NA	79,000	Manchester	#/100ml	79,000 (J)	Manchester	#/100ml	P	P	ND	H/R	ND	P
LG-10	10164260	Dairy Lagoon	Liquid	NA	NA	NA	1.1 billion	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
LG-11	10164261	Dairy Lagoon	Liquid	NA	NA	NA	5.4 million	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
LG-12	10164262	Dairy Lagoon	Liquid	NA	NA	NA	4.5 million	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
LG-13	10164263	Dairy Lagoon	Liquid	NA	NA	NA	3.3 billion (J)	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
LG-14	10164264	Dairy Lagoon	Liquid	NA	NA	NA	2.4 billion (J)	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
LG-15	10164265	Dairy Lagoon	Liquid	NA	NA	NA	5.4 million	Cascade	CFU/100ml	NA	NA	NA	NA	NA	NA	NA	NA	NA
SP-01	10154271	WWTP Influent	Liquid	NA	NA	NA	TNTC	Cascade	CFU/100ml	NA	NA	NA	P	A	A	H	ND	P
SP-02	10154272	WWTP Influent	Liquid	NA	NA	NA	9.2 million	Manchester	#/100ml	5.4 million (J)	Manchester	#/100ml	P	A	A	H	ND	P
SP-03[1]	10154273	WWTP Influent	Liquid	NA	NA	NA	>1.6 million	Manchester	#/100ml	>1.6 million (J)	Manchester	#/100ml	P	A	A	H	A	P
SP-04[1]	10154274	WWTP Influent	Liquid	NA	NA	NA	13 million	Manchester	#/100ml	13million (J)	Manchester	#/100ml	P	P	ND	H/R	P	A

Samples were analyzed by the EPA Manchester Environmental Laboratory.

Abbreviations

A = Absent

H = Human

MST - Microbial Source Tracking

NA = Not analyzed

ND = Not detected

P = Present

R = Ruminant

TNTC = Too numerous to count

WWTP - Wastewater Treatment Plant

BAC32: This is the screening Bacteroides biomarker. If it is present, further testing is done to determine the specific source. If the test is negative, nothing more is done.

CF128 and CF193: These are two separate biomarkers that identify the presence of ruminant fecal source. Between the two of them, they comprise most of the biomarkers that would be found in ruminants. There may be other biomarkers that could exist in very isolated populations of ruminants, but these two will identify the majority. A "P" would identify detection of the biomarker in the particular sample, an "A" indicates absence of that biomarker in the sample.

HF134 and HF183: These are two separate biomarkers that identify the presence of human fecal source. As above, between the two of these biomarkers, the majority of human source will be detected. Again, a very isolated community might develop a different biomarker. A "P" would identify detection of the biomarker in the particular sample, an "A" indicates absence of that biomarker in the sample.

MST- Microbial Source Tracking. MST contaminants: This identifies by two letter code the kind of fecal source was identified in the particular sample.GB indicates that although Bacteroides DNA was present, the source was neither human nor ruminant. An "A" indicates that no Bacteroides DNA was present in the sample. H indicates human source; R indicates ruminant; H/R indicates that both were found in that sample. To be noted, where there is a species identification, there may be fecal contamination from other species present as well, but due to method limitations is not identified.

Units

#/100ml - number per 100 millilters

<1 - less than one organism

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

Notes

[1]Samples SP-03 and SP-04 were collected at the same wastewater treatment plant at different times. Sample SP-04 was submitted to EPA's Manchester Laboratory only and was analyzed for a subset of compounds as identified in the table.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
2,3,4,5-Tetrachlorophenol	0.2 U	0.2 U	0.2 U	0.19 U	0.19 U	0.2 U	0.19 U
2,3,4,6-Tetrachlorophenol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
2,4,5-T	0.5 U	0.49 U	0.49 U	0.49 U	0.48 U	0.5 U	0.48 U
2,4,5-Trichlorophenol	0.2 U	0.2 U	0.2 U	0.19 U	0.19 U	0.2 U	0.19 U
2,4,6-Trichlorophenol	0.5 UJ	0.49 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.5 UJ	0.48 UJ
2,4-D	0.5 UJ	0.49 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.5 UJ	0.48 UJ
2,4-DB	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
3,5-Dichlorobenzoic acid	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
4-Nitrophenol	0.5 UJ	0.49 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.5 UJ	0.48 UJ
Acifluorfen	0.5 U	0.49 U	0.49 U	0.49 U	0.48 U	0.5 U	0.48 U
Alachlor	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Atrazine	0.015 J	0.041 J	0.1 UJ	0.015 J	0.11 J	0.026 J	0.1 UJ
Azinphos-methyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bentazon	0.1 U	0.1 U	0.098 U	0.1 U	0.1 U	0.1 U	0.012 NJ
Benzonitrile, 2,6-dichloro-	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bromoxynil	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Chloramben	0.2 UJ	0.2 UJ	0.2 UJ	0.19 UJ	0.19 UJ	0.2 UJ	0.19 UJ
Chlorpyrifos, Ethyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Clopyralid	1 UJ	0.99 UJ	0.98 UJ	0.97 UJ	0.95 UJ	1 UJ	0.96 UJ
DACTHAL-DCPA	0.5 UJ	0.49 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.5 UJ	0.48 UJ
Diazinon	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Dicamba	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Dichlorprop	0.5 U	0.49 U	0.49 U	0.49 U	0.48 U	0.5 U	0.48 U
Diclofop, Methyl	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Dinoseb	0.5 U	0.49 U	0.49 U	0.49 U	0.48 U	0.5 U	0.48 U
Diuron	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Endosulfan I	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Endosulfan II	0.1 UJ	0.1 UJ	0.098 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.096 UJ
Endosulfan Sulfate	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Fenhexamid	1 UJ	0.99 UJ	0.98 UJ	0.97 UJ	0.95 UJ	1 UJ	0.96 UJ
Fenpropathrin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Imidan	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.19 UJ	0.2 UJ	0.19 UJ
Ioxynil	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Kresoxim-methyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
MCPA	0.2 U	0.2 U	0.2 U	0.19 U	0.19 U	0.2 U	0.19 U
MCPP	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Metribuzin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Myclobutanil	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Oxyfluorfen	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pendimethalin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pentachlorophenol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Picloram	1 UJ	0.99 UJ	0.98 UJ	0.97 UJ	0.95 UJ	1 UJ	0.96 UJ
Propargite	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Silvex	0.2 U	0.2 U	0.2 U	0.19 U	0.19 U	0.2 U	0.19 U
Simazine	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
SURFLAN	2 UJ	1.97 UJ	2 UJ	2 UJ	1.9 UJ	2 UJ	1.9 UJ
Terbacil	2 UJ	2 UJ	2 UJ	2 UJ	1.9 UJ	2 UJ	1.9 UJ
Trichlorpyr	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Triflumizole	0.4 UJ	0.39 UJ	0.39 UJ	0.39 UJ	0.38 UJ	0.4 UJ	0.39 UJ
Trifluralin	0.1 UJ	0.1 UJ	0.1 UJ	0.098 UJ	0.1 UJ	0.1 UJ	0.1 UJ

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-08	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14
Sample ID	10154208	10164209	10164210	10154211	10154212	10154213	10154214
Sample Type	Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
2,3,4,5-Tetrachlorophenol	0.19 U	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U
2,3,4,6-Tetrachlorophenol	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
2,4,5-T	0.47 U	0.48 U	0.48 U	0.5 U	0.49 U	0.48 U	0.49 U
2,4,5-Trichlorophenol	0.19 U	0.19 U	0.19 U	0.2 U	0.19 UJ	0.19 U	0.19 U
2,4,6-Trichlorophenol	0.47 UJ	0.48 UJ	0.48 UJ	0.5 UJ	0.49 UJ	0.48 UJ	0.49 UJ
2,4-D	0.47 UJ	0.48 UJ	0.48 UJ	0.5 UJ	0.49 UJ	0.48 UJ	0.49 UJ
2,4-DB	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
3,5-Dichlorobenzoic acid	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
4-Nitrophenol	0.47 UJ	0.48 UJ	0.48 UJ	0.5 UJ	0.49 UJ	0.48 UJ	0.49 UJ
Acifluorfen	0.47 U	0.48 U	0.48 U	0.5 U	0.49 U	0.48 U	0.49 U
Alachlor	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.048 J	0.1 UJ
Atrazine	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.016 J	0.048 J	0.06 J
Azinphos-methyl	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bentazon	0.036 J	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Benzonitrile, 2,6-dichloro-	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bromoxynil	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Chloramben	0.19 UJ	0.19 UJ	0.19 UJ	0.2 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Chlorpyrifos, Ethyl	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Clopyralid	0.95 UJ	0.96 UJ	0.96 UJ	1 UJ	0.97 UJ	0.96 UJ	0.97 UJ
DACTHAL-DCPA	0.47 UJ	0.48 UJ	0.48 UJ	0.5 UJ	0.49 UJ	0.48 UJ	0.49 UJ
Diazinon	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Dicamba	0.1 UJ	0.096 UJ	0.096 UJ	0.1 UJ	0.097 UJ	0.096 UJ	0.097 UJ
Dichlorprop	0.47 U	0.48 U	0.48 U	0.5 U	0.49 U	0.48 U	0.49 U
Diclofop, Methyl	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Dinoseb	0.47 U	0.48 U	0.48 U	0.5 U	0.49 U	0.48 U	0.49 U
Diuron	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Endosulfan I	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-08	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14
Sample ID	10154208	10164209	10164210	10154211	10154212	10154213	10154214
Sample Type	Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Endosulfan II	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Endosulfan Sulfate	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Fenhexamid	0.95 UJ	0.96 UJ	0.96 UJ	1 UJ	0.97 UJ	0.96 UJ	0.97 UJ
Fenpropathrin	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Imidan	0.19 UJ	0.19 UJ	0.19 UJ	0.2 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Ioxynil	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.0063 J	0.097 U
Kresoxim-methyl	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
MCPA	0.19 U	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U
MCPP	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Metribuzin	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Myclobutanil	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Oxyfluorfen	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pendimethalin	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pentachlorophenol	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Picloram	0.95 UJ	0.96 UJ	0.96 UJ	1 UJ	0.97 UJ	0.96 UJ	0.97 UJ
Propargite	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Silvex	0.19 U	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U
Simazine	0.09 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
SURFLAN	1.9 UJ	1.9 UJ	1.9 UJ	2 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Terbacil	1.9 UJ	1.9 UJ	1.9 UJ	2 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Trichlorpyr	0.1 U	0.096 U	0.096 U	0.1 U	0.097 U	0.096 U	0.097 U
Triflumizole	0.38 UJ	0.39 UJ	0.39 UJ	0.4 UJ	0.39 UJ	0.39 UJ	0.39 UJ
Trifluralin	0.095 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ

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Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-15	WW-16	WW-17	WW-18	WW-19	WW-20	WW-21
Sample ID	10154215	10154216	10154217	10154218	10154219	10154220	10154221
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient Septic	Downgradient Septic	Downgradient Septic
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
2,3,4,5-Tetrachlorophenol	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U
2,3,4,6-Tetrachlorophenol	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
2,4,5-T	0.48 U	0.48 U	0.49 U	0.48 U	0.48 U	0.48 U	0.47 U
2,4,5-Trichlorophenol	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U
2,4,6-Trichlorophenol	0.48 UJ	0.48 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ	0.47 UJ
2,4-D	0.48 UJ	0.48 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ	0.47 UJ
2,4-DB	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
3,5-Dichlorobenzoic acid	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
4-Nitrophenol	0.48 UJ	0.48 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ	0.47 UJ
Acifluorfen	0.48 U	0.48 U	0.49 U	0.48 U	0.48 U	0.48 U	0.47 U
Alachlor	0.1 UJ	0.1 UJ	0.057 J	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Atrazine	0.011 J	0.19 J	0.18 J	0.048 J	0.1 UJ	0.03 J	0.094 UJ
Azinphos-methyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Bentazon	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.091 J	0.094 U
Benzonitrile, 2,6-dichloro-	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Bromoxynil	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Chloramben	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Chlorpyrifos, Ethyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Clopyralid	0.96 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.94 UJ
DACTHAL-DCPA	0.48 UJ	0.48 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ	0.47 UJ
Diazinon	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Dicamba	0.096 UJ	0.096 UJ	0.097 UJ	0.096 UJ	0.097 UJ	0.096 UJ	0.094 UJ
Dichlorprop	0.48 U	0.48 U	0.49 U	0.48 U	0.48 U	0.48 U	0.47 U
Diclofop, Methyl	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Dinoseb	0.48 U	0.48 U	0.49 U	0.48 U	0.48 U	0.48 U	0.47 U
Diuron	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Endosulfan I	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-15	WW-16	WW-17	WW-18	WW-19	WW-20	WW-21
Sample ID	10154215	10154216	10154217	10154218	10154219	10154220	10154221
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient Septic	Downgradient Septic	Downgradient Septic
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Endosulfan II	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Endosulfan Sulfate	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Fenhexamid	0.96 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.94 UJ
Fenpropathrin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Imidan	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Ioxynil	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Kresoxim-methyl	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
MCPA	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U
MCPP	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Metribuzin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Myclobutanil	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Oxyfluorfen	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Pendimethalin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Pentachlorophenol	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Picloram	0.96 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.97 UJ	0.96 UJ	0.94 UJ
Propargite	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ
Silvex	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U	0.19 U
Simazine	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.09 UJ
SURFLAN	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Terbacil	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Trichlorpyr	0.096 U	0.096 U	0.097 U	0.096 U	0.097 U	0.096 U	0.094 U
Triflumizole	0.39 UJ	0.38 UJ	0.39 UJ	0.39 UJ	0.39 UJ	0.38 UJ	0.38 UJ
Trifluralin	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.094 UJ

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-22	WW-23	WW-24	WW-25	WW-26	WW-27	WW-28
Sample ID	10164222	10154223	10154224	10154225	10154226	10154227	10154228
Sample Type	Downgradient Septic	Downgradient Mint	Downgradient Mint	Downgradient Corn	Downgradient Hops	Downgradient Hops	Downgradient Corn
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
2,3,4,5-Tetrachlorophenol	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U	0.19 U
2,3,4,6-Tetrachlorophenol	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
2,4,5-T	0.47 U	0.48 U	0.49 U	0.49 U	0.48 U	0.48 U	0.48 U
2,4,5-Trichlorophenol	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U	0.19 U
2,4,6-Trichlorophenol	0.47 UJ	0.48 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ
2,4-D	0.47 UJ	0.48 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ
2,4-DB	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
3,5-Dichlorobenzoic acid	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
4-Nitrophenol	0.47 UJ	0.48 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ
Acifluorfen	0.47 U	0.48 U	0.49 U	0.49 U	0.48 U	0.48 U	0.48 U
Alachlor	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Atrazine	0.094 UJ	0.1 UJ	0.017 J	0.1 UJ	0.025 J	0.1 UJ	0.1 UJ
Azinphos-methyl	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bentazon	0.094 U	0.028 J	0.033 J	0.03 NJ	0.097 U	0.097 U	0.097 U
Benzonitrile, 2,6-dichloro-	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Bromoxynil	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Chloramben	0.19 UJ	0.19 UJ	0.2 UJ	0.19 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Chlorpyrifos, Ethyl	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Clopyralid	0.94 UJ	0.96 UJ	0.98 UJ	0.97 UJ	0.97 UJ	0.97 UJ	0.97 UJ
DACTHAL-DCPA	0.47 UJ	0.48 UJ	0.49 UJ	0.49 UJ	0.48 UJ	0.48 UJ	0.48 UJ
Diazinon	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Dicamba	0.094 UJ	0.096 UJ	0.1 UJ	0.097 UJ	0.097 UJ	0.097 UJ	0.097 UJ
Dichlorprop	0.47 U	0.48 U	0.49 U	0.49 U	0.48 U	0.48 U	0.48 U
Diclofop, Methyl	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Dinoseb	0.47 U	0.48 U	0.49 U	0.49 U	0.48 U	0.48 U	0.48 U
Diuron	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Endosulfan I	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-22	WW-23	WW-24	WW-25	WW-26	WW-27	WW-28
Sample ID	10164222	10154223	10154224	10154225	10154226	10154227	10154228
Sample Type	Downgradient Septic	Downgradient Mint	Downgradient Mint	Downgradient Corn	Downgradient Hops	Downgradient Hops	Downgradient Corn
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Endosulfan II	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Endosulfan Sulfate	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Fenhexamid	0.94 UJ	0.96 UJ	0.98 UJ	0.97 UJ	0.97 UJ	0.97 UJ	0.97 UJ
Fenpropathrin	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Imidan	0.19 UJ	0.19 UJ	0.2 UJ	0.2 UJ	0.19 UJ	0.19 UJ	0.19 UJ
Ioxynil	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Kresoxim-methyl	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
MCPA	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U	0.19 U
MCPP	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Metribuzin	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Myclobutanil	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Oxyfluorfen	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pendimethalin	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Pentachlorophenol	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Picloram	0.94 UJ	0.96 UJ	0.98 UJ	0.97 UJ	0.97 UJ	0.97 UJ	0.97 UJ
Propargite	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
Silvex	0.19 U	0.19 U	0.2 U	0.19 U	0.19 U	0.19 U	0.19 U
Simazine	0.09 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ
SURFLAN	1.9 UJ	1.9 UJ	2 UJ	2 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Terbacil	1.88 UJ	1.9 UJ	2 UJ	2 UJ	1.9 UJ	1.9 UJ	1.9 UJ
Trichlorpyr	0.094 U	0.096 U	0.1 U	0.097 U	0.097 U	0.097 U	0.097 U
Triflumizole	0.38 UJ	0.38 UJ	0.39 UJ	0.39 UJ	0.39 UJ	0.39 UJ	0.39 UJ
Trifluralin	0.094 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ	0.1 UJ

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-29	WW-30	SO-01	SO-02	SO-03	SO-04	SO-05	SO-06
Sample ID	10154229	10164230	10154231	10154232	10154233	10154234	10154235	10154236
Sample Type	Field Blank	Residential Well	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field
Sample Matrix	Water	Water	Solid	Solid	Solid	Solid	Solid	Solid
Compound Units	ug/L	ug/L	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
2,3,4,5-Tetrachlorophenol	0.19 U	0.19 U	96 U	24 U	45 U	22 U	37 U	13 U
2,3,4,6-Tetrachlorophenol	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
2,4,5-T	0.49 U	0.48 U	96 U	24 U	45 U	22 U	37 U	13 U
2,4,5-Trichlorophenol	0.19 U	0.19 U	96 U	24 U	45 U	22 U	37 U	13 U
2,4,6-Trichlorophenol	0.49 UJ	0.48 UJ	96 UJ	24 UJ	45 UJ	22 UJ	37 UJ	13 UJ
2,4-D	0.49 UJ	0.48 UJ	37 J	24 U	45 U	22 U	37 U	13 U
2,4-DB	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
3,5-Dichlorobenzoic acid	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
4-Nitrophenol	0.49 UJ	0.48 UJ	97 U	1400 J	31 J	1800 J	37 UJ	1700 J
Acifluorfen	0.49 U	0.48 U	96 UJ	24 UJ	45 U	22 UJ	37 UJ	13 UJ
Alachlor	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Atrazine	0.1 UJ	0.02 J	720 U	1.1 J	71 U	19 U	62 U	23 U
Azinphos-methyl	0.1 UJ	0.1 UJ	720 UJ	20 UJ	71 UJ	19 UJ	62 UJ	23 UJ
Bentazon	0.097 U	0.015 J	96 U	24 U	45 U	22 U	37 U	13 U
Benzonitrile, 2,6-dichloro-	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Bromoxynil	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
Chloramben	0.19 UJ	0.19 UJ	96 UJ	24 UJ	45 UJ	22 UJ	37 UJ	13 UJ
Chlorpyrifos, Ethyl	0.1 UJ	0.1 UJ	720 U	1.3 J	11 J	1.7 J	8.6 J	5.9 J
Clopyralid	0.97 UJ	0.96 UJ	96 U	24 U	45 U	22 U	36 J	13 U
DACTHAL-DCPA	0.49 UJ	0.48 UJ	7 J	24 U	9 J	22 U	28 J	13 U
Diazinon	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Dicamba	0.097 UJ	0.096 UJ	4.9 J	24 U	4.1 J	22 U	3.8 J	13 U
Dichlorprop	0.49 U	0.48 U	96 U	24 U	45 U	22 U	37 U	13 U
Diclofop, Methyl	0.097 U	0.096 U	96 U	24 U	45 UJ	22 U	37 U	13 U
Dinoseb	0.49 U	0.48 U	96 UJ	24 UJ	45 UJ	22 UJ	37 UJ	13 UJ
Diuron	0.1 UJ	0.1 UJ	720 UJ	3.2 J	71 UJ	2.1 J	8.3 J	23 UJ
Endosulfan I	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	WW-29	WW-30	SO-01	SO-02	SO-03	SO-04	SO-05	SO-06
Sample ID	10154229	10164230	10154231	10154232	10154233	10154234	10154235	10154236
Sample Type	Field Blank	Residential Well	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field
Sample Matrix	Water	Water	Solid	Solid	Solid	Solid	Solid	Solid
Compound / Units	ug/L	ug/L	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Endosulfan II	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Endosulfan Sulfate	0.1 UJ	0.1 UJ	720 U	1.3 J	71 U	1.1 J	62 U	23 U
Fenhexamid	0.97 UJ	0.96 UJ	720 UJ	20 UJ	71 UJ	19 UJ	62 UJ	23 UJ
Fenpropathrin	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Imidan	0.2 UJ	0.19 UJ	720 UJ	20 UJ	71 UJ	19 UJ	62 UJ	23 UJ
Ioxynil	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
Kresoxim-methyl	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
MCPA	0.19 U	0.19 U	96 U	24 U	45 U	22 U	37 U	13 U
MCPP	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
Metribuzin	0.1 UJ	0.1 UJ	720 UJ	20 UJ	71 UJ	19 UJ	62 UJ	23 UJ
Myclobutanil	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Oxyfluorfen	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Pendimethalin	0.1 UJ	0.1 UJ	720 U	20 U	71 U	5.7 J	62 U	23 U
Pentachlorophenol	0.017 J	0.096 U	96 U	1 J	0.9 J	4.2 J	1.9 J	13 U
Picloram	0.97 UJ	0.96 UJ	96 U	24 U	45 U	22 U	37 U	13 U
Propargite	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Silvex	0.19 U	0.19 U	96 U	24 U	45 U	22 U	37 U	13 U
Simazine	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U
SURFLAN	2 UJ	1.9 UJ	1400 UJ	39 UJ	140 UJ	37 UJ	120 UJ	47 UJ
Terbacil	2 UJ	1.9 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Trichlorpyr	0.097 U	0.096 U	96 U	24 U	45 U	22 U	37 U	13 U
Triflumizole	0.39 UJ	0.19 UJ	720 U	20 U	71 U	19 U	62 U	23 U
Trifluralin	0.1 UJ	0.1 UJ	720 U	20 U	71 U	19 U	62 U	23 U

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	SO-07	SO-08	SO-09	SO-10	SO-11	SO-12	SO-13	SO-14
Sample ID	10164237	10164238	10164239	10164240	10154241	10154242	10154243	10154244
Sample Type	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Soil - Mint Field	Soil - Mint Field	Soil - Corn Field	Soil - Corn Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Compound Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
2,3,4,5-Tetrachlorophenol	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
2,3,4,6-Tetrachlorophenol	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
2,4,5-T	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
2,4,5-Trichlorophenol	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
2,4,6-Trichlorophenol	62 UJ	11 UJ	49 UJ	13 UJ	13 UJ	14 UJ	12 UJ	12 UJ
2,4-D	62 U	11 U	49 U	13 U	13 U	14 U	69	6.1 J
2,4-DB	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
3,5-Dichlorobenzoic acid	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
4-Nitrophenol	44 J	300 J	49 UJ	670 J	1100 J	410 J	590 J	190 J
Acifluorfen	62 UJ	11 UJ	49 UJ	13 UJ	13 UJ	14 UJ	12 UJ	12 UJ
Alachlor	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Atrazine	87 U	23 U	79 U	19 U	26 U	26 U	1.6 J	0.7 J
Azinphos-methyl	87 UJ	23 UJ	79 UJ	19 UJ	26 UJ	26 UJ	22 UJ	25 UJ
Bentazon	62 U	11 U	49 U	13 U	38	2 J	12 U	12 U
Benzonitrile, 2,6-dichloro-	87 U	23 U	79 U	19 U	0.5 J	26 U	22 U	25 U
Bromoxynil	62 U	11 U	49 U	13 U	13 U	4.1 J	12 U	12 U
Chloramben	62 UJ	11 UJ	49 UJ	13 UJ	13 UJ	14 UJ	12 UJ	12 UJ
Chlorpyrifos, Ethyl	13 J	1.5 J	79 U	2.3 J	26 U	0.5 J	22 U	25 U
Clopyralid	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
DACTHAL-DCPA	10 J	11 U	11 J	1 J	13 U	14 U	12 U	12 U
Diazinon	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Dicamba	4.4 J	11 U	4 J	13 U	13 U	14 U	12 U	12 U
Dichlorprop	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Diclofop, Methyl	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Dinoseb	62 UJ	11 UJ	49 UJ	13 UJ	13 UJ	14 UJ	12 UJ	12 UJ
Diuron	22 J	2.6 J	79 UJ	19 UJ	7.9 J	26 UJ	22 UJ	25 UJ
Endosulfan I	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	SO-07	SO-08	SO-09	SO-10	SO-11	SO-12	SO-13	SO-14
Sample ID	10164237	10164238	10164239	10164240	10154241	10154242	10154243	10154244
Sample Type	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Soil - Mint Field	Soil - Mint Field	Soil - Corn Field	Soil - Corn Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Compound / Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Endosulfan II	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Endosulfan Sulfate	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Fenhexamid	87 UJ	23 UJ	79 UJ	19 UJ	26 UJ	26 UJ	22 UJ	25 UJ
Fenpropathrin	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Imidan	87 UJ	23 UJ	79 UJ	19 UJ	26 UJ	26 UJ	22 UJ	25 UJ
Ioxynil	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Kresoxim-methyl	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
MCPA	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
MCPP	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Metribuzin	87 UJ	23 UJ	79 UJ	19 UJ	26 UJ	26 UJ	22 UJ	25 UJ
Myclobutanil	87 U	23 U	79 U	19 U	2.7 J	26 U	22 U	25 U
Oxyfluorfen	87 U	23 U	79 U	19 U	470	26 U	22 U	25 U
Pendimethalin	87 U	23 U	79 U	19 U	2100	1100	22 U	25 U
Pentachlorophenol	3.2 J	11 U	49 U	1.7 J	0.7 J	13 J	12 U	0.5 J
Picloram	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Propargite	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Silvex	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Simazine	87 U	23 U	79 U	19 U	1.6 J	26 U	22 U	25 U
SURFLAN	170 UJ	46 UJ	160 UJ	39 UJ	51 UJ	52 UJ	44 UJ	50 UJ
Terbacil	87 U	23 U	79 U	19 U	1700	7.8 J	22 U	25 U
Trichlorpyr	62 U	11 U	49 U	13 U	13 U	14 U	12 U	12 U
Triflumizole	87 U	23 U	79 U	19 U	26 U	26 U	22 U	25 U
Trifluralin	87 U	23 U	79 U	19 U	3.1 J	26 U	22 U	25 U

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	SO-15	SO-16
Sample ID	10154245	10154246
Sample Type	Soil - Hops Field	Soil - Hops Field
Sample Matrix	Solid	Solid
Compound / Units	ug/Kg	ug/Kg
2,3,4,5-Tetrachlorophenol	13 U	10 U
2,3,4,6-Tetrachlorophenol	13 U	10 U
2,4,5-T	13 U	10 U
2,4,5-Trichlorophenol	13 U	10 U
2,4,6-Trichlorophenol	13 UJ	10 UJ
2,4-D	14	7 J
2,4-DB	13 U	10 U
3,5-Dichlorobenzoic acid	13 U	10 U
4-Nitrophenol	510 J	410 J
Acifluorfen	13 UJ	10 UJ
Alachlor	21 U	18 U
Atrazine	21 U	18 U
Azinphos-methyl	21 UJ	18 UJ
Bentazon	13 U	10 U
Benzonitrile, 2,6-dichloro-	21 U	18 U
Bromoxynil	13 U	10 U
Chloramben	13 UJ	10 UJ
Chlorpyrifos, Ethyl	21 U	18 U
Clopyralid	13 U	10 U
DACTHAL-DCPA	13 U	10 U
Diazinon	21 U	18 U
Dicamba	13 U	10 U
Dichlorprop	13 U	10 U
Diclofop, Methyl	13 U	10 U
Dinoseb	13 UJ	10 UJ
Diuron	21 UJ	3 J
Endosulfan I	21 U	18 U

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Location ID	SO-15	SO-16
Sample ID	10154245	10154246
Sample Type	Soil - Hops Field	Soil - Hops Field
Sample Matrix	Solid	Solid
Compound / Units	ug/Kg	ug/Kg
Endosulfan II	21 U	18 U
Endosulfan Sulfate	21 U	18 U
Fenhexamid	21 UJ	18 UJ
Fenpropathrin	21 U	18 U
Imidan	21 UJ	18 UJ
Ioxynil	13 U	10 U
Kresoxim-methyl	21 U	18 U
MCPA	13 U	10 U
MCPP	13 U	10 U
Metribuzin	21 UJ	18 UJ
Myclobutanil	21 U	26
Oxyfluorfen	21 U	13 J
Pendimethalin	21 U	18 U
Pentachlorophenol	1.6 J	8.3 J
Picloram	13 U	10 U
Propargite	21 U	18 U
Silvex	13 U	10 U
Simazine	21 U	18 U
SURFLAN	42 UJ	36 UJ
Terbacil	21 U	18 U
Trichlorpyr	13 U	10 U
Triflumizole	21 U	18 U
Trifluralin	21 U	18 U

See Table C9 notes on page 15 of 15.

Table C9: Phase 3 Analytical Results for Pesticides in Wells, Manure Piles, Application Fields, and Crop Soils

Samples analyzed by the EPA Manchester Environmental Laboratory

Abbreviations

SO - soil

WW - water well

NA - Not analyzed

Units

ug/L = micrograms per liter

mg/L = milligrams per liter

Analytical Method

US EPA Method 8270D

Data Qualifiers

< = less than

J = The analyte was positively identified. The associated numerical value is an estimate.

NJ = The analyte was detected at the reported level, the mass spectrum did not meet criteria. The reported value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07	WW-08	WW-09	WW-10
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207	10154208	10164209	10164210
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well	Dairy Supply Well	Dairy Supply Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,4-dichlorobenzene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
1-methylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
2,2',4,4'-tetrabromodiphenyl ether	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U
2,6-dimethylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
2-methylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
3,4-dichlorophenyl isocyanate	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-beta-coprostanol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-methyl-1h-indole (skatol)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
3-tert-butyl-4-hydroxyanisole (bha)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
4-cumylphenol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 UJ	0.2 U
4-n-octylphenol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 UJ	0.2 U
4-nonylphenol monoethoxylate - total (np1eo)	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 UJ	1.6 UJ	1.6 U
4-octylphenol diethoxylate (op2eo)	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ
4-octylphenol monoethoxylate (op1eo)	1 U	1 U	1 U	1 U	1 U	1 U	1 U	1 UJ	1 UJ	1 U
4-tert-octylphenol	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 UJ	0.4 UJ	0.4 U
5-methyl-1h-benzotriazole	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	0.2 UJ	1.6 UJ	1.6 UJ	1.6 UJ
acetophenone	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 UJ	0.4 UJ	0.4 U
acetyl-hexamethyl-tetrahydro-naphthalene (ahtn)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
anthracene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
anthraquinone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
atrazine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
benz[a]pyrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
benzophenone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
beta-sitosterol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	0.2 U	1.6 U	1.6 U	1.6 U
beta-stigmastanol	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	0.2 U	1.7 U	1.7 U	1.7 U
bis-(2-ethylhexyl) phthalate (dehp)	2.66	2 U	5.26	2 U	2 U	1.74 J	0.2 U	2 U	2 U	2 U
bisphenol a	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.2 UJ	0.4 UJ	0.4 UJ	0.4 U
bromacil	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.2 U	0.8 U	0.8 U	0.8 U
bromoform	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
caffeine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 R
camphor	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbaryl	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbazole	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
chlorpyrifos	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
cholesterol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	0.2 U	1.6 U	1.6 U	1.6 U
cotinine	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.2 U	0.8 UJ	0.8 UJ	0.8 UJ
diazinon	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07	WW-08	WW-09	WW-10
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207	10154208	10164209	10164210
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well	Dairy Supply Well	Dairy Supply Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
dichlorvos	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
diethoxynonylphenols- total (np2eo)	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	0.2 U	3.2 U	3.2 U	3.2 U
diethyl phthalate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.585 U	0.2 U	0.2 U	0.2 U	0.2 U
d-limonene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
fluoranthene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
hexahydrohexamethyl cyclopentabenzopyran (hhcb)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
indole	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoborneol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isophorone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isopropylbenzene (cumene)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoquinoline	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
menthol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metalaxyl	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
methyl salicylate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metolachlor	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
n,n-diethyl-meta-toluamide (deet)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
naphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.242	0.2 U	0.2 UJ	0.2 U
para-nonylphenol total	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	0.2 U	1.6 UJ	1.6 U	1.6 U
p-cresol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pentachlorophenol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 UJ	1.6 UJ	1.6 U
phenanthrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
phenol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 UJ	0.2 U
prometon	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pyrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
tetrachloroethylene	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.175 J	0.4 U	0.4 U	0.4 U
tri(2-butoxyethyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tri(2-chloroethyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tri(dichloroisopropyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tributyl phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triclosan	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triethyl citrate (ethyl citrate)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triphenyl phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

See Table C10 notes on page 13 of 13.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-11	WW-12	WW-13	WW-14	WW-15	WW-16	WW-17	WW-18	WW-19
Sample ID	10154211	10154212	10154213	10154214	10154215	10154216	10154217	10154218	10154219
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient - Septic
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,4-dichlorobenzene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
1-methylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
2,2',4,4'-tetrabromodiphenyl ether	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U
2,6-dimethylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
2-methylnaphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
3,4-dichlorophenyl isocyanate	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-beta-coprostanol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-methyl-1h-indole (skatol)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
3-tert-butyl-4-hydroxyanisole (bha)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
4-cumylphenol	0.2 UJ	0.2 UJ	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
4-n-octylphenol	0.2 UJ	0.2 UJ	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
4-nonylphenol monoethoxylate - total (np1eo)	1.6 UJ	1.6 UJ	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 UJ	1.6 U
4-octylphenol diethoxylate (op2eo)	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ
4-octylphenol monoethoxylate (op1eo)	1 UJ	1 UJ	1 U	1 UJ	1 U	1 U	1 U	1 UJ	1 U
4-tert-octylphenol	0.4 UJ	0.4 UJ	0.4 U	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 UJ	0.4 U
5-methyl-1h-benzotriazole	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ
acetophenone	0.4 UJ	0.4 UJ	0.4 U	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 UJ	0.4 U
acetyl-hexamethyl-tetrahydro-naphthalene (ahtn)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
anthracene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
anthraquinone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
atrazine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
benz[a]pyrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
benzophenone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
beta-sitosterol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
beta-stigmastanol	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U
bis-(2-ethylhexyl) phthalate (dehp)	2.77 J	2 U	2 U	2 U	2 U	2 U	1.03	2 U	2 U
bisphenol a	0.4 UJ	0.4 UJ	0.4 U	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 UJ	0.4 U
bromacil	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U
bromoform	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
caffeine	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
camphor	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbaryl	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbazole	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
chlorpyrifos	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
cholesterol	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
cotinine	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ
diazinon	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-11	WW-12	WW-13	WW-14	WW-15	WW-16	WW-17	WW-18	WW-19
Sample ID	10154211	10154212	10154213	10154214	10154215	10154216	10154217	10154218	10154219
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient - Septic
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
dichlorvos	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
diethoxynonylphenols- total (np2eo)	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U
diethyl phthalate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
d-limonene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
fluoranthene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
hexahydrohexamethyl cyclopentabenzopyran (hhcb)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
indole	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoborneol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isophorone	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isopropylbenzene (cumene)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoquinoline	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
menthol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metalaxyl	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
methyl salicylate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metolachlor	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
n,n-diethyl-meta-toluamide (deet)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
naphthalene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
para-nonylphenol total	1.6 UJ	1.6 UJ	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 UJ	1.6 U
p-cresol	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pentachlorophenol	1.6 UJ	1.6 UJ	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 UJ	1.6 U
phenanthrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
phenol	0.2 UJ	0.2 UJ	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 UJ	0.2 U
prometon	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pyrene	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tetrachloroethylene	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U
tri(2-butoxyethyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tri(2-chloroethyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tri(dichloroisopropyl) phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tributyl phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triclosan	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triethyl citrate (ethyl citrate)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triphenyl phosphate	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

See Table C10 notes on page 13 of 13.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-20	WW-21	WW-22	WW-23	WW-24	WW-25	WW-26	WW-27	WW-28
Sample ID	10154220	10154221	10164222	10154223	10154224	10154225	10154226	10154227	10154228
Sample Type	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Mint	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops	Downgradient - Hops	Downgradient - Corn
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,4-dichlorobenzene	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
1-methylnaphthalene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
2,2',4,4'-tetrabromodiphenyl ether	0.3 U	0.3 UJ	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U	0.3 U
2,6-dimethylnaphthalene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
2-methylnaphthalene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
3,4-dichlorophenyl isocyanate	1.6 U	1.6 UJ	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-beta-coprostanol	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
3-methyl-1h-indole (skatol)	0.2 U	0.2 UJ	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
3-tert-butyl-4-hydroxyanisole (bha)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
4-cumylphenol	0.2 U	0.2 R	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ
4-n-octylphenol	0.2 U	0.2 R	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ
4-nonylphenol monoethoxylate - total (np1eo)	1.6 U	1.6 R	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 UJ
4-octylphenol diethoxylate (op2eo)	0.5 UJ	0.5 R	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ	0.5 UJ
4-octylphenol monoethoxylate (op1eo)	1 U	1 R	1 UJ	1 U	1 U	1 U	1 U	1 U	1 UJ
4-tert-octylphenol	0.4 U	0.4 R	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 UJ
5-methyl-1h-benzotriazole	1.6 UJ	1.6 UJ	1.6 UJ	1.6 U	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ	1.6 UJ
acetophenone	0.4 U	0.4 R	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 UJ
acetyl-hexamethyl-tetrahydro-naphthalene (ahtn)	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
anthracene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
anthraquinone	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
atrazine	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
benz[a]pyrene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
benzophenone	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
beta-sitosterol	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
beta-stigmastanol	1.7 U	1.7 UJ	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U	1.7 U
bis-(2-ethylhexyl) phthalate (dehp)	2 U	2 UJ	2 U	2 U	2 U	2 U	2 U	1.25 J	2 U
bisphenol a	0.4 U	0.4 R	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 UJ
bromacil	0.8 U	0.8 UJ	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U	0.8 U
bromoform	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
caffeine	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ
camphor	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbaryl	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
carbazole	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
chlorpyrifos	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
cholesterol	1.6 U	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U
cotinine	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ	0.8 UJ
diazinon	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-20	WW-21	WW-22	WW-23	WW-24	WW-25	WW-26	WW-27	WW-28
Sample ID	10154220	10154221	10164222	10154223	10154224	10154225	10154226	10154227	10154228
Sample Type	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Mint	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops	Downgradient - Hops	Downgradient - Corn
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water	Water
Compound **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
dichlorvos	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
diethoxynonylphenols- total (np2eo)	3.2 U	3.2 R	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U	3.2 U
diethyl phthalate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
d-limonene	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
fluoranthene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
hexahydrohexamethyl cyclopentabenzopyran (hhcb)	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
indole	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoborneol	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isophorone	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isopropylbenzene (cumene)	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
isoquinoline	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
menthol	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metalaxyl	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
methyl salicylate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
metolachlor	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
n,n-diethyl-meta-toluamide (deet)	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
naphthalene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
para-nonylphenol total	1.6 U	1.6 UJ	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 UJ
p-cresol	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pentachlorophenol	1.6 U	0.8 R	1.6 UJ	1.6 U	1.6 U	1.6 U	1.6 U	1.6 U	1.6 UJ
phenanthrene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
phenol	0.2 U	0.2 R	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 UJ
prometon	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
pyrene	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tetrachloroethylene	0.4 U	0.4 UJ	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U	0.4 U
tri(2-butoxyethyl) phosphate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.713 U	0.2 U	0.2 U	0.2 U
tri(2-chloroethyl) phosphate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tri(dichloroisopropyl) phosphate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
tributyl phosphate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triclosan	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triethyl citrate (ethyl citrate)	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
triphenyl phosphate	0.2 U	0.2 UJ	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

See Table C10 notes on page 13 of 13.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-29	WW-30	LG-01	LG-02	LG-03	LG-04	LG-05	LG-06	LG-07	LG-08	LG-09	LG-10
Sample ID	10154229	10164230	10154251	10154252	10154253	10154254	10154255	10154256	10154257	10154258	10154259	10164260
Sample Type	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Water	Water	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,4-dichlorobenzene	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 UJ	2 UJ	0.2 UJ
1-methylnaphthalene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
2,2',4,4'-tetrabromodiphenyl ether	0.3 U	0.3 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.3 UJ
2,6-dimethylnaphthalene	0.2 U	0.2 U	2 UJ	2 UJ	2 UJ	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
2-methylnaphthalene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
3,4-dichlorophenyl isocyanate	1.6 U	1.6 U	2 U	2 UJ	2 UJ	2 UJ	1.6 UJ	2 UJ	2 UJ	30 U	2 UJ	1.6 UJ
3-beta-coprostanol	1.6 U	1.6 U	95.6 J	48.2 J	62.9 J	23.1 J	4.22 J	16.7 J	14.9 J	200 J	37.6 J	12 J
3-methyl-1h-indole (skatol)	0.2 U	0.2 U	22.2 J	40.9 J	146 J	24.2 J	3.56 J	22.5 J	34.9 J	373 J	170 J	6.93 J
3-tert-butyl-4-hydroxyanisole (bha)	0.2 UJ	0.2 UJ	0.2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	0.2 UJ
4-cumylphenol	0.2 U	0.2 U	2 U	2 R	2 R	2 R	2 R	2 R	2 R	30 U	2 UJ	0.2 UJ
4-n-octylphenol	0.2 U	0.2 U	2 U	2 R	2 R	2 R	2 R	2 R	2 R	30 U	2 UJ	0.2 UJ
4-nonylphenol monoethoxylate - total (np1eo)	1.6 U	1.6 U	48 J	39.5 J	54.6 J	2.32 J	1.48 J	10.1 J	8.09 J	165 J	45.9 J	23.8 J
4-octylphenol diethoxylate (op2eo)	0.5 UJ	0.5 UJ	2 U	2 R	2 R	2 R	2 R	2 R	2 R	48.4	2 UJ	0.5 UJ
4-octylphenol monoethoxylate (op1eo)	1 U	1 U	2 U	2 R	2 R	0.697 J	2 R	2 R	2 J	30 U	2 UJ	1 UJ
4-tert-octylphenol	0.349 J	0.4 U	2 U	2 R	2 R	2 R	2 R	2 R	2 R	30 U	2 UJ	0.4 UJ
5-methyl-1h-benzotriazole	1.6 UJ	1.6 UJ	1.6 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	1.6 UJ
acetophenone	0.4 U	0.4 U	2 U	2 R	2 R	2 R	2 R	2 R	2 R	30 U	2 UJ	0.4 UJ
acetyl-hexamethyl-tetrahydro-naphthalene (ahtn)	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
anthracene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
anthraquinone	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
atrazine	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
benz[a]pyrene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
benzophenone	0.2 U	0.2 U	2 UJ	2 UJ	2 UJ	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
beta-sitosterol	1.6 U	1.6 U	104 J	77.6 J	82 J	43.5 J	7.07 J	15.2 J	23.7 J	219 J	56.6 J	14.6 J
beta-stigmastanol	1.7 U	1.7 U	135 J	77.5 J	91.3 J	34.1 J	4.38 J	15.6 J	19.3 J	292 J	52 J	12.5 J
bis-(2-ethylhexyl) phthalate (dehp)	2 U	2 U	2 U	2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	4.58 J
bisphenol a	0.4 U	0.4 U	2 U	2 R	2 R	2 R	2 R	2 R	2 R	30 U	0.4 UJ	0.4 UJ
bromacil	0.8 U	0.8 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	0.8 UJ	2 UJ	30 U	2 UJ	0.8 UJ
bromoform	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
caffeine	0.2 U	0.2 U	2 UJ	2 UJ	2 UJ	2 R	1.02 J	2 UJ	2 R	30 U	2 UJ	0.282 J
camphor	0.2 U	0.2 U	2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	34 J
carbaryl	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
carbazole	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
chlorpyrifos	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
cholesterol	1.6 U	1.6 U	243 J	81.4 J	121 J	59.6 J	12.3 J	25.9 J	37.3 J	377 J	78.3 J	76.4 J
cotinine	0.8 UJ	0.8 UJ	0.8 UJ	2 UJ	2 UJ	0.8 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	0.8 UJ
diazinon	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	WW-29	WW-30	LG-01	LG-02	LG-03	LG-04	LG-05	LG-06	LG-07	LG-08	LG-09	LG-10
Sample ID	10154229	10164230	10154251	10154252	10154253	10154254	10154255	10154256	10154257	10154258	10154259	10164260
Sample Type	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Water	Water	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
dichlorvos	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
diethoxynonylphenols- total (np2eo)	3.2 U	3.2 U	66 J	41.6 J	41.8 J	2.16 J	2 UJ	2 UJ	4.87 J	46.5 J	3.2 UJ	36.4 J
diethyl phthalate	1.69	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	15.1 J
d-limonene	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	12.2 J
fluoranthene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
hexahydrohexamethyl cyclopentabenzopyran (hhcb)	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
indole	0.2 U	0.2 U	2 U	2 UJ	2 UJ	25.6 J	2 U	1.17 J	20.1 J	30 U	13 J	6.46
isoborneol	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	37.2 J
isophorone	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	1.06 J	2 UJ	5.33 J
isopropylbenzene (cumene)	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
isoquinoline	0.2 U	0.2 U	2 U	0.224 J	1.01 J	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
menthol	0.29	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
metalaxyl	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
methyl salicylate	0.2 U	0.2 U	2.24 J	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
metolachlor	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
n,n-diethyl-meta-toluamide (deet)	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
naphthalene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
para-nonylphenol total	1.6 U	1.6 U	2 U	35.5 J	49.8 J	2 UJ	3.17 J	17.9 J	2 UJ	81.2 J	18.1 J	7.16 J
p-cresol	0.216	0.2 U	25600 J	5480 J	9010 J	1110 J	14.7 J	112 J	1880 J	9600 J	4690 J	787 J
pentachlorophenol	1.6 U	1.6 U	32 U	2 R	2 R	2 R	2 R	2 R	2 R	60 U	2 UJ	0.8 UJ
phenanthrene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 R	30 UJ	2 R	0.2 R
phenol	0.2 U	1.42	1970 J	1100 J	1360 J	147 J	3.85 J	31.3 J	245 J	2930 J	1120 J	56.6 J
prometon	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
pyrene	0.2 U	0.2 U	2 UJ	2 R	2 R	2 R	2 R	2 R	2 UJ	30 UJ	2 R	0.2 R
tetrachloroethylene	0.4 U	0.4 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.4 UJ
tri(2-butoxyethyl) phosphate	0.178 J	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
tri(2-chloroethyl) phosphate	0.179 J	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
tri(dichloroisopropyl) phosphate	0.323	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
tributyl phosphate	0.202 J	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
triclosan	0.2 U	0.2 U	2 U	2 J	2 UJ	2 UJ	2 U	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
triethyl citrate (ethyl citrate)	0.2 U	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	0.2 UJ
triphenyl phosphate	0.285	0.2 U	2 U	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	2 UJ	30 U	2 UJ	1.47 J

See Table C10 notes on page 13 of 13.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	LG-11	LG-12	LG-13	LG-14	LG-15	SP-01	SP-02	SP-03	SP-04
Sample ID	10164261	10164262	10164263	10164264	10164265	10154271	10154272	10154273	10154274
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WTTP	WWTP	WWTP
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
1,4-dichlorobenzene	0.2 UJ	0.2 UJ	30 U	30 UJ	2 UJ	2.42 J	2.18 J	1.42 J	NA
1-methylnaphthalene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
2,2',4,4'-tetrabromodiphenyl ether	0.3 UJ	0.3 UJ	30 U	30 U	2 UJ	2 U	0.3 U	0.3 U	NA
2,6-dimethylnaphthalene	0.2 R	0.2 R	3.41 J	2.01 J	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
2-methylnaphthalene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
3,4-dichlorophenyl isocyanate	1.6 UJ	1.6 UJ	30 U	30 U	2 UJ	2 U	1.6 U	1.6 U	NA
3-beta-coprostanol	2.82 J	2.6 J	591 J	356 J	46.8 J	227 J	75.9 J	166 J	NA
3-methyl-1h-indole (skatol)	45.4 J	48.3 J	1360 J	1170 J	330 J	3.89 J	2.97 J	4.06 J	NA
3-tert-butyl-4-hydroxyanisole (bha)	0.2 UJ	0.2 UJ	2 UJ	2 UJ	2 UJ	3.75 J	0.2 UJ	0.2 U	NA
4-cumylphenol	0.2 UJ	0.2 R	30 U	30 U	2 UJ	2 U	0.2 R	0.2 R	NA
4-n-octylphenol	0.2 UJ	0.2 R	30 U	30 U	2 UJ	2 U	0.489 R	0.2 R	NA
4-nonylphenol monoethoxylate - total (np1eo)	3.14 J	3.06 J	745 J	559 J	166 J	2.66 J	2.86 R	1.6 R	NA
4-octylphenol diethoxylate (op2eo)	0.5 UJ	0.5 R	30 U	30 U	2 UJ	2 UJ	7.9 U	4.45	NA
4-octylphenol monoethoxylate (op1eo)	1 UJ	1 R	30 U	30 U	2 UJ	1.77 J	1 R	0.733 J	NA
4-tert-octylphenol	0.4 UJ	0.4 R	30 U	30 U	2 UJ	1.02 J	0.335 J	0.4 R	NA
5-methyl-1h-benzotriazole	1.6 UJ	1.6 UJ	1.6 UJ	2 UJ	2 UJ	2 UJ	1.6 UJ	1.6 UJ	NA
acetophenone	0.4 UJ	0.4 R	30 U	30 U	2 UJ	0.743 J	0.239 J	0.4 R	NA
acetyl-hexamethyl-tetrahydro-naphthalene (ahtn)	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	0.406 J	5.25 U	0.283 J	NA
anthracene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
anthraquinone	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	9.98 U	0.2 U	NA
atrazine	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
benz[a]pyrene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
benzophenone	0.2 R	0.2 R	30 UJ	30 UJ	2 R	1.03 J	0.408 J	0.486 J	NA
beta-sitosterol	2.41 J	2.22 J	613 J	312 J	77.6 J	19.3 J	19 J	24.3 U	NA
beta-stigmastanol	2.73 J	2.64 J	535 J	260 J	45.3 J	7.94 J	19.9 J	8.04 J	NA
bis-(2-ethylhexyl) phthalate (dehp)	2 U	2 UJ	30 U	30 U	2 UJ	4.35 J	3.95 J	2.42 J	NA
bisphenol a	0.4 UJ	0.4 R	30 U	30 U	2 UJ	2 J	0.4 R	0.4 R	NA
bromacil	0.8 UJ	0.8 UJ	30 U	30 U	2 UJ	2 U	2.34 U	0.8 U	NA
bromoform	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
caffeine	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	81.3	8.59	18.1	NA
camphor	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	1.79 J	0.398 J	1.07 J	NA
carbaryl	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
carbazole	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
chlorpyrifos	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
cholesterol	3.83 J	3.71 J	808 J	406 J	114 J	77.5 J	118 J	181.6 J	NA
cotinine	0.8 UJ	0.8 UJ	0.8 UJ	2 UJ	2 UJ	0.8 UJ	0.8 UJ	0.8 U	NA
diazinon	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID	LG-11	LG-12	LG-13	LG-14	LG-15	SP-01	SP-02	SP-03	SP-04
Sample ID	10164261	10164262	10164263	10164264	10164265	10154271	10154272	10154273	10154274
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WTTP	WWTP	WWTP
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
dichlorvos	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
diethoxynonylphenols- total (np2eo)	2.24 J	2.02 J	293 J	247 J	55.3 J	8.84 J	11.2 J	15.6 J	NA
diethyl phthalate	0.2 UJ	0.2 U	30 U	30 U	2 UJ	8.03 J	4.03 J	1.83 J	NA
d-limonene	0.2 UJ	0.2 UJ	30 U	0.892 J	2 UJ	4.92	2.3 J	7.74 J	NA
fluoranthene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.393 J	NA
hexahydrohexamethyl cyclopentabenzopyran (hhcb)	0.2 U	0.2 UJ	30 U	30 U	2 UJ	3.5	5.95 J	3.2 J	NA
indole	4.04 J	4.57 J	30 U	30 U	6.68 J	3.4 J	18.1 J	1.81 J	NA
isoborneol	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 J	0.395 J	1.02 J	NA
isophorone	0.2 U	0.2 U	2.36 J	2.12 J	1.26 J	2 U	0.2 U	0.2 U	NA
isopropylbenzene (cumene)	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
isoquinoline	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	3.9 U	0.2 U	NA
menthol	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	24.5 J	8.6 J	15.3 J	NA
metalaxyl	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
methyl salicylate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	1.06	0.306 J	1.28 J	NA
metolachlor	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.374 U	0.2 U	NA
n,n-diethyl-meta-toluamide (deet)	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	0.986 J	0.476 U	0.2 U	NA
naphthalene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
para-nonylphenol total	37.4 J	32.1 J	328 J	233 J	129 J	3.9 J	2.79 U	1.74 J	NA
p-cresol	889 J	1350 J	10800 J	8970 J	935 J	69.4 J	11.4 J	27.8 J	NA
pentachlorophenol	0.8 UJ	0.8 R	1.6 U	30 U	2 UJ	2 U	1.6 R	0.8 R	NA
phenanthrene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.2 UJ	NA
phenol	66.6 J	125 J	4600 J	2760 J	1780 J	16.4 J	6.84 R	12.8 J	NA
prometon	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA
pyrene	0.2 R	0.2 R	30 UJ	30 UJ	2 R	2 UJ	0.2 UJ	0.242 J	NA
tetrachloroethylene	0.4 UJ	0.4 UJ	30 U	30 U	2 UJ	2 U	0.4 U	0.4 U	NA
tri(2-butoxyethyl) phosphate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	1.86	0.2 U	2.06 J	NA
tri(2-chloroethyl) phosphate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	0.413 J	0.2 U	0.2 U	NA
tri(dichloroisopropyl) phosphate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	39.5 J	0.2 U	0.2 U	NA
tributyl phosphate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	0.2 U	0.2 U	0.2 U	NA
triclosan	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	6.19	1.62 J	3.53 J	NA
triethyl citrate (ethyl citrate)	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	1.56 J	0.351 J	0.724 J	NA
triphenyl phosphate	0.2 UJ	0.2 UJ	30 U	30 U	2 UJ	2 U	0.2 U	0.2 U	NA

See Table C10 notes on page 13 of 13.

Table C10: Phase 3 Analytical Results for Trace Organics in Wells, Lagoons, and Wastewater Treatment Plant Influents

Samples were analyzed by the United States Geological Survey National Water Quality Laboratory.

Abbreviations

WWTP - Wastewater Treatment Plant Influent

NA - Not Analyzed

Units

ug/L = micrograms per liter

Analytical Method

United States Geological Survey (USGS) Standard Operating Procedure (SOP) for the "*Analysis of Waste Water Samples by Gas Chromatography/Mass Spectroscopy"* – USGS SOPs 1433 and 4433.

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound and Description **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Amphetamine - psychostimulant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
DEET - insect repellent	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Ibuprofen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 U
Methamphetamine - psychostimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Naproxen - anti-inflamatory	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Paraxanthine - stimulant (metabolite of caffeine)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Triclosan - antibacterial	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-08	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14
Sample ID	10154208	10164209	10164210	10154211	10154212	10154213	10154214
Sample Type	Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound and Description / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Amphetamine - psychostimulant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
DEET - insect repellent	0.2 U	0.2 U	0.67	0.2 U	0.2 U	0.2 U	0.2 U
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Ibuprofen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Methamphetamine - psychostimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Naproxen - anti-inflamatory	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Paraxanthine - stimulant (metabolite of caffeine)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Triclosan - antibacterial	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-15	WW-16	WW-17	WW-18	WW-19	WW-20
Sample ID	10154215	10154216	10154217	10154218	10154219	10154220
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient - Septic	Downgradient - Septic
Sample Matrix	Water	Water	Water	Water	Water	Water
Compound and Description / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Amphetamine - psychostimulant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
DEET - insect repellent	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Ibuprofen - pain reliever	0.2 U	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Methamphetamine - psychostimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Naproxen - anti-inflamatory	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Paraxanthine - stimulant (metabolite of caffeine)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Triclosan - antibacterial	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R

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Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-21	WW-22	WW-23	WW-24	WW-25
Sample ID	10154221	10164222	10154223	10154224	10154225
Sample Type	Downgradient - Septic	Downgradient - Septic	Downgradient - Mint	Downgradient - Mint	Downgradient - Corn
Sample Matrix	Water	Water	Water	Water	Water
Compound and Description **Units**	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Amphetamine - psychostimulant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
DEET - insect repellent	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Ibuprofen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Methamphetamine - psychostimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Naproxen - anti-inflamatory	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Paraxanthine - stimulant (metabolite of caffeine)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Triclosan - antibacterial	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-26	WW-27	WW-28	WW-29	WW-30	LG-01
Sample ID	10154226	10154227	10154228	10154229	10164230	10154251
Sample Type	Downgradient - Hops	Downgradient - Hops	Downgradient - Corn	Field Blank	Residential Well	Dairy Lagoon
Sample Matrix	Water	Water	Water	Water	Water	Liquid
Compound and Description **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	NA	0.2 U
Amphetamine - psychostimulant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	NA	0.2 R
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	NA	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 U
DEET - insect repellent	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 U
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 U
Ibuprofen - pain reliever	0.2 UJ	0.2 UJ	0.2 UJ	0.2 U	NA	0.2 U
Methamphetamine - psychostimulant	0.2 U	0.2 U	0.2 U	0.2 U	NA	0.2 R
Naproxen - anti-inflamatory	0.2 R	0.2 R	0.2 R	0.2 R	NA	0.2 U
Paraxanthine - stimulant (metabolite of caffeine)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	NA	0.2 U
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	NA	4.7 J
Triclosan - antibacterial	0.2 R	0.2 R	0.2 R	0.2 R	NA	0.2 U

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-02	LG-03	LG-04	LG-05	LG-06	LG-07	LG-08	LG-09
Sample ID	10154252	10154253	10154254	10154255	10154256	10154257	10154258	10154259
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound and Description **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Amphetamine - psychostimulant	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 R	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
DEET - insect repellent	0.2 U	0.42 J	0.36 J	0.2 U	0.2 U	0.2 U	0.2 U	0.4 J
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	1.3	2.3	0.2 U
Ibuprofen - pain reliever	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Methamphetamine - psychostimulant	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R
Naproxen - anti-inflamatory	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Paraxanthine - stimulant (metabolite of caffeine)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Thiabendazole - parasiticide (mintezol)	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	1.9 J	0.2 UJ
Triclosan - antibacterial	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-10	LG-11	LG-12	LG-13	LG-14	LG-15	SP-01	SP-02
Sample ID	10164260	10164261	10164262	10164263	10164264	10164265	10154271	10154272
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WWTP
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound and Description **Units**	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Acetaminophen - pain reliever	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	32	17
Amphetamine - psychostimulant	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 U	0.2 U
Azithromycin - antibiotics	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Caffeine - stimulant	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	42 J
Carbamazepine - anticonvulsant	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 UJ	0.2 U	0.2 U
Cotinine - metabolite of nicotine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	1.5	0.59
DEET - insect repellent	0.48 J	0.61 J	0.58 J	0.67 J	0.78 J	0.45 J	1.6	1.6
Diphenhydramine - antihistimine	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.5	0.2 U
Ibuprofen - pain reliever	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	22 J	110 J
Methamphetamine - psychostimulant	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 R	0.2 U	0.2 U
Naproxen - anti-inflamatory	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	11	13
Paraxanthine - stimulant (metabolite of caffeine)	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U
Thiabendazole - parasiticide (mintezol)	0.2 UJ	1.3 J	0.2 UJ	0.2 UJ	1.8 J	0.2 UJ	0.57 J	0.2 UJ
Triclosan - antibacterial	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U	1 J	1.5 J

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SP-03	SP-04	SO-01	SO-02	SO-03	SO-04	SO-05
Sample ID	10154273	10154274	10154231	10154232	10154233	10154234	10154235
Sample Type	WWTP	WWTP	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure
Sample Matrix	Liquid	Liquid	Solid	Solid	Solid	Solid	Solid
Compound and Description **Units**	ug/L	ug/L	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Acetaminophen - pain reliever	83	NA	100 U	100 U	100 U	100 U	100 U
Amphetamine - psychostimulant	0.2 U	NA	50 U	50 U	50 U	50 U	50 U
Azithromycin - antibiotics	0.2 U	NA	NA	NA	NA	NA	NA
Caffeine - stimulant	46 J	NA	50 U	50 U	50 U	50 U	50 U
Carbamazepine - anticonvulsant	0.2 U	NA	50 U	50 U	50 U	50 U	50 U
Cotinine - metabolite of nicotine	2.2	NA	50 U	50 U	50 U	50 U	50 U
DEET - insect repellent	0.88	NA	50 U	50 U	50 U	50 U	50 U
Diphenhydramine - antihistimine	0.9	NA	50 U	50 U	50 U	50 U	50 U
Ibuprofen - pain reliever	91 J	NA	50 U	50 U	50 U	50 U	50 U
Methamphetamine - psychostimulant	0.2 U	NA	50 U	50 U	50 U	50 U	50 U
Naproxen - anti-inflamatory	59	NA	50 U	50 U	50 U	50 U	50 U
Paraxanthine - stimulant (metabolite of caffeine)	0.2 U	NA	50 U	50 U	50 U	50 U	50 U
Thiabendazole - parasiticide (mintezol)	0.2 UJ	NA	50 U	50 U	50 U	50 U	50 U
Triclosan - antibacterial	2.5 J	NA	50 U	50 U	50 U	50 U	50 U

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-06	SO-07	SO-08	SO-09	SO-10	SO-11	SO-12
Sample ID	10154236	10164237	10164238	10164239	10164240	10154241	10154242
Sample Type	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Soil – Mint Field	Soil – Mint Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Compound and Description **Units**	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Acetaminophen - pain reliever	100 U	100 U	100 U	100 U	100 U	100 U	100 U
Amphetamine - psychostimulant	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Azithromycin - antibiotics	NA	NA	NA	NA	NA	NA	NA
Caffeine - stimulant	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Carbamazepine - anticonvulsant	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Cotinine - metabolite of nicotine	50 U	50 U	50 U	50 U	50 U	50 U	50 U
DEET - insect repellent	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Diphenhydramine - antihistimine	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Ibuprofen - pain reliever	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Methamphetamine - psychostimulant	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Naproxen - anti-inflamatory	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Paraxanthine - stimulant (metabolite of caffeine)	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Thiabendazole - parasiticide (mintezol)	50 U	50 U	50 U	50 U	50 U	50 U	50 U
Triclosan - antibacterial	50 U	50 U	50 U	50 U	50 U	50 U	50 U

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-13	SO-14	SO-15	SO-16
Sample ID	10154243	10154244	10154245	10154246
Sample Type	Soil – Corn Field	Soil – Corn Field	Soil – Hops Field	Soil – Hops Field
Sample Matrix	Solid	Solid	Solid	Solid
Compound and Description **Units**	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Acetaminophen - pain reliever	100 U	100 U	100 U	100 U
Amphetamine - psychostimulant	50 U	50 U	50 U	50 U
Azithromycin - antibiotics	NA	NA	NA	NA
Caffeine - stimulant	50 U	50 U	50 U	50 U
Carbamazepine - anticonvulsant	50 U	50 U	50 U	50 U
Cotinine - metabolite of nicotine	50 U	50 U	50 U	50 U
DEET - insect repellent	50 U	50 U	50 U	50 U
Diphenhydramine - antihistimine	50 U	50 U	50 U	50 U
Ibuprofen - pain reliever	50 U	50 U	50 U	50 U
Methamphetamine - psychostimulant	50 U	50 U	50 U	50 U
Naproxen - anti-inflamatory	50 U	50 U	50 U	50 U
Paraxanthine - stimulant (metabolite of caffeine)	50 U	50 U	50 U	50 U
Thiabendazole - parasiticide (mintezol)	50 U	50 U	50 U	50 U
Triclosan - antibacterial	50 U	50 U	50 U	50 U

See Table C11 notes on page 11 of 11.

Table C11: Phase 3 Analytical Results for Wastewater Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Wastewater pharmaceutical analyses were conducted by the University of Nebraska Water Sciences Laboratory in Lincoln, Nebraska.

Abbreviations

LG - Dairy waste lagoon

NA - Not analyzed

SOP- Standard Operating Procedure

SP - wastewater treatment plant influent

WW - water well

WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

ug/Kg = micrograms per kilogram

Analytical Methods

Liquids: UNL LC/MS SOP- LCQ-Wastewater-001"*Determination of antibiotics in water and wastewater using off- line solid phase extraction liquid chromatography (LC) - atmospheric pressure electro spray ionization ion trap mass spectrometry (MS) "*.

Solids: UNL SOP-LCQ-Wastesolid-001 "*Determination of antibiotics in solid samples by microwave-assisted solvent extraction (MASE), solid –phase extraction (SPE) and isotope dilution liquid chromatography (LC)- atmospheric pressure electro spray ionization ion trap mass spectrometry (MS)"*.

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.02 U	0.02 U	0.02 U	0.049	0.02 U	0.02 U	0.02 U
Erythromycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Lincomycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.04 U
Monensin	0.027	0.02 U	0.028	0.023	0.022	0.02 U	0.109
Oxytetracycline	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ractopamine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfachloropyridazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfadimethoxine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamerazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethoxazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfathiazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Tetracyline	0.02 U	0.02 U	0.041 J	0.075 J	0.02 U	0.051 J	0.041 J
Tiamulin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Tylosin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Virginiamycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.023 J

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-08	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14
Sample ID	10154208	10164209	10164210	10154211	10154212	10154213	10154214
Sample Type	Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Erythromycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Lincomycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.085 U	0.073 U
Monensin	0.02 U	0.023	0.499	0.02 U	0.02 U	0.02 U	0.033
Oxytetracycline	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ractopamine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfachloropyridazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfadimethoxine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamerazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethoxazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfathiazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Tetracyline	5.17	0.02 U	0.02 U	0.038	0.02 U	0.02 U	0.02 U
Tiamulin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Tylosin	0.02 U	0.02 U	0.02 U	0.029	0.02 U	0.02 U	0.02 U
Virginiamycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.041	0.024

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-15	WW-16	WW-17	WW-18	WW-19	WW-20	WW-21
Sample ID	10154215	10154216	10154217	10154218	10154219	10154220	10154221
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.119	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Erythromycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.11
Lincomycin	0.02 U	0.02 U	0.02 U	0.03 U	0.02 U	0.02 U	0.371
Monensin	0.393 U	0.02 U	0.02 U	0.02 U	1.62	0.02 U	0.194
Oxytetracycline	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Ractopamine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.079
Sulfachloropyridazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfadimethoxine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamerazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.053
Sulfamethazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethoxazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.04
Sulfathiazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.051
Tetracyline	0.02 U	0.02 U	0.049	0.02 U	0.02 U	0.04 J	0.02 U
Tiamulin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.05
Tylosin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Virginiamycin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.162

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-22	WW-23	WW-24	WW-25	WW-26	WW-27
Sample ID	10164222	10154223	10154224	10154225	10154226	10154227
Sample Type	Downgradient - Septic	Downgradient - Mint	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops	Downgradient - Hops
Sample Matrix	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Erythromycin	0.02 U	0.02 U	0.02 U	0.02 U	0.185	0.02 U
Lincomycin	0.038 U	0.02 U	0.02 U	0.02 U	0.376	0.02 U
Monensin	0.02 U	0.02 U	0.02 U	0.023 U	0.319	0.02 U
Oxytetracycline	0.02 U	0.02 U	0.02 U	0.02 U	0.2	0.02 U
Ractopamine	0.02 U	0.02 U	0.02 U	0.02 U	0.061	0.02 U
Sulfachloropyridazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfadimethoxine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamerazine	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethazine	0.02 U	0.02 U	0.02 U	0.02 U	0.055	0.02 U
Sulfamethazole	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Sulfamethoxazole	0.02 U	0.02 U	0.02 U	0.02 U	0.041 U	0.02 U
Sulfathiazole	0.02 U	0.02 U	0.02 U	0.02 U	0.037	0.02 U
Tetracyline	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Tiamulin	0.02 U	0.02 U	0.02 U	0.02 U	0.029	0.02 U
Tylosin	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U	0.02 U
Virginiamycin	0.02 U	0.02 U	0.02 U	0.02 U	0.084	0.02 U

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-28	WW-29	WW-30	LG-01	LG-02	LG-03	LG-04	LG-05
Sample ID	10154228	10154229	10164230	10154251	10154252	10154253	10154254	10154255
Sample Type	Downgradient - Corn	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Water	Water		Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.02 U	0.02 U	NA	0.02 R	0.067 J	0.02 R	0.02 UJ	0.075 J
Erythromycin	0.02 U	0.02 U	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	0.916 J
Lincomycin	0.02 U	0.059	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	3.55 J
Monensin	0.02 U	0.02 U	NA	44.97 J	1086 J	420 J	0.02 UJ	430.2 J
Oxytetracycline	0.02 U	0.02 U	NA	0.02 R	0.02 R	0.02 R	0.02 UJ	1.24 J
Ractopamine	0.02 U	0.02 U	NA	0.081 J	0.085 J	0.078 J	0.02 UJ	0.04 J
Sulfachloropyridazine	0.02 U	0.02 U	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	1.21 J
Sulfadimethoxine	0.02 U	0.02 U	NA	0.38 J	4.68 J	2.18 J	0.02 UJ	0.322 J
Sulfamerazine	0.02 U	0.02 U	NA	0.02 UJ	0.117 J	0.02 UJ	0.02 UJ	0.068 J
Sulfamethazine	0.02 U	0.02 U	NA	0.071 J	0.109 J	0.02 UJ	0.02 UJ	1.5 J
Sulfamethazole	0.02 U	0.02 U	NA	0.06 J	0.02 UJ	0.02 UJ	0.02 UJ	0.02 R
Sulfamethoxazole	0.02 U	0.02 U	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	0.02 R
Sulfathiazole	0.02 U	0.02 U	NA	0.305 J	0.312 J	0.216 J	0.02 UJ	0.137 J
Tetracyline	0.02 U	0.02 U	NA	1.96 J	5.83 J	2.88 J	0.02 UJ	4.48 J
Tiamulin	0.02 U	0.02 U	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	0.02 R
Tylosin	0.02 U	0.02 U	NA	0.381 J	1.85 J	1.12 J	0.02 UJ	1.7 J
Virginiamycin	0.02 U	0.02 U	NA	0.02 UJ	0.02 UJ	0.02 UJ	0.02 UJ	0.334 J

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-06	LG-07	LG-08	LG-09	LG-10	LG-11	LG-12	LG-13	LG-14
Sample ID	10154256	10154257	10154258	10154259	10164260	10164261	10164262	10164263	10164264
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
Chlortetracycline(total)	0.02 UJ	0.02 R	0.02 R	0.02 R	0.079 J	0.02 R	0.02 R	0.02 R	0.02 R
Erythromycin	0.02 UJ	0.02 R	0.02 R	1.87 J	0.02 R	2 J	1.11 J	1.3 J	0.02 R
Lincomycin	8.5 J	0.02 R	0.02 R	0.02 R	1.7 J	2.64 J	1.54 J	3.37 J	2.04 J
Monensin	463.8 J	0.02 R	449.6 J	337.7 J	2.24 J	85 J	135 J	662 J	498 J
Oxytetracycline	4.49 J	0.02 R	0.929 J	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R
Ractopamine	0.02 R	0.02 R	0.02 R	0.02 R	0.048 J	0.066 J	0.046 J	0.081 J	0.056 J
Sulfachloropyridazine	0.157 J	0.095 J	0.254 J	0.02 R	0.043 J	0.156 J	0.172 J	0.32 J	0.16 J
Sulfadimethoxine	0.02 R	0.02 R	0.02 R	0.02 R	0.065 J	0.841 J	0.875 J	4.13 J	3.65 J
Sulfamerazine	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R
Sulfamethazine	0.17 J	0.02 R	0.39 J	2.07 J	0.077 J	0.064 J	0.07 J	0.108 J	0.139 J
Sulfamethazole	0.02 R	0.02 R	0.02 R	0.02 R	0.114 J	0.02 R	0.02 R	0.148 J	0.02 R
Sulfamethoxazole	0.02 R	0.02 R	0.02 R	0.02 R	0.133 J	0.269 J	0.264 J	0.02 R	0.031 J
Sulfathiazole	0.829 J	0.02 R	0.872 J	0.02 R	0.038 J	0.089 J	0.065 J	0.24 J	0.061 J
Tetracyline	5.41 J	0.442 J	6.07 J	3.6 J	6.55 J	1.76 J	1.91 J	10.3 J	8.6 J
Tiamulin	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.02 R	0.079 J	0.02 R
Tylosin	10.22 J	0.184 J	0.02 R	1.07 J	0.02 R	0.02 R	0.02 R	0.139 J	0.02 R
Virginiamycin	0.02 R	0.02 R	0.02 R	0.02 R	0.816 J	0.413 J	0.314 J	0.184 J	0.02 R

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-15	SP-01	SP-02	SP-03	SP-04	SO-01	SO-02	SO-03
Sample ID	10164265	10154271	10154272	1E+07	10154274	10154231	10154232	10154233
Sample Type	Dairy Lagoon	WWTP	WTTP	WWTP	WWTP	Manure	Soil – Dairy Application Field	Manure
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Solid	Solid	Solid
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/Kg	ug/Kg	ug/Kg
Chlortetracycline(total)	0.02 R	0.02 R	0.02 UJ	0.02 U	NA	0.5 U	45.6	0.7
Erythromycin	4.35 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	2.1
Lincomycin	1.71 J	0.02 UJ	0.02 R	0.02 U	NA	17.1	0.5 U	1.5
Monensin	426 J	0.02 UJ	0.02 R	0.02 U	NA	441	2.9	109
Oxytetracycline	0.02 R	0.02 R	0.02 UJ	0.02 U	NA	4.5	2.4	251
Ractopamine	0.06 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Sulfachloropyridazine	0.658 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Sulfadimethoxine	2.98 J	0.021 J	0.02 R	0.02 U	NA	0.5 U	1	0.5 U
Sulfamerazine	0.028 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Sulfamethazine	0.601 J	0.02 UJ	0.02 R	0.086	NA	0.5 U	0.5 U	0.5 U
Sulfamethazole	1.27 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Sulfamethoxazole	0.037 J	0.02 UJ	0.106 J	0.662	NA	0.5 U	0.5 U	0.5 U
Sulfathiazole	0.135 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Tetracyline	7.55 J	0.55 J	0.02 UJ	0.02 U	NA	178	26.9	954
Tiamulin	0.132 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U
Tylosin	0.02 R	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	14.8
Virginiamycin	1 J	0.02 UJ	0.02 R	0.02 U	NA	0.5 U	0.5 U	0.5 U

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-04	SO-05	SO-06	SO-07	SO-08	SO-09	SO-10
Sample ID	10154234	10154235	10154236	10164237	10164238	10164239	10164240
Sample Type	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Compound **Units**	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Chlortetracycline(total)	0.6	17.7	3	2303	13.5	0.5 U	0.5 U
Erythromycin	0.5 U	3.1	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Lincomycin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	6.9	0.5 U
Monensin	5.1	1329	5.1	283	7.9	437	7
Oxytetracycline	3.2	0.5 U	3.3	134	2.4	2.1	2.4
Ractopamine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfachloropyridazine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfadimethoxine	0.5 U	0.5 U	0.5 U	6.8	0.5 U	0.5 U	0.6
Sulfamerazine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.7
Sulfamethazine	0.9	7.7	0.5 U	2	0.5 U	0.5 U	0.5 U
Sulfamethazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfamethoxazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfathiazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Tetracyline	27.4	17.9	16.5	2484	104	309	53
Tiamulin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Tylosin	2.1	0.5 U	0.5 U	21.1	0.5 U	0.5 U	0.5 U
Virginiamycin	0.5 U	0.5 U	0.5 U	0.5	0.5 U	0.5 U	0.5 U

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-11	SO-12	SO-13	SO-14	SO-15	SO-16
Sample ID	10154241	10154242	10154243	10154244	10154245	10154246
Sample Type	Soil – Mint Field	Soil – Mint Field	Soil – Corn Field	Soil – Corn Field	Soil – Hops Field	Soil – Hops Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid
Compound / Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
Chlortetracycline(total)	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Erythromycin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Lincomycin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Monensin	0.5 U	4.3	0.5 U	0.5 U	4.5	0.7
Oxytetracycline	1.3	1.4	0.5 U	1.3	10.5	5.3
Ractopamine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfachloropyridazine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfadimethoxine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfamerazine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfamethazine	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfamethazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfamethoxazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Sulfathiazole	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Tetracyline	0.5 U	0.5 U	0.5 U	0.5 U	20.7	10.5
Tiamulin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U
Tylosin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5
Virginiamycin	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U	0.5 U

See Table C12 notes on page 10 of 10.

Table C12: Phase 3 Analytical Results for Veterinary Pharmaceuticals in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Veterinary pharmaceutical analyses were conducted by the University of Nebraska Water Sciences Laboratory in Lincoln, Nebraska (UNL).

Abbreviations

LG - dairy waste lagoon

NA - not analyzed

SO - solid

SOP- Standard Operating Procedure

SP - wastewater treatment plant influent

WW - water well

WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

ug/Kg = micrograms per kilogram

Analytical Method

Liquids: UNL SOP "*Analysis of veterinary pharmaceuticals in water samples using a Spark Holland symbiosis on-line C18 cartridge solid phase extraction (SPE) and high pressure liquid chromatography/tandem mass spectrometry (HPLC/MS/MS)"; Document File number: LCMS_VET_PHARM_WATER_001".*

Solids: UNL SOP "*Analysis of Steroids in solid samples (i.e. soils, manure, etc) by microwave-assisted solvent extraction (MASE) and liquid chromatography-tandem mass spectrometry (LC/MS/MS)" (SOP-VetPharmSED-001)"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U
17-α-ethynyl-estradiol	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U
17-β-estradiol	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U
Estriol	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U
Estrone	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-07	WW-08	WW-09	WW-10	WW-11	WW-12
Sample ID	10154207	10154208	10164209	10164210	10154211	10154212
Sample Type	Dairy Supply Well	Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U
17-α-ethynyl-estradiol	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U
17-β-estradiol	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U
Estriol	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U
Estrone	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-13	WW-14	WW-15	WW-16	WW-17	WW-18
Sample ID	10154213	10154214	10154215	10154216	10154217	10154218
Sample Type	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Residential Well
Sample Matrix	Water	Water	Water	Water	Water	Water
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U
17-α-ethynyl-estradiol	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U
17-β-estradiol	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U
Estriol	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U
Estrone	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-19	WW-20	WW-21	WW-22	WW-23
Sample ID	10154219	10154220	10154221	10164222	10154223
Sample Type	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Mint
Sample Matrix	Water	Water	Water	Water	Water
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U
17-α-ethynyl-estradiol	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U
17-β-estradiol	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U
Estriol	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U
Estrone	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-24	WW-25	WW-26	WW-27	WW-28
Sample ID	10154224	10154225	10154226	10154227	10154228
Sample Type	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops	Downgradient - Hops	Downgradient - Corn
Sample Matrix	Water	Water	Water	Water	Water
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U
17-α-ethynyl-estradiol	0.16 U	0.16 U	0.16 U	0.16 U	0.16 U
17-β-estradiol	0.14 U	0.14 U	0.14 U	0.14 U	0.14 U
Estriol	0.22 U	0.22 U	0.22 U	0.22 U	0.22 U
Estrone	0.21 U	0.21 U	0.21 U	0.21 U	0.21 U

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	WW-29	WW-30	LG-01	LG-02	LG-03	LG-04	LG-05
Sample ID	10154229	10164230	10154251	10154252	10154253	10154254	10154255
Sample Type	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Water	Water	Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	0.21 U	0.21 U	10320	1610	1590	3430	1100
17-α-ethynyl-estradiol	0.16 U	0.16 U	38.3 U	20 U	20 U	20 U	20 U
17-β-estradiol	0.14 U	0.14 U	86.8	18 J	21.3	555	44
Estriol	0.22 U	0.22 U	8.8 U	8.8 U	8.8 U	8.8 U	8.8 U
Estrone	0.21 U	0.21 U	2660	1920	1950	1100	3180

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	LG-06	LG-07	LG-08	LG-09	LG-10	LG-11	LG-12
Sample ID	10154256	10154257	10154258	10154259	10164260	10164261	10164262
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	1190	1730	1200	1270	292	570	559
17-α-ethynyl-estradiol	20 U	20 U	20 U	20 U	20 U	20 U	20 U
17-β-estradiol	38.5	38.2	25.4	22.3	16 J	12 J	11 J
Estriol	8.8 U	8.8 U	8.8 U	8.8 U	8.8 U	8.8 U	8.8 U
Estrone	3300	592	1020	1050	73	453	451

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C13: Phase 3 Analytical Results for Hormones in Well, Lagoons, Manure Piles, Application Field, Wastewater Treatment Influents, and Crop Soils

Location ID	LG-13	LG-14	LG-15	SP-01	SP-02	SP-03	SP-04
Sample ID	10164263	10164264	10164265	10154271	10154272	10154273	10154274
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WTTP	WWTP	WWTP
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound / Units	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L	ng/L
17-α-estradiol	1220	1050	792	7.6 U	7.6 U	7.6 U	NA
17-α-ethynyl-estradiol	20 U	20 U	20 U	6.4 U	6.4 U	6.4 U	NA
17-β-estradiol	179	41	25.3	21.1	35.4	34.1	NA
Estriol	8.8 U	8.8 U	8.8 U	1030	863	640	NA
Estrone	390	419	830	77.1	96.4	72.7	NA

Samples were analyzed by the EPA Robert S. Kerr Environmental Research Center.

Abbreviations

LG - Dairy waste Dairy Lagoon
SOP- Standard Operating Procedure
SP - wastewater treatment plant influent
WW - water well
WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

Analytical Method

EPA SOP "*Quantitation of Estrogens in Groundwater and Animal Waste Lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.
U = The analyte was not detected at or above the reported value.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07	WW-08
Sample ID	10154201	10154202	10154203	10154204	10154205	10154206	10154207	10154208
Sample Type	Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well	Dairy Supply Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-α-Hydroxyprogesterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.005 U
17-α-trenbolone	0.003 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.004 U
17-β-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003
4-Androstenedione	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003 U	0.002 U	0.004 U
17-α-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003	0.002 U	0.003
Androstadienedione	0.002 UJ	0.002 UJ	0.002 UJ	0.003 U	0.002 UJ	0.002 UJ	0.002 UJ	0.002 J
Androsterone	0.006 U	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ
α-Zearalanol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.005 J	0.009 J
α-Zearalenol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 J
β-Zearalanol	0.002 U	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ
β-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Epitestosterone	0.002 U	0.002 U	0.002 U	0.003	0.002 U	0.002 U	0.002	0.003
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estrone	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Melengesterol Acetate	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.004 U
Progesterone	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.004 U	0.004 U	0.007 U
Testosterone	0.021	0.016	0.009	0.012	0.007	0.005	0.002 U	0.003

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14	WW-15	WW-16
Sample ID	10164209	10164210	10154211	10154212	10154213	10154214	10154215	10154216
Sample Type	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix	Water	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.003	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-α-Hydroxyprogesterone	0.003 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-α-trenbolone	0.003 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-estradiol	0.006	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-trenbolone	0.004	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Androstenedione	0.003 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-α-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Androstadienedione	0.002 UJ	0.002 UJ	0.002 UJ	0.004 J	0.002 U	0.002 U	0.002 UJ	0.002 UJ
Androsterone	0.005 J	0.002 UJ	0.002 UJ	0.018 J	0.002 U	0.002 U	0.019 J	0.004 UJ
α-Zearalanol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ	0.002 UJ
α-Zearalenol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ	0.002 UJ
β-Zearalanol	0.002 J	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ	0.002 UJ
β-Zearalenol	0.003	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Epitestosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estrone	0.002 J	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ	0.002 UJ
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Melengesterol Acetate	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Progesterone	0.005 U	0.002 UJ	0.002 U	0.002 UJ	0.002 U	0.002 U	0.002 UJ	0.002 UJ
Testosterone	0.008	0.002 U	0.004	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-17	WW-18	WW-19	WW-20	WW-21	WW-22	WW-23
Sample ID	10154217	10154218	10154219	10154220	10154221	10164222	10154223
Sample Type	Downgradient Well	Residential Well	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Septic	Downgradient - Mint
Sample Matrix	Water	Water	Water	Water	Water	Water	Water
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.005	0.002 U
17-α-Hydroxyprogesterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.006 U	0.002 U
17-α-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.007 U	0.002 U
17-β-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.006	0.002 U
17-β-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Androstenedione	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.006 U	0.002 U
17-α-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.005	0.002 U
Androstadienedione	0.002 UJ	0.002 U	0.002 UJ	0.002 UJ	0.002 U	0.003	0.002 UJ
Androsterone	0.008 J	0.002 U	0.002 UJ	0.004 J	0.002 U	0.002 U	0.002 UJ
α-Zearalanol	0.002 UJ	0.002 U	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ
α-Zearalenol	0.002 UJ	0.002 U	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 UJ
β-Zearalanol	0.002 UJ	0.002 U	0.002 UJ	0.002 UJ	0.002 U	0.003	0.002 UJ
β-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Epitestosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.004	0.002 U
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estrone	0.002 UJ	0.002 U	0.002 UJ	0.002 UJ	0.002 U	0.004	0.002 UJ
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Melengesterol Acetate	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.005 U	0.002 U
Progesterone	0.002 UJ	0.003 U	0.002 UJ	0.002 UJ	0.002 U	0.008 U	0.002 UJ
Testosterone	0.002 U	0.003	0.002 U	0.002 U	0.002 U	0.01	0.002 U

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	WW-24	WW-25	WW-26	WW-27	WW-28	WW-29	WW-30
Sample ID	10154224	10154225	10154226	10154227	10154228	10154229	10164230
Sample Type	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops	Downgradient - Hops	Downgradient - Corn	Field Blank	Residential Well
Sample Matrix	Water	Water	Water	Water	Water	Water	
Compound / Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	NA
17-α-Hydroxyprogesterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003	NA
17-α-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002	NA
17-β-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	NA
17-β-trenbolone	0.002 U	0.002 U	0.002 U	0.005	0.002 U	0.002 U	NA
4-Androstenedione	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003	NA
17-α-estradiol	0.002 U	0.002 U	0.002 U	0.002	0.002 U	0.002 U	NA
Androstadienedione	0.002 UJ	0.002 UJ	0.002 U	0.003 J	0.002 U	0.002 U	NA
Androsterone	0.002 UJ	0.002 UJ	0.002 U	0.022 J	0.002 U	0.002 U	NA
α-Zearalanol	0.002 UJ	0.002 UJ	0.002 U	0.002 UJ	0.002 U	0.002 U	NA
α-Zearalenol	0.002 UJ	0.002 UJ	0.002 U	0.002 UJ	0.002 U	0.002 U	NA
β-Zearalanol	0.002 UJ	0.002 UJ	0.002 U	0.002 UJ	0.002 U	0.004 J	NA
β-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	NA
Epitestosterone	0.002 U	0.002 U	0.002 U	0.005	0.002 U	0.002 U	NA
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	NA
Estrone	0.002 UJ	0.002 UJ	0.002 U	0.002 UJ	0.002 U	0.002 U	NA
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	NA
Melengesterol Acetate	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.003	NA
Progesterone	0.002 UJ	0.002 UJ	0.003 U	0.002 UJ	0.002 U	0.005	NA
Testosterone	0.002 U	0.002 U	0.002 U	0.004	0.002 U	0.002 U	NA

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-01	LG-02	LG-03	LG-04	LG-05	LG-06	LG-07	LG-08	LG-09
Sample ID	10154251	10154252	10154253	10154254	10154255	10154256	10154257	10154258	10154259
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.857	0.765	0.549	0.444
17-α-Hydroxyprogesterone	0.002 U	0.002 U	0.002 U	0.002 U	0.131	0.038	0.002 U	0.002 U	0.002 U
17-α-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
4-Androstenedione	0.196	0.35	0.171	0.002 U	0.5	0.101	0.107	0.16	0.204
17-α-estradiol	7.401	0.374	1.043	0.002 U	0.002 U	0.002 U	0.002 U	0.383	0.844
Androstadienedione	0.002 UJ	0.074 J	0.002 UJ	0.002 U	3.504	0.002 U	0.002 U	0.002 U	0.002 U
Androsterone	1.48 J	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
α-Zearalanol	1.643 J	1.181 J	2.889 J	13.9	11.9	12.6	11.3	4.819	6.969
α-Zearalenol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
β-Zearalanol	0.002 UJ	0.002 UJ	0.002 UJ	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
β-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Epitestosterone	0.002 U	0.002 U	0.002 U	0.181	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Estrone	0.994 J	0.002 UJ	0.002 UJ	0.002 U	1.945	1.666	0.002 U	0.002 U	0.002 U
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Melengesterol Acetate	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Progesterone	0.806 J	0.532 J	0.333 J	0.002 U	0.912	0.185	0.757	0.184	0.328
Testosterone	0.032	0.002 U	0.002 U	0.002 U	0.193	0.195	0.016	0.09	0.007

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	LG-10	LG-11	LG-12	LG-13	LG-14	LG-15	SP-01	SP-02
Sample ID	10164260	10164261	10164262	10164263	10164264	10164265	10154271	10154272
Sample Type	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WTTP
Sample Matrix	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound Units	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L
11-Keto Testosterone	0.002 U	0.002 U	0.002 U	0.758	0.002 U	0.002 U	0.1	0.043
17-α-Hydroxyprogesterone	0.002 U	0.085	0.107	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-α-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	1.562	1.014
17-β-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
17-β-trenbolone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	1.059
4-Androstenedione	0.033	0.411	0.23	0.314	0.31	0.002 U	0.28	0.269
17-α-estradiol	0.459	2.92	3.268	0.002 U	0.002 U	0.002 U	0.263	0.002 U
Androstadienedione	0.002 U	0.166	0.2	0.002 U	0.002 U	0.002 U	0.255 J	0.614 J
Androsterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	5.049 J	2.137 J
α-Zearalanol	1.434	1.664	2.576	9.851	8.83	4.977	0.176 J	0.22 J
α-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 UJ	0.002 UJ
β-Zearalanol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 UJ	0.002 UJ
β-Zearalenol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Epitestosterone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.06
Estriol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.632	0.002 U
Estrone	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 UJ	0.002 UJ
17-α-ethynyl-estradiol	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U	0.002 U
Melengesterol Acetate	0.002 U	0.043	0.002 U	0.002 U	0.039	0.002 U	0.002 U	0.002 U
Progesterone	0.002 U	0.251	0.248	0.926	0.682	0.002 U	0.002 UJ	0.002 UJ
Testosterone	0.028	0.002 U	0.024	0.262	0.17	0.002 U	0.053	0.059

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SP-03	SP-04	SO-01	SO-02	SO-03	SO-04	SO-05	SO-06
Sample ID	10154273	10154274	10154231	10154232	10154233	10154234	10154235	10154236
Sample Type	WWTP	WWTP	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field
Sample Matrix	Liquid	Liquid	Solid	Solid	Solid	Solid	Solid	Solid
Compound Units	ug/L	ug/L	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
11-Keto Testosterone	0.002 U	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-α-Hydroxyprogesterone	0.002 U	NA	0.1 U	0.1 U	1.94	0.1 U	0.1 U	0.1 U
17-α-trenbolone	1.521	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-β-estradiol	0.002 U	NA	0.1 U	0.1 U	12.4	0.1 U	1.48	0.1 U
17-β-trenbolone	0.439	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
4-Androstenedione	1.352	NA	2.08	0.16	33.2	0.1 U	5.63	0.12
17-α-estradiol	0.002 U	NA	2.39	0.24	34.7	0.1 U	0.1 U	0.11
Androstadienedione	14.1 J	NA	0.1 U	0.1 U	29.4	0.1 U	15.4	0.1 U
Androsterone	3.187 J	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
α-Zearalanol	0.011 J	NA	17.4	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
α-Zearalenol	0.002 UJ	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
β-Zearalanol	0.002 UJ	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
β-Zearalenol	8.015	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Epitestosterone	0.002 U	NA	0.1 U	0.1 U	8.47	0.1 U	0.1 U	0.1 U
Estriol	0.55	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Estrone	0.002 UJ	NA	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-α-ethynyl-estradiol	0.002 U	NA	6.3	0.1 U	4.22	0.1 U	10.5	0.1 U
Melengesterol Acetate	0.002 U	NA	0.44	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Progesterone	0.002 UJ	NA	2.83	0.1 U	70.4	0.25	33.1	0.17
Testosterone	0.045	NA	0.1 U	0.1 U	2.95	0.1 U	0.1 U	0.1 U

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-07	SO-08	SO-09	SO-10	SO-11	SO-12	SO-13	SO-14
Sample ID	10164237	10164238	10164239	10164240	10154241	10154242	10154243	10154244
Sample Type	Manure	Soil – Dairy Application Field	Manure	Soil – Dairy Application Field	Soil – Mint Field	Soil – Mint Field	Soil – Corn Field	Soil – Corn Field
Sample Matrix	Solid	Solid	Solid	Solid	Solid	Solid	Solid	Solid
Compound / Units	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg	ug/Kg
11-Keto Testosterone	8.8	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-α-Hydroxyprogesterone	3.64	0.1 U	3.42	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-α-trenbolone	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-β-estradiol	8.35	0.1 U	4.37	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-β-trenbolone	0.1 U	0.29	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
4-Androstenedione	10.2	0.1 U	12.4	0.12	0.1 U	0.12	0.1 U	0.1 U
17-α-estradiol	18.7	0.1 U	16.9	0.1 U	0.1 U	0.11	0.1 U	0.1 U
Androstadienedione	13.5	0.1 U	19.3	0.1 U	0.18	0.1 U	0.1 U	0.1 U
Androsterone	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
α-Zearalanol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
α-Zearalenol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
β-Zearalanol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
β-Zearalenol	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Epitestosterone	2.78	0.1 U	4.43	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Estriol	0.1 U	0.48	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Estrone	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
17-α-ethynyl-estradiol	8.52	0.1 U	4.06	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
Melengesterol Acetate	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.13	0.1 U
Progesterone	39	0.1 U	48	0.23	0.14	0.17	0.1 U	0.1 U
Testosterone	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Location ID	SO-15	SO-16
Sample ID	10154245	10154246
Sample Type	Soil – Hops Field	Soil – Hops Field
Sample Matrix	Solid	Solid
Compound / Units	ug/Kg	ug/Kg
11-Keto Testosterone	0.1 U	0.1 U
17-α-Hydroxyprogesterone	0.1 U	0.1 U
17-α-trenbolone	0.1 U	0.1 U
17-β-estradiol	0.1 U	0.1 U
17-β-trenbolone	0.1 U	0.1 U
4-Androstenedione	0.16	0.13
17-α-estradiol	0.1 U	0.1 U
Androstadienedione	0.15	0.1 U
Androsterone	0.1 U	0.1 U
α-Zearalanol	0.1 U	0.1 U
α-Zearalenol	0.1 U	0.1 U
β-Zearalanol	0.1 U	0.1 U
β-Zearalenol	0.1 U	0.1 U
Epitestosterone	0.1 U	0.1 U
Estriol	0.1 U	0.1 U
Estrone	0.1 U	0.1 U
17-α-ethynyl-estradiol	0.1 U	0.1 U
Melengesterol Acetate	0.1 U	0.1 U
Progesterone	0.13	0.1
Testosterone	0.1 U	0.1 U

See Table C14 notes on page 10 of 10.

Table C14: Phase 3 Analytical Results for Hormones in Wells, Lagoons, Manure Piles, Application Fields, Wastewater Treatment Plant Influents, and Crop Soils

Samples were analyzed by the U. of Nebraska Water Sciences Laboratory

Abbreviations

LG - dairy waste lagoon

NA - not analyzed

SO - solid

SOP - Standard Operating Procedure

SP - wastewater treatment plant influent

WW - water well

WWTP - wastewater treatment plant

Units

ug/L = micrograms per liter

ug/Kg = micrograms per kilogram

Analytical Methods

Liquids: UNL SOP LCMS-APPI-STEROIDS- WATER-001*"Analysis of steroids in water samples using a Spark Holland symbiosis on-line C18 cartridge solid phase extraction (SPE) and high pressure liquid chromatography/tandem mass spectrometry (HPLC/MS/MS)"* .
Solids: UNL SOP Analyte-Steroids-Solids-001*"Analysis of Steroids in solid samples (i.e. soils, manure, etc) by microwave-assisted solvent extraction (MASE) and liquid chromatography-tandem mass spectrometry (LC/MS/MS)"* .

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

R = The data are unusable for all purposes.

U = The analyte was not detected at or above the reported value.

UJ = The analyte was not detected at or above the reported estimated result. The associated numerical value is an estimate of the quantitation limit of the analyte in this sample.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		WW-01	WW-02	WW-03	WW-04	WW-05	WW-06	WW-07
Sample ID		10154201	10154202	10154203	10154204	10154205	10154206	10154207
Sample Type		Upgradient Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Upgradient Well	Dairy Supply Well
Sample Matrix		Water	Water	Water	Water	Water	Water	Water
Compound	**Units**							
Nitrate	mg/L	0.2	3	34	49.9	12.8	0.6	1.1
δ15N-NO3	‰	NM	2.73	2.3	3.53	9.66	NM	-0.09
Ammonia	mg/L	<0.1	<0.1	0.3	0.8	0.3	0.1	<0.1
δ15N-NH4	‰	NM	NM	NM	NM	NM	NM	NM
δ18O-NO3	‰ SMOW	NM	15.1	29	-4.5	7.1	NM	NM

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		WW-08	WW-09	WW-10	WW-11	WW-12	WW-13	WW-14
Sample ID		10154208	10164209	10164210	10154211	10154212	10154213	10154214
Sample Type		Dairy Supply Well	Dairy Supply Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well	Downgradient Well
Sample Matrix		Water	Water	Water	Water	Water	Water	Water
Compound	**Units**							
Nitrate	mg/L	11.7	NM	NM	21.6	43.6	42	40.7
δ15N-NO3	‰	5.3	NM	NM	3.03	6.21	11.17	10.39
Ammonia	mg/L	0.2	0.1	<0.1	<0.1	<0.1	0.1	0.1
δ15N-NH4	‰	NM	NM	NM	NM	NM	NM	NM
δ18O-NO3	‰ SMOW	22.6	NM	NM	18.22	-1.4	15.9	8.5

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		WW-15	WW-16	WW-17	WW-18	WW-19	WW-20
Sample ID		10154215	10154216	10154217	10154218	10154219	10154220
Sample Type		Downgradient Well	Downgradient Well	Downgradient Well	Residential Well	Downgradient - Septic	Downgradient - Septic
Sample Matrix		Water	Water	Water	Water	Water	Water
Compound	**Units**						
Nitrate	mg/L	27.4	23	23.3	72.3	36.4	15
δ15N-NO3	‰	5.23	5.87	6.85	6.88	8.74	6.28
Ammonia	mg/L	1.1	<0.1	0.1	0.2	0.5	0.1
δ15N-NH4	‰	NM	NM	NM	NM	NM	NM
δ18O-NO3	‰ SMOW	30.27	5.83	2.45	8.8	15.43	52.86

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		WW-21	WW-22	WW-23	WW-24	WW-25	WW-26
Sample ID		10154221	10164222	10154223	10154224	10154225	10154226
Sample Type		Downgradient - Septic	Downgradient - Septic	Downgradient - Mint	Downgradient - Mint	Downgradient - Corn	Downgradient - Hops
Sample Matrix		Water	Water	Water	Water	Water	Water
Compound	**Units**						
Nitrate	mg/L	36.5	16.6	17.3	14	32.9	15.1
δ15N-NO3	‰	7.65	10.22	2.17	-0.3	2.43	7.54
Ammonia	mg/L	<0.1	0.1	0.5	<0.1	1.1	<0.1
δ15N-NH4	‰	NM	NM	NM	NM	NM	NM
δ18O-NO3	‰ SMOW	12.2	11	18.04	12.11	15.04	6.3

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		WW-27	WW-28	WW-29	WW-30	LG-01	LG-02	LG-03
Sample ID		10154227	10154228	10154229	10164230	10154251	10154252	10154253
Sample Type		Downgradient - Hops	Downgradient - Corn	Field Blank	Residential Well	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix		Water	Water	Water	Water	Liquid	Liquid	Liquid
Compound	**Units**							
Nitrate	mg/L	19.9	69.6	NM	NA	<0.1	<0.1	<0.1
δ15N-NO3	‰	8.83	5.36	NM	NA	NM	NM	NM
Ammonia	mg/L	0.2	0.4	NM	NA	907	923	896
δ15N-NH4	‰	NM	NM	NM	NA	3.37	10.07	9.88
δ18O-NO3	‰ SMOW	16.82	44.41	NM	NA	NM	NM	NM

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		LG-04	LG-05	LG-06	LG-07	LG-08	LG-09	LG-10
Sample ID		10154254	10154255	10154256	10154257	10154258	10154259	10164260
Sample Type		Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon
Sample Matrix		Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound	**Units**							
Nitrate	mg/L	NM	NM	NM	NM	NM	NM	NM
δ15N-NO3	‰	NM	NM	NM	NM	NM	NM	NM
Ammonia	mg/L	899	1151	1293	869	696	658	NM
δ15N-NH4	‰	6.69	10.63	10.25	5.36	10.27	10.13	NM
δ18O-NO3	‰ SMOW	NM	NM	NM	NM	NM	NM	NM

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Location ID		LG-11	LG-12	LG-13	LG-14	LG-15	SP-01	SP-02
Sample ID		10164261	10164262	10164263	10164264	10164265	10154271	10154272
Sample Type		Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	Dairy Lagoon	WWTP	WTTP
Sample Matrix		Liquid	Liquid	Liquid	Liquid	Liquid	Liquid	Liquid
Compound	**Units**							
Nitrate	mg/L	NM	NM	NM	NM	NM	<0.1	<0.1
δ15N-NO3	‰	NM	NM	NM	NM	NM	NM	NM
Ammonia	mg/L	274	222	469	600	658	30.1	31.5
δ15N-NH4	‰	3.13	2.01	4.4	3.26	13.85	3.72	7.43
δ18O-NO3	‰ SMOW	NM	NM	NM	NM	NM	NM	NM

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

	Location ID	SP-03	SP-04
	Sample ID	10154273	10154274
	Sample Type	WWTP	WWTP
	Sample Matrix	Liquid	Liquid
Compound	**Units**		
Nitrate	mg/L	<0.1	NA
δ15N-NO3	‰	NM	NA
Ammonia	mg/L	49.3	NA
δ15N-NH4	‰	2.7	NA
δ18O-NO3	‰ SMOW	NM	NA

See Table C15 notes on page 9 of 9.

Table C15: Phase 3 Analytical Results for Isotopic Analyses in Wells, Lagoons, and Wastewater Treatment Plant Influents

Samples were analyzed by the University of Nebraska Water Sciences Laboratory.

Abbreviations

NM = Insufficient Nitrate to complete analysis
NA = Not analyzed
‰ = parts per thousand difference from the atmospheric standard
SMOW = standard mean of ocean water
WWTP - wastewater treatment plant influent

δ15N-NO3 = Nitrogen isotopes of nitrate. Ratio of the nitrogen isotopes 15N and 14N in a specific sample using nitrate compared to a standard of known composition of 15N and 14N. This expressed as the parts per thousand (‰).

δ15N-HN4 = Nitrogen isotopes of ammonia. Ratio of the nitrogen isotopes 15N and 14N in a specific sample using ammonia compared to a standard of known composition of 15N and 14N. This expressed as the parts per thousand (‰).

δ180-NO3 = Oxygen isotopes of nitrate. Ratio of the oxygen isotopes 180 and 160 in a specific sample using nitrate compared to a standard of known composition of 180 and 160. This expressed as the parts per thousand (‰) standard mean of ocean water.

Units

mg/L - milligrams per liter

$$\delta^{15}N\ (‰) = \frac{(^{15}N/^{14}N)_{sample} - (^{15}N/^{14}N)_{standard}}{(^{15}N/^{14}N)_{standard}} * 1000$$

Analytical Methods

UNL SOP: N15 Analysis Dual Inlet IRMS
UNL SOP: Inst-Isoprime EA-18O-001

Table C16: Phase 3 Analytical Results for Sulfur Hexafluoride Age Dating in Wells

Sample Location	Sample Type	Sample Media	Sample ID	SF_6 Age Range (Years)	Qualifier
WW-01	Upgradient Well – Dairy	Water	10154201	Over Value	
WW-02	Supply Well – Dairy	Water	10154202	15.8	
				16.3	
WW-03	Downgradient Well – Dairy	Water	10154203	24.8	J
				25.8	J
WW-04	Downgradient Well – Dairy	Water	10154204	21.8	J
				23.3	J
WW-05	Downgradient Well – Dairy	Water	10154205	18.3	J
				20.8	J
WW-06	Upgradient – Dairy	Water	10154206	16.3	J
				15.8	J
WW-07	Supply Well – Dairy	Water	10154207	36.3	J
				32.8	J
WW-08	Supply Well – Dairy	Water	10154208	35.3	J
				40.8	J
WW-09	Supply Well – Dairy	Water	10154209	58.3	J
				51.3	J
WW-10	Downgradient Well – Dairy	Water	10154210	44.3	J
				44.8	J
WW-11	Downgradient Well – Dairy	Water	10154211	Over Value	
WW-12	Downgradient Well – Dairy	Water	10154212	Over Value	
WW-13	Downgradient Well – Dairy	Water	10154213	24.3	J
				23.8	J
WW-14	Downgradient Well – Dairy	Water	10154214	30.8	
				29.3	
WW-15	Downgradient Well – Dairy	Water	10154215	27.8	J
				28.3	J
WW-16	Downgradient Well – Dairy	Water	10154216	29.8	J
				28.8	J
WW-17	Downgradient Well – Dairy	Water	10154217	33.3	J
				33.8	J
WW-18	Residential Well	Water	10154218	27.8	J
				28.3	J
WW-19	Downgradient Well – Septic	Water	10154219	44.3	J
				34.3	J
WW-20	Downgradient Well – Septic	Water	10154220	14.3	J
				14.3	J
WW-21	Downgradient Well – Septic	Water	10154221	31.3	
				28.8	

Table C16: Phase 3 Analytical Results for Sulfur Hexafluoride Age Dating in Wells

Sample Location	Sample Type	Sample Media	Sample ID	SF_6 Age Range (Years)	Qualifier
WW-22	Downgradient Well – Septic	Water	10154222	29.3	J
				29.3	J
WW-23	Downgradient Well – Mint	Water	10154223	Over Value	
WW-24	Downgradient Well – Mint	Water	10154224	14.8	J
				15.8	J
WW-25	Downgradient Well – Corn	Water	10154225	10.3	
				9.8	
WW-26	Downgradient Well – Hops	Water	10154226	12.8	J
				11.8	J
WW-27	Downgradient Well – Hops	Water	10154227	Over Value	
				14.3	J
WW-28	Downgradient Well - Corn	Water	10154228	Over Value	
WW-29	Field Blank	Water	10154229	NA	
WW-30	Residential Well	Water	10164230	NA	

Samples were analyzed by the United States Geological Survey Chlorofluorocarbon Laboratory.

Analaytical Method

(http://water.usgs.gov/lab/) as well as the research publication *Dating Young Ground Water with Sulfur Hexafluoride: Natural and Anthropogenic Sources of Sulfur Hexafluoride* (E. Busenberg & L. Plummer, 2000).

Data Qualifiers

J = The analyte was positively identified. The associated numerical value is an estimate.

Notes

Over Value: These samples contained more SF6 than can be explained by equilibrium with modern air. Aquifer materials in volcanic areas such as the basalts under the Yakima Valley are known to host naturally-occurring SF6. No anthropogenic source of SF6 is known in the area of the Dairy Cluster.

SF_6 - Sulfur hexaflouride.

The SF6 recharge dating limit is around 1970. Any sample that has a model recharge date before about 1970 is older than the dating range of SF_6. The SF6 method is useful in dating very young waters.

APPENDIX D

DETAILS ON THE ISOTOPIC ANALYTICAL RESULTS

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Appendix D: Details on the Isotopic Analytical Results for the Study

The U.S. Environmental Protection Agency ("EPA") submitted all the water well, dairy lagoon, and wastewater treatment plant (WWTP) influent samples to the University of Nebraska – Lincoln Water Sciences Laboratory ("UNL Laboratory") for isotopic analysis. The results of the isotopic analyses are presented in Table C15 in Appendix C. Summary results for the dairy lagoons are presented below in Table D1. In addition, summary results for water wells are presented in Table D2 below and in Tables 14, 23, 30, and 35 within the main report. Summary results for the WWTP influent are included below as Table D3.

The dual isotopic composition of nitrate (δ^{15}N-NO_3 and δ^{18}O-NO_3) measured in any given water sample is determined by a combination of mixing between different nitrate sources, and in-situ biogeochemical processes. In groundwater, the main biogeochemical process which will significantly alter the isotopic composition of nitrate is denitrification, which requires anoxic conditions. Denitrification will result in a coupled linear increase of both δ^{15}N-NO_3 and δ^{18}O-NO_3 values as the nitrate concentrations exponentially decrease. This combined isotope and concentration pattern was not observed in the water wells, which indicates that the nitrate isotope compositions measured in the water wells are primarily controlled by mixing of one or more nitrate sources. These potential sources are referred to as "end-members" when doing either quantitative or qualitative mixing estimates.

Different end-members tend to have distinct nitrate isotope ranges, either in δ^{15}N-NO_3 or δ^{18}O-NO_3. For example, nitrate derived from fertilizer tends to have much lower δ^{15}N-NO_3 values than nitrate derived from animal waste, but the δ^{18}O-NO_3 values of these two end-members overlap. Nitrate derived from atmospheric sources has much higher δ^{18}O-NO_3 values than all other major nitrate sources due to complex reactions in the atmosphere, but overlapping δ^{15}N-NO_3 values. By measuring both the δ^{15}N-NO_3 and δ^{18}O-NO_3 for all water samples, more information about the possible end-member contributions to any given well can be obtained. If the δ^{15}N-NO_3 and δ^{18}O-NO_3 values of a given water sample fall within the ranges where the isotope values of the potential end-members overlap, then nitrate isotope composition cannot be used to identify the dominant end-member(s).

The isotopic ranges for major nitrate sources are well-established in the literature, however, local end-members specific to a particular study region often have a smaller isotopic range in comparison to world-wide reported values, and therefore measuring the isotopic compositions of local end-members can sometimes help better constrain and interpret nitrate isotope values within a specific data set. In this study, the EPA was able to measure samples representing local animal and human waste end-members.

EPA followed a two-step process to associate a specific source of nitrogen to each water well, dairy lagoon, and WWTP influent sample. First, the concentration of nitrate in each well was compared with nitrate values reported in the literature for unimpacted groundwater. Nitrate concentrations in unimpacted groundwater can be up to 1.1 milligrams per liter (mg/L) (Nolan and Hitt 2003). The second step was to evaluate which of the potential sources or combination of sources (animal waste, synthetic fertilizer, or atmospheric) were likely sources of the nitrate in the water wells. To evaluate whether animal waste was a potential source of the nitrates in the water wells, EPA used the dairy lagoon data presented in Table D1.

Based on the isotopic values observed in this study for nitrogen and oxygen in nitrate and for nitrogen in ammonia, the sources identified include: (1) nitrate formed locally in soil derived from the breakdown of plant material; (2) animal waste; (3) synthetic fertilizers; and (4) accumulation from atmospheric deposition from precipitation and dry deposition. It is important to note that the animal waste category does not differentiate between human and non-human wastes.

Concentrations of nitrate in the two upgradient wells (WW-01 and WW-06), two dairy supply wells (WW-07 and WW-09) and one downgradient well (WW-10) were below 1.1 mg/L (Table C5 in Appendix C). The concentration of nitrate in the majority of downgradient wells was higher. This indicates that animal waste, synthetic fertilizer, atmospheric contributions, or a combination of these sources, are the likely source of the nitrate in the water wells.

Three dairy lagoon samples were collected from each dairy in order to better characterize the local animal waste (includes both human and non-human) end-member. One sample was collected at the influent to each dairy lagoon system (LG-01, LG-04, LG-07, LG-10 and LG-13), and the other lagoon samples were collected at the "discharge" end of the system just before the manure wastes were pumped onto the dairy application fields. Lagoon samples LG-02 and LG-03 were collected from the same lagoon, as were lagoon samples, LG-08 and LG-09, and LG-11 and LG-12. Lagoon samples LG-05 and LG-06 and LG-14 and LG-15 were collected from different lagoons.

The concentration of ammonium was measured in each dairy lagoon sample. The $\delta^{15}N\text{-}NH_4$ values were then quantified for each sample. The $\delta^{15}N\text{-}NH_4$ value is the nitrogen isotopic composition reported for ammonium. It is the ratio of the nitrogen isotopes ^{15}N and ^{14}N in a specific sample compared to a standard of known composition of ^{15}N and ^{14}N. This is expressed as the parts per thousand or parts per mil (‰).

It is expected that the $\delta^{15}N\text{-}NH_4$ values would increase as the waste goes from the lagoon influent to the discharge point. In this process, the lighter ^{14}N isotope volatilizes resulting in a higher proportion of the heavier ^{15}N isotope in the remaining pool of NH_4. These data are summarized in Table D1. The samples collected from the lagoon influent generally have a lower $\delta^{15}N\text{-}NH_4$ ratio than the discharge samples, with the exception of samples LG-10, LG-11and LG-12.

The co-located samples (LG-02 and LG-03; LG-08 and LG-09; and LG-11 and LG-12) all show similar $\delta^{15}N\text{-}NH_4$ values. The average $\delta^{15}N\text{-}NH_4$ value for the five lagoon influent samples (LG-01, LG-04, LG-07, LG-10, and LG-13) is 5.0‰. The average $\delta^{15}N\text{-}NH_4$ value for the 10 dairy lagoons that are located immediately prior to land application (LG-02, LG-03, LG-05, LG-06, LG-08, LG-09, LG-11, LG-12, LG-14, and LG-15) is 8.4‰.

The $\delta^{15}N\text{-}NH_4$ ratios from the dairy lagoon samples provide a better understanding of the local animal waste end-member that could potentially contribute to groundwater nitrate. When NH_4 is converted to NO_3 in oxic groundwater (called "nitrification"), typically there is almost complete conversion of NH_4 to NO_3, and therefore the $\delta^{15}N\text{-}NO_3$ of the newly formed nitrate pool is very similar or equal to the ^{15}N of the NH_4. Therefore, the $\delta^{15}N\text{-}NH_4$ measurements in the lagoons represent minimum ^{15}N end-member values for animal waste derived nitrate, because it is quite likely that there is some additional increase in the $\delta^{15}N\text{-}NH_4$ from the waste ponds (due to continuing NH_3 loss) before it enters the groundwater.

Table D1: Phase 3 – Concentrations of Ammonium, and Isotopic Signatures in Dairy Lagoons

Location	Position in System	Ammonium (mg/L)	$\delta^{15}N\text{-}NH_4$ (‰)
LG-01: Haak	Influent	907	3.4
LG-02:Haak	Discharge	923	10.1
LG-03: Haak	Discharge	896	9.9
LG-04: DeRuyter	Influent	899	6.7
LG-05:DeRuyter	Discharge	1151	10.6
LG-06: DeRuyter	Discharge	1293	10.3
LG-07:D and A	Influent	869	5.4
LG-08: D and A	Discharge	696	10.3
LG-09: D and A	Discharge	658	10.1
LG-10: Cow Palace	Influent	NM	NM
LG-11:Cow Palace	Discharge	274	3.1
LG-12: Cow Palace	Discharge	222	2.0
LG-13:Liberty/Bosma	Influent	469	4.4
LG-14:Liberty/Bosma	Discharge	600	3.3
LG-15:Liberty/Bosma	Discharge	658	13.9

$\delta^{15}N\text{-}NO_3$ ratios measured in water wells that have elevated $\delta^{15}N\text{-}NO_3$ values similar to the $\delta^{15}N\text{-}NH_4$ measured in the waste lagoons would indicate that animal waste is a dominant source of the nitrate in water wells. $\delta^{15}N\text{-}NO_3$ is the nitrogen isotopic composition reported for nitrogen. It is the ratio of the nitrogen isotopes ^{15}N and ^{14}N in a specific sample compared to a standard of known composition of ^{15}N and ^{14}N. This is expressed as the parts per thousand or parts per mil (‰).

Literature values for animal waste indicate a range of $\delta^{15}N\text{-}NO_3$ ratios between 10‰ and 20‰ (Kreitler 1975; Komor and Anderson 1993; and Kendall and Aravena 1999), but with some values lower or higher than this range (Becker and others 2001 and Kendall 1998). For this study, a $\delta^{15}N\text{-}NO_3$ ratio above 8.4‰ was used to indicate that the likely dominant source of the nitrate in the water wells was animal waste (see Table D2 for a summary of the findings for water wells). As discussed above, the average $\delta^{15}N\text{-}NH_4$ ratio at the discharge end of the lagoons was 8.4‰ and this ratio forms the lower end of the expected range for the weights of nitrogen that, after microbial conversion to nitrate, would be transported in groundwater to drinking water wells. The process of isotopic fractionation could be expected to continue after the lagoon liquids escape or are applied as fertilizer. The tendency for the $\delta^{15}N\text{-}NH_4$ value to continue to increase is why 8.4‰ is considered a lower bound for identifying animal waste as a source of nitrate in the water wells. Values of $\delta^{15}N\text{-}NO_3$ below 8.4‰ do not rule out animal waste as a source.

Synthetic fertilizers are another potential source of nitrate in water wells. This study did not directly evaluate the isotopic values for fertilizer used in the study area, but $\delta^{15}N\text{-}NO_3$ ratios for synthetic

fertilizers are often within a range of -4.0 to +4.0‰ (Komor and Anderson 1993; Kendall, C.1998; and Kendall and Aravena 1999). In addition, the lowest $\delta^{15}N\text{-}NH_4$ value from the dairy lagoons was 2.0‰. This result suggests synthetic fertilizers are the likely dominant source of nitrate in water wells when the $\delta^{15}N\text{-}NO_3$ values are below 2.0‰. As with the animal waste, this value does not mean synthetic fertilizer cannot be a likely source of the nitrate in water wells if $\delta^{15}N\text{-}NO_3$ values are above 2.0‰.

For $\delta^{15}N\text{-}NO_3$ values between 2.0‰ and 8.4‰, the source of nitrate in the water wells cannot be confidently attributed to a single source. The source could be animal waste or synthetic fertilizer, or a mixture of the two. In addition, for water wells that suggest an atmospheric contribution, other sources could be solely animal waste, solely synthetic fertilizer, or a mixture of all three with an atmospheric contribution.

Another possible source of nitrate in water wells is atmospheric deposition, although nitrogen contribution from this source is estimated to be less than 2% of the total amount of nitrogen in the Valley (EPA 2012). Because of the very low rainfall in the Lower Yakima Valley, atmospherically deposited nitrate may accumulate in shallow soils in the caliche layer. A caliche layer is a characteristic of desert regions that forms when carbonate minerals accumulate in the shallow subsurface because insufficient rainfall occurs to wash them into the deeper groundwater. Other minerals may accumulate along with the carbonates in areas of very low rainfall. These minerals include gypsum and, if the area is sufficiently dry, nitrates and perchlorate.

As mentioned above, nitrate derived from atmospheric sources has significantly higher $\delta^{18}O\text{-}NO_3$ values in comparison to other major nitrate sources. $\delta^{18}O\text{-}NO_3$ values for pure atmospheric deposition (the atmospheric end-member) typically range from 60‰ to 95‰ (Kendall and others 2007). If the nitrate in any given water sample has a significant component of atmospheric nitrate, then the $\delta^{18}O\text{-}NO_3$ value will be higher than the $\delta^{18}O\text{-}NO_3$ values reported for other sources such as fertilizers and animal waste. Since the major nitrate sources have ranges of $\delta^{18}O\text{-}NO_3$ values, the exact contribution of each end-member cannot be determined, but a qualitative evaluation can be made.

The $\delta^{18}O\text{-}NO_3$ results were used to evaluate the degree to which an atmospheric signature or contribution was dominant in the sample. Ratios above 20.0‰ for $\delta^{18}O\text{-}NO_3$ were considered to have some contribution from atmospherically derived nitrate. This ratio was selected because the literature based on multiple studies of various nitrate sources suggests that $\delta^{18}O\text{-}NO_3$ ratios from synthetic fertilizer, soil cycling, and animal wastes are typically below 15.0‰ (Kendall and others 2007) and the desire to use a value higher than 15.0‰ for $\delta^{18}O\text{-}NO_3$ to ensure that the atmospheric contribution is dominate in the sample. Values of $\delta^{18}O\text{-}NO_3$ below 20.0‰ could have an atmospheric contribution, but it becomes indistinguishable from other sources.

Table D2: Phase 3 – Nitrate Concentrations, Isotopic Signatures, and Interpreted Dominant Source(s) of Nitrate in Wells

Location	Nitrate-N (mg/L)[a]	$\delta^{15}N\text{-}NO_3$ (‰)	$^{18}O\text{-}NO_3$ (‰)	Interpreted Dominant Source
WW-01	0.2	NM	NM	NM
WW-02	3.0	2.7	15	Indeterminate
WW-03	34	2.3	29	Fertilizer and/or animal waste with some atmospheric contribution
WW-04	49.9	3.5	-4.5	Fertilizer and/or animal waste
WW-05	12.8	9.7	7.1	Animal waste
WW-06	0.6	NM	NM	NM
WW-07	1.1	-0.1	NM	Fertilizer
WW-08	11.7	5.3	23	Fertilizer and/or animal waste with some atmospheric contribution
WW-09	NM	NM	NM	NM
WW-10	NM	NM	NM	NM
WW-11	21.6	3.0	18	Fertilizer and/or animal waste
WW-12	43.6	6.2	-1.4	Fertilizer and/or animal waste
WW-13	42	11	16	Animal waste
WW-14	40.7	10	8.5	Animal waste
WW-15	27.4	5.2	30	Fertilizer and/or animal waste with some atmospheric contribution
WW-16	23	5.9	5.8	Fertilizer and/or animal waste
WW-17	23.3	6.9	2.5	Fertilizer and/or animal waste
WW-18	69.6	5.4	44.4	Fertilizer and/or animal waste with Some Atmospheric Contribution
WW-19	36.4	8.7	15.4	Animal waste
WW-20	15	6.3	52.9	Fertilizer and/or animal waste with some atmospheric contribution
WW-21	36.5	7.7	12.2	Fertilizer and/or animal waste
WW-22	16.6	10	11.0	Animal waste
WW-23	17.3	2.2	18	Fertilizer and/or animal waste
WW-24	14	-0.3	12	Fertilizer
WW-25	32.9	2.4	15	Fertilizer and/or animal waste
WW-26	15.1	7.5	6.3	Fertilizer and/or animal waste
WW-27	19.9	8.8	17	Animal waste
WW-28	69.6	5.5	44	Fertilizer and/or animal waste with some atmospheric contribution

[a]The nitrate concentrations are from the UNL isotopic analysis.

Isotopic results were obtained from the ammonium sampled from the inlet to three sewer treatment plants in the Lower Yakima Valley. The plants were located in Zillah, Mabton and Toppenish, and correspond to SP-01 through SP-03. The results for the analysis of $\delta^{15}N\text{-}NH_4$ from the ammonium in the influent are presented below.

Table D3: Phase 3 – Isotopic Signatures, and Nitrogen Enrichment in Wastewater Treatment Plants

Location	$\delta^{15}N\text{-}NH_4$ (‰)	Nitrogen Enrichment
SP-01: Zillah	3.72	Slightly Enriched
SP-02: Mabton	7.43	Ammonia Volatilization has occurred
SP-03: Toppenish	2.70	Slightly Enriched

References Appendix D

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APPENDIX E

QUALITY ASSURANCE AND QUALITY CONTROL

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Appendix E: Quality Assurance and Quality Control

This project was implemented in three phases. In Phase 1, a geographic information system (GIS) screening application was developed and used to identify potential sample locations and sites in the Lower Yakima Valley for Phase 2 sampling and screening. Phase 1 also developed estimates of the relative nitrogen available for application to the land from different sources. Phase 2 and Phase 3 involved extensive sampling and analysis. A discussion of the quality assurance and quality control (QA/QC) procedures followed in Phase 2 and Phase 3 is presented below.

Phase 2 was implemented following the specifications of the U.S. Environmental Protection Agency (EPA)-approved "*QA Project Plan for Yakima Nitrate Study, Phase 2 – Initial Nitrate/Coliform Screening of Domestic Wells, February 2010"* (EPA 2010a). Deviations from the quality assurance project plan (QAPP) included changes in sample locations and modifications to the analytical method used, sampling method techniques, and additional number of samples collected. The rationale for these deviations was documented in the project team-approved Sample Alteration Form or Corrective Action Form.

In Phase 2 a multi-parameter water quality instrument was used in the field for measuring dissolved oxygen, oxidation/reduction (redox) potential, pH, specific conductance, and temperature. All field instruments were calibrated before use. For quality control, duplicate sample readings and calibration checks were performed. All field testing QC samples met the frequency of analysis, precision, and accuracy checks. The data generated are acceptable and can be used for screening purposes.

In Phase 2, EPA's Manchester Environmental Laboratory ("EPA Manchester Laboratory") received 189 samples for analysis. Of these 189 samples, 102 were analyzed for nitrate and chloride, two were analyzed for nitrate and nitrite, and 123 were analyzed for total Kjeldahl nitrogen (TKN). Two percent of the total nitrate data points were qualified as follows: one sample (10086211) did not meet the holding time requirement and the result was qualified estimated; the nitrate concentration reported for this sample may be biased low. One sample (10086101) exceeded the highest level of the calibration curve and was qualified estimated. Data users are advised to consider the nitrate reported for this sample as biased low. All nitrate data, as reported and qualified, are acceptable for use for all purposes. All of the chloride and TKN analyses met the method required QC criteria. The data as reported are usable for all purposes.

A separate QAPP was developed for Phase 3 sampling (EPA 2010b). Phase 3 samples were collected and shipped to the following laboratories for chemical analysis: EPA's Manchester Laboratory, Cascade Analytical Laboratory, University of Nebraska – Lincoln, Water Sciences Laboratory ("UNL Laboratory"), U.S. Geological Survey National Water Quality Laboratory ("USGS NWQ Laboratory"), USGS Laboratory in Reston ("USGS Reston Laboratory") and EPA's Robert S. Kerr Environmental Research Center in Ada, Oklahoma ("EPA's Ada Laboratory"). The field sampling team and analytical laboratories followed the protocols described in the QAPP with the exception of the deviations identified in Table E1. The quality assurance review summaries for each lab are included below.

Table E1: Deviations from the Phase 3 Quality Assurance Project Plan (QAPP)

Location in QAPP	QAPP Description	Deviation or Action or Modification
Page 11, Table 2, First Column. Surface Soil	"Surficial soil from waste application fields (large area multi-increment sample of at least 30 subsamples…)"	The surface soil sampling method in the QAPP was misidentified as multi-increment sampling. It should have been identified as composite sampling. EPA collected composite surface soil samples comprised of at least 30 subsamples from a depth of 1 inch below the surface.
Page 13, Table 5	Schedule of Tasks	The actual schedule for laboratory analysis, data validation, and report preparation deviated from the schedule in the QAPP.
Page 15, Section 3.1, second full paragraph	"The laboratories performing the sample analysis of drinking water analytes …are SDWA certified and/or accredited."	EPA's Manchester Laboratory and Cascade Analytical Laboratory are Safe Drinking Water Act (SDWA) certified for nitrate analysis in drinking water. EPA's Manchester Laboratory used other standard methods for the analysis of metals and pesticides. The UNL Laboratory, USGS Laboratories and Ada Laboratory are not SDWA certified. A complete list of analytical methods used in Phase 3 is included in Appendix C, Table C-2.
Page 21, Section 4.0, third paragraph	"Water Wells ….Locations are identified as WW01 to WW29"	Water well locations were identified as WW-01 through WW-30 because one additional sample, a field blank (WW-29), was collected.
Page 21, Section 4.0, third paragraph	"Locations are identified as LG01 to LG15 and SP01 to SP03"	An additional wastewater treatment plan influent sample was collected at the Toppenish wastewater treatment plant (SP04) because the laboratory requested additional sample volume.
Page 28, Section 4.2, Shipping Location and Requirements	Samples to be shipped to the UNL Laboratory were to be frozen at -20C.	The on-site freezer trailer could not continuously maintain a temperature of -20C. Samples were transferred to a freezer at WSU. Samples were reported to have arrived frozen at the UNL Laboratory.
Page 33, Section 4.13, second bullet	"Coolers or boxes containing cleaned bottles will be sealed with a custody tape seal during transport to the field or while in storage before use."	After custody seals had been removed from coolers or boxes containing cleaned sample bottles, custody seals were not reapplied if coolers or boxes remained in the custody of EPA at all times.
Page 35, Section 5.0, first paragraph	"The required precision and accuracy for this project is 20% relative percent difference (RPD) …"	For herbicide, pesticide and age dating analyses, the laboratory established duplicate analysis control limits were used instead of the customary 20% RPD.

Location in QAPP	QAPP Description	Deviation or Action or Modification
Page 35, Section 5.0, first full paragraph	"Transfer blanks will be incorporated into the sample schedule at a rate of approximately 5% or once per sample location type."	Transfer blanks were collected for bacterial analysis only.
Page 39, Section 7.2, fourth sentence	"Data validation will be performed by the laboratory for all the analyses prior to the release of data in accordance with each laboratory's quality assurance plan."	The QAPP should have stated "Data **verification** will be performed by the laboratory for all the analyses prior to the release of data in accordance with each laboratory's quality assurance plan." EPA chemists conducted an independent validation of all Phase 3 data.
Page 40, Table 7	Bias of 80-120% was specified for Alkalinity, ammonia, mercury, metals, nitrate+nitrite, TKN and total phosphorus	The laboratory established control limits of 75%-125% were used.
Page 40, Table 7 General Chemistry and Inorganics	Plus 1 duplicate sample for QA out of each 10 drinking water wells. Plus 1 triple sample for QA out of each 20 lagoon samples.	Due to an oversight, no field duplicate or triplicate samples were collected from the water wells or the lagoons.
Page 40, Table 7	Chloride and bromide analysis of lagoon samples.	After analysis at EPA's Manchester Environmental Laboratory, excess volumes of thirteen of the fifteen lagoon samples were shipped to EPA's Laboratory in Ada, OK for analysis of bromide to see if lower detection limits could be achieved. Chloride also was reanalyzed by the Ada Laboratory to determine the Cl:Br ratio for the lagoon samples. The bromide results from the Ada Laboratory also were non-detects, therefore no Cl:Br ratios were determined.
Page 41, Table 8	Varian Plexa SPE cartridge was specified in the sample prep methods column.	The Varian Plexa adsorbent cartridge did not meet the laboratory recovery control limits of 70% to 130% specified in the QAPP. Water samples were extracted using Method 551.1.
Page 41, Table 8	Dichlobenil	Reported as IUPAC 2,6-dichlor-benzonitrile
Page 41, Table 8	Phosmet	Reported as Imidan
Page 41, Table 8	Oryzalin	Reported as Surflan
Page 41, Table 8	N/A	Acid Herbicides were added.
Page 48, Table 12	N/A	Laboratory also analyzed for ^{18}O. No blanks were analyzed for ^{18}O.

Location in QAPP	QAPP Description	Deviation or Action or Modification
Page 50, Table 14	N/A	The USGS laboratory's standard list of trace organic compounds included analytes in addition to those listed in the QAPP. These compounds were analyzed and the data are presented in the report.
Page 58, Table 18	N/A	Table 18 in the QAPP is incomplete. Cascade Analytical Laboratory also analyzed for ammonia solid by Standard Method 4500-NH_3, Nitrate-N/Total Solid by Standard Method 4500-NO_3 E, Ammonium-N by Standard Method 4500-NH_4 H, Nitrate-N/Nitrite by Standard Method 4500-NO_3 F and TKN by 4500N-ORG-C.
Page 58, Table 18	Matrix spike (bias) limits 85-115%.	Matrix spike (bias) limits were 80-120%.

1. EPA's Manchester Environmental Laboratory, Port Orchard, Washington

A Stage 4 data validation was performed by the EPA Region 10 Quality Assurance (QA) team for all the data generated by EPA's Manchester Laboratory (Appendix Table E2).

Table E2: Phase 3 – Chemical Analyses Conducted and Analytical Methods Used by the EPA's Manchester Laboratory

Sample Type	Number of Samples	Parameter or Compound	Analytical Method (Prep)	Analytical Method (Analysis)
Water Wells, Dairy Lagoons, and WWTP Influent	49	TKN	EPA Method 351.2	
	49	NH3	EPA Method 350.1	
	49	Nitrate-Nitrites	EPA Method 353.2	
	49	Total Metals	EPA Method 200.2 (water) SW846 Method 3010A (lagoons)	EPA Method 200.7
	49	Mercury	EPA Method 245.1	
	49	Alkalinity	Standard Method 2320B	
	32	Coliforms	Standard Methods 9221F/9221E/9222B	
	13	Microbial Source Tracking	DNA PCR Techniques	
	49	Bromide, Chloride, Fluoride, and Sulfate	EPA Method 300.0	
	49	Total Phosphorous	EPA Method 365.1	
	30	Pesticides (only water wells)	EPA Method 551.1	SW846 – Method 8270D-SIM
	30	Herbicides (only water wells)	EPA Method 551.1	SW846-Method 8270D-SIM
Soils and Manure	16	Pesticides	SW846- Method 3570	SW846 – Method 8270D-SIM
	16	Herbicides	SW846-Method 8151A	SW846-Method 8270D-SIM

All of the chemical and microbial analyses conducted at EPA's Manchester Laboratory met the project data quality goals and criteria for accuracy, precision, comparability, completion, representativeness, and sensitivity, and are useable for all purposes with the following exceptions:

Nitrate and Nitrogen Compounds

Nitrogen compounds included ammonia, TKN, and nitrate-nitrites. Samples 10154251, 10154252, 10154253, 10154254, 10154255, 10154256, 10154257, 10154258, 10154259, 10164260, 10164261, 10164262, 10164263, 10164264 and 10164265 did not meet the required preservation when they were received at the laboratory. Nitrate/nitrites, TKN, and ammonia results for these samples were qualified estimated with a possible low bias. Thirty-one (31 percent) of the data points (147) were qualified estimated.

Mercury and Alkalinity

Thirty-nine percent (39 percent) of the total mercury data points were qualified estimated based on out of control sample spike and blank spike recoveries. Alkalinity results met all the QC criteria. The mercury and alkalinity data, as reported and qualified, are acceptable for use for all purposes.

Metals

Two dairy lagoon samples, 10164261 and 10164262 (4 percent of the total metals data points), were qualified estimated based on blank contamination. The metals data, as reported and qualified, are acceptable for use for all purposes.

Pesticides and Herbicides

The project data quality goals for precision and accuracy for numerous target analytes were not met for dairy lagoons and WWTPs. As stated above, all of the pesticides and herbicide results for the dairy lagoons and WWTPs could not be quantified and are considered unusable because of (1) the complexity of the sample matrices, (2) holding times that were exceeded, (3) recurring QC failures, and (4) the limitations of modified Method 8270D for detecting pesticides and herbicides at the project reporting levels. However, the pesticides for water and soil, as qualified, are usable for all purposes.

Anions

Anions included chloride, fluoride, bromide, and sulfates. As a result of matrix interferences, the dairy lagoon and WWTP biosolids samples collected were analyzed at 50x dilutions for bromide, fluoride, and sulfate. The reporting limits for these bromide, fluoride, and sulfate were elevated and did not meet the project goals. As qualified and reported, the analytical results for water and soil are acceptable for use for all purposes.

Microbial Source Tracking

Microbial Source Tracking (MST) analysis was performed on nine lagoon and four wastewater treatment plant samples using a polymerase chain reaction (PCR) technique. All quality control measures passed including laboratory QC, sterility controls, and blank analyses. Samples were assessed on a present (P) / absent (A) basis for *Bacteroides* species with possible source identification of general *Bacteroides* (GB), human (H), ruminant (R), or both human and ruminant (H/R).

Bacteria

Twenty-one well water, six lagoon, and three wastewater treatment plant samples were analyzed for total coliform by Standard Method (SM) 9222B, fecal coliform by SM 9221E, and/or *E. coli* by SM 9221F. All quality control measures passed including holding time requirements, laboratory QC, sterility controls, and blank analyses. All lagoon and wastewater treatment samples were qualified estimated ("J") for *E. coli* as the method, SM 9221F, has not been approved for use under the Clean Water Act (CWA).

2. Cascade Analytical Laboratory, Wenatchee, Washington

Nitrate and Other Forms of Nitrogen

Cascade Analytical Laboratory is a certified by the State of Washington to conducted drinking water analysis including analysis for nitrate. It is located in Union Gap and Wenatchee Washington, and analyzed nitrate for this study. Because of the short holding times for certain nitrate analytical methods, Cascade Analytical Laboratory was sub-contracted by Region 10 to analyze the water well, soil, and manure samples for nitrate and nitrogen compounds for Phase 3. A total of 30 water wells, 11 soil, and five manure samples were submitted.

The analytical method used for the determination of nitrate in water samples was Method 300.0. Five samples were analyzed for Total Nitrogen/Solid by AOAC Method 993.13, Ammonia Solid by SM 4500-NH3, and Nitrate-N/Total Solid by SM 4500-NO_3 E. Ten samples were analyzed for Total Nitrogen/Solid by AOAC Method 993.13, Ammonium-N by SM 4500-NH_4 H, and Nitrate-N/Nitrite by SM 4500-NO_3 F. In addition, several samples were analyzed for TKN by 4500-Norg C. A Stage 4 data validation was performed by EPA Region 10 QA team for all data generated by Cascade Analytical Laboratory.

All of the QC samples and sample analysis met the technical acceptance criteria set forth by the methods. The data, as reported, are acceptable for use for all purposes.

Thirty split water samples were collected, shipped to Cascade Analytical Laboratory and EPA's Manchester Laboratory, and analyzed for nitrate using the EPA Method 300.0 (Cascade Analytical Laboratory) and EPA Method 353.2 (EPA's Manchester Laboratory). Both sets of data met all the method-specified QC criteria and are acceptable for use for all purposes. The nitrate concentrations reported by both laboratories are comparable within 10 percent. The following is a list of water samples that were collected, split, and sent to these two labs:10154201 10154202 10154203 10154204

10154206	10154207	10154208	10154211	10154212
10154213	10154214	10154215	10154216	10154217
10154218	10154219	10154220	10154221	10154223
10154224	10154225	10154226	10154227	10154228
10154229	10164209	10164210	10164222	10164230

Bacteria

Cascade Analytical Laboratory analyzed nine well water samples for Escherichia Coli and Total Coliform using a Quanti-Tray method (Standard Method 9223 B). Three of the well water samples along with nine

dairy lagoon samples and one wastewater treatment plant influent sample were analyzed for fecal coliform in accordance with Standard Method 9222 D.

For bacterial analyses, a holding time of 30 hours must be met for drinking water samples and a holding time of 6 hours must be met for wastewater samples. All samples met these requirements, except for the following dairy lagoon and wastewater treatment plant samples: 10154251, 10154252, 10154253, 10154271, 10164263 and 10164264. The fecal coliform results for these samples were qualified estimated based on holding time exceeded. In addition, all sample results that exceeded the upper limit for microbial estimates were reported as "TNTC" or "too numerous to count." The data, as reported and qualified, are acceptable for use for all purposes.

3. EPA National Risk Management Research Laboratory, Robert S. Kerr Environmental Research Center, Ada,

Hormone and Perchlorate Analyses

Fifteen dairy lagoon, three WWTP, and 30 water samples were analyzed for estrogens (17-α-estradiol; 17-β-estradiol;17-α-ethynyl estradiol; estriol; and estrone) by EPA's Ada Laboratory following the in-house standard operating procedure (SOP) "*Quantitation of Estrogens in Groundwater and Animal waste Dairy lagoon Water Using Solid Phase Extraction, Pentafluorobenzyl and Trimethylsilyl Derivatization and Gas Chromatography Negative Ion Chemical Ionization/Mass Spectrometry/Mass Spectrometry, RSKSOP-253, Revision 2, October 2010."*

The same 30 water samples were also analyzed for perchlorate following the modified *USEPA SW846 Method 6850, "Perchlorate in Soils, Water and Wastes Using High performance Liquid Chromatography/Electrospray/Ionization (ESI) Mass Spectroscopy (MS) or Tandem Mass Spectroscopy (MS/MS).* All sample analyses were evaluated following the EPA's Stage 2B Manual Data Validation Process. The summaries of sample and QC analyses were evaluated and laboratory qualifiers were mapped to Region 10 EPA validation qualifiers following the technical acceptance criteria and method quality control specifications. All of the technical acceptance criteria for QC were met by both analyses. Target compounds detected above the method detection limit (MDL) but below reporting limits were qualified estimated, "J." Data detected below the MDL were qualified non-detects, "U," and reported at the MDL level. The data, as qualified, are usable for all purposes.

4. USGS National Water Quality Laboratory, Denver, Colorado

Trace Organics

USGS NWQ Laboratory analyzed fifteen dairy lagoons, three WWTP plant influent, and 30 water samples for trace organic chemicals following the SOP for the "*Analysis of Waste Water Samples by Gas Chromatography/Mass Spectroscopy*" – USGS SOPs 1433 and 4433. All sample analyses were evaluated following EPA's Stage 2B Manual Data Validation Process (S2VM). The summaries of sample and QC analyses were evaluated and laboratory qualifiers were mapped to Region 10 EPA validation qualifiers following the technical acceptance criteria and method quality control specifications.

Data users are advised to consider the values reported as a screen. For full usability, data need further confirmation for the following reasons: (1) data were not thoroughly verified by the validator because of the absence of the instrument raw data output at the time of review, and (2) the laboratory followed their in-house SOP and the recurrence of results out of SOP QC control limits indicates that the data may not be reproducible by a third party. The data reported can only be used for information purposes and a good starting point in determining sample locations for confirmatory analyses.

Samples were analyzed following the technical specifications of the analytical method. Approximately 6 percent of the total data points were qualified unusable based on extremely low surrogate recoveries. Approximately 32 percent of the total data points were qualified estimated due to chromatographic interference and QC results that did not meet the specified criteria.

Trace levels of 4-tert-octylphenol, diethyl phthalate, menthol, p-cresol, tri(2-butoxyethyl)phosphate, tri(2-chloroethyl) phosphate, tri (dichloroisopropyl) phosphate, tributyl phosphate, and triphenyl phosphate were detected in the field blank (WW29). Only the diethyl phthalate in associated sample WW06 detected at a concentration less than 5x the value in the blank was qualified as non-detect, "U," based on blank contamination.

5. University of Nebraska – Lincoln Water Science Laboratory (UNL)

The University of Nebraska – Lincoln Water Science Laboratory (UNL Laboratory) analyzed several different types of compounds. Table E3 provides a summary of the compounds evaluated, number of samples, matrix, and analytical method.
A Stage 2A data validation review was conducted by the EPA QA team on all the data. The validation included the limited evaluation of calibration, QA, and sample analytical summary results. All samples were analyzed following the technical specifications of UNL's in-house SOPs.

General QA Observations for UNL Analyses

UNL data sets may not meet the third-party reproducibility criterion set forth by EPA's Information Quality Guidelines (EPA /260R-02-008 October 2002) for the following reasons: (1) there is no established or standard analytical method for the analysis of the target compounds, and the analytical methods used are for research purposes only, (2) the recurrence of out-of-control QC results; (3)variability in duplicate runs; and (4) compound identification and calculations were not verified at the time of review because the instruments' raw data output was not available.

Twenty-nine water, 15 dairy lagoons, three WWTP, and 16 soil or manure samples were collected and analyzed for wastewater pharmaceuticals, veterinary pharmaceuticals, hormones and steroids, and isotopic nitrogen and isotopic oxygen. The following is a summary of the data validations for UNL:

Table E3: Phase 3 – Chemical Analyses Conducted and Analytical Methods Used by the University of Nebraska – Lincoln Water Science Laboratory

Sample Type	Compound Class	No. of Samples	Analytical Method (Prep)	Analytical Method (Analysis)
Water Wells, Dairy Lagoons, and WWTP Influent	Hormones	47	On-line SPE with C18 clean-up	SOP#LCMS_APPI_ Steroids_Water-001
	Wastewater Pharmaceuticals	47	Off-line SPE-Modified Method 3535	LC/MS SOP-LCQ-Wastewater-001
	Veterinary Pharmaceuticals	47	On-line SPE extraction with citrate buffer	SOP#LC/MS_Vet_P harm_water-002
	Isotopic Nitrogen	47	Analyte Prep 15-002	N15 Analysis Dual Inlet IRMS
	Isotopic Oxygen	47	SOP#Analyte-O18 in Nitrate/$AgNO_3$	SOP# Inst-Isoprime EA-18O-001
	Ammonia	47	Analyte-DISTN15-004	Titrimetric
	Nitrate	47	Analyte Prep 15-002	Titrimetric
Soil and Manure	Hormones	16	Microwave-Assisted solvent extraction (MASE) and SPE	SOP# Analyte-Steroids_Solids-001
	Wastewater Pharmaceuticals	16	Microwave-Assisted solvent extraction (MASE) and SPE	SOP#-Analyte-LCQ-Wastesolid-001
	Veterinary Pharmaceuticals	16	On-line SPE extraction with citrate buffer	SOP#-Analyte-VetPharmSED-001

Wastewater Pharmaceuticals: Samples were analyzed following the technical specifications of UNL's in-house SOP. Data users are advised to consider the values reported as a screen. For full usability, data needs further confirmation for the following reasons: (1) data were not thoroughly verified by the validator because of the absence of the instrument raw data output at the time of review, and (2) there is no established standard analytical method for the analysis of the target compounds and the recurrence of out of control QC results and big variability in the duplicate runs indicated that the data may not be reproducible by a third party. The data reported can only be used for informational purposes only and a good starting point in determining sample locations for confirmatory analyses.

Approximately 10 percent of the wastewater pharmaceutical data points were qualified unusable because of extremely low spike and surrogate recoveries (less than 10 percent). An additional 55% of the total data points were qualified estimated due to out of control recoveries in the associated QC runs. The rest of the data as qualified are usable for all purposes.

Veterinary Pharmaceuticals: No significant problems were encountered with the analysis of soil/solid samples for veterinary pharmaceuticals. Most of the liquid samples (dairy lagoons, well water, and WWTP) underwent multiple analyses because of concentrations of some of the target compounds in the

field blank and also because of matrix interferences. Approximately 9 percent of the total data points were qualified unusable and an additional 18 percent were qualified estimated concentrations with a high bias because of out of control internal standards or calibration. Five lincomycin and three monensin results in the water samples were detected above the reporting limits but were flagged non-detects based on contamination in the associated field blank, WW29. The concentrations reported were calculated using internal standard techniques. Most of the internal standards did not meet minimum area requirements when compared with the daily calibration standards. Therefore, the associated results may be biased high.

Steroids/Hormones: Because of the calibration results, the detected results or reporting limits for androstadienedione, androsterone, progesterone, estrone, α-zearalanol, α-zearalenol, β-zearalanol for samples associated with the calibration run on January 18, 2011, were qualified estimated, "J/UJ." Approximately 15 percent of the total data points were flagged estimated because of calibrations. In addition, some target compounds were qualified non-detects based on contamination in the associated blank.

Isotopic Nitrogen/Isotopic Oxygen Analyses/Ammonium and Nitrate Nitrogen Analyses: Isotopic nitrogen and oxygen were determined using the amounts of ammonium and nitrate-nitrogen in water. No problems were encountered with the isotopic nitrogen, isotopic oxygen, and intermediate ammonia and nitrate nitrogen results. For QC, laboratory reagent blanks, duplicates, and laboratory-fortified blanks were analyzed at the required frequency. All of the results were comparable to each other. Data were not qualified and are usable for all purposes.

6. USGS Laboratory, Reston Virginia

Recharge Age Dating

The USGS Laboratory located in Reston, Virginia (USGS Reston Laboratory) analyzed the recharge age of the water well samples following the SF_6 procedure.

Limitations of the Method: The recharge dating procedure is a statistical calculation derived from the SF_6 gas evolved in the sample and other existing data. It is applicable to young groundwater systems aged 1970 to present. This procedure is not applicable to areas with high anthropogenic and natural SF_6 background values such as indicated by samples WW-01, WW-11, WW-12, WW-13, WW-23, and WW-28. As a result, age could not be measured in those samples because of the high values of SF_6 as dissolved gases. These samples may indicate areas where localized anthropogenic sources of SF_6 exist. Alternatively, volcanic rocks can contain more SF_6 than the average atmospheric concentrations of SF_6 and the volcanic terrain and mineralogy of the sediments in the local aquifer may be the source of the SF_6.

The USGS Reston Laboratory flagged these six water wells samples with a "C" qualifier, meaning contaminated. For clarity, the validator replaced the "C" qualifier with "NM," not measured. In addition, there were also some samples with recharge calculated dates before 1970. The dating technique used provides only a range, and data users should be warned that the reported recharge ages are estimates.

References Appendix E

EPA. 2010a. Yakima Basin Nitrate Study Phase 2 – Initial Nitrate/Coliform Screening of Domestic Water Wells February 2010 Sampling Event. Quality Assurance Project Plan. USEPA Region 10. January 27, 2010.

EPA. 2010b. Yakima Basin Nitrate Study Phase 3 – Comprehensive Analytical Source Tracer Sampling April 2010 Sampling Event. Quality Assurance Project Plan. EPA Region 10. April 8, 2010.

APPENDIX F

DAIRIES AND NITROGEN

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Appendix F - Dairies and Nitrogen

Animal feeding operations (AFOs) such as dairies generate large volumes of waste of the following types: animal manure and urine, hair and corpses, bedding and spilled feed, wash-flush water, and other processing wastes. If properly stored and used, manure from animal feeding operations can be an environmentally sound approach to fertilizing fields. However, if not managed correctly, the waste produced by AFOs can pollute the environment, including groundwater (NRCS 2008 and EPA 2004).

Animal wastes applied to the land can contaminate groundwater and surface water. This problem has received increasing attention as livestock operations have become more concentrated, with a trend toward more animals on fewer farms and less land (EPA 2001). In 1998, there were 71 dairies in Yakima County that generated 20,162,500 pounds of waste nitrogen. In 2010, the number of dairies contracted to 67 but the amount of nitrogen they generated increased by more than 50 percent to 33,278,300 pounds (WSDA 2010). Over this time period the amount of waste generated by the average Yakima Valley dairy increased substantially.

Concentrated animal feeding operations produce large amounts of waste in small areas (EPA 2004). Rapid growth in the amount of nitrogen per dairy poses waste disposal challenges. It can become increasingly difficult to effectively store and manage the waste onsite, and to find enough land on which it can be safely applied without causing pollution of groundwater and surface water.

A dairy cow produces considerable amounts of nitrogenous organic waste, typically in the range of 110 to 120 pounds of manure per day (EPA 2009). A lactating dairy cow excretes about 328 to 405 pounds of nitrogen over the same time period (USDA 2009). In a typical dairy, liquid waste from the cow pens is flushed with water into a ditch and then may go to a solids separator, which removes most of the solids. Then the liquid waste may drain into a lagoon, or into a sequence of lagoons. This allows time for additional solids to settle out to the bottom of the lagoon(s). Periodically, dairy lagoons fill with solids and must be dredged. After the liquid has passed through the lagoon system it is typically applied with irrigation water to wastewater application fields. Solids, either from the cow pens, aprons, the solids separator, or from the dredged lagoons, are also usually distributed onto the application fields as fertilizer for crops.

Agricultural ditches or creeks can receive nitrogen from overland runoff, discharges from agricultural return flows, or discharges from application fields. These surface waters can infiltrate into the underlying soils and carry nitrogen down to the aquifer. Contaminated surface water in creeks and ditches can carry nitrogen away from the dairy footprint and transport it into the soil column and groundwater at off-site locations.

As they age, underground pipes transporting dairy waste can deteriorate and develop cracks and holes resulting in leakage of liquid over time. Pipes can crack when the soils around them settle or shift, and they can be damaged by heavy equipment. Typically, it is difficult to determine if underground pipes are leaking once they have been installed unless a leak detection system was incorporated into the design or other integrity testing, such as pressure testing, is performed.

Intact concrete slabs are relatively impermeable, but liquid can move through cracks that occur from ground settlement, through unsealed joints between slabs, or from animal waste spillage off the slab onto the ground.

The rate of leakage, or seepage, from manure lagoons can be significantly reduced by the presence of an engineered liner. However, several studies have concluded that clay liners do not completely prevent leakage. A study in southwest Kansas reported seepage rates from swine and cattle waste lagoons lined with compacted soil liners ranging from 0.2 to 2.4 millimeters per day based on measurements of evaporation and changes in water depth in response to the addition or removal of waste (Ham 2002). Harter and others (2002) inferred manure lagoon leaching rates on the order of 2 millimeters per day at a site in California's Central Valley. Leakage from manure lagoons with clay liners has also been reported by Ritter and Chirnside (1987) and by McCurdy and McSweeney (1993).

Studies have shown that manure solids do not completely "self-seal" unlined lagoons. For example, when researchers analyzed samples from the vadose zone (the unsaturated zone above the water table) downgradient of unlined waste lagoons at five Texas dairies, they found that three of the five sites exhibited nitrate levels in excess of the maximum contaminant level (MCL) (Frarey and others 1994).[29] The term "sealing," as it is sometimes used with regard to dairy lagoon solids, is misleading because it suggests complete containment of the wastewater. The term refers to only a reduction in the seepage rate. Ham and DeSutter found that in new lagoons constructed without clay liners, permeability decreased on average by a factor of five after addition of waste to the lagoons, indicating some permeability reduction over time from organic sludge buildup.

Irrigation with manure lagoon water is a common animal waste disposal practice as it can be used as fertilizer while reducing the volume of liquid waste stored in the lagoons. Nitrogen is an essential nutrient for plant growth. However, if too much nitrogen or water is applied to a field, nitrogen can migrate downward and contaminate groundwater. The potential for nitrogen migration is increased if surface soils are highly permeable.

Nutrient Management in Washington

Because dairies generate large quantities of animal waste that can pollute surface water and groundwater, the State of Washington requires all newly licensed Grade A milk[30] producers to have an approved Nutrient Management Plan (NMP) on site within 6 months of licensing, and a certified NMP on site within two years of licensing. "Approved" means the local conservation district has determined that the facility's plan to manage nutrients meets all the elements identified on a checklist established by the Washington Conservation Commission. Certified means the local conservation district has determined all plan elements are in place and implemented as described in the plan. To be certified, both the dairy operator and an authorized representative of the local conservation district must sign the plan.

The checklist contains 20 elements that the dairy must meet in order to receive a license. Most dairies keep their NMPs and associated sampling data on location and they are not available for public review. At the end of the growing season, operators are required to collect soil samples from their fields to which they apply manure or dairy waste water and test for nitrogen. Soil nitrogen concentrations are not to

[29] Environmental Impacts of Animal Feeding Operations, U.S. Environmental Protection Agency, Office of Water Standards and Applied Sciences Division, December 31, 1998. Page 14.

[30] In the United States, Grade A milk refers to milk that is produced under sufficiently sanitary conditions to qualify for fluid (beverage) consumption.

exceed 45 parts per million (ppm) at the end of the growing season. Adherence to this guideline reduces, but does not eliminate the potential for nitrogen to move below the plant root zone and potentially contaminate groundwater.

Consequences of Waste Mismanagement

Improperly stored or used, animal waste can pollute rivers and groundwater, including underground drinking water supplies. Inadequately sized, unlined, or poorly lined lagoons or other storage structures allow manure to escape into the surrounding environment. Poorly maintained and unlined corrals can allow contaminated wastewater to seep into groundwater. Many AFOs also lack necessary stormwater runoff controls that divert rainwater and snowmelt from the animal confinement area. Stored manure can be washed into nearby streams or infiltrate into the soil column. Applying too much AFO wastewater to fields too quickly or by inadequate methods can also cause the pollutants in animal waste to pollute streams or groundwater before they can be completely absorbed by the land and crops. In some cases, an AFO's location - for example, on hillsides, along streams, and atop sensitive groundwater areas - complicates sound animal waste management practices. Animal waste has the potential to contribute contaminants such as nutrients (nitrogen or phosphorus), organic matter, sediments, pathogens (*E. coli*, giardia, or cryptosporidium), heavy metals, hormones, and antibiotics to groundwater and surface water (EPA 2011 and EPA 1999).

Nitrate Transport

Water wells can facilitate the downward migration of nitrogen. Water can flow downward outside a well casing. If a casing is cracked or deteriorated, water can migrate down the well shaft. Negative pressure created by the well pump can pull water from more shallow, contaminated parts of the aquifer downward more quickly that it would otherwise migrate. Improperly abandoned wells (that were not sealed to prevent the downward migration of shallow groundwater) can serve as conduits for downward water migration. A comparison of historical aerial photographs shows that a number of houses that used to exist on Dairy Cluster property have been demolished or removed. Some of these houses were situated where dairy animal waste application fields now exist. EPA has asked the dairies for documentation that any wells abandoned on their property were properly sealed on closure to prevent contaminant migration, but they have declined to provide this information.

Relatively high-production dairy supply wells are often located on the facility they serve, in areas where the shallow aquifer could become contaminated with nitrate from dairy operations. Dairy supply wells may be screened in the upper basalt layers below the shallow, alluvial aquifer. If the well casings are placed down to the top of the first basalt layer but not sealed to it, contaminated water from the shallow aquifer may migrate down the outside of the well casing into the water-bearing zones between the upper basalt layers. During the cooling process following a volcanic eruption, basaltic flows, like those in the Yakima Valley, develop significant fracture permeability. These fractures can serve as preferential pathways for the migration of contaminated groundwater. Dairy production wells and irrigation wells are generally high production wells with large pumps.

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APPENDIX G
IRRIGATED CROPS IN THE YAKIMA COUNTY

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Appendix G: Irrigated Crops in the Yakima County

The Yakima County is one of the world's most fertile growing regions with more than 240,000 acres of cropland in the county (USDA 2007a). Agriculture is the largest economic sector in Yakima County and it accounts for approximately 70% to 80% of land use. The top seven crops account for about 90% of the agricultural acreage in Yakima County (USDA 2007b):

- Orchards (about 95,000 acres)
- Corn for silage and grain (about 42,000 acres)
- Alfalfa hay (about 37,000 acres)
- Hops (about 19,000 acres)
- Mint (about 12,000 acres)
- Winter wheat (about 9,000 acres)
- Haylage (about 8,000 acres)

Nitrogen is essential to crop growth and development. This nutrient can be supplied in the form of fertilizer as synthetic compounds or through organic-based amendments including manure, plant residues, and for legume plants like alfalfa, by atmospheric nitrogen-fixing Rhizobium bacteria. Nitrate is the principal form of nitrogen used by plants, and numerous biological and chemical processes result in the conversion of nitrogen-containing compounds to nitrate.

The amount, timing, frequency, and form of nitrogen fertilizer affect the amount of nitrogen (in the form of nitrate) available for uptake. Many synthetic nitrogen fertilizers are readily available for assimilation into the plant. Organic forms of nitrogen fertilizer, such as manure or crop residue, require degradation and transformation over time and release nitrate at a slower rate than synthetic fertilizers. Other factors such as denitrification in the soil by microorganisms, soil type, and volatilization to the atmosphere, also affect the amount of nitrogen available for plant uptake. Regardless of the form of nitrogen, application of nutrients or water at rates greater than plant demand can result in excess nitrate infiltrating through the soil below the root zone into the groundwater.

Nitrogen Application to Irrigated Crops

It is likely that both historic and current use of nitrogen-based fertilizers and irrigation methods in Yakima County contribute to groundwater nitrate levels (Ecology 2010). Crop management has advanced substantially over the past 20 years with more precise nutrient and water management for many crops grown in the Yakima County including hops, grapes, and tree fruit. Based on recommended rates, EPA estimated the amount of nitrogen that is being applied to irrigated crop fields (EPA 2012) by determining the amount of irrigated crop acreage for individual crops (USDA 2007a) and multiplying that by the WSU fertilizer application guidelines (WSU 2009). When the 2007 census did not provide adequate information, crop data from the 2002 Census of Agriculture was used (USDA 2002).

Nitrogen application rates may be based on yield goals, soil type, and existing residual nitrate levels as determined by soil or plant tissue tests. The development of recommended agronomic nitrogen application rates does not take into account protection of groundwater. Since published application rates specific to Yakima County could not be found, the recommended average nitrogen application rates for

each crop was obtained from the Washington State University fertilizer guidelines (WSU 2009). For each type of crop, WSU recommends a range of nitrogen application bounded by a high and low application rate. The annual nitrogen application rate for each crop was estimated by averaging the high and low rates. These are estimated rates and actual application rates by farmers vary.

Below is a list of the crops that EPA estimates have potentially the highest nitrogen demand for fertilizers, either synthetic, organic, or both based on the WSDA crop data (WSDA 2008) and WSU fertilizer guidelines (WSU 2009):

- Corn for silage and grain – 32%
- Orchard Land – 21%
- Hops – 9%
- Mint for oil, both peppermint & spearmint – 8%
- Alfalfa Hay – 7%
- Winter wheat for grain – 6%

These six crops account for nearly 83% of the total potential nitrogen loading from crop fertilization in Yakima County. Corn, when either grown for silage or grain, accounts for the greatest potential nitrogen loading due to its high nitrogen demand and high biomass yield potential. Silage corn is now a common crop associated with dairy operations in Yakima County. Washington State University Fertilizer Guides estimate total nitrogen requirements for a 30 ton yield of corn silage to be approximately 220 pounds per acre per year.

Orchard land has a relatively low recommended nitrogen application rate of approximately 50 pounds per acre per year, but because the total acreage of orchard land is large it accounts for high nitrogen loading in Yakima County for irrigated crops. The crop management practices for orchard land are generally closely monitored because of the need to ensure a high quality product for consumers (Peck and others 2006).

The form of fertilizer applied may also be constrained by crop physiology. Application of manure solids on mint and alfalfa is limited as these perennial crops cannot withstand tillage or incorporation of manure but could accept a liquid form of dairy waste (Mitchell and others, 1992). Application of manure to hop fields may be limited to amendment of soil prior to planting because hop production trellises limit manure incorporation between rows. Food safety concerns for directly consumed crops, such as apples, limit the application window for manure. The National Organic Program, Washington State Organic Standard, and USDA Good Agricultural Practices (GAP) prohibit the application of raw manure on any directly consumed crop 90 days prior to harvest and require incorporation of the waste into the soil (WSDA 2009).

Irrigation Practices

In addition to fertilizer, irrigation is a significant component of the Yakima County crop production. Water quality violations of total suspended sediment in the Yakima River led to enactment of Total Maximum Daily Load (TMDL) limits in the late 1990s. Since then, significant progress has been made in reducing soil erosion from agricultural fields through cost share incentive programs for growers to convert from highly erodible irrigation systems (rill and flood) to less erosive sprinkler-based or drip

irrigation systems (NACD 2008). However, nitrate leaching may occur under any irrigation system, including sprinkler based, if irrigation water is applied beyond crop plant water demand.

Estimates of predominant irrigation methods for the top seven crops in Yakima County, based on acreage, are shown in Figure G1 (WSDA 2008). The irrigation method was estimated by quarter section and resulted in combinations of irrigation system types as shown by the example center pivot/rill. Rill irrigation is the practice of applying water to row crops via small ditches or channels between the rows made by tillage implements. Apples on sprinkler had the greatest acreage at 27,388 acres, followed closely by corn on rill irrigation at 22,145 acres.

Detailed irrigation water management studies conducted by universities, industry and agencies in the past have documented that rill (surface) irrigation results in significantly more deep percolation of irrigation water than sprinkler irrigation (USDA 1997). Drip irrigation has the lowest deep percolation rate. Figure G1 shows that there are approximately 22,145 acres of rill or surface irrigated cropland in Yakima County and of that, corn and wheat which are both annually seeded crops make up 38% of the total irrigated acres.

No published data are available for irrigation scheduling or management for Yakima County crops. USDA National Agriculture Statistics Service (NASS) conducted a survey in 2007 on the methods used by crop producers on when to irrigate (USDA 2007b). For Washington State, nearly 70% of irrigated farms surveyed use qualitative factors to determine water demand such as calendar scheduling, delivery by the irrigation provider, or crop appearance. It was estimated that less than 30% of Washington irrigated farms use quantitative methods such as crop evapotranspiration (ET), crop models, or soil or plant sensors to determine irrigation water quantity and application timing.

Figure G1: Irrigation System for the Seven Crops with the Highest Total Acreage in the Yakima County[1]

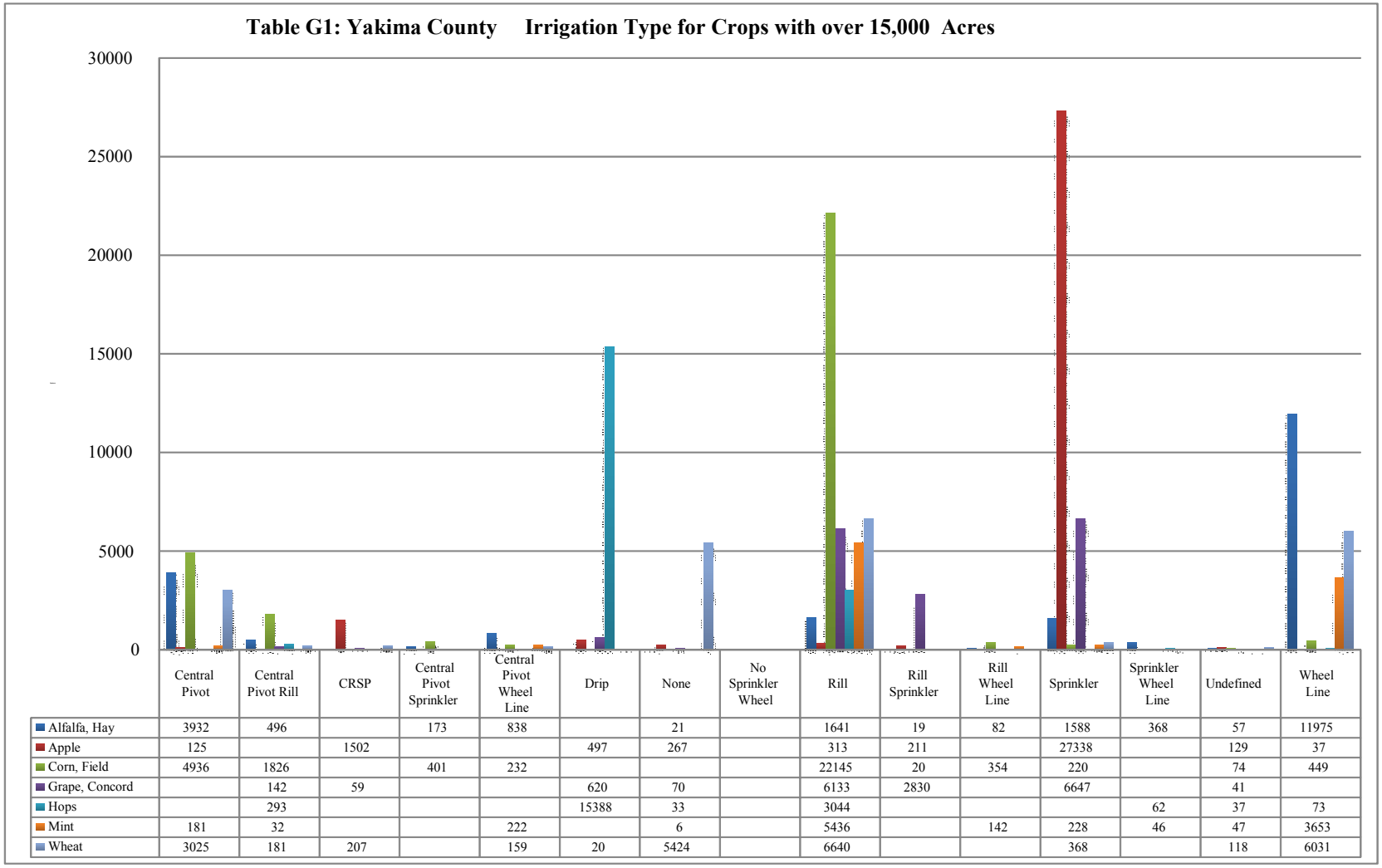
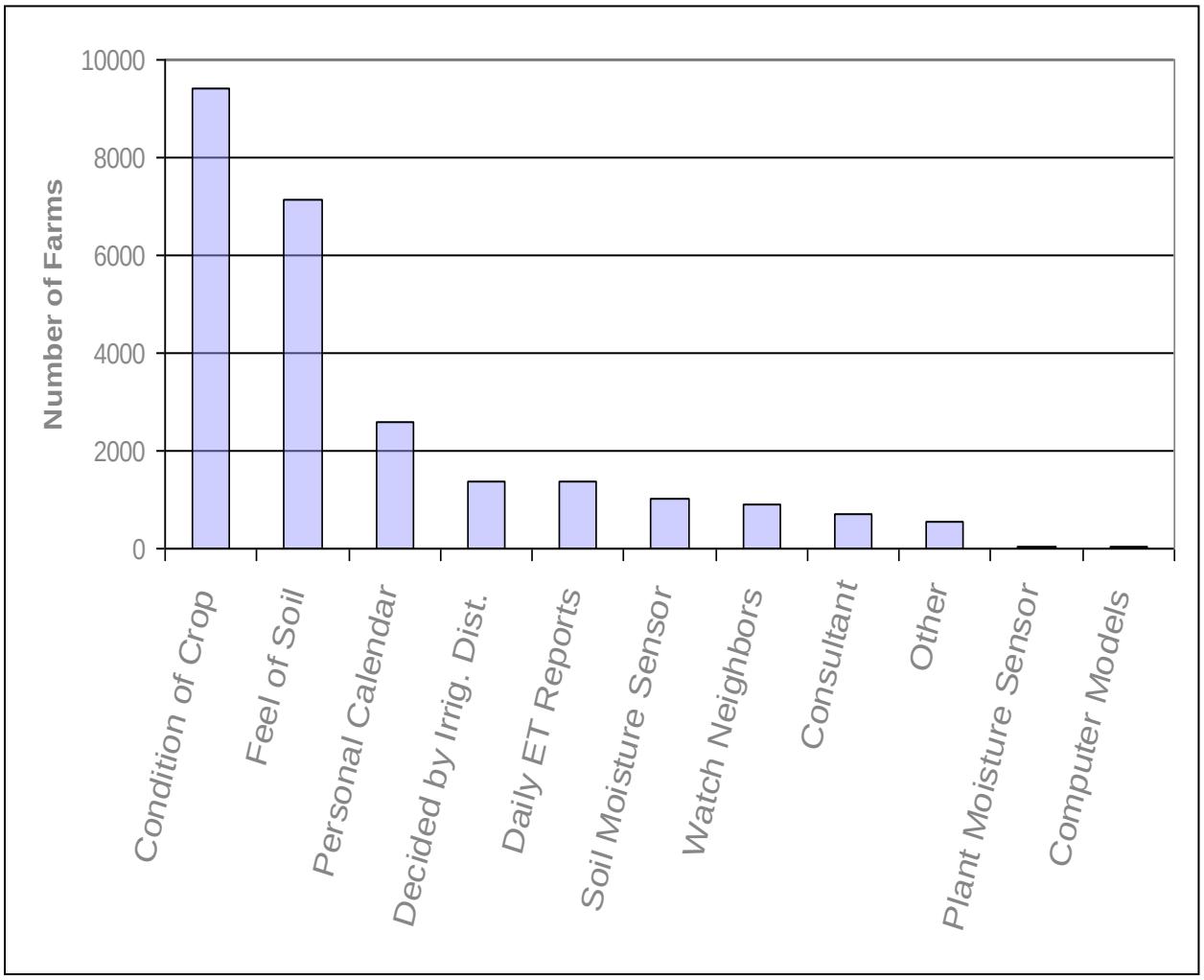


Table G1: Yakima County Irrigation Type for Crops with over 15,000 Acres

	Central Pivot	Central Pivot Rill	CRSP	Central Pivot Sprinkler	Central Pivot Wheel Line	Drip	None	No Sprinkler Wheel	Rill	Rill Sprinkler	Rill Wheel Line	Sprinkler	Sprinkler Wheel Line	Undefined	Wheel Line
Alfalfa, Hay	3932	496		173	838		21		1641	19	82	1588	368	57	11975
Apple	125		1502			497	267		313	211		27338		129	37
Corn, Field	4936	1826		401	232				22145	20	354	220		74	449
Grape, Concord		142	59			620	70		6133	2830		6647		41	
Hops		293				15388	33		3044				62	37	73
Mint	181	32			222		6		5436		142	228	46	47	3653
Wheat	3025	181	207		159	20	5424		6640			368		118	6031

[1]Irrigation system survey was conducted on a quarter section basis which results in combinations of irrigation system types (USDA 2007b).

Figure G2: USDA Survey of Methods Used to Determine When to Irrigate Crop Fields (USDA 2007b)



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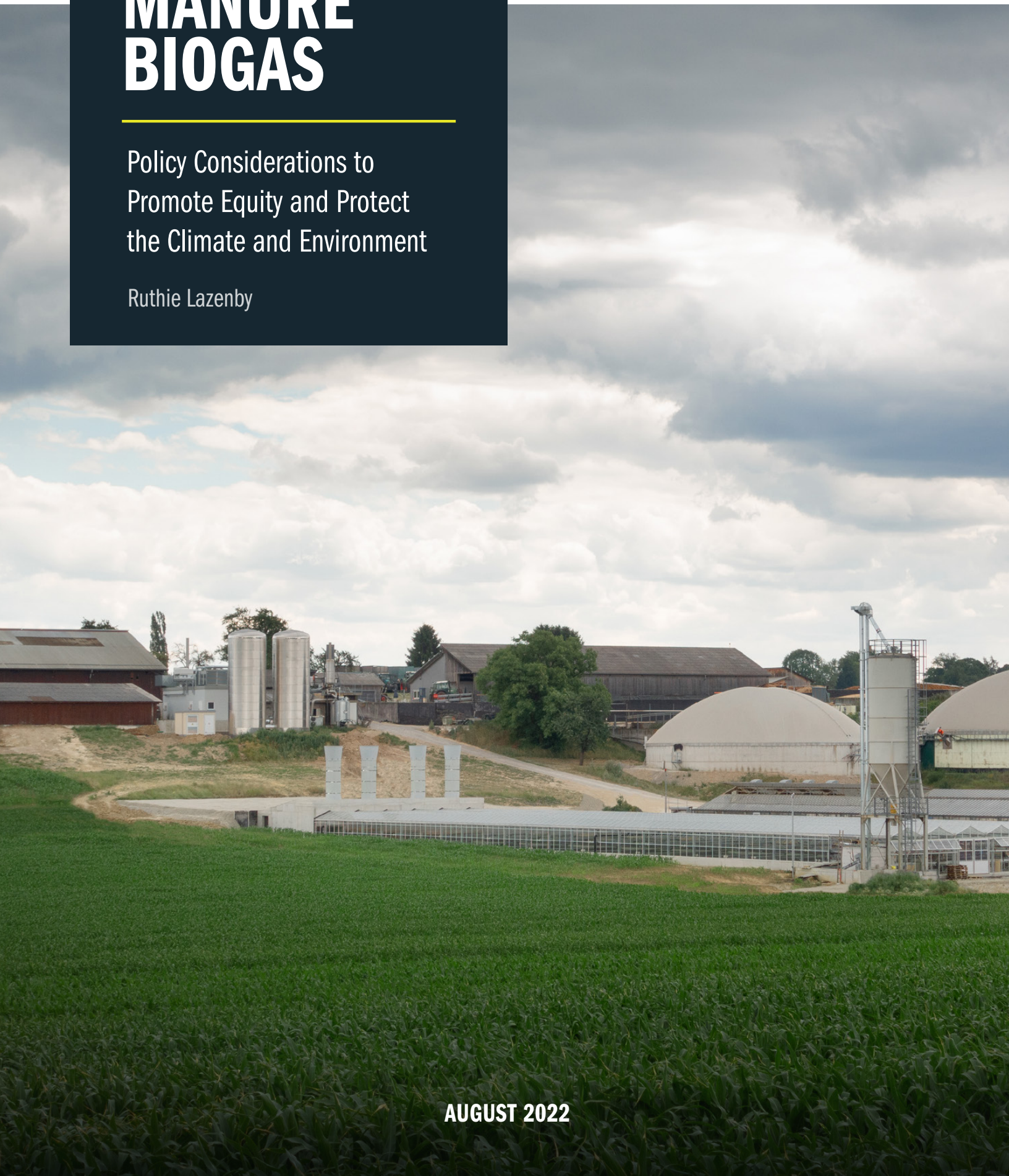

EPA
United States
Environmental Protection
Agency

RETHINKING MANURE BIOGAS

Policy Considerations to Promote Equity and Protect the Climate and Environment

Ruthie Lazenby

VERMONT LAW & GRADUATE SCHOOL
CENTER FOR AGRICULTURE & FOOD SYSTEMS



AUGUST 2022



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This report was produced by the Center for Agriculture and Food Systems at Vermont Law and Graduate School. The author of this report is **Ruthie Lazenby** (she/her), LLM Fellow and Staff Attorney at the Environmental Justice Clinic at Vermont Law and Graduate School.

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Vermont Law and Graduate School's Center for Agriculture and Food Systems (CAFS) uses law and policy to build a more sustainable and just food system. In partnership with local, regional, national, and international partners, CAFS addresses food system challenges related to food justice, food security, farmland access, animal welfare, worker protections, the environment, and public health, among others. CAFS works closely with its partners to provide legal services that respond to their needs and develop resources that empower the communities they serve. Through CAFS' Food and Agriculture Clinic and Research Assistant program, students work directly on projects alongside partners nationwide, engaging in innovative work that spans the food system. Please visit www.vermontlaw.edu/cafs to learn more.

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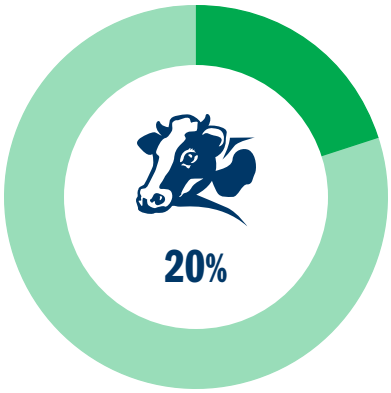


INTRODUCTION

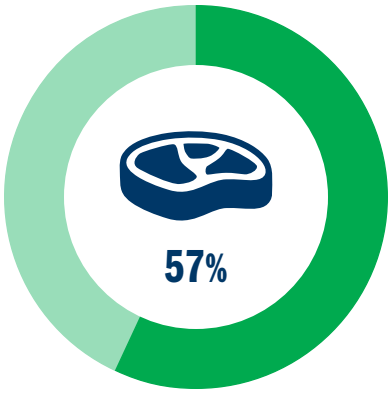
THE WORLD IS ON TRACK TO EXCEED A 2° C INCREASE DURING THE 21ST CENTURY, an outcome scientists have described as catastrophic.[1] Direct impacts on the food and agriculture sectors will be far-reaching.[2] Already, climate-related impacts to farming include "observed changes in extremes such as heatwaves, heavy precipitation, droughts, and tropical cyclones."[3] These changes impact both crop and livestock production. Experts predict that further warming will continue to dramatically affect the "global water cycle and its variability, global monsoon precipitation and the severity of wet and dry events."[4]

In regions like eastern North Carolina, home to the United States' top two pork producing counties,[5] producers will experience more regular hurricanes of greater magnitude.[6] California's Central Valley, which provides cropland for over 250 different crops[7] and houses 80 percent of the state's milk cows,[8] already relies on the second most over-pumped aquifer in the nation while facing substantially drier conditions as a result of climate change.[9] These impacts will disproportionately harm vulnerable populations[10] in addition to historically marginalized farmers, who will be the first to lose their livelihoods.[11] Climate change will force agriculture to adapt—either now, through innovation to mitigate increased warming, or later, as regional climates become incompatible with existing models of food production.[12]

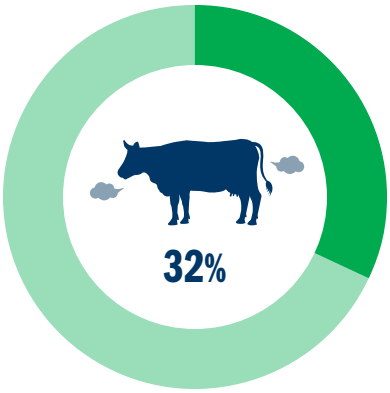
It is clear that the food and agriculture sector will bear significant impacts from climate change, but this sector is also a major contributor of greenhouse gas (GHG) emissions. Animal agriculture, in particular, is responsible for approximately 20 percent of global GHG emissions and 57 percent of food related emissions.[13] Animal agriculture's primary contributions to climate change result from methane and nitrous oxide emissions. Methane has a global warming potential 28 to 36 times that of carbon dioxide on a 100-year timescale and nitrous oxide has a global warming potential 265 to 298 times that that of carbon dioxide on a 100-year timescale.[14] Moreover, while emissions from the energy sector have decreased as a result of emission reduction policies, GHG emissions from agriculture have increased over recent decades with this trend projected to continue.[15] Consequently, addressing emissions from agriculture is increasingly critical.



Percent of global greenhouse gas emissions caused by animal agriculture



Percent of global food-based emissions caused by animal agriculture



Percent of global methane emissions caused by livestock manure and enteric fermentation

Source: Food in the Anthropocene: the EAT-Lancet Commission on Healthy Diets from Sustainable Food Systems, THE LANCET

One approach to reducing atmospheric GHGs from livestock involves capturing emissions from manure through the use of anaerobic digesters.[16] Proponents of this approach herald it as a win-win. Manure biogas systems reduce GHG emissions by capturing GHGs that would otherwise be emitted and can displace the use of fossil fuels. Additionally, this new fuel source (biogas) creates a new revenue stream from a former waste product. In a 2017 press release announcing federal funding to help farmers construct biogas systems, the United States Department of Agriculture (USDA) articulated the conventional wisdom of the emissions reduction claim, stating:

> "Anaerobic digesters actually provide two-fold greenhouse gas reduction. First, they capture methane that otherwise would be emitted from the manure into the atmosphere. . . . Second, by utilizing the trapped biogas as a renewable energy source, digesters displace the need for additional fossil fuels."[17]
>
> **– LAURA MELLING**

While these claims sound promising, they omit important nuance. **Animal agriculture generates emissions throughout the operation—from land conversion to enteric fermentation (the emissions generated from ruminant burps), to transportation.** It is imperative that policymakers and others recognize that manure biogas systems reduce emissions from only one part of this system—manure management. At the same time, manure biogas systems rely on the ongoing production of large quantities of livestock manure—the source of manure management emissions—to function. Espousing these systems to the exclusion of other emissions mitigation measures can foreclose the potential to make important modifications throughout the livestock life cycle. Ultimately, this reinforces current conventional models of livestock production at the expense of farmers using more sustainable production models.

Currently, policymakers are dedicating increasing amounts of public funding and attention to manure biogas as compared to other policy interventions that can reduce livestock emissions. Recently, the American Biogas Council suggested that the US could support at least another 13,740 potential new biogas systems, including 8,300 on farms, in addition to 4,000



What is Methane?

"Methane is produced as part of normal digestive processes in animals. During digestion, microbes resident in an animal's digestive system ferment food consumed by the animal. This microbial fermentation process, referred to as enteric fermentation, produces CH4 as a byproduct, which can be exhaled or eructated by the animal. The amount of CH4 produced and emitted by an individual animal depends primarily upon the animal's digestive system, and the amount and type of feed it consumes."

Source: Inventory of US Greenhouse Gas Emissions and Sinks (1990-2020), Environmental Protection Agency

What is Enteric Fermentation?

"Enteric fermentation is fermentation that takes place in the digestive systems of animals. In particular, ruminant animals (cattle, buffalo, sheep, goats, and camels) have a large "fore-stomach," or rumen, within which microbial fermentation breaks down food into soluble products that can be utilized by the animal."

Source: AP-42: Compilation of Air Emissions Factors, Environmental Protection Agency

What are Biosolids?

"Biosolids are a product of the wastewater treatment process. During wastewater treatment the liquids are separated from the solids. Those solids are then treated physically and chemically to produce a semisolid, nutrient-rich product known as biosolids. The terms 'biosolids' and 'sewage sludge' are often used interchangeably."

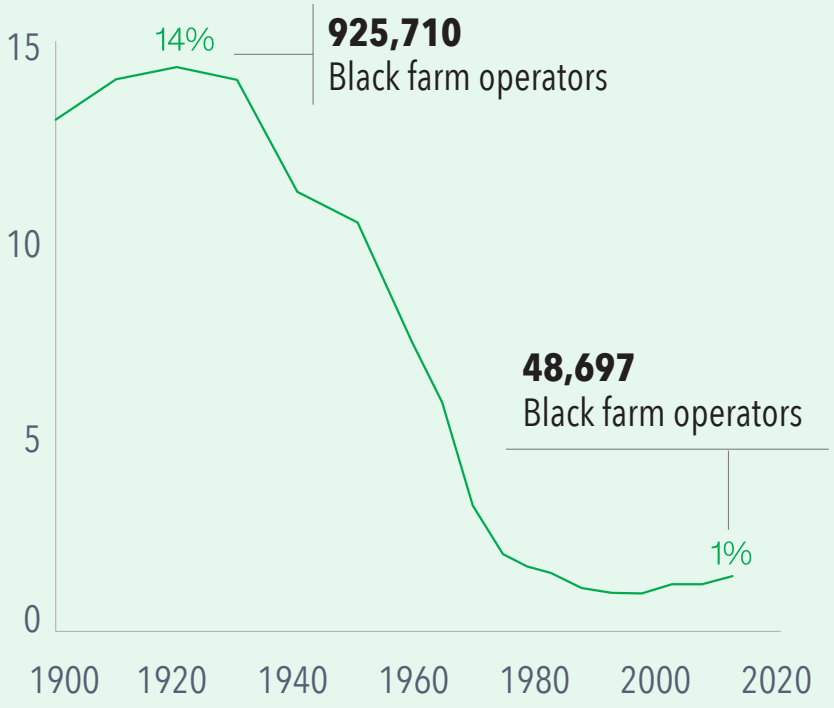
Source: Environmental Protection Agency

for wastewater, 1,000 for food scraps, and 440 for landfills.[18] Biogas systems are expensive to construct and operate. They require substantial investment into long-lasting, durable infrastructure such as pipeline interconnections and facilities upgrades. As more public and private resources are dedicated to this infrastructure, the incentives to continuing using these systems will increase.

To date, many discussions on the benefits of manure biogas fail to account for the concerning and negative implications associated with widespread adoption of manure biogas systems. For example, the climate implications resulting from the need for these systems to engage in long-term production of massive quantities of livestock manure (or other biosolids) to recoup the fixed upfront costs of installation and continued revenue generation is rarely addressed. To illustrate this point, the public programs subsidizing production and sale of biomethane from these operations provide incentives for the ongoing production of the core input—livestock manure—even as climate scientists warn that greater reductions from animal agriculture are necessary.[19] Promoting widespread investment in and adoption of manure biogas systems will inevitably impact livestock agriculture for years, if not decades, into the future, creating potential barriers for more substantial and systemic climate mitigation measures for the sector.

Moreover, because manure digesters are typically feasible only for industrial-scale livestock operations, the largest confined animal feeding operations will reap the financial and public relations benefits that accompany the installation of digesters. This is not a new trend: today and historically, large-scale commercial operations have benefited from the lion's share of federal funding for agriculture. Due to decades of discriminatory lending by USDA,[20] the majority of these operations are owned by white farmers.[21] Racism and discriminatory lending by the federal government over the past century has resulted in a dramatic loss of Black-owned land and farms across the board (one recent analysis calculated this dispossession to total $326 billion).[22] This disparity is even more pronounced for larger agricultural operations.[23] However, in some parts of the country, the substantial environmental impacts generated by these larger agricultural operations disproportionately harm Black, Indigenous, and communities of color.[24]

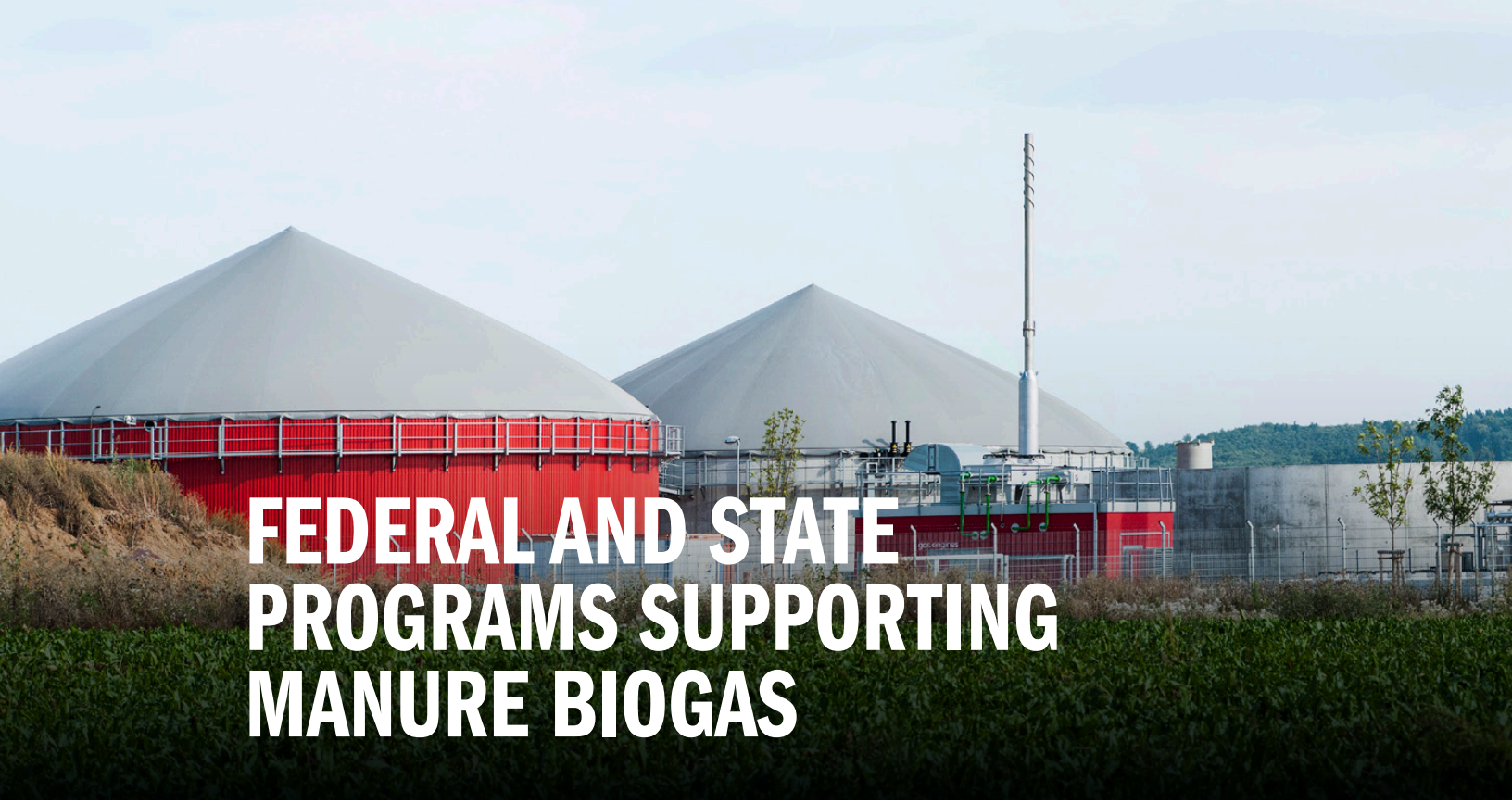
The share of Black farmers has declined significantly over the last century. Today just 1.4 percent of farmers identify as Black.



Source: Black farmers in the US: The opportunity for addressing racial disparities in farming, McKinsey & Company

Anaerobic digesters, in contrast to alternative mitigation measures, are an appealing means to reduce livestock emissions in industrial animal agriculture because they require no change to the structure of conventional livestock operations and manure management. On the contrary, these systems function by ensuring the continuity of both the existing system and its beneficiaries. This fails to consider and plan for the systemic changes needed in conventional operations and manure management due to the current, near, and long-term impacts of climate change.[25] Consequently, policymakers should immediately begin to proactively plan for the future by assessing the full range of suitable mitigation measures and supporting those that will provide for long-term sustainability and climate mitigation. As part of this process, policymakers must also critically evaluate the environmental justice impacts to neighboring communities and equity implications of elevating biogas systems over other mitigation measures.

This report analyzes and evaluates the extensive adoption and support of manure anaerobic digesters with a specific focus on the resulting equity implications, a goal explicitly aligned with two executive orders issued by the Biden Administration—Executive Order 14008: Tackling the Climate Crisis at Home and Abroad[26] and Executive Order 13985: Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.[27] The report begins by surveying existing funding opportunities for manure biogas systems and the fuels they produce. It then addresses the direct environmental impacts of installing and operating these systems, including a brief discussion about the methodology used to account for life cycle emissions. The next section evaluates alternative methods to reduce livestock emissions, indirect environmental impacts of adopting manure biogas as the primary means to reduce GHG emissions from livestock operations, and the equity impacts. The report concludes with a set of recommendations for policymakers and regulators as they consider the role this technology should play in shifting livestock agriculture toward a more equitable, just, and climate-smart model.



FEDERAL AND STATE PROGRAMS SUPPORTING MANURE BIOGAS

THE BIDEN ADMINISTRATION HAS CONSISTENTLY EMPHASIZED ITS COMMITMENT TO CLIMATE-SMART AGRICULTURE and tasked a number of federal agencies with collecting input from stakeholders and developing plans to address the climate crisis.[28] USDA was directed to submit a report to the administration laying out an "agricultural and forestry strategy."[29] In USDA's 90-Day Progress Report on Climate-Smart Agriculture and Forestry,[30] the agency embraced the president's "focus on developing a climate-smart agriculture and forestry strategy that employs proven conservation practices," announced plans to reduce methane from livestock,[31] and significantly funded research efforts targeted at these reductions.[32] With this new momentum, policy attention and interest in manure biogas has never been greater due to the perception that it provides an easy solution to reduce atmospheric emissions without requiring significant changes to the conventional industrial livestock model. This section surveys many of the existing and overlapping funding sources and incentive programs for manure biogas.

Grants & Loans Covering Start-Up Costs

Direct financial support for anaerobic digester systems is available to livestock facilities in the form of grants and loans. At the federal level, the Rural Energy for America Program (REAP) provides guaranteed loan financing and grant funding for the construction of biogas systems.[33] Federal funds for biogas systems can also be obtained through USDA's conservation programs—the Environmental Quality Incentives Program (EQIP), the Conservation Stewardship Program (CSP), and the newer Conservation Loan Program (CLP).[34] While these conservation and energy programs are the most important sources of federal funds for manure biogas, many other programs support the development of the industry. The 2018 Farm Bill's Energy Title alone includes the Biorefinery, Renewable Chemical, and Biobased Product Manufacturing Assistance Program;[35] the Bioenergy Program for Advanced Biofuels;[36] Biomass Research and Development Program;[37] the Biodiesel Fuel Education Program;[38] and the Carbon Utilization and Biogas Education Program.[39]

USDA encourages livestock operations to "stack" multiple programs. In 2015, USDA stated:

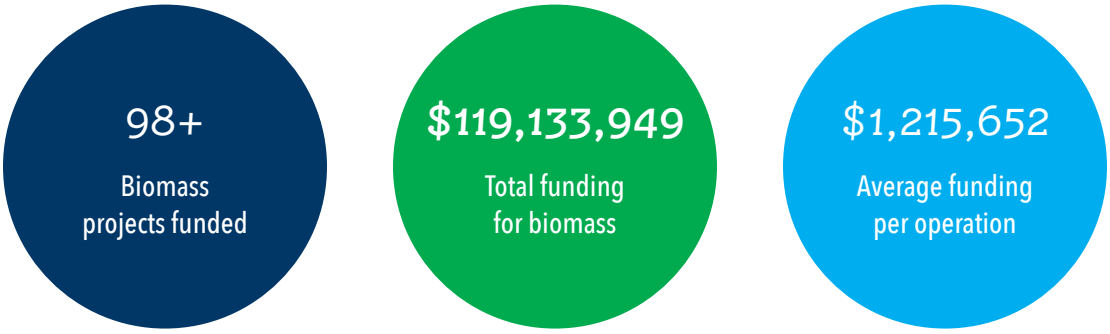
> To coordinate and maximize the potential assistance programs, Rural Development (RD) and Natural Resources Conservation Service (NRCS) met and developed a working partnership to deliver USDA services to producers interested in getting an anaerobic digester for their farming operation…. When "stacking," both RD and NRCS funding mechanisms can be used to assist in funding a project but each has limitations; for instance, the $450,000 cap on EQIP encompasses financial assistance for any practice that the producer wants to implement during the life of the Farm Bill.[40]

The report encourages the 50-50 use of EQIP and REAP funds and provides a detailed breakdown of estimated costs, where the two programs cover the total $1,778,950 required to construct the digester system.

Some states provide a similar suite of programs to fund the installation of manure biogas systems. In California, for example, the Dairy Digester Research & Development Program (DDRDP) provides funding for the installation of dairy digesters.[41] There are many smaller programs that offer grants, such as the Minnesota Department of Agriculture's Methane Digester Loan Program.[42]

The federal 1603 program, "Payments for Specified Energy Property in Lieu of Tax Credits,"[43] provides grants to reimburse businesses for a portion of the cost of installing certain energy projects, including anaerobic digesters on farms.[44] The 1603 program's creation as part of the American Recovery and Reinvestment Act in 2009 was "motivated by difficult economic conditions and the perceived lack of tax-equity capacity to support renewable energy projects" eligible for the tax credits discussed below.[45] While most 1603 funding has gone to wind and solar projects,[46] the program has provided funding for at least 98 projects designated "biomass (open loop, livestock)" for a total of $119,133,949.00 or an average of $1,215,652.54 per operation.[47]

1603 PROGRAM:
Payments for Specified Energy Property in Lieu of Tax Credits



Private investment is also available to livestock operations seeking funding to install digester systems. As public programs to subsidize manure biogas production proliferate, the industry has become increasingly appealing to private investors. A March 2021 report by Stifel Equity Research laid out the prospects for manure biogas as follows:

> We are bullish on the fundamentals of renewable natural gas (RNG) as it is positive for the environment (net negative carbon form of energy post-combustion), it is economic today (10-60 percent project IRRs), and offers immense growth potential (IEA projects an 18x increase in supply by 2040).[48]

The report noted that the current optimistic forecast for investors is closely linked to the enormous policy supports for this technology:[49]

> The combination of policy ([CA] Senate Bill 1383, requiring reductions in short-lived climate pollutants) and regulatory incentives (both federal and state) have driven the recent inflection in RNG growth. In our view, producers are not in the business of producing RNG; they are in the business of monetizing RNG's environmental attributes through various federal and state programs.[50]



Subsidies & Other Programs That Enhance Revenue from Biogas Sales

In addition to funding sources intended to help livestock operators cover the fixed costs of biogas system construction, state and federal programs subsidize the revenue from biogas production on an ongoing basis.

The Federal Renewable Fuel Standard (RFS), which requires transportation fuels sold in the United States to contain a minimum amount of renewable fuel (a "Renewable Volume Obligation"), is a key source of potential revenue for manure biogas operations. The RFS is a market-based program intended to reduce overall emissions from transportation fuels in the United States. It is structured like a cap-and-trade program, but rather than cap net GHG emissions, the RFS mandates a quota for the amount of renewable fuel that must be incorporated into conventional transportation fuels.

EPA measures the emissions impact of each eligible renewable fuel through the evaluation of fuel "pathways."[51] The pathway for each renewable fuel describes the inputs and processes required, as well as the life cycle GHGs.[52] Renewable fuel producers then apply to EPA for the specific pathways to which their fuel product corresponds. Once approved, these fuel producers can generate renewable identification numbers (RINs), which allow EPA to track and monitor these fuels.[53] Renewable fuels and their corresponding RINs can be sold to producers of conventional fuels so they can meet the quota required by the RFS. Biogas from manure digesters can be used to generate advanced biofuel RINs, coded D5 in the RFS regulation.[54] (77,000 British thermal units are equal to one gallon equivalent or one RIN.[55]) RINs are explicitly allowed to be layered on top of other analogous credits, such as those from California's Low Carbon Fuel Standard.[56]

Meeting the Federal Renewable Fuel Standard (RFS)

EPA measures the emissions impact of renewable fuels by evaluating their fuel "pathway," or the processes required to produce them. Biogas from manure digesters can be used to generate advanced biofuel renewable identification numbers (RINs).



Renewable fuel producers apply to EPA for their product's specific pathway.



Approved fuel producers generate RINs so EPA can track and monitor their fuels.

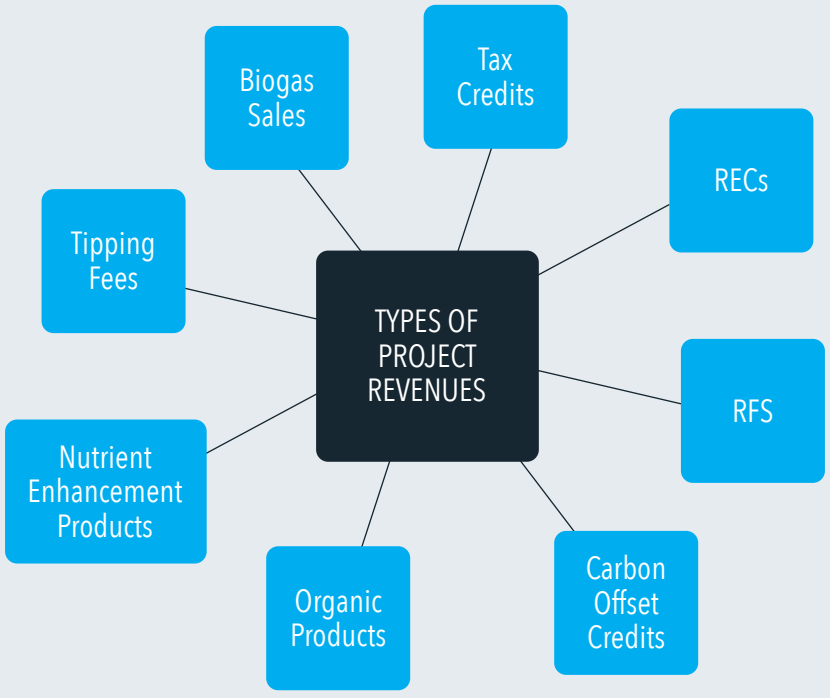


RINs can be sold to conventional fuel producers, allowing them to meet the Renewable Fuel Standard.

The federal Advanced Biofuel Payment Program also subsidizes biogas revenue. The program provides quarterly payments "for the actual quantity of eligible advanced biofuel produced during that quarter" to biofuel producers, including refined biogas from farms.[57] Entities that produce and sell biofuels, as defined in 7 CFR § 4288.102, can apply to participate in the program.[58] This program was granted $322,000,000 in mandatory funding between 2009 and 2023, in addition to $80,000,000 of discretionary funding authorized to be appropriated for the program between 2019 and 2023.[59]

In addition to direct payments, the federal government provides tax credits through the Electricity Production Credit and the Investment Tax Credit. Both corporate tax credits reduce energy producers' tax burdens, but while the Electricity Production Credit compensates producers on a per kilowatt-hour basis for renewable energy (including "open-loop biomass"), the Investment Tax Credit reimburses a set percentage of installation costs.[60] Importantly, taxpayers must choose either the Electricity Production Credit or the Investment Tax Credit—they cannot apply for both.

TYPES OF PROJECT REVENUES



Source: AgSTAR Project Development Handbook, Environmental Protection Agency

[61]

At the state level, the Biofuels Investment Tax Credit also allowed companies in Florida to recoup "75% of all capital, operation, maintenance, and research and development costs incurred in connection with an investment in the production, storage, and distribution of biodiesel (B10-B100), ethanol (E10-E100), or other renewable fuel" through 2016.[62] Additionally, industry groups tout California's Low Carbon Fuel Standard (LCFS) as a boon to the biogas industry's profitability.[63] The program creates a tradeable market for credits and deficits, which are allocated to transportation fuel producers based on the carbon intensity of the fuels they produce. Low carbon intensity fuels receive credits, while high carbon intensity fuels receive deficits. Like the federal RFS, California's LCFS program currently designates manure biogas as a negative emissions fuel and, consequently, awards profitable credits for its production.[64] This revenue is allocated to producers on an ongoing basis in proportion to the quantity of fuel they produce. Biogas producers that participate in the LCFS are also explicitly allowed to participate in California's cap-and-trade program, as well as the federal RFS. Like the stacking of USDA and DOE funds described above, layering multiple credits is explicitly described as a benefit.

Ultimately, however, the layering of credits from multiple market-based programs can undermine the additionality of emissions reductions claimed by those programs. Additionality is a term of art used to evaluate whether the policy intervention in question is in fact the cause of a given real-world behavior change. A behavior is not additional if it would have happened with or without the policy intervention. Compensating or crediting nonadditional behaviors, like the production of manure biogas, risks over-incentivizing them and even increasing rather than decreasing overall emissions. While California's LCFS is the most well-developed credit trading program for transportation fuels, other states are developing similarly structured programs, including Oregon's Clean Fuels Initiative program.

Finally, some states are creating reliable markets for these fuels as a source of "renewable energy" through utilities. Where renewable fuels standards like the programs described above focus on transportation fuels, renewable portfolio standards or renewable electricity standards focus on the use of renewable energy sources for electricity generation. These programs typically mandate that a certain amount of energy be derived from renewable sources and define what constitutes renewable sources for the purposes of the program. Much like the RINs in the federal renewable fuel standard, many renewable portfolio standards at the state level implement trading programs using renewable electricity certificates (RECs). State programs vary, but they usually include manure biogas as a renewable energy source.[65]

Considered collectively, these funds represent potential windfalls for operations well suited to the installation of manure biogas systems. But, smaller, less established operations, or operations that use dry manure management systems or grazing systems are unlikely to benefit from these funds, even though their models may be more climate smart overall in accord with the Biden Administration's stated goals and objectives.

More Information on Funding for Manure Biogas

- *Federal and State Laws and Incentives*, Alternative Fuels Data Center, https://afdc.energy.gov/laws/search
- U.S. Env't Protection Agency, AgStar Handbook, https://www.epa.gov/sites/default/files/2014-12/documents/agstar-handbook.pdf#page=81
- Cal. Dep't of Food and Agriculture, *Dairy Digester Research and Development Program Report of Funded Projects (2015-2019)* (April 2020), https://www.cdfa.ca.gov/oefi/ddrdp/docs/DDRDP_Report_April2020.pdf
- Cal. Public Utilities Comm'n., *Bioenergy Feed-In Tariff Program* (SB 1122), https://www.cpuc.ca.gov/SB_1122/





ANAEROBIC DIGESTERS CAN IMPOSE NEW ENVIRONMENTAL HARMS

TO PRODUCE BIOGAS FROM MANURE, farming operations must install an anaerobic digester, typically by capping or covering an existing manure lagoon to create an oxygen-free environment in which bacteria can break down organic matter. Biogas is a byproduct of this process. These systems offer some climate benefits (namely capturing methane and converting it to carbon dioxide during combustion) but their installation and use can also add new environmental harms. Such harms depend on a range of factors, including:

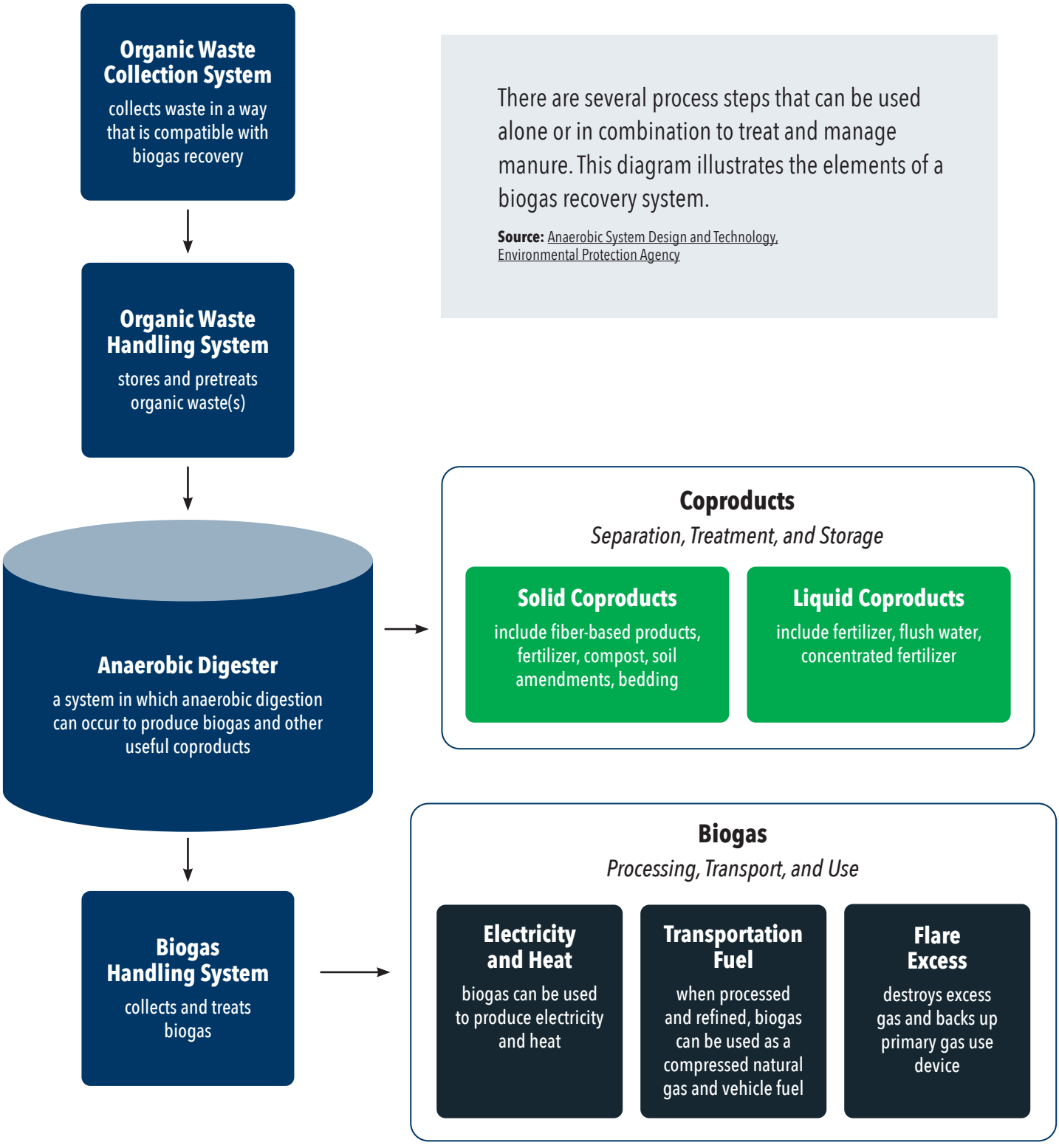
- the scale of the operations;
- the geography of the site;
- existing cumulative impacts to air and water;
- the end use of the biomethane; and
- the management of digestate (a byproduct of anaerobic digestion).

Through the process of anaerobic digestion, animal manure undergoes chemical changes that result in the production of a mix of gases, solid digestate, and liquid effluent. Biogas can be combusted to generate electricity on-site or exported as electricity and sold to the grid or at wholesale rates. The gases can be further "upgraded" to biomethane, which has a range of potential uses. Biomethane can be used on-site, injected into a pipeline, or used as a transportation fuel (when compressed to produce compressed natural gas).[66]

Through the process of anaerobic digestion, animal manure undergoes chemical changes that result in the production of a mix of gases, solid digestate, and liquid effluent.

Photo source: 20120717-OSEC-RBN-8338 by US Department of Agriculture is licensed under CC BY 2.0.

Anaerobic System Design & Technology



There are several process steps that can be used alone or in combination to treat and manage manure. This diagram illustrates the elements of a biogas recovery system.

Source: Anaerobic System Design and Technology, Environmental Protection Agency

Biogas Systems Primarily Benefit Large Operations Using Liquid Manure Management Systems

Two of EPA's screening questions to evaluate a livestock facility's potential for anaerobic digester systems ask whether the operation is "large" and whether it uses a liquid manure management system.[67] To be financially viable, biogas recovery systems typically require manure from at least 2,000 hogs or at least 500 cows.[68] According to EPA, manure biogas projects are "most likely to succeed where manure is collected as a liquid, slurry, or semi-solid and stored in open pits, ponds, or lagoons" because liquid manure can be easily flushed into lagoons.[69] Dry manure management is more common on pasture-based operations, where there is no easy manure collection system. Industrial scale operations and liquid manure management tend to go hand-in-hand because very large facilities often cannot dispose of all of their manure safely through land application without exceeding the amount of nutrients the land can take up. Additionally, liquefaction makes manure management less costly where livestock is confined.[70] A major downside to the liquefaction of manure, however, is that it generates more GHG emissions, since the anaerobic conditions in manure lagoons produce additional methane.[71] A 2022 EPA report explains:

To be financially viable, biogas recovery systems typically require manure from at least 2,000 hogs or at least 500 cows.

> When livestock manure is stored or treated in systems that promote anaerobic conditions (e.g., as a liquid/slurry in lagoons, ponds, tanks, or pits), the decomposition of the volatile solids component in the manure tends to produce CH4 (methane). When manure is handled as a solid (e.g., in stacks or drylots) or deposited on pasture, range, or paddock lands, it tends to decompose aerobically and produce CO2 and little or no CH4.[72]

The same report tied growth in industrial animal agriculture operations that liquefy manure to the broader increase in manure-related methane and nitrous oxide emissions since 1990.[73] EPA concluded:

> In many cases, manure management systems with the most substantial methane emissions are those associated with confined animal management operations where manure is handled in liquid-based systems… The shift toward larger dairy cattle and swine facilities since 1990 has translated into an increasing use of liquid manure management systems, which have higher potential CH4 emissions than dry systems.[74]

Biogas Systems Require New Infrastructure

Depending on the desired end use of the refined biomethane produced by anaerobic digestion and subsequent refining, operations require a range of additional infrastructure. New infrastructure can introduce additional truck traffic or pipeline interconnections and result in significant wear to common infrastructure such as roads. Depending on how the biogas is to be used, on-site gas treatment systems may be necessary to process the gas accordingly. Temporary storage systems for biogas may also be required and excess biogas may need to be flared, or burned off, in some cases.

Biogas Systems Produce New Co-Pollutants & Exacerbate Existing Co-Pollutants

Anaerobic digestion creates a byproduct called digestate, which can be used as animal bedding or as fertilizer. Digestate is chemically different from the original manure. Digestate contains "more soluble plant nutrients due to mineralization and has less degradable biomass than the original substrate resulting in changes in GHG and NH3 emissions."[75] The method of storage and treatment of digestate can significantly impact the total GHG emissions from the biogas system, as well as co-pollutants like volatile organic compounds (VOCs) and hydrogen sulfide.

A 2017 study seeking to provide clarity on the emissions impact of anaerobic digestion (versus solid-liquid separation versus a combination of the two methods) found that anaerobic digestion alone resulted in an 81 percent increase in ammonia emissions during storage.[76] The authors concluded that anaerobic digestion could "significantly increase NH3 emissions from manure storage if manure covers are not implemented."[77] While ammonia is not a greenhouse gas, it



creates serious public health harms and degrades air quality.[78] The study also found that the nitrous oxide from digested separated solids "was much higher than separated solids without digestion," canceling out net GHG reductions.[79] This indicates that the simple adoption of manure biogas systems is not enough to ensure a net reduction in emissions from a given operation.

One study at a swine biogas facility in China took digestate to a research facility, stored it under controlled conditions, and then measured resulting emissions. The study identified 49 VOCs, 22 of which have been described as hazardous air pollutants by EPA. Of these 22 hazardous VOCs, "11 of these had relatively high concentrations . . . 8 were identified to be or likely to be carcinogenic, and 14 were identified to be harmful to other human organs or systems."[80] While most studies on VOCs from manure focus on the odor-causing compounds, the "proportion of hazardous air pollutants (32.77 percent) was shown to be considerably higher than that of odorous pollutants (5.15 percent)."[81]

Another study looked at manure under anaerobic conditions from two different dairy farms in Japan and found that hydrogen sulfide emissions vary considerably based on the mixing speed and frequency of disturbance of the stored manure as well as the manure's total solid content, temperature, and pH. For example, when stored at 18 degrees Celsius (64 degrees Fahrenheit), there was a sudden increase in the concentration of hydrogen sulfide (H_2S).[82] Additionally, "[the highest H_2S emissions were achieved at the fastest speed and longest duration of manure mixing."[83] Given that exposure to hydrogen sulfide is extremely dangerous and has been linked to death, the storage and treatment of manure and digestate is critical.[84]

New Impacts Must Be Evaluated in Analyses of Biogas Systems

These new impacts must be incorporated into analyses intended to evaluate the potential benefits of manure biogas systems. Unfortunately, such analyses often omit key considerations regarding co-pollutants, new infrastructure, and the environmental justice and equity implications associated with manure biogas systems. As stated above, the conventionally cited environmental benefit of manure biogas systems is a net reduction in atmospheric GHG emissions. Policy support for biogas systems rests on this reduction and as a result, life cycle analyses of manure biogas systems typically focus their impact evaluation on GHG emissions specifically and do not always address harms from co-pollutants or new infrastructure.

The metric typically used to quantify the environmental sustainability of a product or service is life cycle analysis (LCA). The goal of LCA is to provide a comprehensive view of environmental impacts to help decision-makers identify the effect of a given good or service. LCAs estimate

To properly account for the full life cycle emissions, any manure biogas LCA should include the storage and disposal of digestate, as well as the emissions generated in the production of manure, that is, the emissions resulting from raising the livestock in question.



the cumulative environmental impacts resulting from all stages of a product, process, or service through the life cycle, from raw material acquisition, manufacturing, use/reuse/maintenance, to recycling/waste management.[85] Programs like the Federal Renewable Fuel Standard and California's Low Carbon Fuel Standard, described above in part II, rely on life cycle assessments to determine the life cycle GHG emissions of participant fuels, including those derived from manure biogas systems. Both EPA and the California Air Resources Board use versions of the Greenhouse Gases, Regulated Emissions, and Energy Use in Transportation (GREET) life cycle analysis model which is designed for transportation fuels.[86]

System boundaries mark the beginning and end of the process or life cycle in question. Consequently, the boundaries and assumptions used in the LCA model are critical. For example, an LCA that excluded emissions related to digestate would not fully account for life cycle emissions of manure biogas. To properly account for the full life cycle emissions, any manure biogas LCA should include the storage and disposal of digestate, as well as the emissions generated in the production of manure, that is, the emissions resulting from raising the livestock in question.

When produced at an industrial scale, animal manure can create severe environmental harms and adverse impacts to public health. The impacts of manure include water contamination, air pollution, and foul odor (which can degrade quality of life for neighboring communities and decrease property values), in addition to GHG emissions. Manure biogas systems capture some of the emissions from livestock facilities, but fail to address the co-pollutants associated with manure production while also producing new co-pollutants from the processing and storage of the resulting digestate, as discussed above. Multiple toxic pollutants, including VOCs, ammonia, endotoxins, particulate matter, and bioaerosols are linked to large-scale industrial confined animal feeding operations.[87] To the extent that anaerobic digestion technology maintains or even expands the model of concentrated industrial animal agriculture, it can perpetuate and even increase resulting public health harms.

In many parts of the country, these impacts disproportionately harm Black, Indigenous, and low-income communities. Multiple disparity analyses (and resulting civil rights complaints submitted to regulators) have challenged states' approaches to the regulation of industrial animal agriculture. One recent complaint filed with EPA's External Civil Rights Compliance

"These harms disproportionately affect Black and Latinx people living near the Hog Operations, and it is these communities who will suffer most if pollution from the Hog Operations worsens, as is expected with the Permits. Decades of research–including research reviewed by this office–demonstrate how the lagoon and sprayfield waste management system authorized by the Permits pollute rivers, streams, and air quality throughout eastern North Carolina. Despite this, and despite evidence indicating the increased risk of pollution and adverse health impacts to nearby residents from the increases to harmful hog waste pollutants resulting from biogas production, DEQ issued the Permits without addressing these harms. This is unacceptable and a violation of federal law." – SELC complaint to EPA, 2021

Source: Southern Environmental Law Center

Office under Title VI of the Civil Rights Act alleged that North Carolina's new general permit for manure biogas exacerbated existing discriminatory impacts of the livestock industry in the state.[88] The complaint alleges that the North Carolina Department of Environmental Quality's new general permit for biogas systems on confined animal feeding operations "authorizes not only the continued use of the discriminatory lagoon and sprayfield system, but also the use of anerobic digesters and uncovered 'secondary' lagoons, which will exacerbate the underlying system's impacts on communities of color."[89] This complaint follows another civil rights complaint addressing the discriminatory harms of the hog industry in North Carolina, to which EPA responded with a letter expressing "deep concern."[90]

Typical Pollutants Found in Air Surrounding CAFOs

CAFO EMISSIONS	SOURCE	TRAITS	HEALTH RISKS
Ammonia	Formed when microbes decompose undigested organic nitrogen compounds in manure	Colorless, sharp pungent odor	Respiratory irritant, chemical burns to the respiratory tract, skin, and eyes, severe cough, chronic lung disease
Hydrogen Sulfide	Anaerobic bacterial decomposition of protein and other sulfur containing organic matter	Odor of rotten eggs	Inflammation of the moist membranes of eye and respiratory tract, olfactory neuron loss, death
Methane	Microbial degradation of organic matter under anaerobic conditions	Colorless, odorless, highly flammable	No health risks. Is a greenhouse gas and contributes to climate change
Particulate Matter	Feed, bedding materials, dry manure, unpaved soil surfaces, animal dander, poultry feathers	Comprised of fecal matter, feed materials, pollen, bacteria, fungi, skin cells, silicates	Chronic bronchitis, chronic respiratory symptoms, declines in lung function, organic dust toxic syndrome

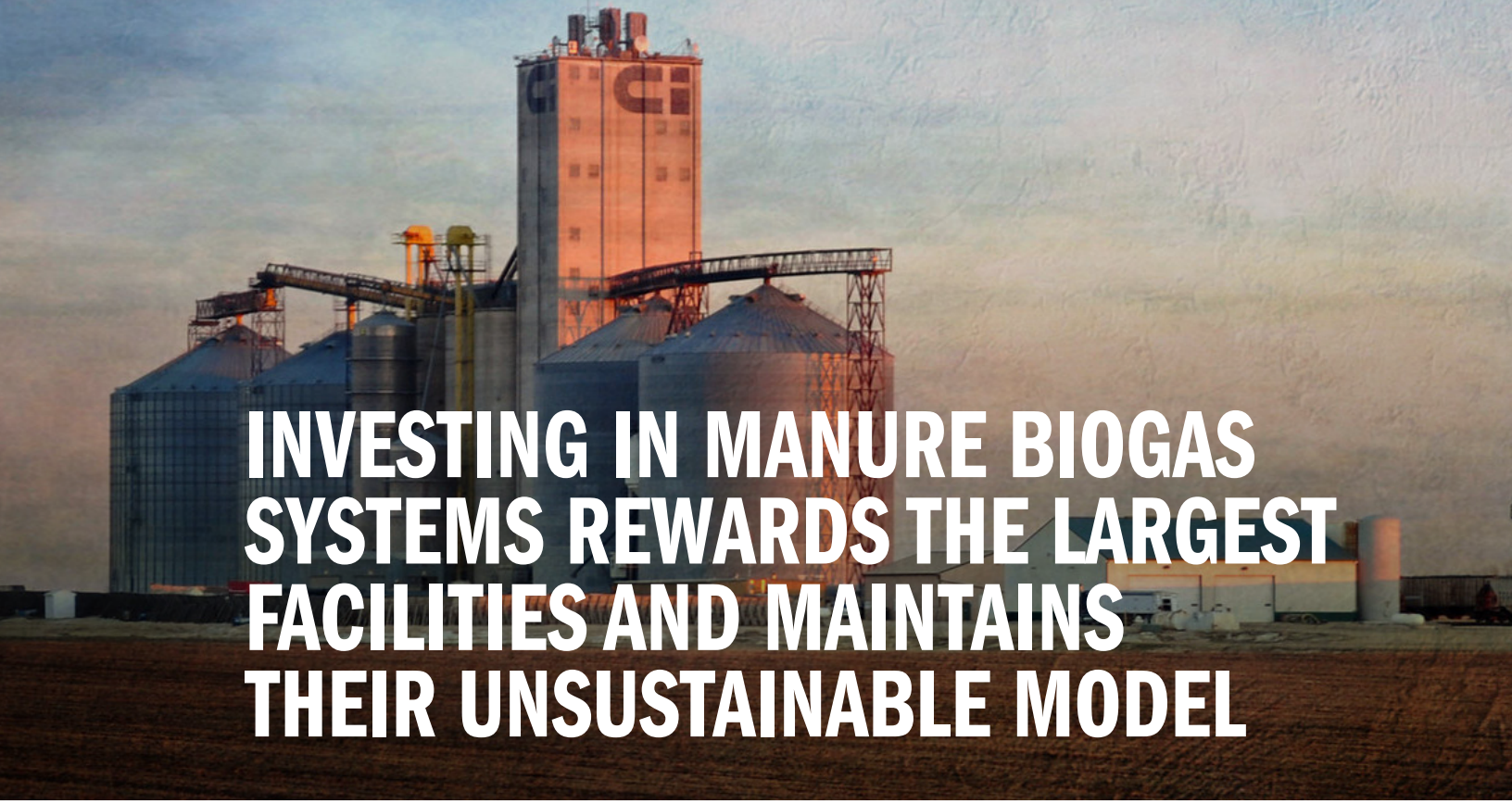
Source: Understanding Concentrated Animal Feeding Operations and Their Impact on Communities

More Information on the Impacts of Manure Biogas

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Photo source: Anaerobic Digester Fenville, MI by eXtension Farm Energy Community of Practice is licensed under CC BY-NC 2.0.



INVESTING IN MANURE BIOGAS SYSTEMS REWARDS THE LARGEST FACILITIES AND MAINTAINS THEIR UNSUSTAINABLE MODEL

THE SHEER NUMBER OF PROGRAMS designed to support the installation and operation of manure biogas systems on livestock operations presents two important questions. First, are these programs necessary to obtain the intended climate benefits of biogas systems and to what extent do they contribute to an overall emissions reduction? Second, what are the opportunity costs of the intense focus on this one method of reducing livestock emissions, given the range of alternatives? The fact that alternatives exist, coupled with the requirement that manure production continue at staggering rates to ensure the productivity of manure biogas systems calls into question whether it is prudent to focus policy efforts on a single solution.

Biogas Systems May Not Reduce Overall Emissions

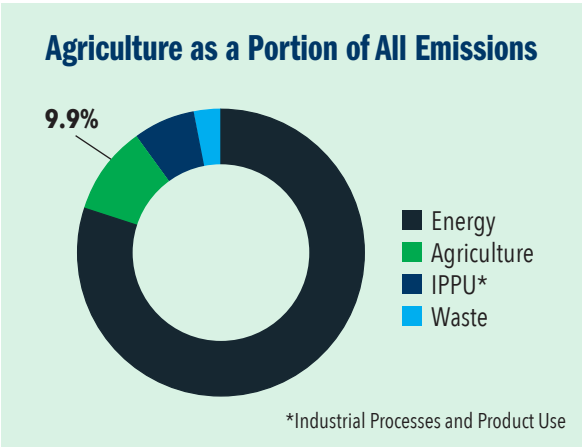
Anaerobic digesters are designed to capture (and monetize) methane and other gases that would otherwise be emitted into the air from manure lagoons. However, *capturing* emissions does not avoid or reduce emissions at the source. Reducing emissions at the source would entail significant changes in livestock production systems. Digester systems are sometimes described as stopgap measures—a means to reduce emissions quickly in the absence of developing or implementing alternative measures. However, climate science demonstrates that significant reductions at the source are required in the next decade. Investing in expensive durable infrastructure that requires ongoing manure production at current rates without emissions reductions fails to meet this imperative.

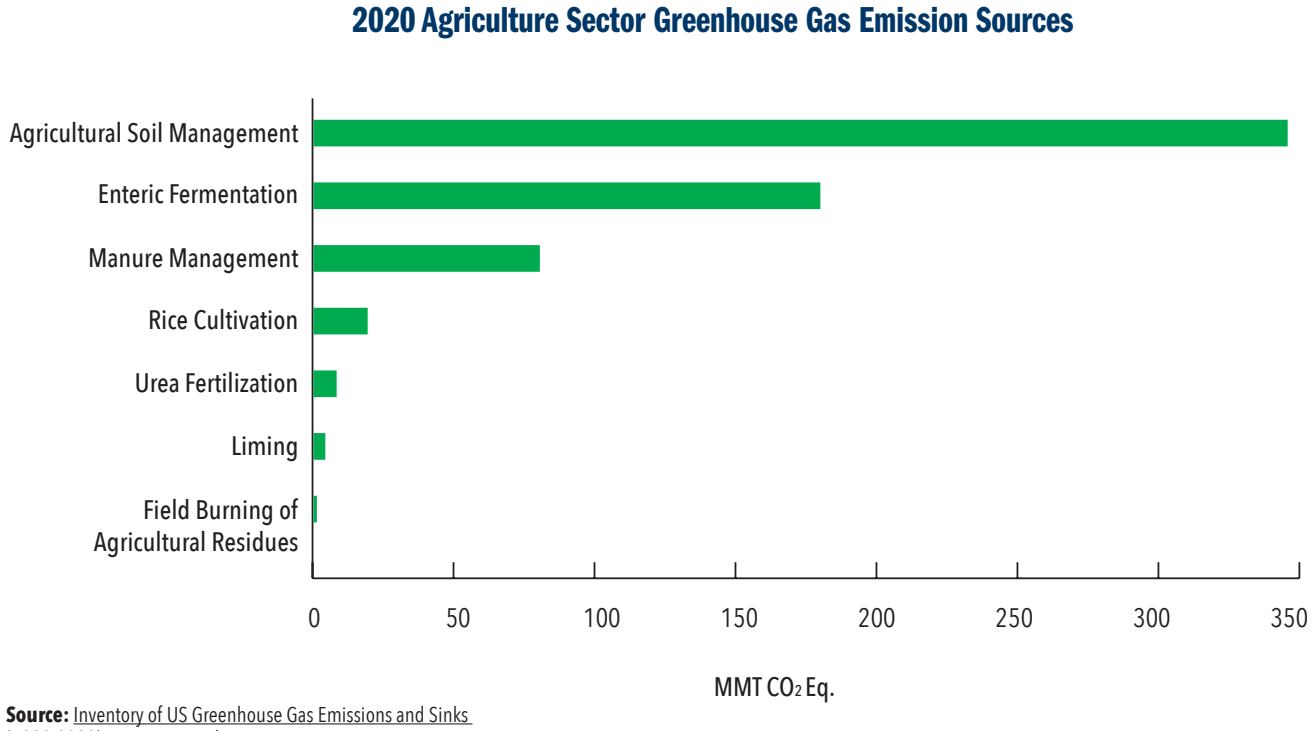
Because manure biogas systems capture rather than reduce emissions, these systems **require the ongoing generation of GHG emissions** to be financially viable. The digester's function is to capture the emissions, so the system breaks down if emissions are reduced at the source. Producers must continue to generate manure at scale for the facilities to remain financially sustainable. The large upfront investment in these systems then fixes the current numbers and concentration of livestock at facilities where they are installed, despite the range of harms

Photo source: Ag Partners, Hartley, Iowa by TumblingRun is licensed under CC BY-NC-ND 2.0.

generated by such concentrated operations. Simultaneously, the new subsidized revenue streams support the ongoing generation of manure at scale. This outcome is sharply at odds with the prescriptions of climate scientists and the Biden Administration's stated climate goals.

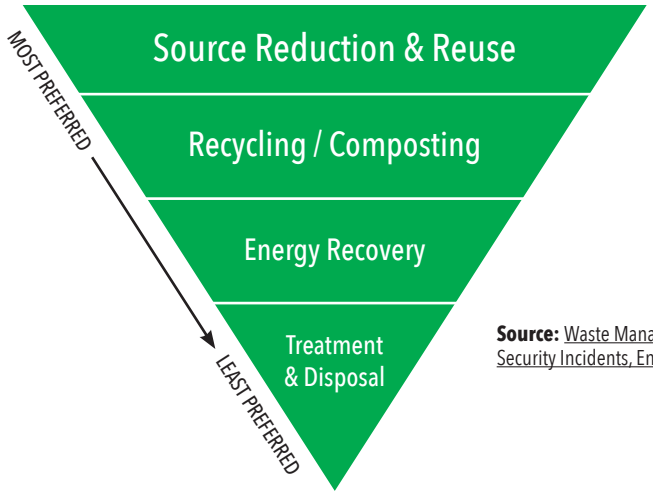
Additionally, while anaerobic digesters capture manure methane from lagoons, they do not capture greenhouse gas emissions before or after this point. The emissions from manure management that can be targeted by digesters make up 9.2 percent of total methane emissions from anthropogenic activities, while emissions from enteric fermentation, which remain untouched by digester systems, make up 26.9 percent.[91] In contrast, other interventions in the industrial animal agriculture system, including alternative methods of manure management and changes to animals' diet, address emissions throughout or at various points in the process of raising livestock. Importantly, a significant portion of livestock GHG emissions result from the decision to liquefy manure.[92] Some manure management emissions can be avoided by using dry manure management systems, as many farmers do. Capturing GHG emissions should be a last resort option after other alternatives have been pursued to avoid





Source: Inventory of US Greenhouse Gas Emissions and Sinks (1990-2020), Environmental Protection Agency

Waste Management Hierarchy



Source: Waste Management Hierarchy and Homeland Security Incidents, Environmental Protection Agency

or reduce emissions. This tracks with other federal policy efforts and priorities, as reduction is the management method at the top of EPA's waste management hierarchy for decision-making (organized from least to most detrimental to human and animal health and the environment).[93]

Alternative measures to reduce methane emissions from animal agriculture are available and feasible. Manure management systems generally include processes for the collection, transfer, storage, and sometimes treatment and end-use of manure.[94] Alternatives are available at each point along the way. At the initial collection stage, operations can opt for dry-scrape systems, rather than the flush systems typically used for lagoons. Dry scrape systems use mechanical scrapers to move manure into holding pits.

Livestock operations can also be designed as pasture-based, rather than confinement. On pasture-based operations, manure is typically left on pasture and produces minimal methane.[95] Pasture-based operations that rely primarily on grazing for animals' nutrition can also avoid emissions associated with the production and transportation of the feed used on confinement operations[96] and can potentially provide carbon sequestration benefits if grasslands and grazing are properly managed.[97] At the storage stage, operations can employ solid-liquid separation rather than flushing all liquefied manure directly into a lagoon. Once liquids have been separated out, manure solids can be composted.[98] A technical report prepared for the California Air Resources Board concluded that, in addition to manure biogas system installation:

> Methane emissions from lagoon storage systems can be decreased by reducing the amount or modifying anaerobic storage (i.e. solids separation and diversion from lagoon, modifying dominant flush collection to manure scraping with drying/composting or other lagoon diversion, etc.), aerating the lagoon (to reduce or eliminate anaerobic conditions).[99]

These are viable methods of manure management that would avoid, rather than simply capture, at least some emissions associated with open-air lagoons of liquid manure.[100] Many livestock operations already employ these lower-emissions practices. Unfortunately for them, however, smaller operations, pasture-based operations, or operations that have a more sustainable business model of dry manure management will not benefit from the significant public funds currently being channeled to biogas-eligible facilities. This sets a perverse precedent of neglecting historically good actors while rewarding the worst polluters in the livestock industry with new revenue and fodder for positive public relations.

Tied to the claim that biogas systems reduce emissions is the argument that the use of manure systems displaces the use of fossil fuels. An empirical analysis of this claim is beyond the scope of this report. However, regulators and policymakers should carefully consider the climate value of replacing fossil fuels with the combustion of biomethane, especially for the magnitude of public funds invested in this displacement. Renewability does not necessarily mean that a fuel is sustainable or climate friendly.[101]

Biogas Systems May Not Generate Revenue & "Design Out Waste"

Another important consideration is whether manure biogas systems really generate revenue and "design out" waste. This reflects a broader trend in policy prescriptions, sometimes referred to as the "circular economy," that seeks to "design out" waste from various industrial life cycles.[102] Proponents of the circular economy use the phrase "designing out" manure or any other waste product to mean that the waste is made profitable through other industrial processes. Unlocking new profits from waste,[103] however, does not necessarily entail any changes to the processes of waste generation or to any environmental or public health harms that arise from these processes.

In the case of manure biogas systems, manure is still produced, liquefied, and transported to manure lagoons—it must be for the biogas system to function. Anaerobic digestion does not make the manure vanish, it produces digestate. As discussed above, digestate has industrial uses, as fertilizer, for example, but also carries many of the same potential environmental harms as manure. Therefore, while it is correct to say that manure biogas systems access the potential economic value of manure as a fuel source, the waste does not disappear and can continue to cause environmental and public health harms, before, during, and after (as digestate) the process of anaerobic digestion.

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The massive quantities of manure produced at industrial scale livestock facilities can and do cause serious environmental, quality of life, and public health harms to neighboring communities. These harms do not cease to exist upon the addition of an anaerobic digester. In fact, while proponents of biogas systems sometimes argue that capping lagoons can address these issues, impacted environmental justice communities around the country have organized against the proliferation of biogas because it is viewed as maintaining and supporting a harmful system.[104]

Beyond the Baseline: Evaluating Mitigation Measures Against Policy Alternatives

The climate benefits associated with greater public resources devoted to expanding manure biogas production can only be evaluated relative to other available policy options. Such policy options cannot be limited to a business-as-usual scenario, which the scientific community has made clear is untenable. Regulators currently consider the displacement of fossil fuels when evaluating the benefits associated with these systems, but they must also consider the alternative emissions reduction strategies that are displaced now and into the future upon investment in large-scale manure biogas systems.

Unfortunately, conventional win-win claims break down when framed in the broader context of policy mechanisms available to address emissions from livestock. This is attributable to the many alternative approaches to reducing emissions from livestock facilities, some of which could reduce emissions throughout the life cycle, instead of those emitted only from



manure lagoons. The Biden Administration's plan to reduce methane names several of these alternatives, including installing "solid separators that reduce methane-producing slurries; providing conservation assistance for transitions to alternative manure management systems, such as deep pits, composting, transitions to pasture, or other practices that have a lower greenhouse gas profile."[105] Despite the administration's support of reducing methane-producing slurries on paper, funding for manure biogas systems that require methane-producing slurries to function continues to dwarf alternatives.

While it is unreasonable to expect a single policy mechanism or technology to solve all problems, there are viable alternative manure management practices and policy mechanisms to decrease emissions as well as co-pollutants in a more equitable manner. Currently, however, these programs are not being funded at nearly the same rate as manure biogas. In California, for example, the Alternative Manure Management Program (AAMP) has been funded at roughly half the rate of the Dairy Digester Research & Development Program (DDRDP) in recent years.[106]

In addition to a broad evaluation of each of these alternative mechanisms and potential policy mechanisms to promote them, it is essential to note the reason policy incentives are strictly necessary in this case—industrial livestock operations have historically been essentially exempt from any regulation of GHG emissions. It is, in fact, only this absence of regulation that makes the calculation of emissions reductions from the addition of digesters so high. The primary alternative policy mechanism should be to treat industrial livestock operations like every other industry in the country and regulate the emissions they externalize to the detriment of the public—the primary funders of manure biogas systems. Regulators should actively support farmers that engage in climate-friendly practices less likely to harm neighboring communities.

In the United States, livestock agriculture has dramatically shifted toward "large scale industrialized production systems."[107] As a result, livestock operations are producing more manure in centralized regions.[108] The storage, transportation, and land application[109] of this waste poses serious environmental risks, in addition to the GHG emissions from other parts of the livestock life cycle. Methane emissions from livestock manure are significant, but experts note that the trade-offs associated with manure management options, including the use of biodigesters, are not well studied and have not been proven to be "climate smarter."[110]

While it is unreasonable to expect a single policy mechanism or technology to solve all problems, there are viable alternative manure management practices and policy mechanisms to decrease emissions and co-pollutants in a more equitable manner.



POLICY RECOMMENDATIONS AND CONCLUSION

LIVESTOCK OPERATIONS' IMPACT ON CLIMATE CHANGE presents an opportunity for a real win-win: the US can develop policies that reduce GHG emissions from these facilities—as is required in order to mitigate the substantial impact of livestock agriculture on the climate—while simultaneously reducing the additional environmental harms many such facilities externalize into local communities. In many cases, have a discriminatory impact on the basis of race. These prerogatives are well aligned with the Biden Administration's Climate Smart Agriculture policy, Executive Order 14008, and Executive Order 13985.[111] Specifically, policymakers should consider the following:

USDA must ensure that recipients of its funding are in compliance with Title VI of the Civil Rights Act of 1964. This includes ensuring that state agencies that receive USDA funding and implement programs supporting manure biogas are developing such policies in a manner that does not disproportionately benefit white operators or disproportionately harm nearby communities on the basis of race, national origin, or color.

Evaluate USDA's programs to ensure that they do not have a disproportionate impact on the basis of race, national origin, or other protected class.

Properly account for the full climate impacts of manure biogas and ensure that emissions life cycle analyses consider the full range of upstream and downstream emissions in the manure biogas life cycle.

Move beyond business-as-usual as a point of comparison for manure biogas, which does not ensure a viable climate-smart future. The point of comparison should be the range of policy alternatives to biogas promotion, including the regulation of methane from agricultural operations.

Properly account for the full impacts of policies supporting manure biogas, including environmental, public health, and quality of life impacts from co-pollutants caused by manure.

Ensure a just transition for all, including for livestock farmers. Policy should ensure that farmers and farmworkers can make viable livelihoods while transitioning to more sustainable models.

Evaluate the efficacy of overlapping programs to ensure that public funds for manure biogas are effectively promoting new emissions reductions.

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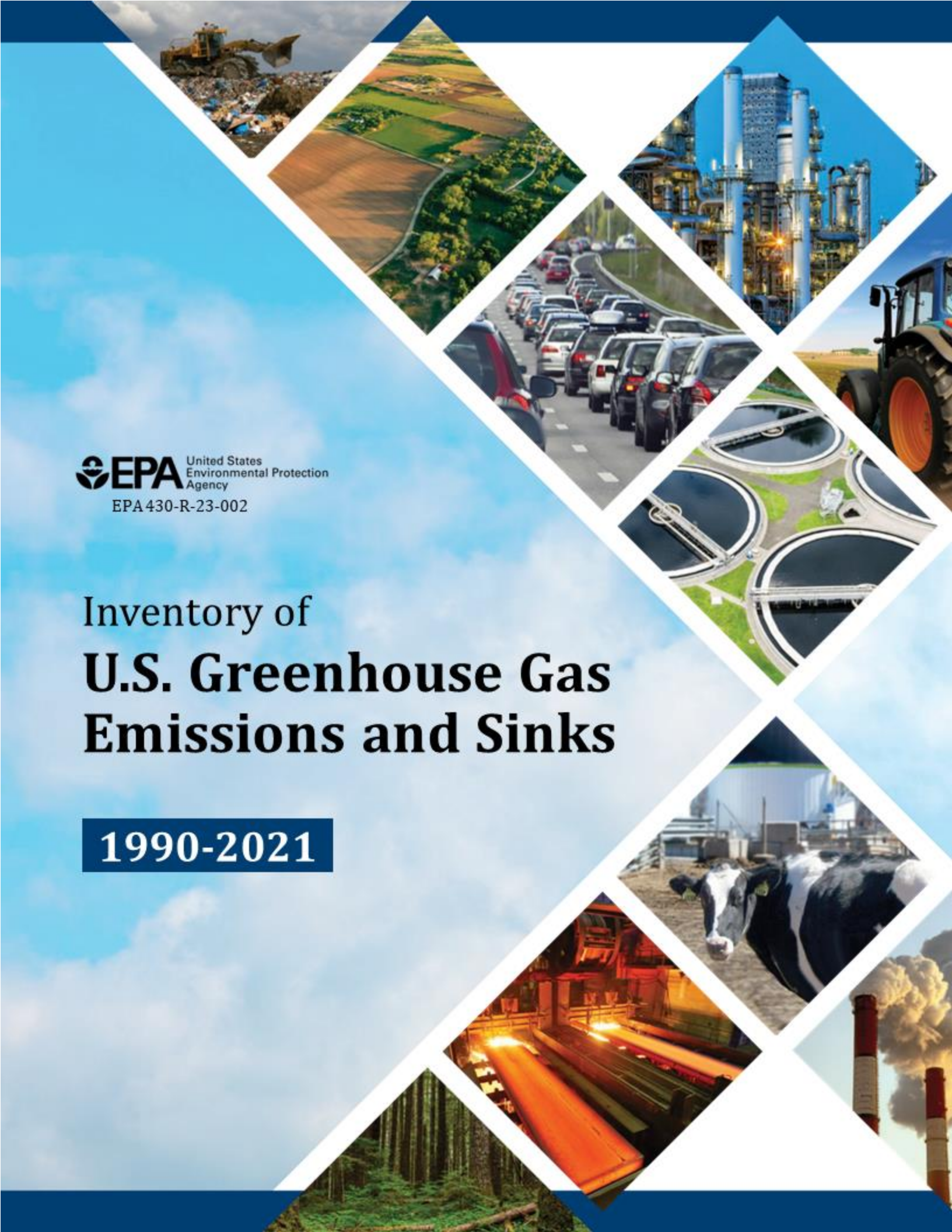
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United States Environmental Protection Agency

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Inventory of U.S. Greenhouse Gas Emissions and Sinks

1990-2021

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All data tables of this document for the full time series 1990 through 2021, inclusive, will be made available within 4-6 weeks after publication of the final report at the internet site mentioned above.

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For more information regarding climate change and greenhouse gas emissions, see the EPA web site at https://www.epa.gov/ghgemissions.

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Preface

The United States Environmental Protection Agency (EPA) prepares the official U.S. Inventory of Greenhouse Gas Emissions and Sinks to fulfill annual existing commitments under the United Nations Framework Convention on Climate Change (UNFCCC). Under UNFCCC Article 4 and decisions at the First, Second, Fifth and Nineteenth Conference of Parties, national inventories for UNFCCC Annex I parties should be provided to the UNFCCC Secretariat each year by April 15.

In an effort to engage the public and researchers across the country, the EPA has instituted an annual public review and comment process for this document. The availability of the draft document on the EPA Greenhouse Gas Emissions web site was announced via Federal Register Notice. The public comment period covered a 30-day period from February 15 through March 17, 2023, and comments received during the public review period were posted to the docket EPA-HQ-OAR-2023-0001. Comments received after the closure of the public comment period will be considered for the next edition of this annual report. Responses to comments are typically posted to EPA's website 2-4 weeks following publication of the final report in April 2023.

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Executive Summary

An inventory that identifies and quantifies a country's anthropogenic[1] sources and sinks of greenhouse gas emissions and removals is essential for addressing climate change. This Inventory adheres to both (1) a comprehensive and detailed set of methodologies for estimating national sources and sinks of anthropogenic greenhouse gases, and (2) a common and consistent format that enables Parties to the United Nations Framework Convention on Climate Change (UNFCCC) to compare the relative contribution of different emission sources and greenhouse gases to climate change.

In 1992, the United States signed and ratified the UNFCCC. As stated in Article 2 of the UNFCCC, "The ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time-frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner."[2]

As a signatory to the UNFCCC, consistent with Article 4[3] and decisions at the First, Second, Fifth, and Nineteenth Conference of Parties,[4] the United States is committed to submitting a national inventory of anthropogenic sources and sinks of greenhouse gases to the UNFCCC by April 15 of each year. The United States views this report, in conjunction with Common Reporting Format (CRF) reporting tables that accompany this report, as an opportunity to fulfill this annual commitment under the UNFCCC.

This executive summary provides the latest information on U.S. anthropogenic greenhouse gas emission trends from 1990 through 2021. The structure of this report is consistent with the UNFCCC guidelines for inventory reporting, as discussed in Box ES-1.[5]

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[1] The term "anthropogenic," in this context, refers to greenhouse gas emissions and removals that are a direct result of human activities or are the result of natural processes that have been affected by human activities (IPCC 2006).

[2] Article 2 of the Framework Convention on Climate Change published by the UNEP/WMO Information Unit on Climate Change. See http://unfccc.int.

[3] Article 4(1)(a) of the United Nations Framework Convention on Climate Change (also identified in Article 12) and subsequent decisions by the Conference of the Parties elaborated the role of Annex I Parties in preparing national inventories. Article 4 states "Parties to the Convention, by ratifying, shall develop, periodically update, publish and make available…national inventories of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol, using comparable methodologies…" See http://unfccc.int for more information.

[4] See UNFCCC decisions 3/CP.1, 9/CP.2, 3/CP.5, and 24/CP.19 at https://unfccc.int/documents.

[5] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Box ES-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the UNFCCC requirement under Article 4.1 and related decisions to develop and submit annual national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)* and where appropriate, its supplements and refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common manner in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable (UNFCCC 2014). The presentation of emissions and removals provided in this Inventory does not preclude alternative examinations, but rather this Inventory presents emissions and removals in a common format consistent with how countries are to report inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP), which is complementary to the U.S. Inventory.[6] The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject carbon dioxide (CO_2) underground for sequestration or other reasons and requires reporting by over 8,000 sources or suppliers in 41 industrial categories.[7] Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO_2 Eq. per year. Facilities in most source categories subject to GHGRP began reporting for the 2010 reporting year while additional types of industrial operations began reporting for reporting year 2011. Methodologies used in EPA's GHGRP are consistent with the *2006 IPCC Guidelines*. While the GHGRP does not provide full coverage of total annual U.S. greenhouse gas emissions and sinks (e.g., the GHGRP excludes emissions from the agricultural, land use, and forestry sectors), it is an important input to the calculations of national-level emissions in this Inventory.

The GHGRP dataset provides not only annual emissions information, but also other annual information such as activity data and emission factors that can improve and refine national emission estimates over time. GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing the application of QA/QC procedures and assessment of uncertainties. See Annex 9 for more information on specific uses of GHGRP data in the Inventory (e.g., use of Subpart W data in compiling estimates for natural gas systems).

ES.1 Background Information

Greenhouse gases absorb infrared radiation, trapping heat in the atmosphere and making the planet warmer. The most important greenhouse gases directly emitted by humans include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and several fluorine-containing halogenated substances (HFCs, PFCs, SF_6 and NF_3). Although CO_2, CH_4, and N_2O occur naturally in the atmosphere, human activities have changed their atmospheric

[6] On October 30, 2009 the EPA promulgated a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emissions sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

[7] See http://www.epa.gov/ghgreporting and http://ghgdata.epa.gov/ghgp/main.do.

concentrations. From the pre-industrial era (i.e., ending about 1750) to 2021, concentrations of these greenhouse gases have increased globally by 48.1, 170.8, and 23.8 percent, respectively (IPCC 2013; NOAA/ESRL 2023a, 2023b, 2023c). This annual report estimates the total national greenhouse gas emissions and removals associated with human activities across the United States.

Global Warming Potentials

The IPCC developed the global warming potential (GWP) concept to compare the ability of a greenhouse gas to trap heat in the atmosphere relative to another gas. The GWP of a greenhouse gas is defined as the ratio of the accumulated radiative forcing within a specific time horizon caused by emitting 1 kilogram of the gas, relative to that of the reference gas CO_2 (IPCC 2013); therefore, CO_2-equivalent emissions are provided in million metric tons of CO_2 equivalent (MMT CO_2 Eq.) for non-CO_2 greenhouse gases.[8,9] All estimates are provided throughout the main report in both CO_2 equivalents and unweighted units, while estimates for all gases in this Executive Summary are presented in units of MMT CO_2 Eq. Emissions by gas in unweighted mass kilotons are also provided in the Trends and sector chapters of this report and in the Common Reporting Format (CRF) tables that are included in the submission to the UNFCCC.

Recent decisions under the UNFCCC[10] require Parties to use 100-year GWP values from the IPCC *Fifth Assessment Report* (AR5) for calculating CO_2-equivalents in their national reporting (IPCC 2013) by the end of 2024. This reflects updated science and ensures that national greenhouse gas inventories reported by all nations are comparable. In preparation for upcoming UNFCCC requirements,[11] this report reflects CO_2-equivalent greenhouse gas emission totals using 100-year AR5 GWP values. A comparison of emission values with the previously used 100-year GWP values from the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007), and the IPCC *Sixth Assessment Report* (AR6) (IPCC 2021) values can be found in Annex 6.1 of this report. The 100-year GWP values used in this report are listed below in Table ES-1.

Table ES-1: Global Warming Potentials (100-Year Time Horizon) Used in this Report

Gas	GWP
CO_2	1
CH_4[a]	28
N_2O	265
HFCs	up to 12,400
PFCs	up to 11,100
SF_6	23,500
NF_3	16,100
Other Fluorinated Gases	See Annex 6

[a] The GWP of CH_4 includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to production of CO_2 is not included. See Annex 6 for additional information.
Source: IPCC (2013).

[8] Carbon comprises 12/44 of carbon dioxide by weight.

[9] One million metric ton is equal to 10^{12} grams or one teragram.

[10] See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27), available online at https://unfccc.int/sites/default/files/resource/cp2022_10a01_adv.pdf.

[11] See Annex to decision 18/CMA.1, available online at https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf.

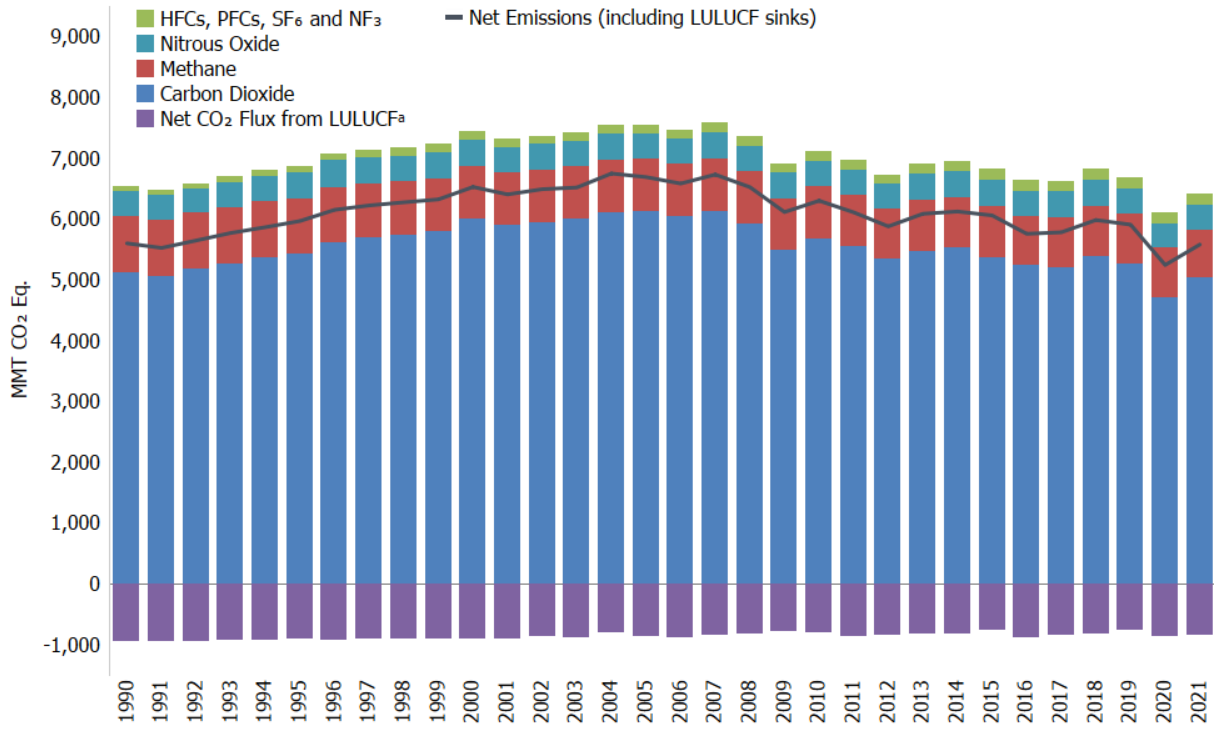
ES.2 Recent Trends in U.S. Greenhouse Gas Emissions and Sinks

In 2021, total gross U.S. greenhouse gas emissions were 6,340.2 million metric tons of carbon dioxide equivalent (MMT CO_2 Eq.).[12] Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2 Eq.). Net emissions (including sinks) were 5,586.0 MMT CO_2 Eq. in 2021. Overall, net emissions increased 6.4 percent from 2020 to 2021 and decreased 16.6 percent from 2005 levels as shown in Table ES-2. From 2019 to 2020, there was a sharp decline in emissions largely due to the impacts of the coronavirus (COVID-19) pandemic on travel and other economic activity. Between 2020 and 2021, the increase in total greenhouse gas emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. In 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent relative to the previous year. Carbon dioxide emissions from natural gas use increased by 8.6 MMT CO_2 Eq., a 0.5 percent increase from 2020. In a shift from recent trends, CO_2 emissions from coal consumption increased by 121.7 MMT CO_2 Eq., a 14.6 percent increase from 2020. The increase in natural gas consumption and emissions in 2021 is observed across all sectors except the Electric Power sector and U.S. Territories, while the coal increase is primarily in the Electric Power sector. Emissions from petroleum use also increased by 163.9 MMT CO_2 Eq. (8.6 percent) from 2020 to 2021. In 2021, CO_2 emissions from fossil fuel combustion were 4,639.1 MMT CO_2 Eq., or 1.9 percent below emissions in 1990.

Figure ES-1 and Figure ES-2 illustrate the overall trends in total U.S. emissions by gas, annual percent changes, and relative change since 1990 for each year of the time series, and Table ES-2 provides information on trends in gross U.S. greenhouse gas emissions and sinks for 1990 through 2021. Unless otherwise stated, all tables and figures provide total gross emissions and exclude the greenhouse gas fluxes from the Land Use, Land-Use Change, and Forestry (LULUCF) sector. For more information about the LULUCF sector, see Section ES.3 Overview of Sector Emissions and Trends.

[12] The gross emissions total presented in this report for the United States excludes emissions and removals from Land Use, Land-Use Change, and Forestry (LULUCF). The net emissions total presented in this report for the United States includes emissions and removals from LULUCF.

Figure ES-1: U.S. Greenhouse Gas Emissions and Sinks by Gas



[a] The term "flux" is used to describe the exchange of CO_2 to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO_2 from the atmosphere is also referred to as "carbon sequestration."

Table ES-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	5,121.0	6,132.2	5,212.2	5,377.8	5,262.1	4,714.6	5,032.2
CH_4[c]	868.7	791.1	762.7	774.0	767.8	742.2	727.4
N_2O[c]	406.3	415.8	414.7	430.2	410.3	388.9	393.3
HFCs	39.0	116.4	160.8	160.9	165.4	168.2	175.1
PFCs	21.8	6.1	3.8	4.3	4.0	3.9	3.5
SF_6	30.5	15.5	7.2	7.1	7.8	7.5	8.0
NF_3	+	0.4	0.5	0.5	0.5	0.6	0.6
Total Gross Emissions (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Emissions[a]	57.9	72.4	68.3	64.4	64.2	76.4	77.8
CH_4	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change[b]	(938.9)	(853.5)	(842.5)	(829.5)	(768.2)	(852.5)	(832.0)
LULUCF Sector Net Total[c]	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

+ Does not exceed 0.05 MMT CO_2 Eq.

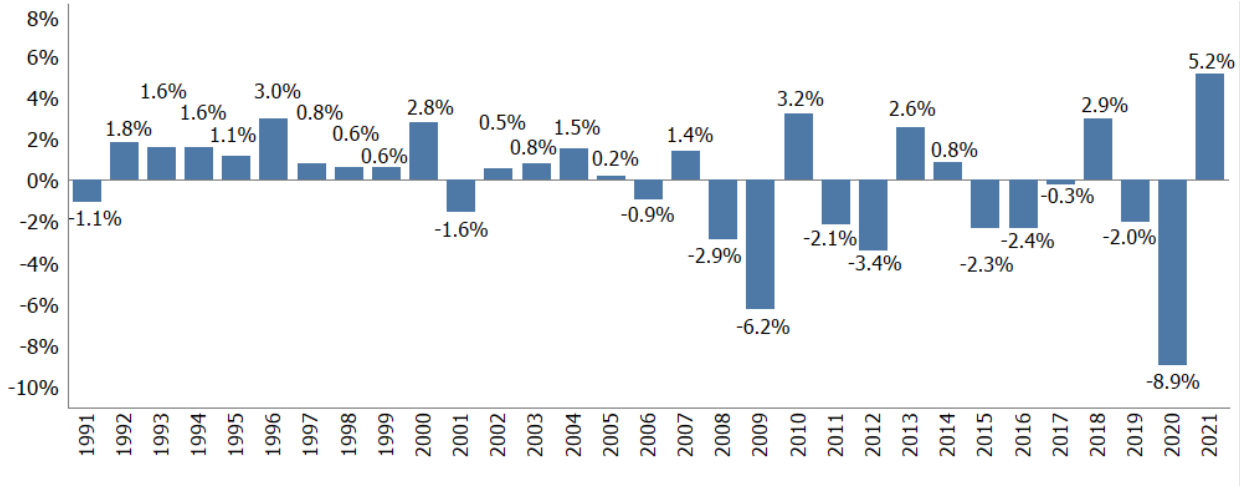
[a] LULUCF emissions subtotal of CH_4 and N_2O are reported separately from gross emissions totals. LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils.

[b] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[c] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net C stock changes.

Notes: Total (gross) are emissions presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Figure ES-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions and Sinks Relative to the Previous Year



Improvements and Recalculations Relative to the Previous Inventory

Each year, some emission and sink estimates in the Inventory are recalculated and revised to incorporate improved methods and/or data. The most common reason for recalculating U.S. greenhouse gas emission estimates is to update recent historical data. Changes in historical data are generally the result of changes in data supplied by other U.S. government agencies or organizations, as they continue to make refinements and improvements. These improvements are implemented consistently across the previous Inventory's time series, as necessary, (i.e., 1990 to 2020) to ensure that the trend is accurate. In addition, for the current Inventory, CO_2-equivalent emission estimates have been updated to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013).

Below are categories with methodological and data-related recalculations[13] resulting in an average change of greater than 2.5 MMT CO_2 Eq. over the time series.

- Forest Land Remaining Forest Land: Changes in Forest Carbon Stocks (CO_2)
- Wetlands Remaining Wetlands: Emissions from Flooded Land Remaining Flooded Land (CH_4)
- Biomass and Biodiesel Consumption (CO_2)
- Agricultural Soil Management (N_2O)
- Petroleum Systems (CH_4)
- Land Converted to Grassland: Changes in all Ecosystem Carbon Stocks (CO_2)
- Land Converted to Cropland: Changes in all Ecosystem Carbon Stocks (CO_2)
- Natural Gas Systems (CH_4)

[13] This does not include the recalculations related to the update from AR4 to AR5 GWP values. For more information on the impact of that update, please see Chapter 9, Recalculations and Improvements.

In addition, the Inventory includes two new categories not included in the previous Inventory that improve completeness of the national estimates: CO_2 emissions from the Substitution of Ozone Depleting Substances and CO_2 from the biogenic components of municipal solid waste combustion (reported as a memo item in the Inventory).

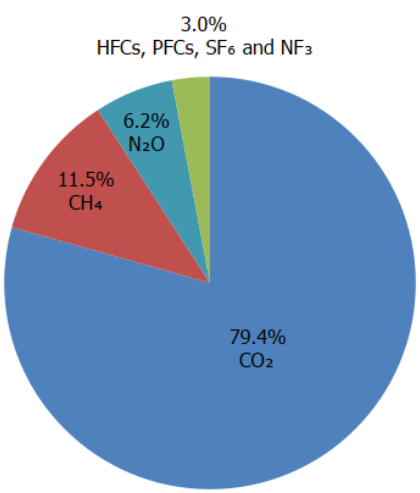
In each Inventory, the results of all methodological changes and historical data updates and the inclusion of new sources and sink estimates are summarized in the Recalculations and Improvements chapter (Chapter 9). Collectively, all methodological changes and historical data updates made in the current Inventory, including the quantitative effects of updating to from use of AR4 to AR5 GWPs in calculating CO_2-equivalent U.S. greenhouse gas emissions and sink for non-CO_2 emissions resulted in an annual average increase of 43.2 MMT CO_2 Eq. (0.7 percent) for net total emissions. The impact of methodological changes and historical data updates excluding quantitative effects of updating to AR5 GWP resulted in an annual average increase of 16.1 MMT CO_2 Eq. (0.3 percent) for net total emissions. For more detailed descriptions of each recalculation including references for data, please see the respective source or sink category description(s) within the relevant report chapter (i.e., the Energy chapter [Chapter 3], the Industrial Processes and Product Use [IPPU] chapter [Chapter 4], the Agriculture chapter [Chapter 5], the Land Use, Land-Use Change, and Forestry [LULUCF] chapter [Chapter 6], and the Waste chapter [Chapter 7]). In implementing improvements, the United States follows the *2006 IPCC Guidelines* (IPCC 2006), which states,

> "Both methodological changes and refinements over time are an essential part of improving inventory quality. It is good practice to change or refine methods when: available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; new inventory methods become available; and for correction of errors."

Emissions by Gas

Figure ES-3 illustrates the relative contribution of the greenhouse gases to total gross U.S. emissions in 2021, weighted by global warming potential. The primary greenhouse gas emitted by human activities in the United States is CO_2, representing 79.4 percent of total greenhouse gas emissions. The largest source of CO_2 and of overall greenhouse gas emissions is fossil fuel combustion, primarily from transportation and power generation. Methane (CH_4) emissions account for 11.5 percent of emissions. The major sources of methane include enteric fermentation associated with domestic livestock, natural gas systems, and decomposition of wastes in landfills. Agricultural soil management, wastewater treatment, stationary sources of fuel combustion, and manure management are the major sources of N_2O emissions. Ozone depleting substance substitute emissions are the primary contributor to aggregate hydrofluorocarbon (HFC) emissions. Perfluorocarbon (PFC) emissions are primarily attributable to electronics manufacturing and primary aluminum production. Electrical transmission and distribution systems account for most sulfur hexafluoride (SF_6) emissions. The electronics industry is the only source of nitrogen trifluoride (NF_3) emissions.

Figure ES-3: 2021 Total Gross U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO_2 Eq.)



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above.

From 1990 to 2021, total emissions of CO_2 decreased by 88.7 MMT CO_2 Eq. (1.7 percent), total emissions of CH_4 decreased by 141.2 MMT CO_2 Eq. (16.3 percent), and emissions of N_2O decreased by 13.0 MMT CO_2 Eq. (3.2 percent). During the same period, emissions of fluorinated greenhouse gases including HFCs, PFCs, SF_6, and NF_3 rose by 95.9 MMT CO_2 Eq. (104.8 percent). From 1990 to 2021, emissions of HFCs increased by 136.1 MMT CO_2 Eq. (348.6 percent) and NF_3 emissions increased by 0.6 MMT CO_2 Eq. (1,318.9 percent), while emissions of PFCs decreased by 18.3 MMT CO_2 Eq. (83.8 percent) and SF_6 emissions decreased by 22.5 MMT CO_2 Eq. (73.7 percent). Despite being emitted in smaller quantities relative to the other principal greenhouse gases, emissions of HFCs, PFCs, SF_6 and NF_3 are significant because many of these gases have extremely high global warming potentials and, in the cases of PFCs and SF_6, long atmospheric lifetimes. Conversely, U.S. greenhouse gas emissions were partly offset by carbon (C) sequestration in forests, trees in urban areas, agricultural soils, landfilled yard trimmings and food scraps, and coastal wetlands, which together offset 13.1 percent of gross total emissions in 2021 (as reflected in Figure ES-1). The following sections describe each gas's contribution to total U.S. greenhouse gas emissions in more detail.

Carbon Dioxide Emissions

The global carbon cycle is made up of large carbon flows and reservoirs. Billions of tons of carbon in the form of CO_2 are absorbed by oceans and living biomass (i.e., sinks) and are emitted to the atmosphere annually through natural processes (i.e., sources). When in equilibrium, global carbon fluxes among these various reservoirs are roughly balanced.[14]

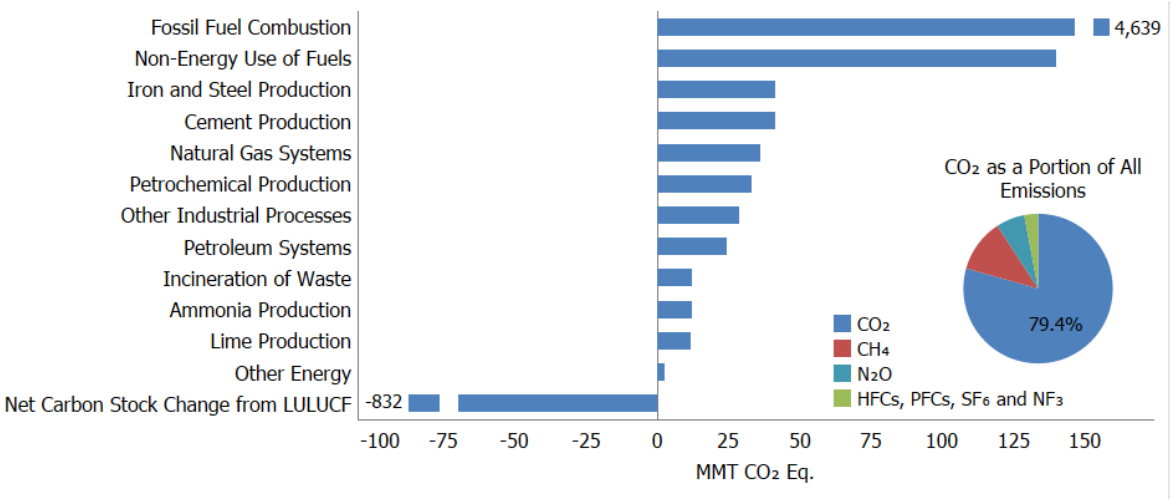
Since the Industrial Revolution (i.e., about 1750), global atmospheric concentrations of CO_2 have risen 48.1 percent (IPCC 2013; NOAA/ESRL 2023a), principally due to the combustion of fossil fuels for energy. Globally, an estimated

[14] The term "flux" is used to describe the exchange of CO_2 to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO_2 from the atmosphere is also referred to as "carbon sequestration."

33,000 MMT of CO_2 were added to the atmosphere through the combustion of fossil fuels in 2021, of which the United States accounted for approximately 14.1 percent.[15]

Overall CO_2 emissions have decreased 2 percent since 1990 and increased 7 percent since 2020, consistent with increases in fuel combustion as noted above. Within the United States, fossil fuel combustion accounted for 92.2 percent of CO_2 gross emissions in 2021. Nationally, the fossil fuel combustion transportation subsector was the largest emitter of CO_2 in 2021 followed by the electric power generation subsector. There are 27 additional sources of CO_2 emissions included in the Inventory (see Table 2-1). Although not illustrated in Table ES-4, changes in land use and forestry practices can also lead to net CO_2 emissions (e.g., through conversion of forest land to agricultural or urban use) or to a net sink for CO_2 (e.g., through net additions to forest biomass). See more on these emissions and removals in Table ES-4.

Figure ES-4: 2021 Sources of CO_2 Emissions



Note: Other Industrial Processes includes emissions from Aluminum Production, Carbide Production and Consumption, Carbon Dioxide Consumption, Ferroalloy Production, Glass Production, Lead Production, Magnesium Production, Other Process Uses of Carbonates, Phosphoric Acid Production, Substitution of Ozone Depleting Substances, Soda Ash Production, Titanium Dioxide Production, Urea Consumption for Non-Agricultural Purposes, and Zinc Production. Other Energy includes emissions from Abandoned Oil and Gas Wells and Coal Mining.

As the largest source of U.S. greenhouse gas emissions, CO_2 from fossil fuel combustion has accounted for an average of 74.8 percent of CO_2-equivalent total gross U.S. emissions across the time series. Between 1990 and 2021, CO_2 emissions from fossil fuel combustion decreased from 4,728.2 MMT CO_2 Eq. to 4,639.1 MMT CO_2 Eq., a 1.9 percent total decrease. Carbon dioxide emissions from fossil fuel combustion decreased by 1,108.2 MMT CO_2 Eq. from 2005 levels, a decrease of 19.3 percent. From 2020 to 2021, these emissions increased by 294.2 MMT CO_2 Eq. (6.8 percent).

Historically, changes in emissions from fossil fuel combustion have been the driving factor affecting U.S. emission trends. Changes in CO_2 emissions from fossil fuel combustion are influenced by many long-term and short-term factors. Important drivers include: (1) changes in demand for energy; and (2) a general decline in the overall carbon intensity of fuels combusted for energy in recent years by non-transport sectors of the economy. Long-term factors affecting energy demand include population and economic trends, technological changes including energy efficiency, shifting energy fuel choices, and various policies at the national, state, and local level. In the short term, the overall consumption and mix of fossil fuels in the United States fluctuates primarily in response to changes in general economic conditions, overall energy prices, the relative price of different fuels, weather, and

[15] Global CO_2 emissions from fossil fuel combustion were taken from International Energy Agency *Global energy-related CO_2 emissions, 1990-2021 – Charts* Available at: https://www.iea.org/data-and-statistics/charts/global-energy-related-co2-emissions-1990-2021 (IEA 2022).

the availability of non-fossil alternatives. For example, between 2019 and 2021, changes in economic activity and travel due to the COVID-19 pandemic and the subsequent recovery have had significant impacts on energy use and fossil fuel combustion emissions.

The five major fuel-consuming economic sectors are transportation, electric power, industrial, residential, and commercial and are described below. Carbon dioxide emissions are produced by the electric power sector as fossil fuel is consumed to provide electricity to one of the other four sectors, or "end-use" sectors, see Figure ES-5. Note that this Figure reports emissions from U.S. Territories as their own end-use sector due to incomplete data for their individual end-use sectors. Fossil fuel combustion for electric power also includes emissions of less than 0.5 MMT CO_2 Eq. from geothermal-based generation.

Figure ES-5: 2021 CO_2 Emissions from Fossil Fuel Combustion by Sector and Fuel Type

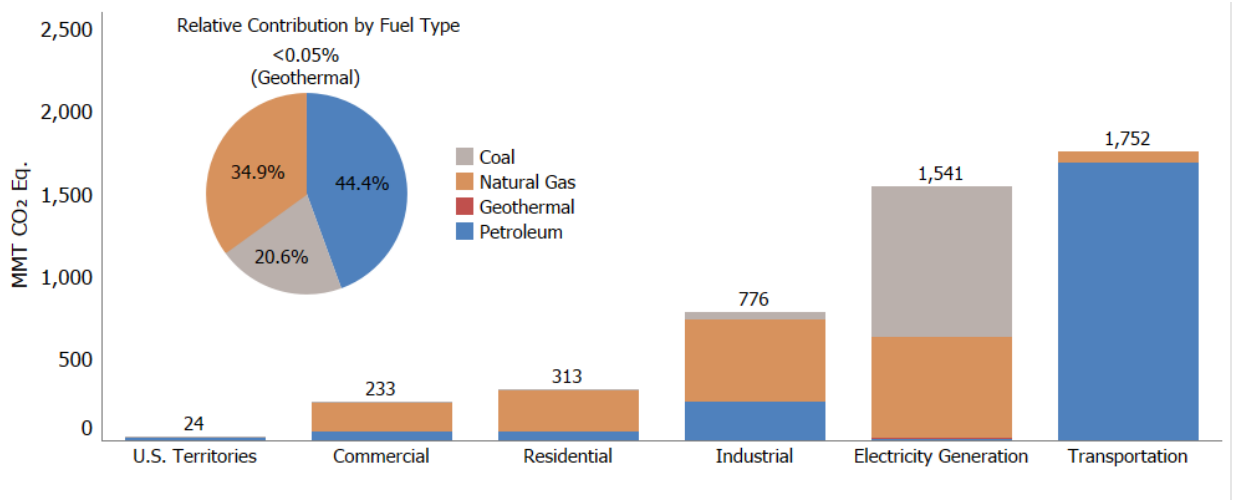
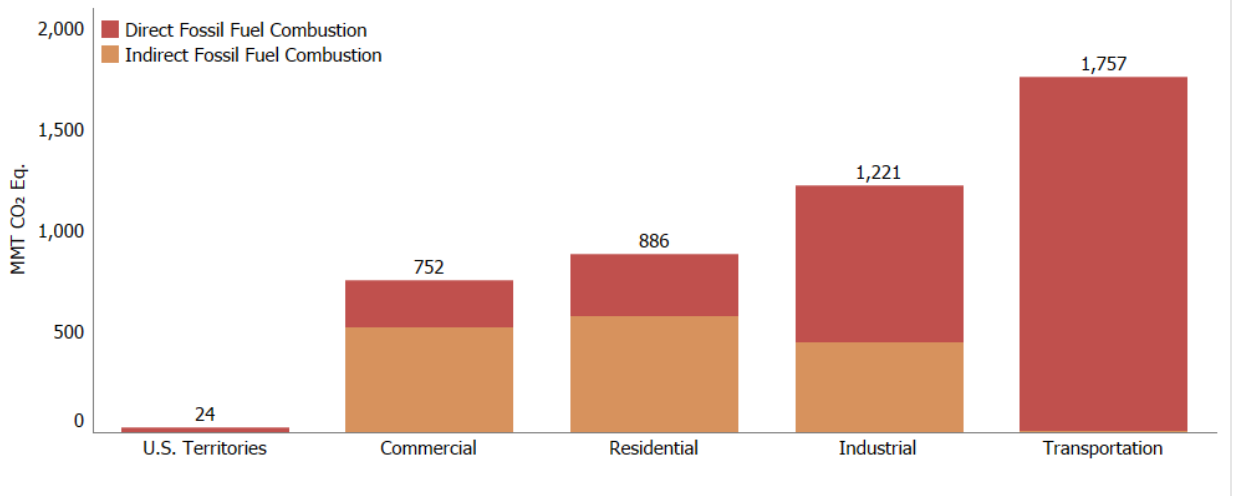


Table ES-6 summarizes CO_2 emissions from fossil fuel combustion by end-use sector including electric power emissions. For Figure ES-6, electric power emissions have been distributed to each end-use sector on the basis of each sector's share of aggregate electricity use (i.e., indirect fossil fuel combustion). This method of distributing emissions assumes that each end-use sector uses electricity that is generated from the national average mix of fuels according to their carbon intensity. Emissions from electric power are also addressed separately after the end-use sectors are discussed.

Figure ES-6: 2021 End-Use Sector Emissions of CO_2 from Fossil Fuel Combustion



Transportation End-Use Sector. Transportation activities accounted for 37.9 percent of U.S. CO_2 emissions from fossil fuel combustion in 2021, with the largest contributors being light-duty trucks (37.3 percent), followed by

freight trucks (23.3 percent) and passenger vehicles (20.8 percent). Annex 3.2 presents the total emissions from all transportation and mobile sources, including CO_2, CH_4, N_2O, and HFCs.

In terms of the overall trend, from 1990 to 2021, total transportation CO_2 emissions increased due, in large part, to increased demand for travel which was a result of a confluence of factors including population growth, economic growth, urban sprawl, and low fuel prices during the beginning of this period. From 2020 to 2021, transportation CO_2 emissions, excluding emissions from international bunker fuels, increased 11.4 percent, largely reflective of a rebound in travel activity as COVID-19 pandemic restrictions were eased. While an increased demand for travel has led to generally increasing CO_2 emissions since 1990, improvements in average new vehicle fuel economy since 2005 have slowed the rate of increase of CO_2 emissions. In 2021, petroleum-based products supplied 94.5 percent of the energy consumed for transportation, primarily from gasoline consumption in automobiles and other highway vehicles (53.3 percent), diesel fuel for freight trucks (24.1 percent), jet fuel for aircraft (10.4 percent), and natural gas, residual fuel, aviation gasoline, and liquefied petroleum gases (6.8 percent). The remaining 5.5 percent is associated with renewable fuels (i.e., biofuels).

Industrial End-Use Sector. Industrial CO_2 emissions, resulting both directly from the combustion of fossil fuels and indirectly from the generation of electricity that is used by industry, accounted for 26.3 percent of CO_2 emissions from fossil fuel combustion in 2021. Approximately 63.5 percent of these emissions resulted from direct fossil fuel combustion to produce steam and/or heat for industrial processes. The remaining emissions resulted from the use of electricity for motors, electric furnaces, ovens, lighting, and other applications. Total direct and indirect emissions from the industrial sector have declined by 20.7 percent since 1990. This decline is due to structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and efficiency improvements. From 2020 to 2021, total energy use in the industrial sector increased by 3.7 percent due to an increase in total industrial production and manufacturing output.

Residential and Commercial End-Use Sectors. The residential and commercial end-use sectors accounted for 19.1 and 16.2 percent, respectively, of CO_2 emissions from fossil fuel combustion in 2021 including indirect emissions from electricity. The residential and commercial sectors relied heavily on electricity for meeting energy demands, with 64.6 and 69.0 percent, respectively, of their emissions attributable to electricity use for lighting, heating, cooling, and operating appliances. The remaining emissions were due to the consumption of natural gas and petroleum for heating and cooking. Total direct and indirect emissions from the residential sector have decreased by 4.9 percent since 1990. Total direct and indirect emissions from the commercial sector have decreased by 1.9 percent since 1990. From 2020 to 2021, an increase in heating degree days (0.5 percent) increased energy demand for heating in the residential and commercial sectors, however, a 1.8 percent decrease in cooling degree days compared to 2020 reduced demand for air conditioning in the residential and commercial sectors. Combined, this resulted in a 1.5 percent increase in residential sector energy use. From 2020 to 2021 energy use in the commercial sector increased by 3.2 percent, due in part to the gradual recovery from the COVID-19 pandemic, which had reduced economic and manufacturing activity in 2020.

Electric Power. The United States relies on electricity to meet a significant portion of its energy demands. Electricity generators used 30.7 percent of U.S. energy from fossil fuels and emitted 33.2 percent of the CO_2 from fossil fuel combustion in 2021. The type of energy source used to generate electricity is the main factor influencing emissions.[16] The mix of fossil fuels used also impacts emissions. The electric power sector is the largest consumer of coal in the United States. The coal used by electricity generators accounted for 91.9 percent of all coal consumed for energy in the United States in 2021.[17] However, the amount of coal and the percent of total electricity generation from coal has been decreasing over time. Coal-fired electric generation (in kilowatt-hours

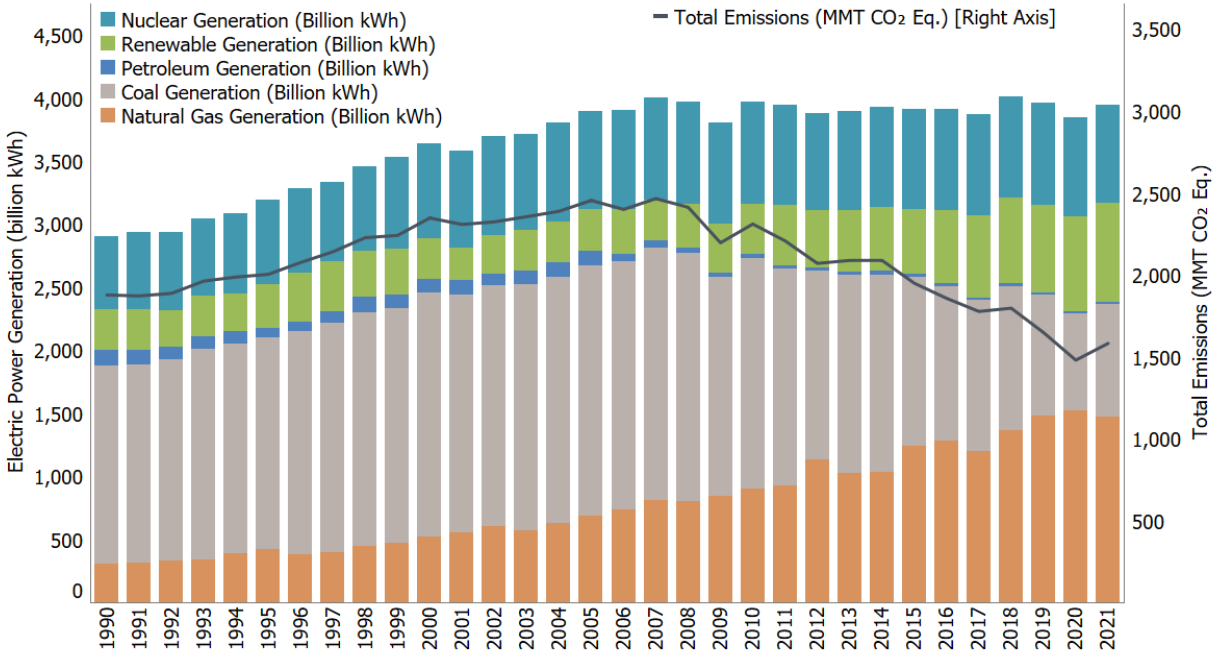
[16] In line with the reporting requirements for inventories submitted under the UNFCCC, CO_2 emissions from biomass combustion have been estimated separately from fossil fuel CO_2 emissions and are not included in the electricity sector totals and trends discussed in this section. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.

[17] See Table 6.2 Coal Consumption by Sector of EIA (2022a).

[kWh]) decreased from 54.1 percent of generation in 1990 to 22.6 percent in 2021.[18] This corresponded with an increase in natural gas generation and non-fossil fuel renewable energy generation, largely from wind and solar energy. Natural gas generation (in kWh) represented 10.7 percent of electric power generation in 1990 and increased over the thirty-two-year period to represent 37.3 percent of electric power generation in 2021. Wind and solar generation (in kWh) represented 0.1 percent of electric power generation in 1990 and increased over the thirty-two-year period to represent 12.5 percent of electric power generation in 2021. The recovery from the COVID-19 pandemic led to an increase in electricity use of about 2.3 percent from 2020 to 2021. Between 2020 and 2021, coal electricity generation increased by 13.2 percent, natural gas generation decreased by 5.5 percent, and renewable energy generation increased by 1.7 percent.

Across the time series, changes in electricity generation and the carbon intensity of fuels used for electric power have a significant impact on CO_2 emissions. While CO_2 emissions from fossil fuel combustion from the electric power sector have decreased by 15.3 percent since 1990, the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu input, has significantly decreased during that same timeframe by 24.9 percent. This decoupling of the level of electric power generation and the resulting CO_2 emissions is shown in Figure ES-7.

Figure ES-7: Electric Power Generation and Emissions



Other significant CO_2 trends included the following:

- Carbon dioxide emissions from natural gas and petroleum systems were 36.2 and 24.7 MMT CO_2 Eq., respectively, and combined accounted for 1.2 percent of CO_2 emissions and 1.0 percent of total gross emissions in 2021. These emissions increased by 19.1 MMT CO_2 Eq. (45.8 percent) from 1990 to 2021. This increase is due primarily to increases in the production segment, where flaring emissions from associated gas flaring, tanks, and miscellaneous production flaring have increased over time.
- Carbon dioxide emissions from iron and steel production and metallurgical coke production were 41.7 MMT CO_2 Eq. in 2021 and accounted for 0.8 percent of CO_2 and total gross emissions. Emissions have

[18] Values represent electricity *net* generation from the electric power sector. See Table 7.2b Electricity Net Generation: Electric Power Sector of EIA (2022a).

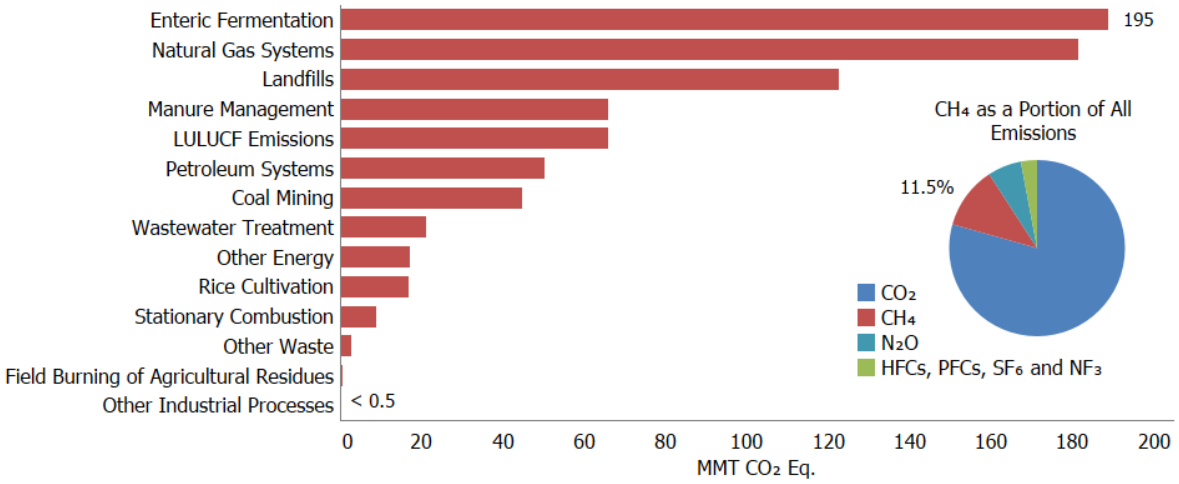
decreased by 63.1 MMT CO_2 Eq. (60.2 percent) from 1990 through 2021. This decrease is primarily due to restructuring of the industry, technological improvements, and increased scrap steel utilization.

- Total C stock change (i.e., net CO_2 removals) in the LULUCF sector decreased by 11.4 percent between 1990 and 2021. This decrease was primarily due to a decrease in the rate of net C accumulation in forest C stocks and Cropland Remaining Cropland*, as* well as an increase in emissions from Land Converted to Settlements.

Methane Emissions

Methane (CH_4) is significantly more effective than CO_2 at trapping heat in the atmosphere–by a factor of 28 over a 100-year time frame based on the IPCC *Fifth Assessment Report* estimate (IPCC 2013). Over the last two hundred and fifty years, the concentration of CH_4 in the atmosphere increased by 170.8 percent (IPCC 2013; NOAA/ESRL 2023b). Within the United States, the main anthropogenic sources of CH_4 include enteric fermentation from domestic livestock, natural gas systems, landfills, domestic livestock manure management, coal mining, and petroleum systems (see Figure ES-8).

Figure ES-8: 2021 Sources of CH_4 Emissions



Note: Other Energy includes CH_4 emissions from Abandoned Oil and Gas Wells, Incineration of Waste, and Mobile Combustion. Other Waste includes CH_4 emissions from Anaerobic Digestion at Biogas Facilities and Composting. Other Industrial Processes includes CH_4 emissions from Carbide Production and Consumption, Ferroalloy Production, Iron and Steel Production, and Petrochemical Production. LULUCF emissions include the CH_4 reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, Coastal Wetlands Remaining Coastal Wetlands, Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land.

Overall, CH_4 emissions in the United States in 2021, including LULUCF CH_4 emissions, accounted for 793.4 MMT CO_2 Eq., representing a decrease of 133.9 MMT CO_2 Eq. (14.4 percent) since 1990 and 14.3 MMT CO_2 Eq. (1.8 percent) since 2020. Significant trends for the largest sources of anthropogenic CH_4 emissions include the following:

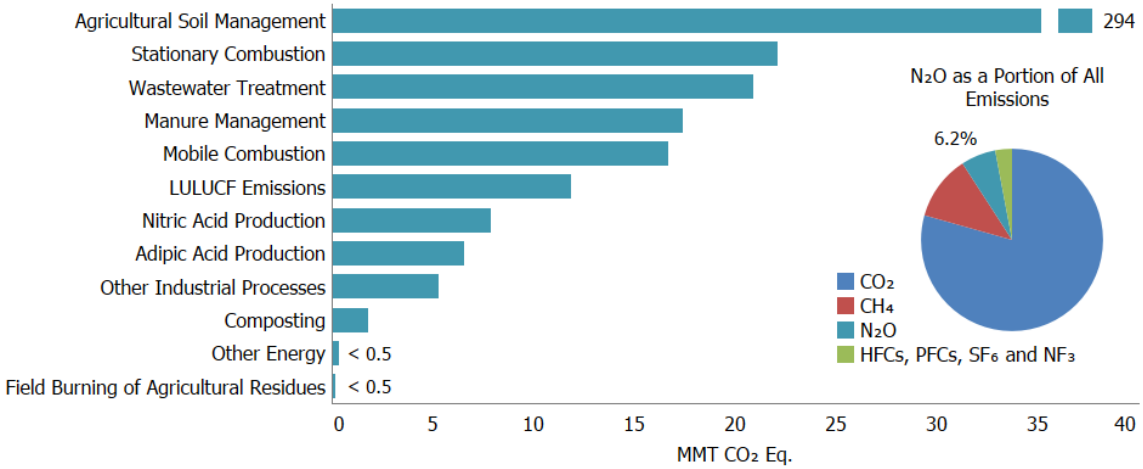
- Enteric fermentation was the largest anthropogenic source of CH_4 emissions in the United States in 2021, accounting for 194.9 MMT CO_2 Eq. of CH_4 (26.4 percent of total CH_4 emissions and 3.1 percent of total gross emissions) and representing an increase of 11.9 MMT CO_2 Eq. (6.5 percent) since 1990. This increase in emissions from 1990 to 2021 generally follows the increasing trends in cattle populations.
- Natural gas systems were the second largest anthropogenic source category of CH_4 emissions in the United States in 2021, accounting for 181.4 MMT CO_2 Eq. of CH_4 (22.9 percent of total CH_4 emissions and 2.9 percent of total gross emissions). Emissions decreased by 33.7 MMT CO_2 Eq. (15.7 percent) since 1990 largely due to decreases in emissions from distribution, transmission, and storage.

- Landfills were the third largest anthropogenic source of CH_4 emissions in the United States in 2021, accounting for 122.6 MMT CO_2 Eq. (15.5 percent of total CH_4 emissions and 1.9 percent of total gross emissions) and representing a decrease of 75.1 MMT CO_2 Eq. (38.0 percent) since 1990, with small year-to-year increases. This downward trend in emissions coincided with increased landfill gas collection and control systems, and a reduction of decomposable materials (i.e., paper and paperboard, food scraps, and yard trimmings) discarded in MSW landfills over the time series.[19]

Nitrous Oxide Emissions

Nitrous oxide (N_2O) is produced by biological processes that occur in soil and water and by a variety of anthropogenic activities in the agricultural, energy, industrial, and waste management fields. While total N_2O emissions are much lower than CO_2 emissions, N_2O is 265 times more powerful than CO_2 at trapping heat in the atmosphere over a 100-year time frame (IPCC 2013). Since 1750, the global atmospheric concentration of N_2O has risen by 23.8 percent (IPCC 2013; NOAA/ESRL 2023c). The main anthropogenic activities producing N_2O in the United States are agricultural soil management, wastewater treatment, stationary fuel combustion, manure management, fuel combustion in motor vehicles, and nitric acid production (see Figure ES-9).

Figure ES-9: 2021 Sources of N_2O Emissions



Note: Other Industrial Processes includes N_2O emissions from Caprolactam, Glyoxal, and Glyoxylic Acid Production; Electronics Industry; and Product Uses. Other Energy includes N_2O emissions from Petroleum Systems, Natural Gas Systems, and Incineration of Waste. LULUCF emissions include N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, Coastal Wetlands Remaining Coastal Wetlands, Forest Soils, and Settlement Soils.

Overall, N_2O emissions in the United States in 2021, including LULUCF N_2O emissions, accounted for 405.1 MMT CO_2 Eq., representing an increase of 3.3 MMT CO_2 Eq. (0.8 percent) since 1990 and an increase of 5.3 MMT CO_2 Eq. (1.3 percent) since 2020. Significant trends for the largest sources of anthropogenic N_2O emissions include the following:

- Agricultural soils were the largest anthropogenic source of N_2O emissions in 2021, accounting for 294.0 MMT CO_2 Eq., 72.6 percent of N_2O emissions and 4.6 percent of total gross greenhouse gas emissions in the United States. These emissions increased by 6.1 MMT CO_2 Eq. (2.1 percent) from 1990 to 2021, but have fluctuated during that period due to annual variations in weather patterns, fertilizer use, and crop production.

[19] Carbon dioxide emissions from landfills are not included specifically in summing waste sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs and decay of disposed wood products are accounted for in the estimates for LULUCF.

- Stationary combustion was the second largest source of anthropogenic N_2O emissions in 2021, accounting for 22.1 MMT CO_2 Eq. (5.5 percent of N_2O emissions) and 0.3 percent of total gross U.S. greenhouse gas emissions in 2021. Stationary combustion emissions peaked in 2007, and have steadily decreased since then.
- Wastewater treatment, both domestic and industrial, was the third largest anthropogenic source of N_2O emissions in 2021, accounting for 20.9 MMT CO_2 Eq., 5.2 percent of N_2O emissions and 0.3 percent of total gross greenhouse gas emissions in the United States in 2021. Emissions from wastewater treatment increased by 6.1 MMT CO_2 Eq. (41.6 percent) since 1990 as a result of growing U.S. population and protein consumption. Nitrous oxide emissions from industrial wastewater treatment sources fluctuated throughout the time series with production changes associated with the treatment of wastewater from the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and brewery industries.
- Nitrous oxide emissions from manure management accounted for 17.4 MMT CO_2 Eq., 4.3 percent of N_2O emissions and 0.3 percent of total gross greenhouse gas emissions in the United States in 2021. These emissions increased by 5.0 MMT CO_2 Eq. (40.5 percent) from 1990 to 2021. While the industry trend has been a shift toward liquid systems, driving down the emissions per unit of nitrogen excreted (dry manure handling systems have greater aerobic conditions that promote N_2O emissions), increases in specific animal populations have driven an increase in overall manure management N_2O emissions over the time series.
- Nitrous oxide emissions from mobile combustion, the fifth largest anthropogenic source of N_2O emissions in 2021, decreased by 21.7 MMT CO_2 Eq. (56.6 percent) from 1990 to 2021, primarily as a result of national vehicle emissions standards and emission control technologies for on-road vehicles.

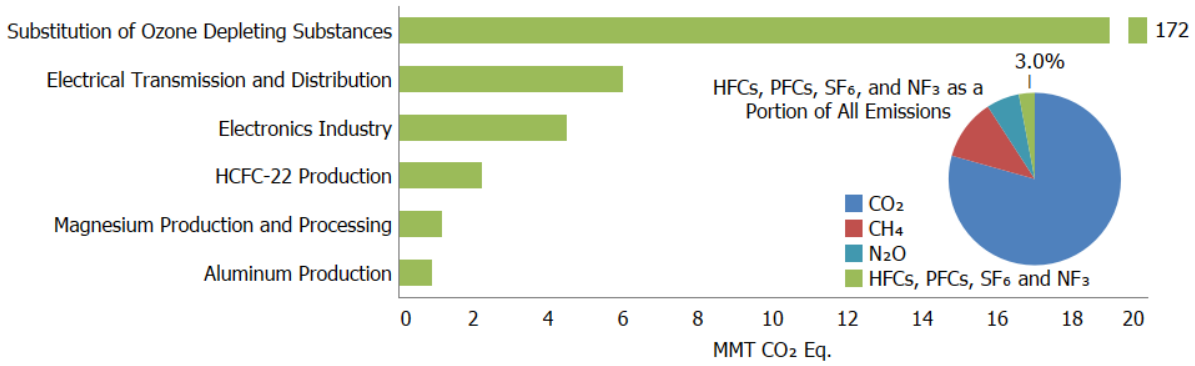
HFC, PFC, SF_6, and NF_3 Emissions

Hydrofluorocarbons (HFCs) are synthetic chemicals that are used as alternatives to ozone depleting substances (ODS), which are being phased out under the Montreal Protocol and Clean Air Act Amendments of 1990. Hydrofluorocarbons do not deplete the stratospheric ozone layer and therefore have been used as alternatives under the *Montreal Protocol on Substances that Deplete the Ozone Layer*.

Perfluorocarbons (PFCs) are emitted from the production of electronics and aluminum and also (in smaller quantities) from their use as alternatives to ozone depleting substances. Sulfur hexafluoride (SF_6) is emitted from the manufacturing and use of electrical transmission and distribution equipment as well as the production of electronics and magnesium. NF_3 is emitted from electronics production. HFCs are also emitted during production of HCFC-22 and electronics (see Figure ES-10).

HFCs, PFCs, SF_6, and NF_3 are potent greenhouse gases. In addition to having very high global warming potentials, SF_6, NF_3, and PFCs have extremely long atmospheric lifetimes, resulting in their essentially irreversible accumulation in the atmosphere once emitted. Sulfur hexafluoride is the most potent greenhouse gas the IPCC has evaluated (IPCC 2021).

Figure ES-10: 2021 Sources of HFCs, PFCs, SF_6, and NF_3 Emissions



Some significant trends for the largest sources of U.S. HFC, PFC, SF_6, and NF_3 emissions include the following:

- Hydrofluorocarbon and perfluorocarbon emissions resulting from their use as substitutes for ODS (e.g., chlorofluorocarbons [CFCs]) are the largest share of fluorinated emissions (92.1 percent) in 2021 and have been consistently increasing, from small amounts in 1990 to 172.5 MMT CO_2 Eq. in 2021. This increase was in large part the result of efforts to phase out CFCs and other ODS in the United States.
- Sulfur hexafluoride emissions from electric power transmission and distribution systems decreased by 18.7 MMT CO_2 Eq. (75.7 percent) from 1990 to 2021. There are two factors contributing to this decrease: (1) a sharp increase in the price of SF_6 during the 1990s and (2) a growing awareness of the environmental impact of SF_6 emissions through programs such as EPA's SF_6 Emission Reduction Partnership for Electric Power Systems.
- HFC-23 emissions from HCFC-22 production decreased by 36.4 MMT CO_2 Eq. (94.2 percent) from 1990 to 2021. The decrease from 1990 emissions was caused primarily by a reduction in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced). The emission rate was lowered by optimizing the production process and capturing much of the remaining HFC-23 for use or destruction.
- PFC emissions from aluminum production decreased by 18.4 MMT CO_2 Eq. (95.3 percent) from 1990 to 2021, due to both industry emission reduction efforts and lower domestic aluminum production.

ES.3 Overview of Sector Emissions and Trends

Figure ES-11 and Table ES-3 aggregate emissions and sinks by the sectors defined by the UNFCCC reporting guidelines and methodological framework in the IPCC Guidelines to promote comparability across countries. Over the thirty-two-year period of 1990 to 2021, total emissions from the Energy and Waste sectors decreased by 171.4 MMT CO_2 Eq. (3.2 percent) and 66.8 MMT CO_2 Eq. (28.3 percent) respectively. Emissions from the Industrial Processes and Product Use and Agriculture sectors grew by 41.0 MMT CO_2 Eq. (12.2 percent), and 50.0 MMT CO_2 Eq. (9.1 percent), respectively. Over the same period, the overall net flux from LULUCF (i.e., the net sum of all CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.) decreased 126.7 MMT CO_2 Eq. (14 percent) and resulted in a removal of 754.2 MMT CO_2 Eq. in 2021.

Figure ES-11: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector

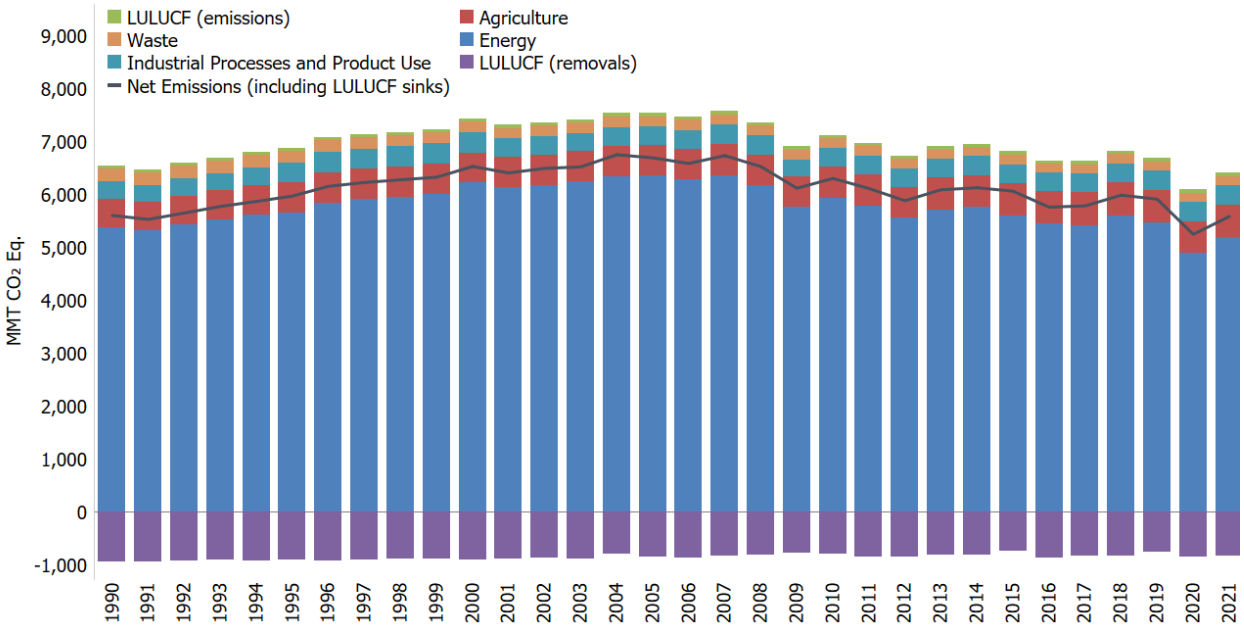


Table ES-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector (MMT CO_2 Eq.)

IPCC Sector	1990	2005	2017	2018	2019	2020	2021
Energy	5,368.0	6,351.5	5,418.7	5,589.5	5,460.6	4,894.0	5,196.6
Industrial Processes and Product Use	335.4	356.1	359.1	362.2	366.8	363.2	376.4
Agriculture	548.0	577.7	613.1	629.5	614.5	597.3	598.1
Waste	236.0	192.1	170.9	173.7	176.0	171.5	169.2
Total Gross Emissions[a] (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Sector Net Total[b]	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)[c]	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

[a] Total emissions without LULUCF.

[b] The LULUCF Sector Net Total is the sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.

[c] Net emissions with LULUCF.

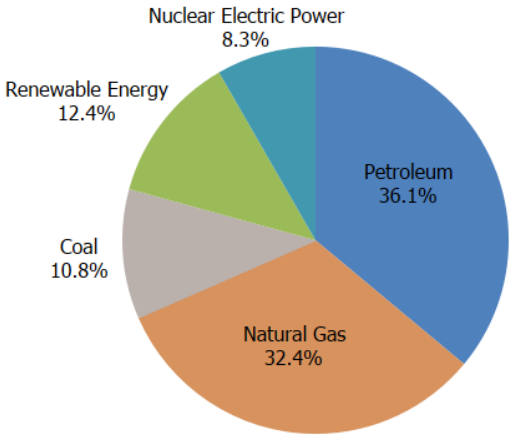
Notes: Total emissions presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Energy

The Energy chapter contains emissions of all greenhouse gases resulting from stationary and mobile energy activities including fuel combustion and fugitive fuel emissions, and the use of fossil fuels for non-energy purposes. Energy-related activities, primarily fossil fuel combustion, accounted for the vast majority of U.S. CO_2 emissions for the period of 1990 through 2021. Energy-related activities are also responsible for CH_4 and N_2O emissions (41.6 percent and 10.0 percent of total U.S. emissions of each gas, respectively). Overall, emission sources in the Energy chapter account for a combined 82.0 percent of total gross U.S. greenhouse gas emissions in 2021. Emissions from energy increased by 302.6 MMT CO_2 Eq. (6.2 percent) since 2020, but they have decreased by 171.4 MMT CO_2 Eq. (3.2 percent) since 1990.

In 2021, 79.3 percent of the energy used in the United States (on a Btu basis) was produced through the combustion of fossil fuels. The remaining 20.7 percent came from other energy sources, such as hydropower, biomass, nuclear, wind, and solar energy (see Figure ES-12).

Figure ES-12: 2021 U.S. Energy Consumption by Energy Source (Percent)



Industrial Processes and Product Use

The Industrial Processes and Product Use (IPPU) chapter contains greenhouse gas emissions generated and emitted as the byproducts of non-energy-related industrial processes, which involve the chemical or physical transformation of raw materials and can release waste gases such as CO_2, CH_4, N_2O, and fluorinated gases (e.g., HFC-23). These processes include iron and steel production and metallurgical coke production, cement production, petrochemical production, ammonia production, lime production, other process uses of carbonates (e.g., flux stone, flue gas desulfurization, and soda ash consumption not associated with glass manufacturing), nitric acid production, adipic acid production, urea consumption for non-agricultural purposes, aluminum production, HCFC-22 production, glass production, soda ash production, ferroalloy production, titanium dioxide production, caprolactam production, zinc production, phosphoric acid production, lead production, and silicon carbide production and consumption. Most of these industries also emit CO_2 from fossil fuel combustion which, in line with IPCC sectoral definitions, is included in the Energy sector.

This chapter also contains emissions resulting from the release of HFCs, PFCs, SF_6, and NF_3 and other man-made compounds used in industrial manufacturing processes and by end-consumers (e.g., residential and mobile air conditioning). These industries include electronics manufacturing, electric power transmission and distribution, and magnesium metal production and processing. In addition, N_2O is used in and emitted by electronics industry and anesthetic and aerosol applications, and CO_2 is consumed and emitted through various end-use applications. In 2021, emissions resulting from use of the substitution of ODS (e.g., chlorofluorocarbons [CFCs]) by end-consumers was the largest source of IPPU emissions and accounted for 172.5 MMT CO_2 Eq, or 45.8 percent of total IPPU emissions.

IPPU activities are responsible for 3.4, 0.1, and 5.0 percent of total U.S. CO_2, CH_4, and N_2O emissions respectively as well as for all U.S. emissions of fluorinated gases including HFCs, PFCs, SF_6 and NF_3. Overall, emission sources in the IPPU chapter accounted for 5.9 percent of U.S. greenhouse gas emissions in 2021. IPPU emissions increased by 13.2 MMT CO_2 Eq. (3.6 percent) since 2020 and by 41 MMT CO_2 Eq. (12.2 percent) since 1990, mostly due to increased use of ODS substitutes (e.g., HFCs).

Agriculture

The Agriculture chapter contains information on anthropogenic emissions from agricultural activities (except fuel combustion, which is addressed in the Energy chapter, and some agricultural CO_2, CH_4, and N_2O fluxes, which are addressed in the Land Use, Land-Use Change, and Forestry chapter).

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes, including the following sources: agricultural soil management, enteric fermentation in domestic livestock, livestock manure management, rice cultivation, urea fertilization, liming, and field burning of agricultural residues.

In 2021, agricultural activities were responsible for emissions of 598.1 MMT CO_2 Eq., or 9.4 percent of total gross U.S. greenhouse gas emissions. Agriculture sector emissions increased slightly (0.8 MMT CO_2 Eq. or 0.1 percent) since 2020 and have increased by 50 MMT CO_2 Eq. (9.1 percent) since 1990, mostly from trends in enteric fermentation and manure management. Methane, N_2O, and CO_2 are greenhouse gases emitted by agricultural activities. Methane emissions from enteric fermentation and manure management represented 35.9 percent of total CH_4 emissions from anthropogenic activities in 2021. Agricultural soil management activities, such as application of synthetic and organic fertilizers, deposition of livestock manure, and growing N-fixing plants, were the largest contributors to U.S. N_2O emissions in 2021, accounting for 74.8 percent of total N_2O emissions. Carbon dioxide emissions from the application of crushed limestone and dolomite (i.e., soil liming) and urea fertilization represented 0.2 percent of total CO_2 emissions from anthropogenic activities.

Land Use, Land-Use Change, and Forestry

The LULUCF chapter contains emissions and removals of CO_2 and emissions of CH_4 and N_2O from managed lands in the United States. Consistent with the *2006 IPCC Guidelines*, emissions and removals from managed lands are considered to be anthropogenic, while emissions and removals from unmanaged lands are considered to be natural.[20] The share of managed land in the U.S. is approximately 95 percent of total land included in the Inventory.[21] More information on the definition of managed land used in the Inventory is provided in Chapter 6.

Overall, the Inventory results show that managed land is a net sink for CO_2 (C sequestration). The primary drivers of fluxes on managed lands include forest management practices, tree planting in urban areas, the management of agricultural soils, lands remaining and lands converted to reservoirs and other constructed waterbodies, landfilling of yard trimmings and food scraps, and activities that cause changes in C stocks in coastal wetlands. The main drivers for forest C sequestration include forest growth and increasing forest area (i.e., afforestation), as well as a net accumulation of C stocks in harvested wood pools. The net sequestration in Settlements Remaining Settlements, which occurs predominantly from urban forests (i.e., Settlement Trees) and landfilled yard trimmings and food scraps, is a result of net tree growth and increased urban forest area, as well as long-term accumulation of yard trimmings and food scraps carbon in landfills.

The LULUCF sector in 2021 resulted in a net increase in C stocks (i.e., net CO_2 removals) of 832.0 MMT CO_2 Eq.[22] The removals of C offset 13.1 percent of total gross greenhouse gas emissions in 2021. Emissions of CH_4 and N_2O from LULUCF activities in 2021 were 77.8 MMT CO_2 Eq. and represent 1.4 percent of net greenhouse gas emissions.[23] Carbon dioxide removals from C stock changes are presented in Table ES-4 along with CH_4 and N_2O emissions for LULUCF source categories.

[20] See http://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/4_Volume4/V4_01_Ch1_Introduction.pdf.

[21] The current land representation does not include land in U.S. Territories, but there are planned improvements to include these regions in future Inventories. U.S. Territories represent approximately 0.1 percent of the total land base for the United States. See Box 6-2 in Chapter 6 of this report.

[22] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[23] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils.

Between 1990 and 2021, total C sequestration in the LULUCF sector decreased by 11.4 percent, primarily due to a decrease in the rate of net C accumulation in forests and Cropland Remaining Cropland, as well as an increase in CO_2 emissions from Land Converted to Settlements. The overall net flux from LULUCF (i.e., net sum of all CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 eq.) resulted in a removal of 754.2 MMT CO_2 Eq. in 2021.

Flooded lands were the largest source of CH_4 emissions from the LULUCF sector in 2021, totaling 45.4 MMT CO_2 Eq. (1,623 kt of CH_4). Forest fires were the second largest source and resulted in CH_4 emissions of 15.5 MMT CO_2 Eq. (554 kt of CH_4), followed by Coastal Wetlands Remaining Coastal Wetlands with CH_4 emissions of 4.3 MMT CO_2 Eq. (154 kt of CH_4).

Forest fires were the largest source of N_2O emissions from the LULUCF sector in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled 2.1 MMT CO_2 Eq. (8 kt of N_2O).

Table ES-4: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Land[a]	(815.8)	(695.4)	(695.2)	(692.9)	(638.1)	(684.0)	(670.5)
Land Converted to Forest Land[b]	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland[c]	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland[d]	8.8	11.7	11.6	11.9	14.6	6.7	10.6
Land Converted to Grassland[c]	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands[e]	41.5	43.1	41.8	41.8	41.8	41.8	41.8
Land Converted to Wetlands[e]	3.3	1.4	0.8	0.8	0.8	0.6	0.6
Settlements Remaining Settlements[f]	(107.8)	(113.9)	(125.6)	(125.0)	(124.5)	(131.6)	(132.5)
Land Converted to Settlements[c]	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Carbon Stock Change[g]	**(938.9)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
LULUCF Emissions[h]	**57.9**	**72.4**	**68.3**	**64.4**	**64.2**	**76.4**	**77.8**
CH_4	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Sector Net Total[i]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**

[a] Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products, emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land, emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land, and CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[b] Includes the net changes to carbon stocks stored in all forest ecosystem pools.

[c] Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.

[d] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[e] Estimates include CH_4 emissions from Flooded Land Remaining Flooded Land and Land Converted to Flooded Land.

[f] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

[g] LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.

[h] LULUCF emissions subtotal includes the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils. Emissions values are included in land-use category rows.

[i] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Waste

The Waste chapter contains emissions from waste management activities (except the incineration of waste, which is addressed in the Energy chapter). Landfills were the largest source of anthropogenic greenhouse gas emissions from waste management activities, generating 122.6 MMT CO_2 Eq. and accounting for 72.5 percent of total greenhouse gas emissions from waste management activities, and 16.9 percent of total U.S. CH_4 emissions.[24] Additionally, wastewater treatment generated emissions of 42.0 MMT CO_2 Eq. and accounted for 24.8 percent of total Waste sector greenhouse gas emissions, 2.9 percent of U.S. CH_4 emissions, and 5.3 percent of U.S. N_2O emissions in 2021. Emissions of CH_4 and N_2O from composting are also accounted for in this chapter, generating emissions of 2.6 MMT CO_2 Eq., and 1.8 MMT CO_2 Eq., respectively. Anaerobic digestion at biogas facilities generated CH_4 emissions of 0.2 MMT CO_2 Eq., accounting for 0.1 percent of emissions from the waste sector. Overall, emission sources accounted for in the Waste chapter generated 169.2 MMT CO_2 Eq., or 2.7 percent of total gross U.S. greenhouse gas emissions in 2021. Waste sector emissions decreased by 2.4 MMT CO_2 Eq. (1.4 percent) since 2020 and by 66.8 MMT CO_2 Eq. (28.3 percent) since 1990.

ES.4 Other Information

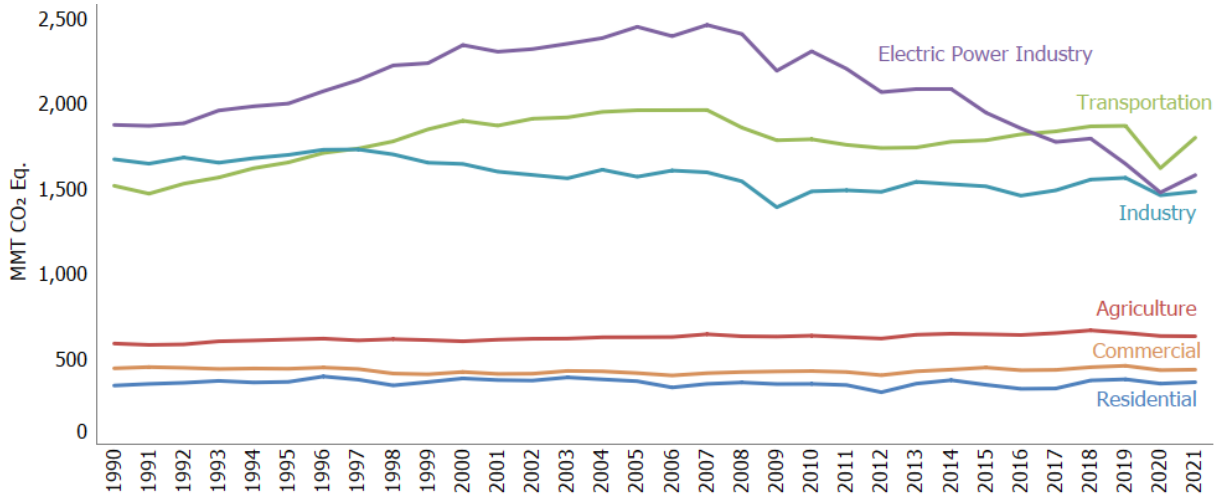
Emissions by Economic Sector

Throughout the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* report, emission estimates are grouped into five sectors (i.e., chapters) defined by the IPCC: Energy, IPPU, Agriculture, LULUCF, and Waste. It is also useful to characterize emissions according to commonly used economic sector categories: Residential, Commercial, Industry, Transportation, Electric Power, and Agriculture. Emissions from U.S. Territories are reported as their own end-use sector due to a lack of specific consumption data for the individual end-use sectors within U.S. Territories. For more information on trends in the Land Use, Land-Use Change, and Forestry sector, see Section ES.2 Recent Trends in U.S. Greenhouse Gas Emissions and Sinks.

Figure ES-13 shows the trend in emissions by economic sector from 1990 to 2021, and Table ES-5 summarizes emissions from each of these economic sectors.

[24] Landfills also store carbon, due to incomplete degradation of organic materials such as harvest wood products, yard trimmings, and food scraps, as described in the Land Use, Land-Use Change, and Forestry chapter of the Inventory report.

Figure ES-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Table ES-5: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO_2 Eq.)

Economic Sectors	1990	2005	2017	2018	2019	2020	2021
Transportation	1,521.4	1,966.0	1,841.6	1,871.3	1,874.3	1,624.9	1,804.3
Electric Power Industry	1,879.7	2,456.9	1,779.2	1,799.1	1,650.5	1,481.8	1,584.1
Industry	1,677.3	1,574.4	1,494.5	1,558.0	1,568.2	1,465.4	1,487.3
Agriculture	592.9	630.2	654.2	670.6	655.4	637.2	635.8
Commercial	447.0	418.9	437.6	453.7	462.0	436.0	439.2
Residential	345.6	371.2	328.4	375.8	382.4	356.9	365.6
U.S. Territories	23.4	59.7	26.3	26.3	25.1	23.6	24.1
Total Gross Emissions (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Sector Net Total[a]	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

[a] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Total (gross) emissions are presented without LULUCF. Total net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Using this categorization, emissions from transportation activities accounted for the largest portion (28.5 percent) of total gross U.S. greenhouse gas emissions in 2021. Electric power accounted for the second largest portion (25.0 percent) of U.S. greenhouse gas emissions in 2021, while emissions from industry accounted for the third largest portion (23.5 percent). Emissions from industry have in general declined over the past decade, due to a number of factors, including structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and energy efficiency improvements.

The remaining 23.1 percent of U.S. greenhouse gas emissions were contributed by, in order of magnitude, the agriculture, commercial, and residential sectors, plus emissions from U.S. Territories. Activities related to agriculture accounted for 10.0 percent of U.S. emissions; unlike other economic sectors, agricultural sector emissions were dominated by N_2O emissions from agricultural soil management and CH_4 emissions from enteric fermentation. An increasing amount of carbon is stored in agricultural soils each year, but this CO_2 sequestration is assigned to the LULUCF sector rather than the agriculture economic sector. The commercial and residential sectors accounted for 6.9 percent and 5.8 percent of emissions, respectively, and U.S. Territories accounted for 0.4

percent of emissions; emissions from these sectors primarily consisted of CO_2 emissions from fossil fuel combustion. Carbon dioxide was also emitted and sequestered by a variety of activities related to forest management practices, tree planting in urban areas, the management of agricultural soils, landfilling of yard trimmings, and changes in C stocks in coastal wetlands.

Electricity is ultimately used in the economic sectors described above. Table ES-6 presents greenhouse gas emissions from economic sectors with emissions related to electric power distributed into end-use categories (i.e., emissions from electric power generation are allocated to the economic sectors in which the electricity is used). To distribute electricity emissions among end-use sectors, emissions from the source categories assigned to electric power were allocated to the residential, commercial, industry, transportation, and agriculture economic sectors according to retail sales of electricity for each end-use sector (EIA 2022).[25] These source categories include CO_2 from fossil fuel combustion and the use of limestone and dolomite for flue gas desulfurization, CO_2 and N_2O from incineration of waste, CH_4 and N_2O from stationary sources, and SF_6 from electrical transmission and distribution systems.

When emissions from electricity use are distributed among these end-use sectors, industrial activities and transportation account for the largest shares of U.S. greenhouse gas emissions (30.1 percent and 28.5 percent, respectively) in 2021. The commercial and residential sectors contributed the next largest shares of total gross U.S. greenhouse gas emissions in 2021 (15.3 and 15.0 percent, respectively). Emissions from the commercial and residential sectors increase substantially when emissions from electricity use are included, due to their relatively large share of electricity use for energy (e.g., lighting, cooling, appliances). Figure ES-14 shows the trend in these emissions by sector from 1990 to 2021.

Table ES-6: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed by Economic Sector (MMT CO_2 Eq.)

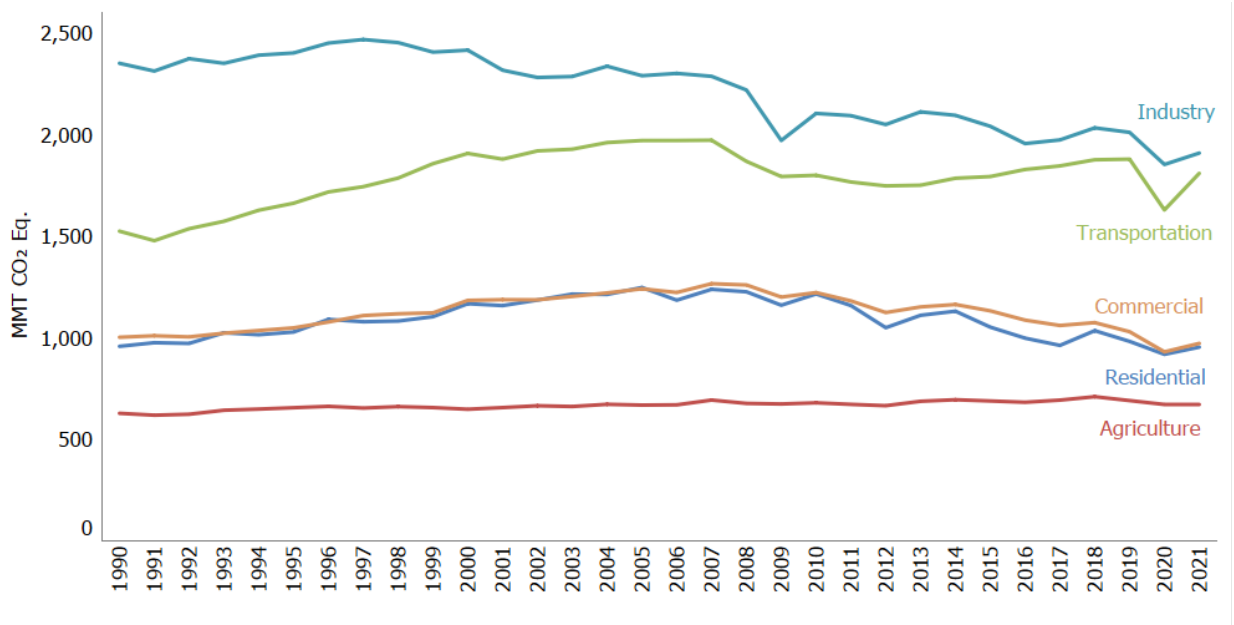
Economic Sectors	1990	2005	2017	2018	2019	2020	2021
Industry	2,351.1	2,289.9	1,973.9	2,033.2	2,011.2	1,852.9	1,909.2
Transportation	1,524.6	1,970.9	1,846.0	1,876.2	1,879.2	1,629.2	1,809.5
Commercial	1,002.4	1,241.0	1,060.4	1,074.5	1,029.7	930.5	972.2
Residential	957.8	1,247.5	962.3	1,034.9	982.0	918.3	953.8
Agriculture	628.0	668.5	693.0	709.8	690.7	671.5	671.5
U.S. Territories	23.4	59.7	26.3	26.3	25.1	23.6	24.1
Total Gross Emissions (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Sector Net Total[a]	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)
Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

[a] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Emissions from electric power are allocated based on aggregate electricity use in each end-use sector. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

[25] U.S. Territories consumption data that are obtained from EIA are only available at the aggregate level and cannot be broken out by end-use sector. The distribution of emissions to each end-use sector for the 50 states does not apply to territories data.

Figure ES-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Box ES-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data

Total (gross) greenhouse gas emissions can be compared to other economic and social indices to highlight changes over time. These comparisons include: (1) emissions per unit of aggregate energy use, because energy-related activities are the largest sources of emissions; (2) emissions per unit of fossil fuel consumption, because almost all energy-related emissions involve the combustion of fossil fuels; (3) emissions per unit of total gross domestic product as a measure of national economic activity; and (4) emissions per capita.

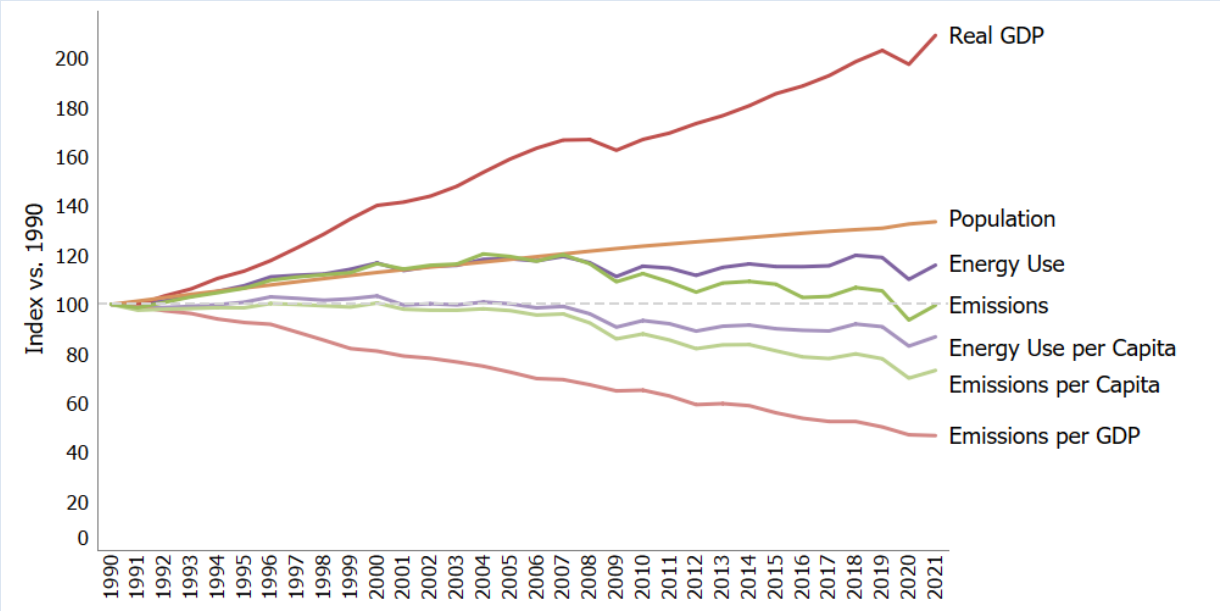
Table ES-7 provides data on various statistics related to U.S. greenhouse gas emissions normalized to 1990 as a baseline year. These values represent the relative change in each statistic since 1990. Greenhouse gas emissions in the United States have declined at an average annual rate of 0.02 percent since 1990, although changes from year to year have been significantly larger. This growth rate is slightly slower than that for total energy use and fossil fuel consumption, and overall gross domestic product (GDP), and national population (see Figure ES-15). The direction of these trends started to change after 2005, when greenhouse gas emissions, total energy use, and fossil fuel consumption began to peak. Greenhouse gas emissions in the United States have decreased at an average annual rate of 0.9 percent since 2005. Fossil fuel consumption has decreased at a slower rate than emissions since 2005, while total energy use, GDP, and national population, generally, continued to increase noting 2020 was impacted by COVID-19 pandemic.

Table ES-7: Recent Trends in Various U.S. Data (Index 1990 = 100)

Variable	1990	2005	2017	2018	2019	2020	2021	Avg. Annual Growth Rate Since 1990[a]	Avg. Annual Growth Rate Since 2005[a]
Greenhouse Gas Emissions[b]	100	115	101	104	102	93	98	(+)%	-1.0%
Energy Use[c]	100	119	116	120	119	109	115	0.5%	-0.1%
GDP[d]	100	159	193	199	203	198	209	2.4%	1.8%
Population[e]	100	118	130	130	131	133	134	0.9%	0.8%

+ Absolute value does not exceed 0.05 percent.
[a] Average annual growth rate.
[b] Gross total GWP-weighted values.
[c] Energy content-weighted values (EIA 2022).
[d] GDP in chained 2012 dollars (BEA 2022).
[e] U.S. Census Bureau (2021).

Figure ES-15: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product (GDP)



Source: BEA (2022), U.S. Census Bureau (2021), and emission estimates in this report.

Key Categories

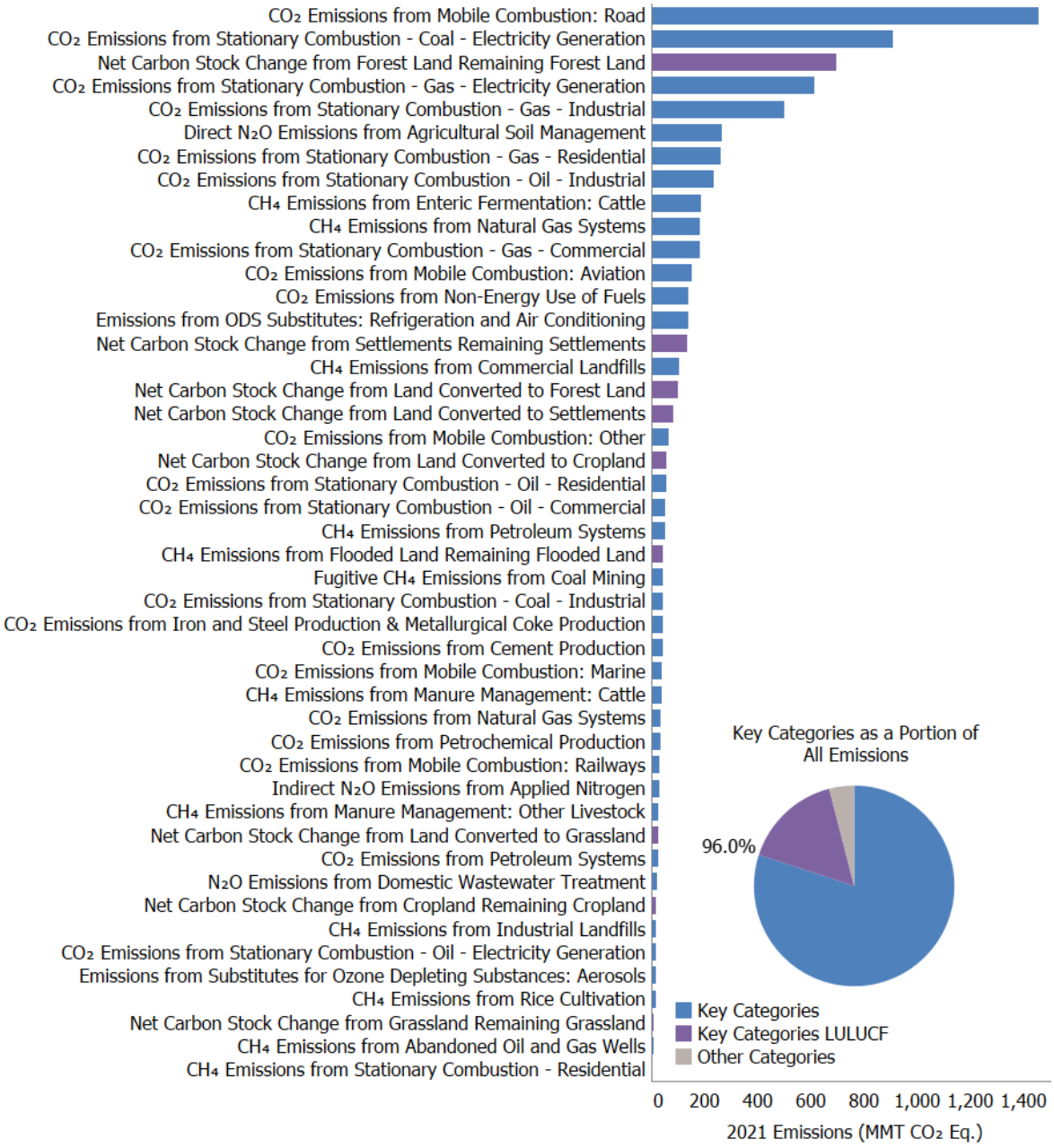
The *2006 IPCC Guidelines* (IPCC 2006) and *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019) defines key categories as "inventory categories which individually, or as a group of categories (for which a common method, emission factor and activity data are applied) are prioritized within the national inventory system because their estimates have a significant influence on a country's total inventory of greenhouse gases in terms of the absolute level, the trend, or the level of uncertainty in emissions or removals."[26] A key category analysis identifies priority source or sink categories for focusing efforts to improve overall Inventory quality. In addition, a qualitative review of key categories and non-key categories can also help identify additional source and sink categories to consider for improvement efforts, including reducing uncertainty.

Figure ES-16 presents the 2021 key categories identified by the Approach 1 level assessment, including the LULUCF sector. A level assessment using Approach 1 identifies all source and sink categories that cumulatively account for 95 percent of total (i.e., gross) emissions in a given year when assessed in descending order of absolute magnitude.

[26] See Chapter 4 "Methodological Choice and Identification of Key Categories" in IPCC (2006) and IPCC (2019). See http://www.ipcc-nggip.iges.or.jp/public/2006gl/vol1.html and https://www.ipcc-nggip.iges.or.jp/public/2019rf/pdf/1_Volume1/19R_V1_Ch04_MethodChoice.pdf.

For a complete list of key categories and more information regarding the overall key category analysis, including approaches accounting for uncertainty and the influence of trends of individual source and sink categories, see the Introduction chapter, Section 1.5 – Key Categories and Annex 1.

Figure ES-16: 2021 Key Categories (Approach 1 including LULUCF)[a]



[a] For a complete list of key categories and detailed discussion of the underlying key category analysis, see Annex 1. Bars indicate key categories identified using Approach 1 level assessment including the LULUCF sector. The absolute values of net CO_2

emissions from LULUCF are presented in this figure but reported separately from gross emissions totals. Refer to Table ES-4 for a breakout of emissions and removals for LULUCF by source/sink category.

Quality Assurance and Quality Control (QA/QC)

The United States seeks continuous improvements to the quality, transparency, and usability of the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*. To assist in these efforts, the United States implemented a systematic approach to QA/QC. The procedures followed for the Inventory have been formalized in accordance with the U.S. Inventory QA/QC plan, and the UNFCCC reporting guidelines and *2006 IPCC Guidelines*. The QA process includes expert and public reviews for the Inventory estimates and this report.

Box ES-3: Use of Ambient Measurements Systems for Validation of Emission Inventories

In following the UNFCCC requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and sinks presented in this report are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC.[27] Several recent studies have estimated emissions at the national or regional level with estimated results that sometimes differ from EPA's estimate of emissions. EPA has engaged with researchers on how remote sensing, ambient measurement, and inverse modeling techniques for estimating greenhouse gas emissions could assist in improving the understanding of inventory estimates. In working with the research community to improve national greenhouse gas inventories, EPA follows guidance from the IPCC on the use of measurements and modeling to validate emission inventories.[28] An area of particular interest in EPA's outreach efforts is how ambient measurement data can be used to assess estimates or potentially be incorporated into the Inventory in a manner consistent with this Inventory report's transparency of its calculation methodologies, and the ability of inverse modeling techniques to attribute emissions and removals from remote sensing to anthropogenic sources, as defined by the IPCC for this report, versus natural sources and sinks.

The *2019 Refinement to the IPCC 2006 Guidelines for National Greenhouse Gas Inventories* (IPCC 2019) Volume 1 General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. The *2019 Refinement* provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC [2019] Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC [2019] Volume 1, Chapter 6) given the technical complexity of such comparisons. Further, it identified fluorinated gases as particularly suitable for such comparisons. The *2019 Refinement* makes this conclusion for fluorinated gases based on their lack of significant natural sources, their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike emissions of CO_2, CH_4, and N_2O, emissions of fluorinated greenhouse gases are almost exclusively anthropogenic, meaning that the fluorinated greenhouse gas emission sources included in this Inventory account for the majority of the total U.S. emissions of these gases detectable in the atmosphere.

In this Inventory, EPA presents the results of two comparisons between fluorinated gas emissions inferred from atmospheric measurements and fluorinated gas emissions estimated based on bottom-up measurements and modeling. These comparisons, performed for HFCs and SF_6 respectively, are described under the QA/QC and Verification discussions in Chapter 4, Sections 4.24 Substitution of Ozone Depleting Substances and 4.25 Electrical Transmission and Distribution in the IPPU chapter of this report.

Consistent with the *2019 Refinement*, a key element to facilitate such comparisons is a gridded prior inventory as an input to inverse modeling. To improve the ability to compare the national-level greenhouse gas inventory with measurement results that may be at other scales, a team at Harvard University along with EPA and other

[27] See http://www.ipcc-nggip.iges.or.jp/public/index.html.

[28] See http://www.ipcc-nggip.iges.or.jp/meeting/pdfiles/1003_Uncertainty%20meeting_report.pdf.

coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1° x 0.1° spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. The gridded inventory is designed to be consistent with the 1990 to 2014 U.S. EPA *Inventory of U.S. Greenhouse Gas Emissions and Sinks* estimates for the year 2012, which presents national totals for different source types.[29] This gridded inventory is consistent with the recommendations contained in two National Academies of Science reports examining greenhouse gas emissions data (National Research Council 2010; National Academies of Sciences, Engineering, and Medicine 2018).

Finally, in addition to use of atmospheric concentration measurement data for comparison with Inventory data, information from top-down studies is directly incorporated in the Natural Gas Systems calculations to quantify emissions from certain well blowout events.

Uncertainty Analysis of Emission and Sink Estimates

Uncertainty assessment is an essential element of a complete inventory of greenhouse gas emissions and removals because it helps to inform and prioritize inventory improvements. Recognizing the benefit of conducting an uncertainty analysis, the UNFCCC reporting guidelines follow the recommendations of the *2006 IPCC Guidelines* (IPCC 2006), Volume 1, Chapter 3 and require that countries provide single estimates of uncertainty for source and sink categories. In addition to quantitative uncertainty assessments, a qualitative discussion of uncertainty is presented for each source and sink category identifying specific factors affecting the uncertainty surrounding the estimates provided in accordance with UNFCCC reporting guidelines. Some of the current estimates, such as those for CO_2 emissions from energy-related combustion activities, are considered to have low uncertainties. This is because the amount of CO_2 emitted from energy-related combustion activities is directly related to the amount of fuel consumed, the fraction of the fuel that is oxidized, and the carbon content of the fuel, and for the United States, the uncertainties associated with estimating those factors is relatively small. For some other categories of emissions and sinks, however, inherent variability or a lack of data increases the uncertainty or systematic error associated with the estimates presented. Finally, an analysis is conducted to assess uncertainties associated with the overall emissions, sinks and trends estimates. The overall uncertainty surrounding total net greenhouse gas emissions is estimated to be -5 to +6 percent in 1990 and -4 to +6 percent in 2021. When the LULUCF sector is excluded from the analysis the uncertainty is estimated to be -2 to +5 percent in 1990 and -2 to +6 percent in 2021.

[29] See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

1. Introduction

This report presents an inventory of U.S. anthropogenic greenhouse gas emissions and sinks for the years 1990 through 2021 compiled by the United States government. A summary of these estimates is provided in Table 2-1 and Table 2-2 by gas and source category in the Trends in Greenhouse Gas Emissions chapter. The emission and sink estimates in these tables are presented on both a full mass basis and on a global warming potential (GWP)-weighted basis[1] in order to show the relative contribution of each gas to global average radiative forcing. This report also discusses the methods and data used to calculate the emission and sink estimates.

In 1992, the United States signed and ratified the United Nations Framework Convention on Climate Change (UNFCCC). As stated in Article 2 of the UNFCCC, "The ultimate objective of this Convention and any related legal instruments that the Conference of the Parties may adopt is to achieve, in accordance with the relevant provisions of the Convention, stabilization of greenhouse gas concentrations in the atmosphere at a level that would prevent dangerous anthropogenic interference with the climate system. Such a level should be achieved within a time-frame sufficient to allow ecosystems to adapt naturally to climate change, to ensure that food production is not threatened and to enable economic development to proceed in a sustainable manner."[2,3]

As a signatory to the UNFCCC, consistent with Article 4[4] and decisions at the First, Second, Fifth, and Nineteenth Conference of Parties,[5] the U.S. is committed to submitting a national inventory of anthropogenic sources and sinks of greenhouse gases to the UNFCCC by April 15 of each year. This Inventory provides a national estimate of sources and sinks for the United States, including all states, the District of Columbia and U.S. Territories.[6] The United States views this report, in conjunction with Common Reporting Format (CRF) reporting tables that accompany this report, as an opportunity to fulfill this annual commitment under the UNFCCC. Overall, this

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[1] More information provided in the Global Warming Potentials section of this chapter on the use of IPCC *Fifth Assessment Report* (AR5) GWP values.

[2] The term "anthropogenic," in this context, refers to greenhouse gas emissions and removals that are a direct result of human activities or are the result of natural processes that have been affected by human activities (IPCC 2006).

[3] Article 2 of the Framework Convention on Climate Change published by the UNEP/WMO Information Unit on Climate Change (UNEP/WMO 2000). See http://unfccc.int.

[4] Article 4(1)(a) of the United Nations Framework Convention on Climate Change (also identified in Article 12) and subsequent decisions by the Conference of the Parties elaborated the role of Annex I Parties in preparing national inventories. Article 4 states "Parties to the Convention, by ratifying, shall develop, periodically update, publish and make available…national inventories of anthropogenic emissions by sources and removals by sinks of all greenhouse gases not controlled by the Montreal Protocol, using comparable methodologies…" See http://unfccc.int for more information.

[5] United Nations Framework Convention on Climate Change, see Decision 7/CP.27 https://unfccc.int/sites/default/files/resource/cp2022_10a01_adv.pdf

[6] U.S. Territories include American Samoa, Guam, Commonwealth of the Northern Mariana Islands, Puerto Rico, U.S. Virgin Islands, and other outlying U.S. Pacific Islands which are not permanently inhabited such as Wake Island. See https://www.usgs.gov/faqs/how-are-us-states-territories-and-commonwealths-designated-geographic-names-information-system?qt-news_science_products=0#qt-news_science_products. See more information on completeness in Section 1.8.

Inventory of anthropogenic greenhouse gas emissions and sinks provides a common and consistent mechanism through which Parties to the UNFCCC can compare the relative contribution of individual sources, gases, and nations to climate change. The structure of this report is consistent with the current UNFCCC Guidelines on Annual Inventories (UNFCCC 2014) for Parties included in Annex I of the Convention.

In 1988, preceding the creation of the UNFCCC, the World Meteorological Organization (WMO) and the United Nations Environment Programme (UNEP) jointly established the Intergovernmental Panel on Climate Change (IPCC). The role of the IPCC is to assess on a comprehensive, objective, open and transparent basis the scientific, technical and socio-economic information relevant to understanding the scientific basis of risk of human-induced climate change, its potential impacts and options for adaptation and mitigation (IPCC 2021). Under Working Group 1 of the IPCC, nearly 140 scientists and national experts from more than thirty countries collaborated in the creation of the *Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC/UNEP/OECD/IEA 1997) to ensure that the emission inventories submitted to the UNFCCC are consistent and comparable between nations. The *IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories* and the *IPCC Good Practice Guidance for Land Use, Land-Use Change, and Forestry* further expanded upon the methodologies in the *Revised 1996 IPCC Guidelines*. In 2006, the IPCC accepted the *2006 Guidelines for National Greenhouse Gas Inventories* at its Twenty-Fifth Session (Mauritius, April 2006). The *2006 IPCC Guidelines* built upon the previous bodies of work and include new sources and gases, "…as well as updates to the previously published methods whenever scientific and technical knowledge have improved since the previous guidelines were issued." The UNFCCC adopted the *2006 IPCC Guidelines* as the standard methodological approach for Annex I countries and encouraged countries to gain experience in using the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* at the Nineteenth Conference of the Parties (Warsaw, November 11-23, 2013). The IPCC has recently released the *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* to clarify and elaborate on the existing guidance in the *2006 IPCC Guidelines*, along with providing updates to default values of emission factors and other parameters based on updated science. This report applies both the *2013 Supplement* and updated guidance in the *2019 Refinement* to improve accuracy and completeness of the Inventory. For more information on specific uses see Section 1.4 of this chapter on Methodology and Data Sources.

Box 1-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the UNFCCC requirement under Article 4.1 and decision 24/CP.19 to develop and submit annual national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the IPCC in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)* and where appropriate, its supplements and refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations reporting their inventories to the UNFCCC ensures that the estimates are comparable. The presentation of emissions and removals provided in this Inventory does not preclude alternative examinations, but rather this Inventory presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP).[7] The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject carbon dioxide

[7] On October 30, 2009, the EPA promulgated a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emissions sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

(CO_2) underground for sequestration or other reasons and requires reporting by over 8,000 sources or suppliers in 41 industrial categories.[8] Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO_2 Eq. per year. Facilities in most source categories subject to GHGRP began reporting for the 2010 reporting year while additional types of industrial operations began reporting for reporting year 2011. While the GHGRP does not provide full coverage of total annual U.S. greenhouse gas emissions and sinks (e.g., the GHGRP excludes emissions from the agricultural, land use, and forestry sectors), it is an important input to the calculations of national-level emissions in the Inventory.

Data presented in this Inventory report and EPA's GHGRP are complementary. The GHGRP dataset continues to be an important resource for the Inventory, providing not only annual emissions information, but also other annual information such as activity data and emission factors that can improve and refine national emission estimates and trends over time. Methodologies used in EPA's GHGRP are consistent with the *2006 IPCC Guidelines* (e.g., higher tier methods). GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing the application of QA/QC procedures and assessment of uncertainties. EPA uses annual GHGRP data in a number of categories to improve the national estimates presented in this Inventory consistent with IPCC methodological guidance. See Annex 9 for more information on specific uses of GHGRP data in the Inventory (e.g., natural gas systems).

1.1 Background Information

Science

For over the past 200 years, the burning of fossil fuels such as coal and oil, along with deforestation, land-use changes, and other activities have caused the concentrations of heat-trapping "greenhouse gases" to increase significantly in our atmosphere (IPCC 2021). These gases in the atmosphere absorb some of the energy being radiated from the surface of the Earth that would otherwise be lost to space, essentially acting like a blanket that makes the Earth's surface warmer than it would be otherwise.

Greenhouse gases are necessary to life as we know it. Without greenhouse gases to create the natural heat-trapping properties of the atmosphere, the planet's surface would be about 60 degrees Fahrenheit cooler than present (USGCRP 2017). Carbon dioxide is also necessary for plant growth. With emissions from biological and geological sources, there is a natural level of greenhouse gases that is maintained in the atmosphere. Human emissions of greenhouse gases and subsequent changes in atmospheric concentrations alter the balance of energy transfers between space and the earth system (IPCC 2021). A gauge of these changes is called radiative forcing, which is a measure of a substance's total net effect on the global energy balance for which a positive number represents a warming effect, and a negative number represents a cooling effect (IPCC 2021). IPCC concluded in its most recent scientific assessment report that it is "unequivocal that human influence has warmed the atmosphere, ocean and land" (IPCC 2021).

As concentrations of greenhouse gases continue to increase in from man-made sources, the Earth's temperature is climbing above past levels. The Earth's average land and ocean surface temperature has increased by about 2.0 degrees Fahrenheit from the 1850 to 1900 period to the decade of 2011 to 2020 (IPCC 2021). The last four decades have each been the warmest decade successively at the Earth's surface since at least 1850 (IPCC 2021). Other aspects of the climate are also changing, such as rainfall patterns, snow and ice cover, and sea level. If greenhouse gas concentrations continue to increase, climate models predict that the average temperature at the Earth's

[8] See http://www.epa.gov/ghgreporting and http://ghgdata.epa.gov/ghgp/main.do.

surface is likely to increase by up to 8.3 degrees Fahrenheit above 2011 to 2020 levels by the end of this century, depending on future emissions and the responsiveness of the climate system (IPCC 2021), though the lowest emission scenario would limit future warming to an additional 0.5 degrees (best estimate).

For further information on greenhouse gases, radiative forcing, and implications for climate change, see the recent scientific assessment reports from the IPCC,[9] the U.S. Global Change Research Program (USGCRP),[10] and the National Academies of Sciences, Engineering, and Medicine (NAS).[11]

Greenhouse Gases

Although the Earth's atmosphere consists mainly of oxygen and nitrogen, neither plays a significant role in enhancing the greenhouse effect because both are essentially transparent to terrestrial radiation. The greenhouse effect is primarily a function of the concentration of water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and other trace gases in the atmosphere that absorb the terrestrial radiation leaving the surface of the Earth (IPCC 2021).

Naturally occurring greenhouse gases include water vapor, CO_2, CH_4, N_2O, and ozone (O_3). Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. Chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine, while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e., halons). As stratospheric ozone depleting substances, CFCs, HCFCs, and halons are covered under the Montreal Protocol on Substances that Deplete the Ozone Layer. The UNFCCC defers to this earlier international treaty. Consequently, Parties to the UNFCCC are not required to include these gases in national greenhouse gas inventories.[12] Some other fluorine-containing halogenated substances—hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3)—do not deplete stratospheric ozone but are potent greenhouse gases. These latter substances are addressed by the UNFCCC and accounted for in national greenhouse gas inventories.

There are also several other substances that influence the global radiation budget but are short-lived and therefore not well-mixed, leading to spatially variable radiative forcing effects. These substances include carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and tropospheric (ground level) ozone (O_3). Tropospheric ozone is formed from chemical reactions in the atmosphere of precursor pollutants, which include volatile organic compounds (VOCs, including CH_4) and nitrogen oxides (NO_x), in the presence of ultraviolet light (sunlight).

Aerosols are extremely small particles or liquid droplets suspended in the Earth's atmosphere that are often composed of sulfur compounds, carbonaceous combustion products (e.g., black carbon), crustal materials (e.g., dust) and other human-induced pollutants. They can affect the absorptive characteristics of the atmosphere (e.g., scattering incoming sunlight away from the Earth's surface, or, in the case of black carbon, absorb sunlight) and can play a role in affecting cloud formation and lifetime, as well as the radiative forcing of clouds and precipitation patterns.

Carbon dioxide, CH_4, and N_2O are continuously emitted to and removed from the atmosphere by natural processes on Earth. Anthropogenic activities (such as fossil fuel combustion, cement production, land-use, land-use change, and forestry, agriculture, or waste management), however, can cause additional quantities of these and other greenhouse gases to be emitted or sequestered, thereby changing their global average atmospheric

[9] See https://www.ipcc.ch/report/ar6/wg1/.

[10] See https://nca2018.globalchange.gov/.

[11] See https://www.nationalacademies.org/topics/climate.

[12] Emissions estimates of CFCs, HCFCs, halons and other ozone-depleting substances are included in this document for informational purposes.

concentrations. Natural activities such as respiration by plants or animals and seasonal cycles of plant growth and decay are examples of processes that only cycle carbon or nitrogen between the atmosphere and organic biomass. Such processes, except when directly or indirectly perturbed out of equilibrium by anthropogenic activities, generally do not alter average atmospheric greenhouse gas concentrations over decadal timeframes. Climatic changes resulting from anthropogenic activities, however, could have positive or negative feedback effects on these natural systems. Atmospheric concentrations of these gases, along with their rates of growth and atmospheric lifetimes, are presented in Table 1-1.

Table 1-1: Global Atmospheric Concentration, Rate of Concentration Change, and Atmospheric Lifetime of Selected Greenhouse Gases

Atmospheric Variable	CO_2	CH_4	N_2O	SF_6	CF_4
Pre-industrial atmospheric concentration	280 ppm	0.730 ppm	0.270 ppm	0 ppt	40 ppt
Atmospheric concentration	416 ppm[a]	1.895 ppm[b]	0.334 ppm[c]	10.63 ppt[d]	85.5 ppt[e]
Rate of concentration change	2.38 ppm/yr[f]	18.05 ppb/yr[f,g]	1.30 ppb/yr[f]	0.39 ppt/yr[f]	0.81 ppt/yr[f]
Atmospheric lifetime (years)	See footnote[h]	11.8	109[i]	About 1,000[j]	50,000

[a] The atmospheric CO_2 concentration is the 2021 annual average at the Mauna Loa, HI station (NOAA/ESRL 2023a). The global atmospheric CO_2 concentration, computed using an average of sampling sites across the world, was 415 ppm in 2021.

[b] The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023b).

[c] The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023c).

[d] The values presented are global 2021 annual average mole fractions (NOAA/ESRL 2023d).

[e] The 2019 CF_4 global mean atmospheric concentration is from the Advanced Global Atmospheric Gases Experiment (IPCC 2021).

[f] The rate of concentration change for CO_2 is an average of the rates from 2007 through 2021 and has fluctuated between 1.5 to 3.0 ppm per year over this period (NOAA/ESRL 2023a). The rate of concentration change for CH_4, N_2O, and SF_6, is the average rate of change between 2007 and 2021 (NOAA/ESRL 2023b; NOAA/ESRL 2023c; NOAA/ESRL 2023d). The rate of concentration change for CF_4 is the average rate of change between 2011 and 2019 (IPCC 2021).

[g] The growth rate for atmospheric CH_4 decreased from over 10 ppb/year in the 1980s to nearly zero in the early 2000s; recently, the growth rate has been about 18.21 ppb/year (NOAA/ESRL 2023b).

[h] For a given amount of CO_2 emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

[i] This lifetime has been defined as an "adjustment time" that takes into account the indirect effect of the gas on its own residence time.

[j] The lifetime for SF_6 was revised from 3,200 years to about 1,000 years based on recent studies (IPCC 2021).

Source: Pre-industrial atmospheric concentrations and atmospheric lifetimes for CH_4, N_2O, SF_6, and CF_4 are from IPCC (2021).

A brief description of each greenhouse gas, its sources, and its role in the atmosphere is given below. The following section then explains the concept of GWPs, which are assigned to individual gases as a measure of their relative average global radiative forcing effect.

Water Vapor (H_2O). Water vapor is the largest contributor to the natural greenhouse effect. Water vapor is fundamentally different from other greenhouse gases in that it can condense and rain out when it reaches high concentrations, and the total amount of water vapor in the atmosphere is in part a function of the Earth's temperature. While some human activities such as evaporation from irrigated crops or power plant cooling release water vapor into the air, these activities have been determined to have a negligible effect on global climate (IPCC 2021). The lifetime of water vapor in the troposphere is on the order of 10 days. Water vapor can also contribute to cloud formation, and clouds can have both warming and cooling effects by either trapping or reflecting heat. Because of the relationship between water vapor levels and temperature, water vapor and clouds serve as a feedback to climate change, such that for any given increase in other greenhouse gases, the total warming is greater than would happen in the absence of water vapor. Aircraft emissions of water vapor can create contrails, which may also develop into contrail-induced cirrus clouds, with complex regional and temporal net radiative forcing effects that currently have a low level of scientific certainty (IPCC 2021).

Carbon Dioxide (CO_2). In nature, carbon is cycled between various atmospheric, oceanic, land biotic, marine biotic, and mineral reservoirs. The largest fluxes occur between the atmosphere and terrestrial biota, and between the atmosphere and surface water of the oceans. In the atmosphere, carbon predominantly exists in its oxidized form

as CO_2. Atmospheric CO_2 is part of this global carbon cycle, and therefore its fate is a complex function of geochemical and biological processes. Carbon dioxide concentrations in the atmosphere increased from approximately 280 parts per million by volume (ppmv) in pre-industrial times to 416 ppmv in 2021, a 48 percent increase (IPCC 2021; NOAA/ESRL 2023a).[13,14] The IPCC states that "Observed increases in well-mixed greenhouse gas (GHG) concentrations since around 1750 are unequivocally caused by human activities" (IPCC 2021). The predominant source of anthropogenic CO_2 emissions is the combustion of fossil fuels. Forest clearing, other biomass burning, and some non-energy production processes (e.g., cement production) also emit notable quantities of CO_2. In its *Sixth Assessment Report*, the IPCC determined that of the 2.0 degrees of observed warming, the best estimate is that 1.9 degrees of that are due to human influence, with elevated CO_2 concentrations being the most important contributor to that warming (IPCC 2021).

Methane (CH_4). Methane is primarily produced through anaerobic decomposition of organic matter in biological systems. Agricultural processes such as wetland rice cultivation, enteric fermentation in animals, and the decomposition of animal wastes emit CH_4, as does the decomposition of municipal solid wastes and treatment of wastewater. Methane is also emitted during the production and distribution of natural gas and petroleum, and is released as a byproduct of coal mining and incomplete fossil fuel combustion. Atmospheric concentrations of CH_4 have increased by about 162 percent since 1750, from a pre-industrial value of about 730 ppb to 1,895 ppb in 2021[15] although the rate of increase decreased to near zero in the early 2000s, and has recently increased again to about 18.05 ppb/year. The IPCC has estimated that about half of the current CH_4 flux to the atmosphere (and the entirety of the increase in concentration) is anthropogenic, from human activities such as agriculture, fossil fuel production and use, and waste disposal (IPCC 2021).

Methane is primarily removed from the atmosphere through a reaction with the hydroxyl radical (OH) and is ultimately converted to CO_2. Minor removal processes also include reaction with chlorine in the marine boundary layer, a soil sink, and stratospheric reactions. Increasing emissions of CH_4 reduce the concentration of OH, a feedback that increases the atmospheric lifetime of CH_4 (IPCC 2021). Methane's reactions in the atmosphere also lead to production of tropospheric ozone and stratospheric water vapor, both of which also contribute to climate change. Tropospheric ozone also has negative effects on human health and plant productivity.

Nitrous Oxide (N_2O). Anthropogenic sources of N_2O emissions include agricultural soils, especially production of nitrogen-fixing crops and forages, the use of synthetic and manure fertilizers, and manure deposition by livestock; fossil fuel combustion, especially from mobile combustion; adipic (nylon) and nitric acid production; wastewater treatment and waste incineration; and biomass burning. The atmospheric concentration of N_2O has increased by 24 percent since 1750, from a pre-industrial value of about 270 ppb to 334 ppb in 2021,[16] a concentration that has not been exceeded during at least the last 800 thousand years. Nitrous oxide is primarily removed from the atmosphere by the photolytic action of sunlight in the stratosphere (IPCC 2021).

Ozone (O_3). Ozone is present in both the upper stratosphere,[17] where it shields the Earth from harmful levels of ultraviolet radiation, and at lower concentrations in the troposphere,[18] where it is the main component of

[13] The pre-industrial period is considered as the time preceding the year 1750 (IPCC 2013).

[14] Carbon dioxide concentrations during the last 1,000 years of the pre-industrial period (i.e., 750 to 1750), a time of relative climate stability, fluctuated by about ±10 ppmv around 280 ppmv (IPCC 2013).

[15] This value is the global 2021 annual average mole fraction (NOAA/ESRL 2023b).

[16] This value is the global 2021 annual average (NOAA/ESRL 2023c).

[17] The stratosphere is the layer from the troposphere up to roughly 50 kilometers. In the lower regions the temperature is nearly constant but in the upper layer the temperature increases rapidly because of sunlight absorption by the ozone layer. The ozone-layer is the part of the stratosphere from 19 kilometers up to 48 kilometers where the concentration of ozone reaches up to 10 parts per million.

[18] The troposphere is the layer from the ground up to 11 kilometers near the poles and up to 16 kilometers in equatorial regions (i.e., the lowest layer of the atmosphere where people live). It contains roughly 80 percent of the mass of all gases in the atmosphere and is the site for most weather processes, including most of the water vapor and clouds.

anthropogenic photochemical "smog." During the last two decades, emissions of anthropogenic chlorine and bromine-containing halocarbons, such as CFCs, have depleted stratospheric ozone concentrations. This loss of ozone in the stratosphere has resulted in negative radiative forcing, representing an indirect effect of anthropogenic emissions of chlorine and bromine compounds (IPCC 2021). The depletion of stratospheric ozone and its radiative forcing remained relatively unchanged since 2000 for the last two decades and is starting to decline; recovery is expected to occur shortly after the middle of the twenty-first century (WMO/UNEP 2018).

The past increase in tropospheric ozone, which is also a greenhouse gas, is estimated to provide the third largest increase in direct radiative forcing since the pre-industrial era, behind CO_2 and CH_4. Tropospheric ozone is produced from complex chemical reactions of volatile organic compounds (including CH_4) mixing with NO_x in the presence of sunlight. The tropospheric concentrations of ozone and these other pollutants are short-lived and, therefore, spatially variable (IPCC 2021).

Halocarbons, Sulfur Hexafluoride, and Nitrogen Trifluoride. Halocarbons are, for the most part, man-made chemicals that have direct radiative forcing effects and could also have an indirect effect. Halocarbons that contain chlorine (CFCs, HCFCs, methyl chloroform, and carbon tetrachloride) and bromine (halons, methyl bromide, and hydrobromofluorocarbons) result in stratospheric ozone depletion and are therefore controlled under the Montreal Protocol on Substances that Deplete the Ozone Layer. Although most CFCs and HCFCs are potent global warming gases, their net radiative forcing effect on the atmosphere is reduced because they cause stratospheric ozone depletion, which itself is a greenhouse gas but which also shields the Earth from harmful levels of ultraviolet radiation. Under the Montreal Protocol, the United States phased out the production and importation of halons by 1994 and of CFCs by 1996. Under the Copenhagen Amendments to the Protocol, a cap was placed on the production and importation of HCFCs by non-Article 5 countries, including the United States,[19] beginning in 1996, and then followed by intermediate requirements and a complete phase-out by the year 2030. While ozone depleting gases covered under the Montreal Protocol and its Amendments are not covered by the UNFCCC, they are reported in this Inventory under Annex 6.2 for informational purposes.

Hydrofluorocarbons, PFCs, SF_6, and NF_3 are not ozone depleting substances. The most common HFCs are, however, powerful greenhouse gases. Hydrofluorocarbons are primarily used as replacements for ozone depleting substances but also emitted as a byproduct of the HCFC-22 (chlorodifluoromethane) manufacturing process. Currently, they have a small aggregate radiative forcing impact, but it is anticipated that without further controls their contribution to overall radiative forcing will increase, the ERF (effective radiative forcing) of halogenated gases increased by 3.5 percent between 2011 and 2019 primarily due to a decrease in atmospheric mixing-ratios of CFCs and an increase in their replacements (IPCC 2021). On December 27, 2020, the American Innovation and Manufacturing (AIM) Act was enacted by Congress and which gives EPA authority to phase down HFC production and consumption (i.e., production plus import, minus export), through an allowance allocation program, promulgate certain regulations for purposes of maximizing reclamation and minimizing releases of HFCs and their substitutes from equipment, and facilitating the transition to next-generation technologies through sector-based restrictions, which will lead to lower HFC emissions over time. Perfluorocarbons, SF_6, and NF_3 are predominantly emitted from various industrial processes including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. Currently, the radiative forcing impact of PFCs, SF_6, and NF_3 is also small, but they have a significant growth rate, extremely long atmospheric lifetimes, and are strong absorbers of infrared radiation, and therefore have the potential to influence climate far into the future (IPCC 2021).

Carbon Monoxide (CO). Carbon monoxide has an indirect radiative forcing effect by elevating concentrations of CH_4 and tropospheric ozone through chemical reactions with other atmospheric constituents (e.g., the hydroxyl radical, OH) that would otherwise assist in destroying CH_4 and tropospheric ozone. Carbon monoxide is created when

[19] Article 5 of the Montreal Protocol covers several groups of countries, especially developing countries, with low consumption rates of ozone depleting substances. Developing countries with per capita consumption of less than 0.3 kg of certain ozone depleting substances (weighted by their ozone depleting potential) receive financial assistance and a grace period of ten additional years in the phase-out of ozone depleting substances.

carbon-containing fuels are burned incompletely. Through natural processes in the atmosphere, it is eventually oxidized to CO_2. Carbon monoxide concentrations are both short-lived in the atmosphere and spatially variable.

Nitrogen Oxides (NO_x). The primary climate change effects of nitrogen oxides (i.e., NO and NO_2) are indirect. Warming effects can occur due to reactions leading to the formation of ozone in the troposphere, but cooling effects can occur due to the role of NO_x as a precursor to nitrate particles (i.e., aerosols) and due to destruction of stratospheric ozone when emitted from very high-altitude aircraft.[20] Additionally, NO_x emissions are also likely to decrease CH_4 concentrations, thus having a negative radiative forcing effect (IPCC 2021). Nitrogen oxides are created from lightning, soil microbial activity, biomass burning (both natural and anthropogenic fires) fuel combustion, and, in the stratosphere, from the photo-degradation of N_2O. Concentrations of NO_x are both relatively short-lived in the atmosphere and spatially variable.

Non-methane Volatile Organic Compounds (NMVOCs). Non-methane volatile organic compounds include substances such as propane, butane, and ethane. These compounds participate, along with NO_x, in the formation of tropospheric ozone and other photochemical oxidants. NMVOCs are emitted primarily from transportation and industrial processes, as well as biomass burning and non-industrial consumption of organic solvents. Concentrations of NMVOCs tend to be both short-lived in the atmosphere and spatially variable.

Aerosols. Aerosols are extremely small particles or liquid droplets found in the atmosphere that are either directly emitted into or are created through chemical reactions in the Earth's atmosphere. Aerosols or their chemical precursors can be emitted by natural events such as dust storms, biogenic or volcanic activity, or by anthropogenic processes such as transportation, coal combustion, cement manufacturing, waste incineration, or biomass burning. Various categories of aerosols exist from both natural and anthropogenic sources, such as soil dust, sea salt, biogenic aerosols, sulfates, nitrates, volcanic aerosols, industrial dust, and carbonaceous[21] aerosols (e.g., black carbon, organic carbon). Aerosols can be removed from the atmosphere relatively rapidly by precipitation or through more complex processes under dry conditions.

Aerosols affect radiative forcing differently than greenhouse gases. Their radiative effects occur through direct and indirect mechanisms: directly by scattering and absorbing solar radiation (and to a lesser extent scattering, absorption, and emission of terrestrial radiation); and indirectly by increasing cloud droplets and ice crystals that modify the formation, precipitation efficiency, and radiative properties of clouds (IPCC 2021). Despite advances in understanding of cloud-aerosol interactions, the contribution of aerosols to radiative forcing are difficult to quantify because aerosols generally have short atmospheric lifetimes, and have number concentrations, size distributions, and compositions that vary regionally, spatially, and temporally (IPCC 2021).

The net effect of aerosols on the Earth's radiative forcing is believed to be negative (i.e., net cooling effect on the climate). In fact, aerosols contributed a cooling influence of up to 1.4 degrees, offsetting a substantial portion of greenhouse gas warming (IPCC 2021). Because aerosols remain in the atmosphere for only days to weeks, their concentrations respond rapidly to changes in emissions.[22] Not all aerosols have a cooling effect. Current research suggests that another constituent of aerosols, black carbon, has a positive radiative forcing by heating the Earth's atmosphere and causing surface warming when deposited on ice and snow (IPCC 2021). Black carbon also influences cloud development, but the direction and magnitude of this forcing is an area of active research.

[20] NO_x emissions injected higher in the stratosphere, primarily from fuel combustion emissions from high altitude supersonic aircraft, can lead to stratospheric ozone depletion.

[21] Carbonaceous aerosols are aerosols that are comprised mainly of organic substances and forms of black carbon (or soot) (IPCC 2013).

[22] Volcanic activity can inject significant quantities of aerosol producing sulfur dioxide and other sulfur compounds into the stratosphere, which can result in a longer lasting negative forcing effect (i.e., a few years) (IPCC 2013).

Global Warming Potentials

A global warming potential (GWP) is a quantified measure of the globally averaged relative radiative forcing impacts of a particular greenhouse gas (see Table 1-2). It is defined as the accumulated radiative forcing within a specific time horizon caused by emitting 1 kilogram (kg) of the gas, relative to that of the reference gas CO_2 (IPCC 2021). Direct radiative effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations involving the original gas produce a gas or gases that are greenhouse gases, or when a gas influences other radiatively important processes such as the atmospheric lifetimes of other gases. The reference gas used is CO_2, and therefore GWP-weighted emissions are measured in million metric tons of CO_2 equivalent (MMT CO_2 Eq.).[23] The relationship between kilotons (kt) of a gas and MMT CO_2 Eq. can be expressed as follows:

Equation 1-1: Calculating CO_2 Equivalent Emissions

$$\text{MMT CO}_2\text{ Eq.} = (\text{kt of gas}) \times (\text{GWP}) \times \left(\frac{\text{MMT}}{1{,}000\text{ kt}}\right)$$

where,

MMT CO_2 Eq.	= Million metric tons of CO_2 equivalent
kt	= kilotons (equivalent to a thousand metric tons)
GWP	= Global warming potential
MMT	= Million metric tons

GWP values allow for a comparison of the impacts of emissions and reductions of different gases. According to the IPCC, GWPs typically have an uncertainty of ±40 percent.

All estimates are provided throughout the report in both MMT CO_2 equivalents and unweighted units. Recent decisions under the UNFCCC require Parties to use 100-year GWP values from the IPCC *Fifth Assessment Report* (AR5) for calculating CO_2-equivalent emissions in their national reporting by the end of 2024.

> *…Decides that, until it adopts a further decision on the matter, the global warming potential values used by Parties in their reporting under the Convention to calculate the carbon dioxide equivalence of anthropogenic greenhouse gas emissions by sources and removals by sinks shall be based on the effects of greenhouse gases over a 100-year time horizon as listed in table 8.A.1 in appendix 8.A to the contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change,[24] excluding the value for fossil methane.*[25]

This reflects updated science and ensures that national greenhouse gas inventories reported by all nations are comparable. In preparation for upcoming UNFCCC requirement,[26] this report reflects CO_2-equivalent greenhouse gas totals using 100-year AR5 GWP values. A comparison of emission values with the previously used 100-year GWP values from IPCC *Fourth Assessment Report* (AR4) (IPCC 2007), and the IPCC *Sixth Assessment Report* (AR6)

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[23] Carbon comprises 12/44[ths] of carbon dioxide by weight.

[24] Intergovernmental Panel on Climate Change. 2013. *Climate Change 2013: The Physical Science Basis*. Contribution of Working Group I to the *Fifth Assessment Report* of the Intergovernmental Panel on Climate Change. TF Stocker, D Qin, G-K Plattner, et al. (eds.). Cambridge and New York: Cambridge University Press. Available at http://www.ipcc.ch/report/ar5/wg1.

[25] See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27), available online at https://unfccc.int/sites/default/files/resource/cp2022_10a01_adv.pdf. The UNFCCC reporting guidelines require use of the 100-year GWPs listed in table 8.A.1 in Annex 8.A of Chapter 8 of the *Fifth Assessment Report* (AR5) of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane. United Nations Framework Convention on Climate Change, see https://unfccc.int/sites/default/files/resource/cp2022_10a01_adv.pdf.

[26] See Annex to decision 18/CMA.1, available online at https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf

(IPCC 2021) values can be found in Annex 6.1 of this report. The 100-year GWP values used in this report are listed below in Table 1-2.

Greenhouse gases with relatively long atmospheric lifetimes (e.g., CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3) tend to be evenly distributed throughout the atmosphere, and consequently global average concentrations can be determined. The short-lived gases such as water vapor, carbon monoxide, tropospheric ozone, ozone precursors (e.g., NO_x, and NMVOCs), and tropospheric aerosols (e.g., SO_2 products and carbonaceous particles), however, vary regionally, and consequently it is difficult to quantify their global radiative forcing impacts. Parties to the UNFCCC have not agreed upon GWP values for these gases that are short-lived and spatially inhomogeneous in the atmosphere.

Table 1-2: Global Warming Potentials and Atmospheric Lifetimes (Years) Used in this Report

Gas	Atmospheric Lifetime	GWP[a]
CO_2	See footnote[b]	1
CH_4[c]	12.4	28
N_2O	121	265
HFC-23	222	12,400
HFC-32	5.2	677
HFC-41[d]	2.8	116
HFC-125	28.2	3,170
HFC-134a	13.4	1,300
HFC-143a	47.1	4,800
HFC-152a	1.5	138
HFC-227ea	38.9	3,350
HFC-236fa	242	8,060
CF_4	50,000	6,630
C_2F_6	10,000	11,100
C_3F_8	2,600	8,900
c-C_4F_8	3,200	9,540
SF_6	3,200	23,500
NF_3	500	16,100
Other Fluorinated Gases		See Annex 6

[a] 100-year time horizon.

[b] For a given amount of CO_2 emitted, some fraction of the atmospheric increase in concentration is quickly absorbed by the oceans and terrestrial vegetation, some fraction of the atmospheric increase will only slowly decrease over a number of years, and a small portion of the increase will remain for many centuries or more.

[c] The GWP of CH_4 includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO_2 is not included.

[d] See Table A-1 of 40 CFR Part 98

Source: IPCC (2013).

Box 1-2: The IPCC Sixth Assessment Report and Global Warming Potentials

In 2021, the IPCC published its *Sixth Assessment Report* (AR6), which updated its comprehensive scientific assessment of climate change. Within the AR6 report, the GWP values of gases were revised relative to previous IPCC reports, namely the IPCC *Second Assessment Report* (SAR) (IPCC 1996), the IPCC *Third Assessment Report* (TAR) (IPCC 2001), the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007), and the IPCC *Fifth Assessment Report* (AR5) (IPCC 2014). Although the AR5 GWP values are used throughout this report, consistent with UNFCCC reporting requirements, it is straight-forward to review the changes to the GWP values and their impact on

estimates of the total GWP-weighted emissions of the United States. In the AR6, the IPCC used more recent estimates of the atmospheric lifetimes and radiative efficiencies of some gases and updated background concentrations. The AR6 now includes climate-carbon feedback effects for non-CO_2 gases, improving the consistency between treatment of CO_2 and non-CO_2 gases. Indirect effects of gases on other atmospheric constituents (such as the effect of methane on ozone) have also been updated to match more recent science.

Table 1-3 presents the new GWP values, relative to those presented in the AR4 and AR5, using the 100-year time horizon common to UNFCCC reporting. For consistency with international reporting standards under the UNFCCC, official emission estimates are reported by the United States using AR4 100-year GWP values, as required by the 2013 revision to the UNFCCC reporting guidelines for national inventories.[27] Updated reporting guidelines under the Paris Agreement which require the United States and other countries to shift to use of the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013) 100-year GWP values (without feedbacks) take effect for national inventory reporting in 2024.[28] All estimates provided throughout this report are also presented in unweighted units. For informational purposes, emission estimates that use 100-year GWPs from other recent IPCC Assessment Reports are presented in detail in Annex 6.1 of this report.

Table 1-3: Comparison of 100-Year GWP values

	100-Year GWP Values				Comparisons to AR5		
Gas	AR4	AR5[a]	AR5 with feedbacks[b]	AR6[c]	AR4	AR5 with feedbacks[b]	AR6[c]
CO_2	1	1	1	1	NC	NC	NC
CH_4[d]	25	28	34	27	(3)	6	1
N_2O	298	265	298	273	33	33	8
HFC-23	14,800	12,400	13,856	14,600	2,400	1,456	2,200
HFC-32	675	677	817	771	(2)	140	94
HFC-41	92	116	141	135	(24)	25	19
HFC-125	3,500	3,170	3,691	3,740	330	521	570
HFC-134a	1,430	1,300	1,549	1,530	130	249	230
HFC-143a	4,470	4,800	5,508	5,810	(330)	708	1,010
HFC-152a	124	138	167	164	(14)	29	26
HFC-227ea	3,220	3,350	3,860	3,600	(130)	510	250
HFC-236fa	9,810	8,060	8,998	8,690	1,750	938	630
CF_4	7,390	6,630	7,349	7,380	760	719	750
C_2F_6	12,200	11,100	12,340	12,400	1,100	1,240	1,300
C_3F_8	8,830	8,900	9,878	9,290	(70)	978	390
c-C_4F_8	10,300	9,540	10,592	10,200	(760)	1,052	660
SF_6	22,800	23,500	26,087	24,300	700	2,587	800
NF_3	17,200	16,100	17,885	17,400	(1,100)	1,785	1,300

NC (No Change)

[a] The GWP values in this column reflect values used in this report from AR5 excluding climate-carbon feedbacks and the value for fossil methane.

[b] The GWP values in this column are from the AR5 report but include climate-carbon feedbacks for the non-CO_2 gases in order to be consistent with the approach used in calculating the CO_2 lifetime.

[c] The GWP values in this column are from the AR6 report.

[d] The GWP of CH_4 includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. Including the indirect effect due to the production of CO_2 resulting from methane oxidation would lead to an increase in AR5 methane GWP values by 2 for fossil methane and is not shown in this table.

Note: Parentheses indicate negative values.

Sources: IPCC (2021), IPCC (2013), IPCC (2007), IPCC (2001), IPCC (1996).

[27] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

[28] See https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-paris-agreement.

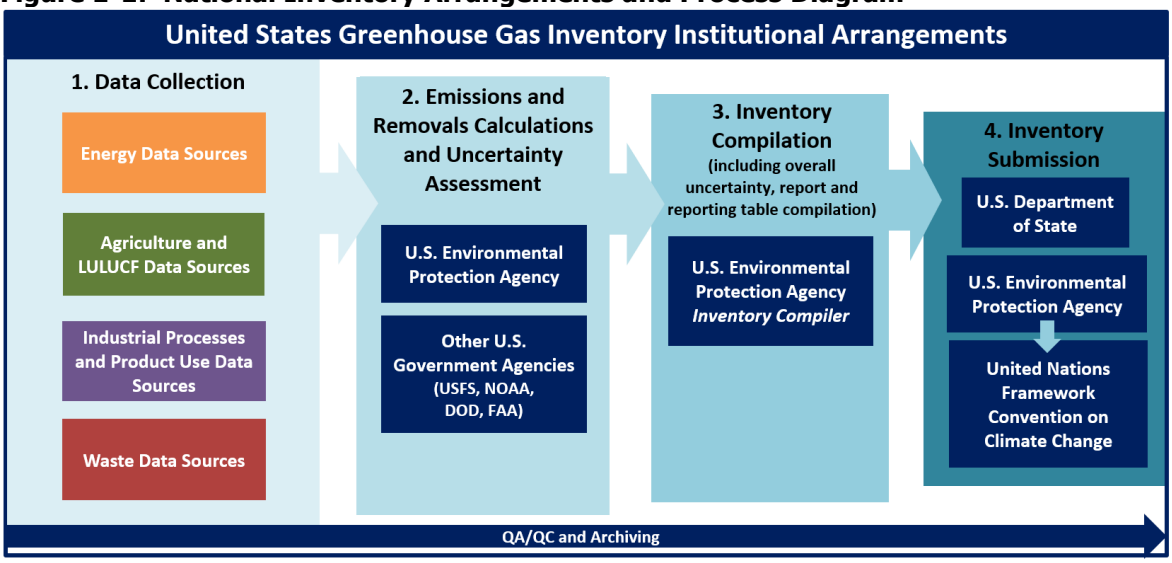
1.2 National Inventory Arrangements

The U.S. Environmental Protection Agency (EPA), in cooperation with other U.S. government agencies, prepares the *Inventory of U.S. Greenhouse Gas Emissions and Sinks*. A wide range of agencies and individuals are involved in supplying data to, planning methodological approaches and improvements, reviewing, or preparing portions of the Inventory—including federal and state government authorities, research and academic institutions, industry associations, and private consultants.

Within EPA, the Office of Atmospheric Protection (OAP) is the lead office responsible for the emission and removal calculations provided in the Inventory, as well as the completion of the National Inventory Report and the Common Reporting Format (CRF) tables. EPA's Office of Transportation and Air Quality (OTAQ) and Office of Research and Development (ORD) are also involved in calculating emissions and removals for the Inventory. The U.S. Department of State (DOS) serves as the overall national focal point to the UNFCCC, and EPA's OAP serves as the National Inventory Focal Point for this report, including responding to technical questions and comments on the U.S. Inventory. EPA staff coordinate the annual methodological choice, activity data collection, emission and removal calculations, uncertainty assessment, QA/QC processes, and improvement planning at the individual source and sink category level. EPA's inventory coordinator manages overall compilation of the entire Inventory into the proper reporting format for submission to the UNFCCC, and is responsible for the synthesis of information and for the consistent application of cross-cutting IPCC good practice across the Inventory.

Several other government agencies contribute to the collection and analysis of the underlying activity data used in the Inventory calculations via formal (e.g., interagency agreements) and informal relationships, in addition to the calculation of estimates integrated in the report (e.g., U.S. Department of Agriculture's U.S. Forest Service and Agricultural Service, National Oceanic and Atmospheric Administration, Federal Aviation Administration, and Department of Defense). Other U.S. agencies provide official data for use in the Inventory. The U.S. Department of Energy's Energy Information Administration provides national fuel consumption data and the U.S. Department of Defense provides data on military fuel consumption and use of bunker fuels. Other U.S. agencies providing activity data for use in EPA's emission calculations include: the U.S. Department of Agriculture, National Oceanic and Atmospheric Administration, the U.S. Geological Survey, the Federal Highway Administration, the Department of Transportation, the Bureau of Transportation Statistics, the Department of Commerce, and the Federal Aviation Administration. Academic and research centers also provide activity data and calculations to EPA, as well as individual companies participating in voluntary outreach efforts with EPA. Finally, EPA as the National Inventory Focal Point, in coordination with the U.S. Department of State, officially submits the Inventory to the UNFCCC each April.

Figure 1-1: National Inventory Arrangements and Process Diagram



Overview of Inventory Data Sources by Source and Sink Category

Energy	Agriculture and LULUCF	IPPU	Waste
U.S. Energy Information Administration	USDA U.S. Forest Service Forest Inventory and Analysis Program (FIA)	EPA Greenhouse Gas Reporting Program (GHGRP)	EPA Greenhouse Gas Reporting Program (GHGRP)
U.S. Department of Commerce – Bureau of the Census	USDA Natural Resource Conservation Service (NRCS)	U.S. Geological Survey (USGS) National Minerals Information Center	EPA Office of Land and Emergency Management (OLEM)
U.S. Department of Defense – Defense Logistics Agency	USDA National Agricultural Statistics Service (NASS) and Agricultural Research Service (ARS)	American Chemistry Council (ACC)	EPA Clean Watershed Needs Survey (CWNS)
U.S. Department of Homeland Security	EPA Office of Research and Development (ORD)	American Iron and Steel Institute (AISI)	American Housing Survey
U.S. Department of Transportation - Federal Highway Administration	U.S. Fish and Wildlife Service	U.S. International Trade Commission (USITC)	Data from research studies, trade publications, and industry associations
U.S. Department of Transportation - Federal Aviation Administration	U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS)	Air-Conditioning, Heating, and Refrigeration Institute	
U.S. Department of Transportation & Bureau of Transportation Statistics	Association of American Plant Food Control Officials (AAPFCO)	Data from other U.S. government agencies, research studies, trade publications, and industry association	
U.S. Department of Labor – Mine Safety and Health Administration	National Oceanic and Atmospheric Administration (NOAA)	UNEP Technology and Economic Assessment Panel (TEAP)	
U.S. Department of Energy and its National Laboratories	EPA Office of Land and Emergency Management (OLEM)		
EPA Acid Rain Program	USDA Farm Service Agency		
EPA MOVES Model	U.S. Geological Survey (USGS)		
EPA Greenhouse Gas Reporting Program (GHGRP)	U.S. Department of the Interior (DOI), Bureau of Land Management (BLM)		

U.S. Department of Labor – Mine Safety and Health Administration	EPA Office of Land and Emergency Management (OLEM)
American Association of Railroads	Alaska Department of Natural Resources
American Public Transportation Association	U.S. Census Bureau
Data from research studies, trade publications, and industry associations	Data from research studies, trade publications, and industry associations

Note: This table is not an exhaustive list of all data sources.

1.3 Inventory Process

This section describes EPA's approach to preparing the annual U.S. Inventory, which consists of the National Inventory Report (NIR) and Common Reporting Format (CRF) tables. The inventory coordinator at EPA, with support from the cross-cutting compilation staff, is responsible for coordination of aggregation of all emission and removal estimates, conducting the overall uncertainty analysis of Inventory emissions and trends over time, and ensuring consistency and quality throughout the NIR and CRF tables. Emission and removal calculations, including associated uncertainty analysis for individual sources and/or sink categories are the responsibility of individual source and sink category leads, who are most familiar with each category, underlying data, and the unique national circumstances relevant to its emissions or removals profile. Using IPCC good practice guidance, the individual leads determine the most appropriate methodology and collect the relevant activity data to use in the emission and removal calculations, based upon their expertise in the source or sink category, as well as coordinating with researchers and expert consultants familiar with the sources and sinks. Each year, the coordinator oversees a multi-stage process for collecting information from each individual source and sink category lead to compile all information and data for the Inventory.

Methodology Development, Data Collection, and Emissions and Sink Estimation

Source and sink category leads at EPA collect input data and, as necessary, evaluate or develop the estimation methodology for the individual source and/or sink categories. Because EPA has been preparing the Inventory for many years, for most source and sink categories, the methodology for the previous year is applied to the new "current" year of the Inventory, and inventory analysts collect any new data or update data that have changed from the previous year. If estimates for a new source or sink category are being developed for the first time, or if the methodology is changing for an existing category (e.g., the United States is implementing improvement efforts to apply a higher tiered approach for that category), then the source and/or sink category lead will develop and implement the new or refined methodology, gather the most appropriate activity data and emission factors (or in some cases direct emission measurements) for the entire time series, and conduct any further category-specific review with involvement of relevant experts from industry, government, and universities (see Chapter 9 and Box ES-3 on EPA's approach to recalculations).

Once the methodology is in place and the data are collected, the individual source and sink category leads calculate emission and removal estimates. The individual leads then update or create the relevant report text and accompanying annexes for the Inventory. Source and sink category leads are also responsible for completing the relevant sectoral background tables of the CRF, conducting quality control (QC) checks, preparing relevant category materials for QA, or expert reviews, category-level uncertainty assessments, and reviewing data for publication in EPA's GHG Data Explorer.

The treatment of confidential business information (CBI) in the Inventory is based on EPA internal guidelines, as well as regulations[29] applicable to the data used. EPA has specific procedures in place to safeguard CBI during the inventory compilation process. When information derived from CBI data is used for development of inventory calculations, EPA procedures ensure that these confidential data are sufficiently aggregated to protect confidentiality while still providing useful information for analysis. For example, within the Energy and Industrial Processes and Product Use (IPPU) sectors, EPA has used aggregated facility-level data from the Greenhouse Gas Reporting Program (GHGRP) to develop, inform, and/or quality-assure U.S. emission estimates. In 2014, EPA's GHGRP, with industry engagement, compiled criteria that would be used for aggregating its confidential data to shield the underlying CBI from public disclosure.[30] In the Inventory, EPA is publishing only data values that meet the GHGRP aggregation criteria.[31] Specific uses of aggregated facility-level data are described in the respective methodological sections within those chapters. In addition, EPA uses historical data reported voluntarily to EPA via various voluntary initiatives with U.S. industry (e.g., EPA Voluntary Aluminum Industrial Partnership (VAIP)) and follows guidelines established under the voluntary programs for managing CBI.

Data Compilation and Archiving

The inventory coordinator at EPA with support from the data/document manager collects the source and sink categories' descriptive text and annexes, and also aggregates the emission and removal estimates into a summary data file that links the individual source and sink category data files together. This summary data file contains all of the essential data in one central location, in formats commonly used in the Inventory document. In addition to the data from each source and sink category, other national trend and related data are also gathered in the summary sheet for use in the Executive Summary, Introduction, and Trends sections of the Inventory report (e.g., GDP, population, energy use). Similarly, the recalculation analysis and key category analysis are completed in a separate data file based on output from the summary data file. The uncertainty estimates for each source and sink category are also aggregated into uncertainty summary data files that are used to conduct the overall Inventory uncertainty analysis (see Section 1.7). A Microsoft SharePoint work site, kept on a central server at EPA under the jurisdiction of the inventory coordinator, provides a platform for facilitating collaboration during each compilation phase, but also the efficient storage and archiving of electronic files each annual cycle. Previous final published inventories are also maintained on a report archive page on EPA's Greenhouse Gas Emissions website.[32]

National Inventory Report (NIR) Preparation

The NIR is compiled from the sections developed by each individual source or sink category lead. In addition, the inventory coordinator prepares a brief overview of each chapter that summarizes the emissions and removals from all sources and sinks discussed in the chapters. Also at this time, the Executive Summary, Introduction, Trends in Greenhouse Gas Emissions and Removals, and Recalculations and Improvements chapters are drafted, to reflect the trends and impact from improvements for the time series of the current Inventory. The analysis of trends necessitates gathering supplemental data, including weather and temperature conditions, economic activity and gross domestic product, population, atmospheric conditions, and the annual consumption of electricity, energy, and fossil fuels. Changes in these data are used to explain the trends observed in greenhouse gas emissions in the United States. Furthermore, specific factors that affect individual sectors are researched and discussed. Many of

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[29] 40 CFR Part 2, Subpart B titled "Confidentiality of Business Information" which is the regulation establishing rules governing handling of data entitled to confidentiality treatment. See https://www.ecfr.gov/cgi-bin/text-idx?SID=a764235c9eadf9afe05fe04c07a28939&mc=true&node=sp40.1.2.b&rgn=div6.

[30] Federal Register Notice on "Greenhouse Gas Reporting Program: Publication of Aggregated Greenhouse Gas Data." See pp. 79 and 110 of notice at https://www.gpo.gov/fdsys/pkg/FR-2014-06-09/pdf/2014-13425.pdf.

[31] U.S. EPA Greenhouse Gas Reporting Program. Developments on Publication of Aggregated Greenhouse Gas Data, November 25, 2014. See http://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting.

[32] See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-archive.

the factors that affect emissions are included in the Inventory document as separate analyses or side discussions in boxes within the text. Finally, the uncertainty analysis and key category analysis are compiled and updated in the report as part of final analysis steps. Throughout the report text boxes are also created to provide additional documentation (e.g., definitions) and/or examine the data aggregated in different ways than in the remainder of the document, such as a focus on transportation activities or emissions from electricity generation. The document is prepared to align with the specification of the UNFCCC reporting guidelines for National Inventory Reports while also reflecting national circumstances.

Common Reporting Format Table (CRF) Compilation

The CRF tables are compiled from individual time series input data sheets completed by each individual source or sink category lead, which contain emissions and/or removals and activity data, estimates, methodological and completeness notations and associated explanations. The inventory coordinator and cross-cutting compilation staff import the category data into the UNFCCC's "CRF Reporter" for the United States, assuring consistency and completeness across all sectoral tables. The summary reports for emissions and removals, methods, and emission factors used, the summary tables indicating completeness of estimates (i.e., notation key NE/IE tables), the recalculation tables, and the emission and removal trends tables automatically compiled by the CRF Reporter and reviewed by the inventory coordinator with support from the cross-cutting compilation staff. Internal automated quality checks within the CRF Reporter, as well as reviews by the cross-cutting and category leads, are completed for the entire time series of CRF tables before submission.

QA/QC and Uncertainty

Quality assurance and quality control (QA/QC) and uncertainty analyses are guided by the QA/QC and Inventory coordinators, who help maintain the QA/QC plan and the overall uncertainty analysis procedures (see sections on QA/QC and Uncertainty, below) in collaboration with the broader inventory compilation team. The QA/QC coordinator works closely with the Inventory coordinator and source and sink category leads to ensure that a consistent QA/QC plan is implemented across all inventory categories. Similarly, the Inventory coordinator ensures the uncertainty analysis is implemented consistently across all categories. The inventory QA/QC plan, outlined in Section 1.7 and Annex 8, is consistent with the quality assurance procedures outlined by EPA and IPCC good practices. The QA/QC and uncertainty findings also inform overall improvement planning, and specific improvements are noted in the Planned Improvements sections of respective categories. QA processes are outlined below.

Expert, Public, and UNFCCC Reviews

The compilation of the inventory includes a two-stage review or QA process, in addition to international technical expert review following submission of the report to the UNFCCC. During the first stage (the 30-day Expert Review period), a first draft of sectoral chapters of the document are sent to a select list of technical experts outside of EPA who are not directly involved in preparing estimates. The purpose of the Expert Review is to provide an objective review, encourage feedback on the methodological and data sources used in the current Inventory, especially for sources and sinks which have experienced any changes since the previous Inventory.

Once comments are received and addressed, the second stage, or second draft of the document is released for public review by publishing a notice in the U.S. Federal Register and posting the entire draft Inventory document on the EPA website. The Public Review period allows for a 30-day comment period and is open to the entire U.S. public. Comments received may require further discussion with experts and/or additional research, and specific Inventory improvements requiring further analysis as a result of comments are noted in the relevant category's Planned Improvement section. EPA publishes responses to comments received during both reviews with the publication of the final report on its report website.

Following completion and submission of the report to the UNFCCC, the report also undergoes review by an international team of independent experts for adherence to UNFCCC reporting guidelines and IPCC methodological

guidance.[33] Feedback from all review processes that contribute to improving inventory quality over time are described within each planned improvement section and further in Annex 8. See also the Improvement Planning process discussed below.

Final Submittal to UNFCCC, Document and Data Publication

After the final revisions to incorporate any comments from the Expert Review and Public Review periods, EPA prepares the final NIR and the accompanying CRF tables for electronic reporting. EPA, as the National Inventory focal point, sends the official submission of the U.S. Inventory to the UNFCCC using the CRF Reporter software, coordinating with the U.S. Department of State, the overall UNFCCC focal point. Concurrently, for timely public access, the report is also published on EPA's website.[34] On EPA's website, users can also visualize and download the current time-series estimates from the GHG Inventory Data Explorer Tool,[35] and also download more detailed data presented in tables within the report and report annex in CSV format.

Improvement Planning

Each year, many emission and sink estimates in the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* are recalculated and revised, through the use of better methods and/or data with the goal of improving inventory quality and reducing uncertainties, including the transparency, completeness, consistency, and overall usefulness of the report. In this effort, the United States follows the *2006 IPCC Guidelines* (IPCC 2006), which state, "Both methodological changes and refinements over time are an essential part of improving inventory quality. It is *good practice* to change or refine methods when available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; improved inventory methods become available; and/or for correction of errors." The EPA's OAP coordinates improvement planning across all sectors and also cross-cutting analyses based on annual review and input from the technical teams leading compilation of each sector's estimates, including continuous improvements to the overall data and document compilation processes. Planned improvements are identified through QA/QC processes (including completeness checks), the key category analysis, and the uncertainty analysis. The inventory coordinator, with input from EPA source and sink category leads, maintains a log of all planned improvements, by sector and cross-cutting, tracking the category significance, specific category improvement, prioritization, anticipated time frame for implementation of each proposed improvement, and status of progress in implementing improvement. Improvements for significant or key categories are usually prioritized across all improvements unless effort would require disproportionate levels of effort and resources relative to improvements for other key categories to address.

1.4 Methodology and Data Sources

Emissions and removals of greenhouse gases from various source and sink categories have been estimated using methodologies that are consistent with the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006) and its supplements and refinements. To a great extent, this report makes use of published official economic and physical statistics for activity data, emission factors and other key parameters. Depending on the category, activity data can include fuel consumption or deliveries, vehicle-miles traveled, raw material processed, etc.

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[33] See https://unfccc.int/process-and-meetings/transparency-and-reporting/reporting-and-review-under-the-convention/greenhouse-gas-inventories-annex-i-parties/review-process.

[34] See https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

[35] See https://cfpub.epa.gov/ghgdata/inventoryexplorer/.

Emission factors are factors that relate quantities of emissions to an activity. For more information on data sources see Section 1.2 above, Box 1-1 on use of GHGRP data, and categories' methodology sections for more information on other data sources. In addition to official statistics, the report utilizes findings from academic studies, trade association surveys and statistical reports, along with expert judgment, consistent with the *2006 IPCC Guidelines*.

The methodologies provided in the *2006 IPCC Guidelines* represent foundational methodologies for a variety of source and sink categories, and many of these methodologies continue to be improved and refined as new research and data become available. This report uses those IPCC methodologies when applicable, and supplements them with refined guidance, other available country-specific methodologies and data where possible (e.g., EPA's GHGRP). For example, as noted earlier in this chapter, this report does apply recent supplements and refinements to *2006 IPCC Guidelines* in estimating emissions and removals from coal mining, wastewater treatment and discharge, low voltage anode effects (LVAE) during aluminum production, drained organic soils, and management of wetlands, including flooded lands. Choices made regarding the methodologies and data sources used are provided in the Methodology and Time Series Consistency discussion of each category within each sectoral chapter of the report. Where additional detail is helpful and necessary to explain methodologies and data sources used to estimate emissions, complete documentation is provided in the annexes as indicated in the methodology sections of those respective source categories (e.g., Annex 3.13 for Forest Land Remaining Forest Land and Land Converted to Forest Land).

1.5 Key Categories

The *2006 IPCC Guidelines* (IPCC 2006) and *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019) define key categories as "inventory categories which individually, or as a group of categories (for which a common method, emission factor and activity data are applied) are prioritized within the national inventory system because their estimates have a significant influence on a country's total inventory of greenhouse gases in terms of the absolute level, the trend, or the level of uncertainty in emissions or removals. Whenever the term *key category* is used, it includes both source and sink categories."[36] A key category analysis identifies source or sink categories for focusing efforts to improve overall Inventory quality, including additional review when feasible.

The *2006 IPCC Guidelines* (IPCC 2006) and its *2019 Refinement* (2019) define several approaches, both quantitative and qualitative, to conduct a key category analysis and identify key categories both in terms of absolute level and trend, along with consideration of uncertainty. This report employs all approaches to identify key categories for the United States. The first approach, Approach 1, identifies significant or key categories without considering uncertainty in its calculations. An Approach 1 level assessment identifies all source and sink categories that cumulatively account for 95 percent of total level, i.e., total emissions (gross) in a given year when assessed in descending order of absolute magnitude. The level analysis was performed twice, including and excluding sources and sinks from the Land Use, Land-Use Change, and Forestry (LULUCF) sector categories. Similarly, an Approach 1 trend analysis can identify categories with trends that significantly influence overall trends by identifying all source and sink categories that cumulatively account for 95 percent of the sum all the trend assessments (e.g., percent change relative to national trend) when sorted in descending order of absolute magnitude.

The next method, Approach 2, was then implemented to identify any additional key categories not already identified from the Approach 1 level and trend assessments by considering uncertainty. The Approach 2 analysis differs from Approach 1 by incorporating each category's uncertainty assessments in its calculations and was also performed twice, including and excluding LULUCF categories. An Approach 2 level assessment identifies all sources and sink categories that cumulatively account for 90 percent of the sum of all level assessments when sorted in descending order of magnitude. Similarly, an Approach 2 trend analysis can identify categories whose trends

[36] See Chapter 4 Volume 1, "Methodological Choice and Identification of Key Categories" in IPCC (2006) and IPCC (2019). See http://www.ipcc-nggip.iges.or.jp/public/2006gl/index.html.

contribute significantly to overall trends weighting the relative trend difference with the category's relative uncertainty assessment for 2021.

For 2021, based on the key category analysis, excluding the LULUCF sector and uncertainty, 32 categories accounted for 95 percent of emissions. Four categories account for 57 percent of emissions: CO_2 from coal-fired electricity generation, CO_2 from gas fired electricity generation, CO_2 from road transport-related fuel combustion, and CO_2 from substitutes for ozone depleting substances. When considering uncertainties, additional categories such as CH_4 emissions from industrial landfills were also identified as a key category. In the trend analysis, 33 categories were identified as key categories, and when considering uncertainties, 6 additional categories were identified as key. The trend analysis shows that HFC and PFC emissions from substitutes of ozone depleting substances, in addition to CO_2 from coal-fired electricity generation and CO_2 from gas fired electricity generation, and CO_2 from road transport related combustion are also significant with respect to trends over the time series.

When considering the contribution of the LULUCF sector to 2021 emissions and sinks, 43 categories accounted for 95 percent of emissions and sinks, with the most significant category from LULUCF being net CO_2 emission from Forest Land Remaining Forest Land. When considering uncertainties and the contribution of the LULUCF sector, additional categories such as N_2O emissions from forest fires were also identified as a key category. In the trend analysis, 39 categories were identified as key, and when considering uncertainties, 8 additional categories were identified as key. The trend analysis includes additional categories such as non-CO_2 emissions from forest fires as key categories in the LULUCF sector.

Finally, in addition to conducting Approach 1 and 2 level and trend assessments as described above, a qualitative assessment of the source and sinks categories was conducted to capture any additional key categories that were not identified using the previously described quantitative approaches. For this Inventory, no additional categories were identified using qualitative criteria recommend by IPCC, but EPA continues to review its qualitative assessment on an annual basis. Find more information on the key category analysis, including the approach to disaggregation of inventory estimates, see Annex 1 to this report.

Table 1-4: Summary of Key Categories for the United States (1990 and 2021) by Sector

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
Energy										
1.A.3.b CO_2 Emissions from Transportation: Road	CO_2	•	•	•	•	•	•	•	•	1,456.3
1.A.1 CO_2 Emissions from Stationary Combustion - Coal - Electricity Generation	CO_2	•	•	•	•	•	•	•	•	909.9
1.A.1 CO_2 Emissions from Stationary Combustion - Gas - Electricity Generation	CO_2	•	•	•	•	•	•	•	•	612.9
1.A.2 CO_2 Emissions from Stationary Combustion - Gas - Industrial	CO_2	•	•	•	•	•	•	•	•	499.6

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
1.A.4.b CO_2 Emissions from Stationary Combustion - Gas - Residential	CO_2	•	•	•	•	•		•		258.6
1.A.2 CO_2 Emissions from Stationary Combustion - Oil - Industrial	CO_2	•	•	•	•	•	•	•	•	232.9
1.A.4.a CO_2 Emissions from Stationary Combustion - Gas - Commercial	CO_2	•	•	•	•	•	•	•	•	180.9
1.A.3.a CO_2 Emissions from Transportation: Aviation	CO_2	•	•	•	•	•	•	•		153.3
1.A.5 CO_2 Emissions from Non-Energy Use of Fuels	CO_2	•	•	•	•	•	•	•	•	140.2
1.A.3.e CO_2 Emissions from Transportation: Other	CO_2	•	•	•	•		•			64.2
1.A.4.b CO_2 Emissions from Stationary Combustion - Oil - Residential	CO_2	•	•	•	•		•		•	54.7
1.A.4.a CO_2 Emissions from Stationary Combustion - Oil - Commercial	CO_2	•	•	•	•					50.7
1.A.2 CO_2 Emissions from Stationary Combustion - Coal - Industrial	CO_2	•	•	•	•	•	•	•	•	43.0
1.A.3.d CO_2 Emissions from Transportation: Domestic Navigation	CO_2	•		•						41.2
1.B.2 CO_2 Emissions from Natural Gas Systems	CO_2	•		•						36.2
1.A.3.c CO_2 Emissions from Transportation: Railways	CO_2	•		•						32.2

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
1.B.2 CO_2 Emissions from Petroleum Systems	CO_2	•	•	•	•		•		•	24.7
1.A.1 CO_2 Emissions from Stationary Combustion - Oil - Electricity Generation	CO_2	•	•	•	•	•	•		•	17.7
1.A.5 CO_2 Emissions from Stationary Combustion - Oil - U.S. Territories	CO_2	•		•						17.0
1.A.5.b CO_2 Emissions from Transportation: Military	CO_2		•		•					5.2
1.A.4.a CO_2 Emissions from Stationary Combustion - Coal - Commercial	CO_2		•		•					1.4
1.A.4.b CO_2 Emissions from Stationary Combustion - Coal - Residential	CO_2						•		•	0.0
1.B.2 CH_4 Fugitive Emissions from Natural Gas Systems	CH_4	•	•	•	•	•	•	•	•	181.4
1.B.2 CH_4 Fugitive Emissions from Petroleum Systems	CH_4	•		•		•				50.2
1.B.1 Fugitive CH_4 Emissions from Coal Mining	CH_4	•	•	•	•	•	•	•	•	44.7
1.B.2 CH_4 Fugitive Emissions from Abandoned Oil and Gas Wells	CH_4					•		•		8.2
1.A.4.b CH_4 Emissions from Stationary Combustion - Residential	CH_4					•	•	•	•	4.6
1.A.1 N_2O Emissions from Stationary Combustion - Coal - Electricity Generation	N_2O					•				15.1

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
1.A.3.b N_2O Emissions from Transportation: Road	N_2O	•	•	•	•	•	•		•	9.4
1.A.1 N_2O Emissions from Stationary Combustion - Gas - Electricity Generation	N_2O						•			3.9
Industrial Processes and Product Use										
2.C.1 CO_2 Emissions from Iron and Steel Production & Metallurgical Coke Production	CO_2	•	•	•	•	•	•	•	•	41.7
2.A.1 CO_2 Emissions from Cement Production	CO_2	•	•	•	•					41.3
2.B.8 CO_2 Emissions from Petrochemical Production	CO_2	•	•	•	•					33.2
2.B.3 N_2O Emissions from Adipic Acid Production	N_2O		•		•					6.6
2.F.1 Emissions from Substitutes for Ozone Depleting Substances: Refrigeration and Air conditioning	HFCs, PFCs	•	•	•	•	•	•	•	•	139.1
2.F.4 Emissions from Substitutes for Ozone Depleting Substances: Aerosols	HFCs, PFCs	•	•	•	•	•	•	•	•	17.7
2.F.2 Emissions from Substitutes for Ozone Depleting Substances: Foam Blowing Agents	HFCs, PFCs		•		•					10.8
2.G SF_6 and CF_4 Emissions from Electrical Transmission and Distribution	SF_6, CF_4	•	•	•	•		•		•	6.0
2.B.9 HFC-23 Emissions from HCFC-22 Production	HFCs	•	•	•	•		•		•	2.2
2.C.3 PFC Emissions from Aluminum Production	PFCs	•	•	•	•					0.9
Agriculture										

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
3.A.1 CH_4 Emissions from Enteric Fermentation: Cattle	CH_4	•	•	•	•	•	•	•		188.2
3.B.1 CH_4 Emissions from Manure Management: Cattle	CH_4	•	•	•	•	•	•		•	37.9
3.B.4 CH_4 Emissions from Manure Management: Other Livestock	CH_4	•		•	•					28.1
3.C CH_4 Emissions from Rice Cultivation	CH_4	•				•		•		16.8
3.D.1 Direct N_2O Emissions from Agricultural Soil Management	N_2O	•		•		•	•	•	•	264.7
3.D.2 Indirect N_2O Emissions from Applied Nitrogen	N_2O	•		•		•		•		29.3
Waste										
5.A CH_4 Emissions from MSW Landfills	CH_4	•	•	•	•	•	•	•	•	103.7
5.A CH_4 Emissions from Industrial Landfills	CH_4	•		•		•	•		•	18.9
5.D CH_4 Emissions from Domestic Wastewater Treatment	CH_4					•				13.9
5.D N_2O Emissions from Domestic Wastewater Treatment	N_2O	•		•		•	•	•	•	20.4
Land Use, Land-Use Change, and Forestry										
4.E.2 Net CO_2 Emissions from Land Converted to Settlements	CO_2			•	•			•	•	81.0
4.B.2 Net CO_2 Emissions from Land Converted to Cropland	CO_2			•				•		56.5
4.C.1 Net CO_2 Emissions from Grassland Remaining Grassland	CO_2							•	•	10.0
4.B.1 Net CO_2 Emissions from Cropland Remaining Cropland	CO_2			•				•	•	(18.9)

CRF Code and Source/Sink Categories	Gas	Approach 1				Approach 2 (includes uncertainty)				2021 Emissions (MMT CO_2 Eq.)
		Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	Level Without LULUCF	Trend Without LULUCF	Level With LULUCF	Trend With LULUCF	
4.C.2 Net CO_2 Emissions from Land Converted to Grassland	CO_2			•	•			•	•	(24.7)
4.A.2 Net CO_2 Emissions from Land Converted to Forest Land	CO_2			•				•		(98.3)
4.E.1 Net CO_2 Emissions from Settlements Remaining Settlements	CO_2			•	•			•	•	(134.5)
4.A.1 Net CO_2 Emissions from Forest Land Remaining Forest Land	CO_2			•	•			•	•	(695.4)
4.D.1 CH_4 Emissions from Flooded Lands Remaining Flooded Lands	CH_4			•						45.4
4.A.1 CH_4 Emissions from Forest Fires	CH_4				•				•	15.5
4.A.1 N_2O Emissions from Forest Fires	N_2O								•	8.9
Subtotal of Key Categories Without LULUCF[b]										**6,171.7**
Total Gross Emissions Without LULUCF										**6,340.2**
Percent of Total Without LULUCF										**97%**
Subtotal of Key Categories With LULUCF[c]										**5,384.5**
Total Net Emissions With LULUCF										**5,586.0**
Percent of Total With LULUCF										**96%**

NO (Not Occurring)

[a] Other includes emissions from pipelines.

[b] Subtotal includes key categories from Level Approach 1 Without LULUCF, Level Approach 2 Without LULUCF, Trend Approach 1 Without LULUCF, and Trend Approach 2 Without LULUCF.

[c] Subtotal includes key categories from Level Approach 1 With LULUCF, Level Approach 2 With LULUCF, Trend Approach 1 With LULUCF, and Trend Approach 2 With LULUCF.

Note: Parentheses indicate negative values (or sequestration).

1.6 Quality Assurance and Quality Control (QA/QC)

As part of efforts to achieve its stated goals for inventory quality, transparency, and credibility, the United States has developed a quality assurance and quality control plan designed to check, document, and improve the quality of its inventory over time. QA/QC activities on the Inventory are undertaken within the framework of the U.S.

Quality Assurance/Quality Control and Uncertainty Management Plan (QA/QC plan) *for the U.S. Greenhouse Gas Inventory: Procedures Manual for QA/QC and Uncertainty Analysis*.

Key attributes of the QA/QC plan are summarized in Figure 1-2. These attributes include:

- *Procedures and Forms:* detailed and specific systems that serve to standardize the process of documenting and archiving information, as well as to guide the implementation of QA/QC and the analysis of uncertainty

- *Implementation of Procedures:* application of QA/QC procedures throughout the whole Inventory development process from initial data collection, through preparation of the emission and removal estimates, to publication of the Inventory

- *Quality Assurance (QA):* expert and public reviews for both the inventory estimates and the Inventory report (which is the primary vehicle for disseminating the results of the inventory development process). The expert technical review conducted by the UNFCCC supplements these QA processes, consistent with the QA good practice and the *2006 IPCC Guidelines* (IPCC 2006)

- *Quality Control (QC)*: application of *General (Tier 1) and Category-specific (Tier 2)* quality controls and checks, as recommended by *2006 IPCC Guidelines* (IPCC 2006), along with consideration of secondary data and category-specific checks (additional Tier 2 QC) in parallel and coordination with the uncertainty assessment; the development of protocols and templates, which provides for more structured communication and integration with the suppliers of secondary information

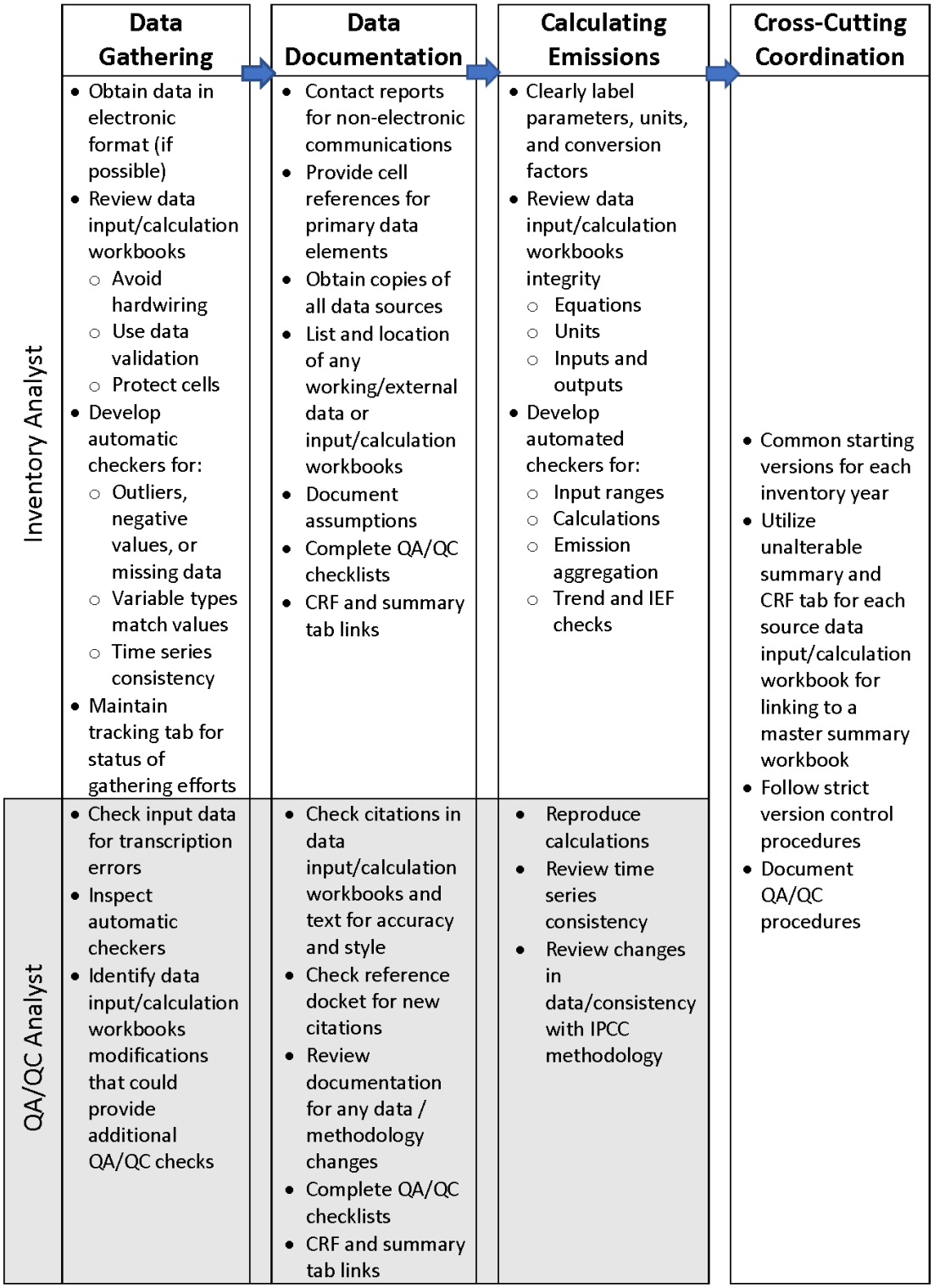
- *General (Tier 1) and Category-specific (Tier 2) Checks:* quality controls and checks, as recommended by *IPCC Good Practice Guidance* and *2006 IPCC Guidelines* (IPCC 2006)

- *Record Keeping:* provisions to track which procedures have been followed, the results of the QA/QC, uncertainty analysis, and feedback mechanisms for corrective action based on the results of the investigations which provide for continual data quality improvement and guided research efforts.

- *Multi-Year Implementation*: a schedule for coordinating the application of QA/QC procedures across multiple years, especially for category-specific QC, prioritizing key categories

- *Interaction and Coordination:* promoting communication within the EPA, across Federal agencies and departments, state government programs, and research institutions and consulting firms involved in supplying data or preparing estimates for the Inventory. The QA/QC Management Plan itself is intended to be revised and reflect new information that becomes available as the program develops, methods are improved, or additional supporting documents become necessary.

Figure 1-2: U.S. QA/QC Plan Summary



Box 1-3: Examples of Verification Activities

Consistent with IPCC guidance for national greenhouse gas inventories, verification activities include comparisons with emission or removal estimates prepared by other bodies and comparisons with estimates derived from fully independent assessments, e.g., atmospheric concentration measurements. Verification activities provide information to improve inventories and are part of the overall QA/QC system.

Use of lower tier methods. The UNFCCC reporting guidelines require countries to complete a "top-down" reference approach for estimating CO_2 emissions from fossil fuel combustion in addition to their "bottom-up" sectoral methodology for purposes of verification. This estimation method uses alternative methodologies and different data sources than those contained in that section of the Energy chapter. The reference approach estimates fossil fuel consumption by adjusting national aggregate fuel production data for imports, exports, and stock changes rather than relying on end-user consumption surveys (see Annex 4 of this report). The reference approach assumes that once carbon-based fuels are brought into a national economy, they are either saved in some way (e.g., stored in products, kept in fuel stocks, or left unoxidized in ash) or combusted, and therefore the carbon in them is oxidized and released into the atmosphere. Accounting for actual consumption of fuels at the sectoral or sub-national level is not required.

Use of Ambient Measurements Systems for Validation of Emission Inventories. In following the UNFCCC requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and sinks presented in this report are organized by source and sink categories and calculated using internationally accepted methods provided by the IPCC.[37] Several recent studies have estimated emissions at the national or regional level with estimated results that sometimes differ from EPA's estimate of emissions. EPA has engaged with researchers on how remote sensing, ambient measurement, and inverse modeling techniques for estimating greenhouse gas emissions could assist in improving the understanding of inventory estimates. In working with the research community to improve national greenhouse gas inventories, EPA follows guidance from the IPCC on the use of measurements and modeling to validate emission inventories.[38] An area of particular interest in EPA's outreach efforts is how ambient measurement data can be used to assess estimates or potentially be incorporated into the Inventory in a manner consistent with this Inventory report's transparency of its calculation methodologies, and the ability of inverse modeling to attribute emissions and removals from remote sensing to anthropogenic sources, as defined by the IPCC for this report, versus natural sources and sinks.

The *2019 Refinement to the IPCC 2006 Guidelines for National Greenhouse Gas Inventories* (IPCC 2019) Volume 1 General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. The *2019 Refinement* provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC [2019] Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC [2019] Volume 1, Chapter 6) given the technical complexity of such comparisons. Further, it identified fluorinated gases as particularly suitable for such comparisons. The *2019 Refinement* makes this conclusion for fluorinated gases based on their lack of significant natural sources, their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike emissions of CO_2, CH_4, and N_2O, emissions of fluorinated greenhouse gases are almost exclusively anthropogenic, meaning that the fluorinated greenhouse gas emission sources included in this Inventory account for the majority of the total U.S. emissions of these gases detectable in the atmosphere.

In this Inventory, EPA presents the results of two comparisons between fluorinated gas emissions inferred from atmospheric measurements and fluorinated gas emissions estimated based on bottom-up measurements and modeling consistent with guidance from the *2019 Refinement*. These comparisons, performed for HFCs and SF_6

[37] See http://www.ipcc-nggip.iges.or.jp/public/index.html.

[38] See http://www.ipcc-nggip.iges.or.jp/meeting/pdfiles/1003_Uncertainty%20meeting_report.pdf.

respectively, are described under the QA/QC and Verification discussions in Chapter 4, Sections 4.24 Substitution of Ozone Depleting Substances and 4.25 Electrical Transmission and Distribution in the IPPU chapter of this report.

Consistent with the *2019 Refinement*, a key element to facilitate such comparisons is a gridded prior inventory as an input to inverse modeling. To improve the ability to compare the national-level greenhouse gas inventory with measurement results that may be at other scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1° x 0.1° spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization. The gridded inventory is designed to be consistent with the 1990 to 2014 U.S. EPA *Inventory of U.S. Greenhouse Gas Emissions and Sinks* estimates for the year 2012, which presents national totals for different source types.[39] This gridded inventory is consistent with the recommendations contained in two National Academies of Science reports examining greenhouse gas emissions data (National Research Council 2010; National Academies of Sciences, Engineering, and Medicine 2018).

Finally, in addition to use of atmospheric concentration measurement data for comparison with Inventory data, information from top-down studies is directly incorporated in the Natural Gas Systems calculations to quantify emissions from certain well blowout events.

In addition, based on the national QA/QC plan for the Inventory, some sector, subsector and category-specific QA/QC and verification checks have been developed. These checks follow the procedures outlined in the national QA/QC plan, tailoring the procedures to the specific documentation and data files associated with individual sources. For each greenhouse gas emissions source or sink category included in this Inventory, a minimum of general or Tier 1 QC analysis has been undertaken. Where QC activities for a particular category go beyond the minimum Tier 1 level, and include category-specific checks (Tier 2) or include verification, further explanation is provided within the respective source or sink category text. Similarly, responses or updates based on comments from the expert, public and the international technical expert reviews (e.g., UNFCCC) are also addressed within the respective source or sink category sections in each sectoral chapter and Annex 8.

The quality control activities described in the U.S. QA/QC plan occur throughout the inventory process; QA/QC is not separate from, but is an integral part of, preparing the Inventory. Quality control—in the form of both good practices (such as documentation procedures) and checks on whether good practices and procedures are being followed—is applied at every stage of inventory development and document preparation. In addition, quality assurance occurs during the Expert Review and the Public Review, in addition to the UNFCCC expert technical review. While all phases significantly contribute to improving inventory quality, the public review phase is also essential for promoting the openness of the inventory development process and the transparency of the inventory data and methods.

The QA/QC plan guides the process of ensuring inventory quality by describing data and methodology checks, developing processes governing peer review and public comments, and developing guidance on conducting an analysis of the uncertainty surrounding the emission and removal estimates. The QA/QC procedures also include feedback loops and provide for corrective actions that are designed to improve the inventory estimates over time.

[39] See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

1.7 Uncertainty Analysis of Emission Estimates

Emissions and removals calculated for the U.S. Inventory reflect best estimates for greenhouse gas source and sink categories in the United States and are continuously revised and improved as new information becomes available. Uncertainty assessment is an essential element of a complete and transparent emissions inventory because it helps inform and prioritize Inventory improvements. For the U.S. Inventory, uncertainty analyses are conducted for each source and sink category as well as for the uncertainties associated with the overall emission (current and base year) and trends estimates. These analyses reflect the quantitative uncertainty in the emission (and removal) estimates associated with uncertainties in their input parameters (e.g., activity data and EFs) and serve to evaluate the relative contribution of individual input parameter uncertainties to the overall Inventory, its trends, and each source and sink category.

The overall level and trend uncertainty estimates for total U.S. greenhouse gas emissions was developed using the IPCC Approach 2 uncertainty estimation methodology (assuming a Normal distribution for Approach 1 estimates), which employs a Monte Carlo Stochastic Simulation technique. The IPCC provides good practice guidance on two approaches—Approach 1 and Approach 2—to estimating uncertainty for both individual and combined source categories. Approach 2 quantifies uncertainties based on a distribution of emissions (or removals), built-up from repeated calculations of emission estimation models and the underlying input parameters, randomly selected according to their known distributions. Approach 2 methodology is applied to each individual source and sink category wherever data and resources are permitted and is also used to quantify the uncertainty in the overall Inventory and its Trends. Source and sink chapters in this report provide additional details on the uncertainty analysis conducted for each source and sink category. See Annex 7 of this report for further details on the U.S. process for estimating uncertainty associated with the overall emission (base and current year) and trends estimates. Consistent with IPCC (IPCC 2006), the United States has ongoing efforts to continue to improve the overall Inventory uncertainty estimates presented in this report.

The United States has also implemented many improvements over the last several years to reduce uncertainties across the source and sink categories and improve Inventory estimates. These improvements largely result from new data sources that provide more accurate data and/or increased data coverage, as well as methodological improvements. Following IPCC good practice, additional efforts to reduce Inventory uncertainties can occur through efforts to incorporate excluded emission and sink categories (see Annex 5), improve estimation methods, and collect more detailed, measured, and representative data. Individual category chapters and Annex 7 both describe current ongoing and planned Inventory and uncertainty analysis improvements. Consistent with IPCC (2006), the United States has ongoing efforts to continue to improve the category-specific uncertainty estimates presented in this report, largely prioritized by considering improvements categories identified as significant by the Key Category Analysis.

Estimates of quantitative uncertainty for the total U.S. greenhouse gas emissions in 1990 (base year) and 2021 are shown below in Table 1-5 and Table 1-6, respectively. The overall uncertainty surrounding the Total Net Emissions is estimated to be -5 to +6 percent in 1990 and -4 to +6 percent in 2021. When the LULUCF sector is excluded from the analysis the uncertainty is estimated to be -2 to +5 percent in 1990 and -2 to +6 percent in 2021.

Table 1-5: Estimated Overall Inventory Quantitative Uncertainty for 1990 (MMT CO_2 Eq. and Percent)

Gas	1990 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Greenhouse Gas Estimate[a]				Mean[b]	Standard Deviation[b]
		(MMT CO_2 Eq.)		(%)		(MMT CO_2 Eq.)	
		Lower Bound[c]	Upper Bound[c]	Lower Bound	Upper Bound		
CO_2	5,121.0	5,008.4	5,356.5	-2%	5%	5,084.8	89.7
CH_4[d]	868.7	784.7	941.9	-10%	8%	742.3	40.2
N_2O[d]	406.3	333.2	616.3	-18%	52%	437.4	72.9
PFC, HFC, SF_6, and NF_3[d]	91.4	81.3	101.7	-11%	11%	195.6	5.5
Total Gross Emissions	**6,487.3**	**6,352.9**	**6,833.1**	**-2%**	**5%**	**6,460.2**	**122.8**
LULUCF Emissions[e]	57.9	54.9	61.5	-5%	6%	78.2	1.7
LULUCF Carbon Stock Change Flux[f]	(938.9)	(1,179.6)	(856.4)	26%	-9%	(901.2)	83.0
LULUCF Sector Net Total[g]	**(881.0)**	**(1,122.0)**	**(798.7)**	**27%**	**-9%**	**(823.1)**	**83.0**
Net Emissions (Sources and Sinks)	**5606.4**	**5,338.3**	**5,920.4**	**-5%**	**6%**	**5,637.1**	**148.2**

[a] The lower and upper bounds for emission estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5th percentile and the upper bound corresponding to 97.5th percentile.

[b] Mean value indicates the arithmetic average of the simulated emission estimates; standard deviation indicates the extent of deviation of the simulated values from the mean.

[c] The lower and upper bound emission estimates for the sub-source categories do not sum to total emissions because the low and high estimates for total emissions were calculated separately through simulations.

[d] The overall uncertainty estimates did not take into account the uncertainty in the GWP values for CH_4, N_2O and high GWP gases used in the Inventory emission calculations for 1990.

[e] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N_2O emissions from forest soils and settlement soils.

[f] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Since the resulting flux is negative the signs of the resulting lower and upper bounds are reversed.

[g] The LULUCF Sector Net Total is the net sum of all CH_4 and N_2O emissions to the atmosphere plus net carbon stock changes.

Notes: Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 1-6: Estimated Overall Inventory Quantitative Uncertainty for 2021 (MMT CO_2 Eq. and Percent)

Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Greenhouse Gas Estimate[a]				Mean[b]	Standard Deviation[b]
		(MMT CO_2 Eq.)		(%)		(MMT CO_2 Eq.)	
		Lower Bound[c]	Upper Bound[c]	Lower Bound	Upper Bound		
CO_2	5,032.2	4,916.2	5,241.7	-2%	4%	5,080	84
CH_4[d]	727.4	678.2	810.4	-7%	11%	743	34
N_2O[d]	393.3	312.7	604.9	-20%	54%	436	76
PFC, HFC, SF_6, and NF_3[d]	187.3	178.7	212.0	-5%	13%	196	8
Total Gross Emissions	**6,340.2**	**6,236.1**	**6,695.2**	**-2%**	**6%**	**6,454**	**118**
LULUCF Emissions[e]	77.8	73.5	83.6	-6%	7%	78	3

LULUCF Carbon Stock Change Flux[f]	(832.0)	(1,047.1)	(763.3)	26%	-8%	(903)	73
LULUCF Sector Net Total[g]	**(754.2)**	**(968.5)**	**(685.0)**	**28%**	**-9%**	**(825)**	**73**
Net Emissions (Sources and Sinks)	**5,586.0**	**5,365.4**	**5,903.0**	**-4%**	**6%**	**5,630**	**138**

[a] The lower and upper bounds for emission estimates correspond to a 95 percent confidence interval, with the lower bound corresponding to 2.5th percentile and the upper bound corresponding to 97.5th percentile.

[b] Mean value indicates the arithmetic average of the simulated emission estimates; standard deviation indicates the extent of deviation of the simulated values from the mean.

[c] The lower and upper bound emission estimates for the sub-source categories do not sum to total emissions because the low and high estimates for total emissions were calculated separately through simulations.

[d] The overall uncertainty estimates did not take into account the uncertainty in the GWP values for CH_4, N_2O and high GWP gases used in the Inventory emission calculations for 2021.

[e] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N_2O emissions from forest soils and settlement soils.

[f] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Since the resulting flux is negative the signs of the resulting lower and upper bounds are reversed.

[g] The LULUCF Sector Net Total is the net sum of all CH_4 and N_2O emissions to the atmosphere plus net carbon stock changes.

Notes: Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

In addition to the estimates of uncertainty associated with the current and base year estimates, Table 1-7 presents the estimates of inventory trend uncertainty. The *2006 IPCC Guidelines* defines trend as the difference in emissions between the base year (i.e., 1990) and the current year (i.e., 2021) Inventory estimates. However, for purposes of understanding the concept of trend uncertainty, the trend is defined in this Inventory as the percentage change in the gross emissions (or net emissions) estimated for the current year, relative to the gross emission (or net emissions) estimated for the base year. The uncertainty associated with this trend is referred to as trend uncertainty and is reported as between -7 and 8 percent at the 95 percent confidence level between 1990 and 2021. This indicates a range of approximately -7 percent below and 8 percent above the trend estimate of -0.4 percent. See Annex 7 for trend uncertainty estimates for individual source and sink categories by gas.

Table 1-7: Quantitative Assessment of Trend Uncertainty (MMT CO_2 Eq. and Percent)

Gas/Source	Base Year Emissions[a]	2021 Emissions	Emissions Trend	Trend Range[b]	
	(MMT CO_2 Eq.)		(%)	(%)	
				Lower Bound	Upper Bound
CO_2	5,121.0	5,032.2	-2%	-6%	3%
CH_4	868.7	727.4	-16%	-24%	-2%
N_2O	406.3	393.3	-3%	-39%	52%
HFCs, PFCs, SF_6, and NF_3	91.4	187.3	105%	86%	147%
Total Gross Emissions[c]	**6,487.3**	**6,340.2**	**-2%**	**-7%**	**3%**
LULUCF Emissions[d]	57.9	77.8	34%	19%	51%
LULUCF Carbon Stock Change Flux[e]	(938.9)	(832.0)	-11%	-30%	12%
LULUCF Sector Net Total[f]	**(881.0)**	**(754.2)**	**-14%**	**-33%**	**10%**
Net Emissions (Sources and Sinks)[c]	**5,606.4**	**5,586.0**	**-0.4%**	**-7%**	**8%**

[a] Base Year is 1990 for all sources.

[b] The trend range represents a 95 percent confidence interval for the emission trend, with the lower bound corresponding to 2.5th percentile value and the upper bound corresponding to 97.5th percentile value.

[c] Totals exclude emissions for which uncertainty was not quantified.

[d] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to

Coastal Wetlands, Land Converted to Flooded Land, and Flooded Land Remaining Flooded Land; and N_2O emissions from forest soils and settlement soils.

[e] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[f] The LULUCF Sector Net Total is the net sum of all CH_4 and N_2O emissions to the atmosphere plus net carbon stock changes.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration. Total emissions (excluding emissions for which uncertainty was not quantified) are presented without LULUCF. Net emissions are presented with LULUCF.

1.8 Completeness

This report, along with its accompanying CRF tables, serves as a thorough assessment of the anthropogenic sources and sinks of greenhouse gas emissions for the United States for the time series 1990 through 2021. This report is intended to be comprehensive and includes the vast majority of emissions and removals identified as anthropogenic, consistent with IPCC and UNFCCC guidelines. In general, sources or sink categories not accounted for in this Inventory are excluded because they are not occurring in the United States and its territories, or because data are unavailable to develop an estimate and/or the categories were determined to be insignificant[40] in terms of overall national emissions per UNFCCC reporting guidelines.

The United States is continually working to improve upon the understanding of such sources and sinks currently not included and seeking to find the data required to estimate related emissions and removals, focusing on categories that are anticipated to be significant. As such improvements are implemented, new emission and removal estimates are quantified and included in the Inventory, improving completeness of national estimates. For a list of sources and sink categories not included and more information on significance of these categories, see Annex 5 and the respective category sections in each sectoral chapter of this report.

1.9 Organization of Report

In accordance with the revision of the UNFCCC reporting guidelines agreed to at the nineteenth Conference of the Parties (UNFCCC 2014), this *Inventory of U.S. Greenhouse Gas Emissions and Sinks* is grouped into five sector-specific chapters consistent with the UN Common Reporting Framework, listed below in Table 1-8. In addition, chapters on Trends in Greenhouse Gas Emissions, Other information, and Recalculations and Improvements to be considered as part of the U.S. Inventory submission are included.

Table 1-8: IPCC Sector Descriptions

Chapter (IPCC Sector)	Activities Included
Energy	Emissions of all greenhouse gases resulting from stationary and mobile energy activities including fuel combustion and fugitive fuel emissions, and non-energy use of fossil fuels.
Industrial Processes and Product Use	Emissions resulting from industrial processes and product use of greenhouse gases.

[40] See paragraph 32 of Decision 24/CP.19, the UNFCCC reporting guidelines on annual inventories for Parties included in Annex 1 to the Convention. Paragraph notes that "…An emission should only be considered insignificant if the likely level of emissions is below 0.05 per cent of the national total GHG emissions, and does not exceed 500 kt CO_2 Eq. The total national aggregate of estimated emissions for all gases and categories considered insignificant shall remain below 0.1 percent of the national total GHG emissions."

Agriculture	Emissions from agricultural activities except fuel combustion, which is addressed under Energy.
Land Use, Land-Use Change, and Forestry	Emissions and removals of CO_2, and emissions of CH_4, and N_2O from land use, land-use change and forestry.
Waste	Emissions from waste management activities.

Within each chapter, emissions are identified by the anthropogenic activity that is the source or sink of the greenhouse gas emissions being estimated (e.g., coal mining). Overall, the following organizational structure is consistently applied throughout this report:

Chapter/IPCC Sector: Overview of emissions and trends for each IPCC defined sector.

CRF Source or Sink Category: Description of category pathway and emission/removal trends based on IPCC methodologies, consistent with UNFCCC reporting guidelines.

Methodology and Time-Series Consistency: Description of analytical methods (e.g., from *2006 IPCC Guidelines,* or country-specific methods) employed to produce emission estimates and identification of data references, primarily for activity data and emission factors, and a discussion of time-series consistency.

Uncertainty: A discussion and quantification of the uncertainty in emission estimates.

QA/QC and Verification: A discussion on steps taken to QA/QC and verify the emission estimates, consistent with the U.S. QA/QC plan, and any key QC findings.

Recalculations Discussion: A discussion of any data or methodological changes that necessitate a recalculation of previous years' emission estimates, and the impact of the recalculation on the emission estimates, if applicable.

Planned Improvements: A discussion on any category-specific planned improvements, if applicable.

Special attention is given to CO_2 from fossil fuel combustion relative to other sources because of its share of emissions and its dominant influence on emission trends. For example, each energy consuming end-use sector (i.e., residential, commercial, industrial, and transportation), as well as the electricity generation sector, is described individually. Additional information for certain source categories and other topics is also provided in several Annexes listed in Table 1-9.

Table 1-9: List of Annexes

ANNEX 1 Key Category Analysis

ANNEX 2 Methodology and Data for Estimating CO_2 Emissions from Fossil Fuel Combustion

2.1. Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion

2.2. Methodology for Estimating the Carbon Content of Fossil Fuels

2.3. Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels

ANNEX 3 Methodological Descriptions for Additional Source or Sink Categories

3.1. Methodology for Estimating Emissions of CH_4, N_2O, and Indirect Greenhouse Gases from Stationary Combustion

3.2. Methodology for Estimating Emissions of CH_4, N_2O, and Indirect Greenhouse Gases from Mobile Combustion and Methodology for and Supplemental Information on Transportation-Related Greenhouse Gas Emissions

3.3. Methodology for Estimating Emissions from Commercial Aircraft Jet Fuel Consumption

3.4. Methodology for Estimating CH_4 Emissions from Coal Mining

3.5. Methodology for Estimating CH_4 and CO_2 Emissions from Petroleum Systems

3.6. Methodology for Estimating CH_4 Emissions from Natural Gas Systems

3.7. Methodology for Estimating CO_2 and N_2O Emissions from Incineration of Waste

3.8. Methodology for Estimating Emissions from International Bunker Fuels used by the U.S. Military

3.9. Methodology for Estimating HFC and PFC Emissions from Substitution of Ozone Depleting Substances

3.10. Methodology for Estimating CH_4 Emissions from Enteric Fermentation

3.11. Methodology for Estimating CH_4 and N_2O Emissions from Manure Management

3.12. Methodology for Estimating N_2O Emissions, CH_4 Emissions and Soil Organic C Stock Changes from Agricultural Lands (Cropland and Grassland)

3.13. Methodology for Estimating Net Carbon Stock Changes in Forest Land Remaining Forest Land and Land Converted to Forest Land
3.14. Methodology for Estimating CH_4 Emissions from Landfills
ANNEX 4 IPCC Reference Approach for Estimating CO_2 Emissions from Fossil Fuel Combustion
ANNEX 5 Assessment of the Sources and Sinks of Greenhouse Gas Emissions Not Included
ANNEX 6 Additional Information
6.1. Global Warming Potential Values
6.2. Ozone Depleting Substance Emissions
6.3. Greenhouse Gas Precursors: Mapping of NEI categories to the Inventory
6.4. Constants, Units, and Conversions
6.5. Chemical Formulas
ANNEX 7 Uncertainty
7.1. Overview
7.2. Methodology and Results
7.3. Reducing Uncertainty
7.4. Planned Improvements
7.5. Additional Information on Uncertainty Analyses by Source
ANNEX 8 QA/QC Procedures
8.1. Background
8.2. Purpose
8.3. Assessment Factors
8.4. Responses During the Review Process
ANNEX 9 Use of Greenhouse Gas Reporting Program (GHGRP) in Inventory

2. Trends in Greenhouse Gas Emissions and Removals

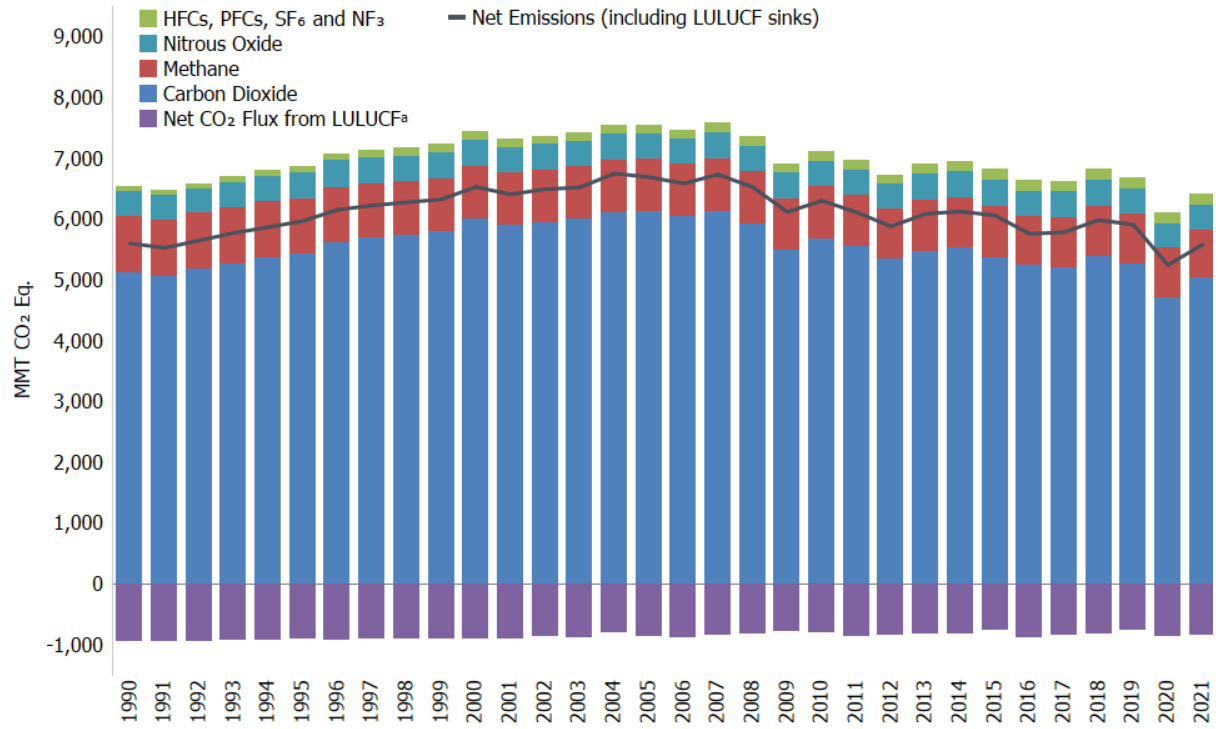
2.1 Overview of U.S. Greenhouse Gas Emissions and Sinks Trends

In 2021, total gross U.S. greenhouse gas emissions were 6,340.2 million metric tons of carbon dioxide equivalent (MMT CO_2 Eq.).[1] Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions increased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2 Eq.). Net emissions (i.e., including sinks) were 5,586.0 MMT CO_2 Eq. in 2021. Overall, net emissions increased 6.4 percent from 2020 to 2021 and decreased 16.6 percent from 2005 levels, as shown in Table 2-1. Between 2020 and 2021, the increase in total greenhouse gas emissions was driven largely by an increase in CO_2 emissions from fossil fuel combustion due to economic activity rebounding after the height of the COVID-19 pandemic. The CO_2 emissions from fossil fuel combustion increased by 6.8 percent from 2020 to 2021, including a 11.4 percent increase in transportation sector emissions and a 7.0 percent increase in electric power sector emissions. The increase in electric power sector emissions was due in part to an increase in electricity demand of 2.4 percent since 2020. Overall there has been a decrease in electric power sector emissions from 1990 through 2021 which reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes including energy efficiency, and the carbon intensity of energy fuel choices. Between 2019 and 2021, there was still a decrease of 3.5 percent and 4.1 percent in CO_2 emissions from fossil fuel combustion from the transportation and electric power sectors, respectively.

Figure 2-1 and Figure 2-2 illustrate the overall trend in total U.S. emissions and sinks by gas and annual percent changes relative to the previous year since 1990.

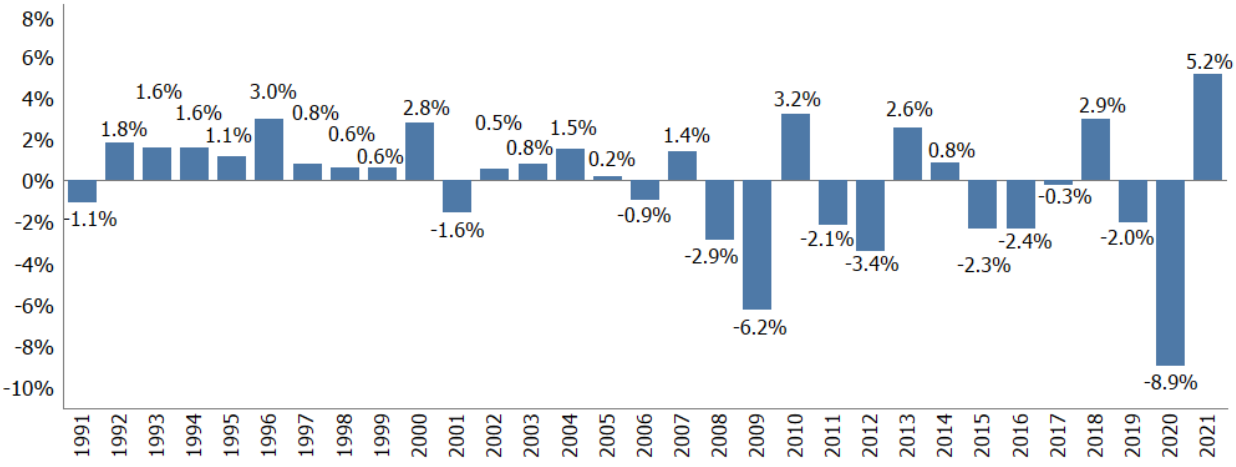
[1] The gross emissions total presented in this report for the United States excludes emissions and sinks from removals from Land Use, Land-Use Change, and Forestry (LULUCF). The net emissions total presented in this report for the United States includes emissions and sinks from removals from LULUCF.

Figure 2-1: U.S. Greenhouse Gas Emissions and Sinks by Gas



[a] The term "flux" is used to describe the exchange of CO_2 to and from the atmosphere, with net flux being either positive or negative depending on the overall balance. Removal and long-term storage of CO_2 from the atmosphere is also referred to as "carbon sequestration."

Figure 2-2: Annual Percent Change in Gross U.S. Greenhouse Gas Emissions Relative to the Previous Year

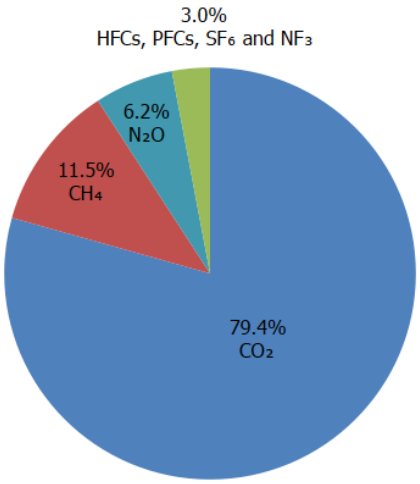


Emissions and Sinks by Gas

Figure 2-3 illustrates the relative contribution of the greenhouse gases to total gross U.S. emissions in 2021, in CO_2-equivalents (i.e., weighted by global warming potential). The primary greenhouse gas emitted by human activities in the United States is CO_2, representing 79.4 percent of total greenhouse gas emissions. The largest source of CO_2,

and of overall greenhouse gas emissions, is fossil fuel combustion primarily from transportation and power generation. Methane (CH_4) emissions account for 11.5 percent of emissions. The major sources of methane include enteric fermentation associated with domestic livestock, natural gas systems, and decomposition of wastes in landfills. Agricultural soil management, wastewater treatment, stationary sources of fuel combustion, and manure management are the major sources of N_2O emissions. Ozone depleting substance (ODS) substitute emissions were the primary contributor to aggregate hydrofluorocarbon (HFC) emissions. Perfluorocarbon (PFC) emissions were primarily attributable to electronics manufacturing and primary aluminum production. Electrical transmission and distribution systems accounted for most sulfur hexafluoride (SF_6) emissions. The electronics industry is the only source of nitrogen trifluoride (NF_3) emissions.

Figure 2-3: 2021 Gross Total U.S. Greenhouse Gas Emissions by Gas (Percentages based on MMT CO_2 Eq.)



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above.

Overall from 1990 to 2021, total emissions of CO_2 decreased by 88.7 MMT CO_2 Eq. (1.7 percent), total emissions of methane (CH_4) decreased by 141.2 MMT CO_2 Eq. (16.3 percent), and total emissions of nitrous oxide (N_2O) decreased by 13.0 MMT CO_2 Eq. (3.2 percent). During the same period, emissions of fluorinated gases including hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3) rose by 95.9 MMT CO_2 Eq. (104.8 percent). Despite being emitted in smaller quantities relative to the other principal greenhouse gases, emissions of HFCs, PFCs, SF_6, and NF_3 are significant because many of them have extremely high global warming potentials (GWPs), and, in the cases of PFCs, SF_6, and NF_3, very long atmospheric lifetimes. Conversely, U.S. greenhouse gas emissions were partly offset by carbon (C) sequestration in managed forests, trees in urban areas, agricultural soils, landfilled yard trimmings, and coastal wetlands. These were estimated to offset 13.1 percent (832.0 MMT CO_2 Eq.) of total gross emissions in 2021.

Table 2-1 provides information on trends in emissions and sinks from all U.S. anthropogenic sources and sinks in weighted units of MMT CO_2 Eq., while unweighted gas emissions and sinks in kilotons (kt) are provided in Table 2-2.

Table 2-1: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**5,121.0**	**6,132.2**	**5,212.2**	**5,377.8**	**5,262.1**	**4,714.6**	**5,032.2**
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	*1,468.9*	*1,858.6*	*1,780.1*	*1,812.9*	*1,816.4*	*1,572.5*	*1,752.4*
Electric Power Sector	*1,820.0*	*2,400.1*	*1,732.0*	*1,753.4*	*1,606.7*	*1,439.6*	*1,540.9*

Industrial	*852.4*	*850.8*	*789.0*	*813.5*	*815.9*	*767.9*	*775.6*
Residential	*338.6*	*358.9*	*293.4*	*338.2*	*341.4*	*313.2*	*313.3*
Commercial	*228.3*	*227.1*	*232.0*	*245.8*	*250.7*	*228.5*	*233.0*
U.S. Territories	*20.0*	*51.9*	*25.9*	*25.9*	*24.8*	*23.3*	*23.8*
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Iron and Steel Production & Metallurgical Coke Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Substitution of Ozone Depleting Substances	+	+	+	+	+	+	+
Magnesium Production and Processing	0.1	+	+	+	+	+	+
Biomass and Biofuel Consumption[a]	*237.9*	*245.4*	*328.9*	*336.0*	*333.1*	*305.6*	*315.4*
International Bunker Fuels[b]	*103.6*	*113.3*	*120.2*	*124.3*	*113.6*	*69.6*	*80.2*
CH_4[c]	**868.7**	**791.1**	**762.7**	**774.0**	**767.8**	**742.2**	**727.4**
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Natural Gas Systems	215.1	203.3	186.2	194.3	193.6	185.3	181.4
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Composting	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Field Burning of Agricultural Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
Petrochemical Production	0.2	0.1	0.3	0.3	0.4	0.3	0.4

Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	+	+	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.2*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*
N_2O[c]	**406.3**	**415.8**	**414.7**	**430.2**	**410.3**	**388.9**	**393.3**
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N_2O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Electronics Industry	+	0.1	0.2	0.2	0.2	0.3	0.3
Field Burning of Agricultural Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.8*	*0.9*	*0.9*	*1.0*	*0.9*	*0.5*	*0.5*
HFCs	**39.0**	**116.4**	**160.8**	**160.9**	**165.4**	**168.2**	**175.1**
Substitution of Ozone Depleting Substances[d]	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4
Magnesium Production and Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	**21.8**	**6.1**	**3.8**	**4.3**	**4.0**	**3.9**	**3.5**
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting Substances[d]	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO	+	+	NO	+	+	+
SF_6	**30.5**	**15.5**	**7.2**	**7.1**	**7.8**	**7.5**	**8.0**
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF_3	**+**	**0.4**	**0.5**	**0.5**	**0.5**	**0.6**	**0.6**
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total Gross Emissions (Sources)	**6,478.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Emissions[c]	**57.9**	**72.4**	**68.3**	**64.4**	**64.2**	**76.4**	**77.8**
CH_4	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change[e]	**(938.9)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
LULUCF Sector Net Total[f]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**

Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

+ Does not exceed 0.05 MMT CO_2 Eq.

NO (Not Occurring)

[a] Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

[b] Emissions from international bunker fuels are not included in totals.

[c] LULUCF emissions of CH_4 and N_2O are reported separately from gross emissions totals. LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

[d] Small amounts of PFC emissions also result from this source.

[e] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

[f] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Total (gross) emissions are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Table 2-2: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**5,120,957**	**6,132,183**	**5,212,162**	**5,377,797**	**5,262,145**	**4,714,628**	**5,032,213**
Fossil Fuel Combustion	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
Transportation	*1,468,944*	*1,858,552*	*1,780,103*	*1,812,903*	*1,816,397*	*1,572,525*	*1,752,427*
Electric Power Sector	*1,819,951*	*2,400,057*	*1,732,033*	*1,753,432*	*1,606,721*	*1,439,563*	*1,540,897*
Industrial	*852,429*	*850,812*	*789,023*	*813,534*	*815,894*	*767,898*	*775,604*
Residential	*338,568*	*358,898*	*293,410*	*338,218*	*341,400*	*313,175*	*313,339*
Commercial	*228,293*	*227,130*	*231,999*	*245,838*	*250,703*	*228,463*	*233,031*
U.S. Territories	*20,011*	*51,858*	*25,947*	*25,924*	*24,815*	*23,281*	*23,774*
Non-Energy Use of Fuels	112,407	128,920	112,841	129,441	127,621	119,208	140,197
Iron and Steel Production & Metallurgical Coke Production	104,737	70,076	40,810	42,858	43,090	37,712	41,656
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312
Natural Gas Systems	32,207	25,033	31,864	32,815	38,563	36,463	36,161
Petrochemical Production	21,611	27,383	28,890	29,314	30,702	29,780	33,170
Petroleum Systems	9,519	10,221	24,462	36,102	46,874	29,081	24,669
Incineration of Waste	12,900	13,254	13,161	13,339	12,948	12,921	12,476
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207
Lime Production	11,700	14,552	12,882	13,106	12,112	11,299	11,870
Other Process Uses of Carbonates	6,233	7,459	9,869	7,351	8,422	8,399	7,951
Urea Fertilization	2,417	3,504	4,862	4,939	5,030	5,122	5,214
Carbon Dioxide Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990
Urea Consumption for Non-Agricultural Purposes	3,784	3,653	5,161	6,111	6,154	5,814	4,989
Liming	4,690	4,351	3,069	2,240	2,203	2,915	3,047
Coal Mining	4,606	4,170	3,153	3,141	2,992	2,198	2,456
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714
Ferroalloy Production	2,152	1,392	1,975	2,063	1,598	1,377	1,567
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541

Titanium Dioxide Production	1,195	1,755	1,688	1,541	1,474	1,193	1,474
Zinc Production	632	1,030	900	999	1,026	977	969
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909
Lead Production	516	553	513	527	531	464	446
Carbide Production and Consumption	243	213	181	184	175	154	172
Abandoned Oil and Gas Wells	7	7	7	7	8	7	7
Substitution of Ozone Depleting Substances	+	1	3	3	3	4	4
Magnesium Production and Processing	128	3	3	2	2	3	3
Biomass and Biofuel Consumption[a]	*237,946*	*245,421*	*328,888*	*335,973*	*333,059*	*305,562*	*315,353*
International Bunker Fuels[b]	*103,634*	*113,328*	*120,192*	*124,279*	*113,632*	*69,638*	*80,180*
CH_4[c]	**31,024**	**28,252**	**27,238**	**27,644**	**27,421**	**26,509**	**25,980**
Enteric Fermentation	6,539	6,722	6,998	7,028	7,046	7,007	6,962
Natural Gas Systems	7,680	7,260	6,652	6,939	6,914	6,619	6,478
Landfills	7,063	5,275	4,424	4,525	4,607	4,456	4,379
Manure Management	1,394	1,960	2,300	2,375	2,348	2,383	2,358
Petroleum Systems	1,833	1,819	2,209	2,165	2,138	1,945	1,791
Coal Mining	3,860	2,566	2,192	2,110	1,893	1,648	1,595
Wastewater Treatment	811	809	770	763	755	761	753
Rice Cultivation	640	720	596	623	602	630	600
Stationary Combustion	344	313	307	344	351	313	319
Abandoned Oil and Gas Wells	274	289	295	296	297	295	295
Abandoned Underground Coal Mines	288	264	257	247	237	232	228
Mobile Combustion	258	158	105	102	103	92	93
Composting	15	75	98	90	91	92	92
Field Burning of Agricultural Residues	15	17	17	17	17	17	17
Petrochemical Production	9	3	10	12	13	12	15
Anaerobic Digestion at Biogas Facilities	1	2	6	6	6	6	6
Ferroalloy Production	1	+	1	1	+	+	+
Carbide Production and Consumption	1	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	1	1	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	*7*	*5*	*4*	*4*	*4*	*3*	*3*
N_2O[c]	**1,533**	**1,569**	**1,565**	**1,623**	**1,548**	**1,468**	**1,484**
Agricultural Soil Management	1,087	1,100	1,172	1,222	1,167	1,096	1,110
Stationary Combustion	84	115	95	95	84	78	84
Wastewater Treatment	56	68	78	80	80	79	79
Manure Management	47	55	64	65	65	66	66
Mobile Combustion	145	140	70	66	72	61	63
Nitric Acid Production	41	38	31	32	34	31	30
Adipic Acid Production	51	24	25	35	18	28	25
N_2O from Product Uses	14	14	14	14	14	14	14
Composting	1	6	7	7	7	7	7
Caprolactam, Glyoxal, and Glyoxylic Acid Production	6	7	5	5	5	4	5
Incineration of Waste	2	1	1	1	1	1	1

Electronics Industry	+	+	1	1	1	1	1
Field Burning of Agricultural Residues	1	1	1	1	1	1	1
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	*3*	*3*	*4*	*4*	*3*	*2*	*2*
HFCs	**M**	**M**	**M**	**M**	**M**	**M**	**M**
Substitution of Ozone Depleting Substances[d]	M	M	M	M	M	M	M
HCFC-22 Production	3	1	+	+	+	+	+
Electronics Industry	M	M	M	M	M	M	M
Magnesium Production and Processing	NO	NO	+	+	+	+	+
PFCs	**M**	**M**	**M**	**M**	**M**	**M**	**M**
Electronics Industry	M	M	M	M	M	M	M
Aluminum Production	M	M	M	M	M	M	M
Substitution of Ozone Depleting Substances[d]	+	+	+	+	+	+	+
Electrical Transmission and Distribution	+	+	+	+	+	+	+
SF_6	**1**	**1**	**+**	**+**	**+**	**+**	**+**
Electrical Transmission and Distribution	1	1	+	+	+	+	+
Magnesium Production and Processing	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
NF_3	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
CO	**133,225**	**78,095**	**41,290**	**38,980**	**39,105**	**42,375**	**43,980**
NO_x	**22,889**	**19,768**	**8,424**	**8,052**	**7,684**	**6,909**	**6,995**
SO_2	**20,935**	**13,108**	**2,093**	**2,001**	**1,676**	**1,471**	**1,628**
NMVOCs	**20,918**	**12,708**	**8,951**	**8,987**	**8,804**	**9,040**	**9,037**

+ Does not exceed 0.5 kt.
M (Mixture of multiple gases)
NO (Not Occurring)
[a] Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.
[b] Emissions from international bunker fuels are not included in totals.
[c] LULUCF emissions of LULUCF CH_4 and N_2O are reported separately from gross emissions totals. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.
[d] Small amounts of PFC emissions also result from this source.
Notes: Totals by gas may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Emissions by IPCC Sector

Emissions and removals of all gases can be summed from each source and sink category into a set of five sectors defined by the UNFCCC Reporting Guidelines and methodological framework provided by the Intergovernmental Panel on Climate Change (IPCC). Figure 2-4 and Table 2-3 illustrate that over the thirty-two-year period of 1990 to 2021, total emissions from the Energy and Waste sectors decreased by 171.4 MMT CO_2 Eq. (3.2 percent) and 66.8 MMT CO_2 Eq. (28.3 percent), respectively. Emissions from Industrial Processes and Product Use and Agriculture grew by 41.0 MMT CO_2 Eq. (12.2 percent) and 50.0 MMT CO_2 Eq. (9.1 percent), respectively. Over the same period, total C sequestration in the Land Use, Land-Use Change, and Forestry (LULUCF) sector decreased by 106.8 MMT CO_2 (11.4 percent decrease in total C sequestration), and emissions from the LULUCF sector increased by 19.9 MMT CO_2 Eq. (34.4 percent).

Figure 2-4: U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector

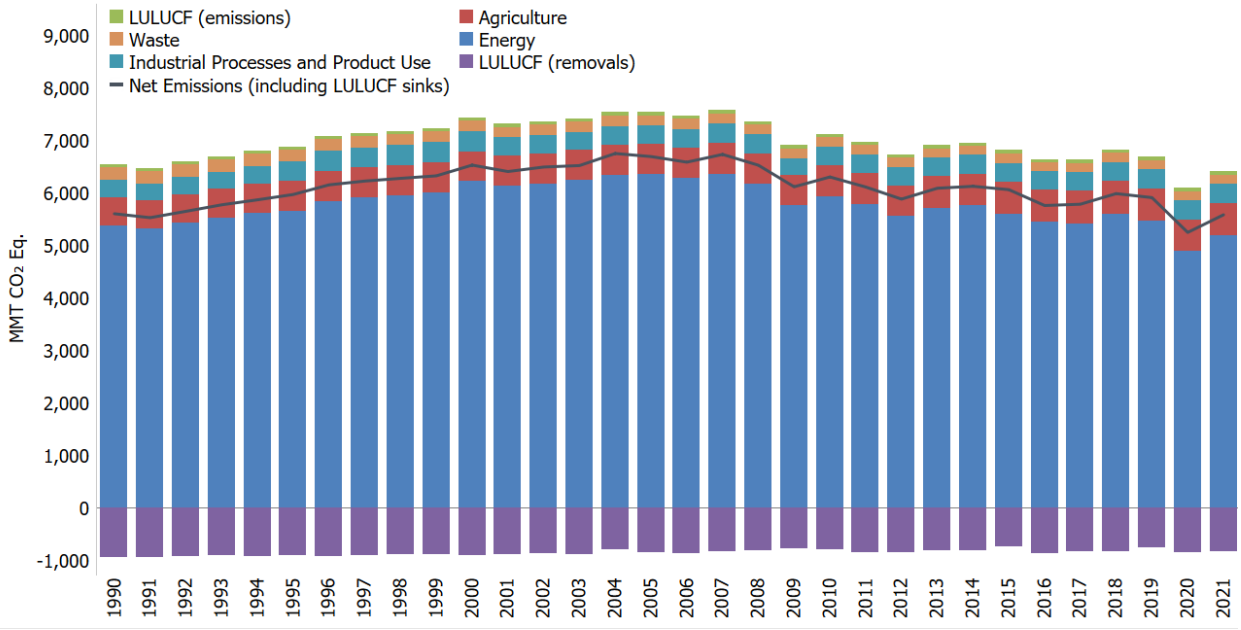


Table 2-3: Recent Trends in U.S. Greenhouse Gas Emissions and Sinks by IPCC Sector/Category (MMT CO_2 Eq.)

IPCC Sector/Category	1990	2005	2017	2018	2019	2020	2021
Energy	**5,368.0**	**6,351.5**	**5,418.7**	**5,589.5**	**5,460.6**	**4,894.0**	**5,196.6**
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Natural Gas Systems	247.3	228.3	218.1	227.1	232.2	221.8	217.5
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Petroleum Systems	60.8	61.2	86.4	96.8	106.8	83.6	74.9
Coal Mining	112.7	76.0	64.5	62.2	56.0	48.3	47.1
Stationary Combustion[a]	31.9	39.3	33.9	34.7	32.0	29.4	31.1
Mobile Combustion[a]	45.6	41.4	21.5	20.4	21.9	18.7	19.3
Incineration of Waste	13.3	13.6	13.5	13.7	13.3	13.3	12.8
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.3	8.3
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Biomass and Biofuel Consumption[b]	*237.9*	*245.4*	*328.9*	*336.0*	*333.1*	*305.6*	*315.4*
International Bunker Fuels[c]	*104.6*	*114.3*	*121.2*	*125.3*	*114.6*	*70.3*	*80.9*
Industrial Processes and Product Use	**335.4**	**356.1**	**359.1**	**362.2**	**366.8**	**363.2**	**376.4**
Substitution of Ozone Depleting Substances	0.3	99.4	156.1	157.8	162.0	166.1	172.5
Iron and Steel Production & Metallurgical Coke Production	104.8	70.1	40.8	42.9	43.1	37.7	41.7
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.9	27.5	29.2	29.7	31.1	30.1	33.6
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0

Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Electronics Industry	3.3	4.5	4.6	4.7	4.3	4.4	4.8
N_2O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Aluminum Production	26.1	7.2	2.2	2.9	3.3	3.2	2.5
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Magnesium Production and Processing	5.5	2.9	1.1	1.1	1.0	0.9	1.2
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.3	0.2	0.2	0.2	0.2	0.2	0.2
Agriculture	**548.0**	**577.7**	**613.1**	**629.5**	**614.5**	**597.3**	**598.1**
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	51.4	69.4	81.3	83.7	83.1	84.2	83.4
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
Field Burning of Agricultural Residues	0.6	0.7	0.7	0.6	0.6	0.6	0.6
Waste	**236.0**	**192.1**	**170.9**	**173.7**	**176.0**	**171.5**	**169.2**
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	37.5	40.7	42.2	42.5	42.5	42.2	42.0
Composting	0.7	3.6	4.7	4.3	4.3	4.4	4.4
Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
Total Gross Emissions[d] (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**
LULUCF Sector Net Total[e]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**
Forest Land	(914.2)	(793.9)	(793.5)	(791.2)	(736.3)	(782.2)	(768.7)
Cropland	31.6	25.6	34.3	39.7	41.7	33.4	37.6
Grassland	2.2	(28.4)	(12.9)	(12.3)	(8.7)	(19.3)	(14.0)
Wetlands	44.8	44.4	42.7	42.6	42.6	42.4	42.4
Settlements	(45.3)	(28.9)	(44.7)	(44.0)	(43.4)	(50.5)	(51.4)
Net Emission (Sources and Sinks)[f]	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Includes CH_4 and N_2O emissions from fuel combustion.

[b] Emissions from biomass and biofuel consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

[c] Emissions from international bunker fuels are not included in totals.

[d] Total emissions without LULUCF.

[e] LULUCF emissions of CH_4 and N_2O are reported separately from gross emissions totals. LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils. Refer to Table 2-8 for a breakout of emissions and removals for LULUCF by gas and source category.

[f] Net emissions with LULUCF.

Notes: Total (gross) emissions are presented without LULUCF. Net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Energy

Emissions from energy-related activities come from two main categories, including direct emissions associated with fuel use (i.e., fossil fuel combustion, non-energy use of fossil fuels and waste combustion) and fugitive emissions mainly from coal, natural gas, and oil production. Energy emissions also include some categories that are not added to energy sector totals but are instead presented as memo items, including international bunker fuels and biomass emissions. Energy-related activities, primarily fossil fuel combustion, accounted for the vast majority of U.S. CO_2 emissions for the period of 1990 through 2021. Fossil fuel combustion is the largest source of energy-related emissions, with CO_2 being the primary gas emitted (see Figure 2-5). Due to their relative importance, fossil fuel combustion-related CO_2 emissions are considered in detail in the Energy chapter (see Chapter 3).

In 2021, 79.3 percent of the energy used in the United States on a Btu basis was produced through the combustion of fossil fuels. The remaining 20.7 percent came from other energy sources such as hydropower, biomass, nuclear, wind, and solar energy. A discussion of specific trends related to CO_2 and other greenhouse gas emissions from energy use is presented here with more detail in the Energy chapter. Energy-related activities are also responsible for CH_4 and N_2O emissions (41.6 percent and 10.0 percent of total U.S. emissions of each gas, respectively). Table 2-4 presents greenhouse gas emissions from the Energy chapter by source and gas.

Figure 2-5: Trends in Energy Sector Greenhouse Gas Sources

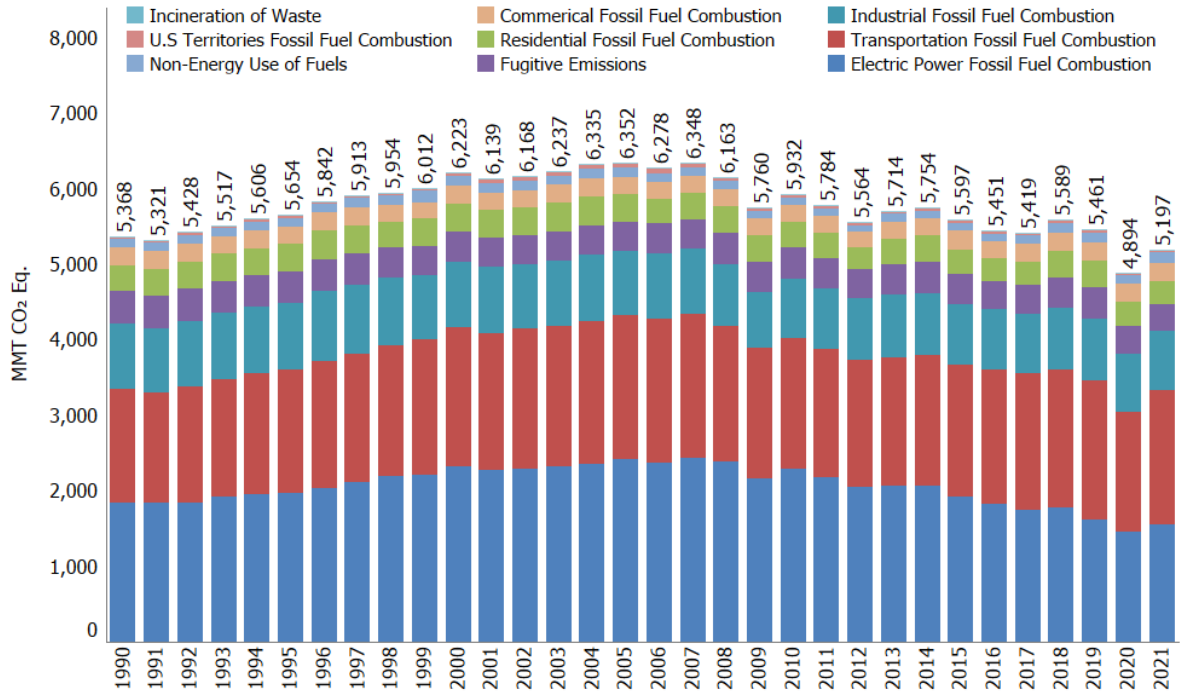


Table 2-4: Emissions from Energy (MMT CO_2 Eq.)[2]

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**4,899.8**	**5,928.9**	**5,038.0**	**5,204.7**	**5,084.9**	**4,544.8**	**4,855.0**
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	*1,468.9*	*1,858.6*	*1,780.1*	*1,812.9*	*1,816.4*	*1,572.5*	*1,752.4*
Electricity Generation	*1,820.0*	*2,400.1*	*1,732.0*	*1,753.4*	*1,606.7*	*1,439.6*	*1,540.9*
Industrial	*852.4*	*850.8*	*789.0*	*813.5*	*815.9*	*767.9*	*775.6*

[2] The full time series data is available in Common Reporting Format (CRF) Tables included in the U.S. UNFCCC submission and in CSV format available at https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

Residential	*338.6*	*358.9*	*293.4*	*338.2*	*341.4*	*313.2*	*313.3*
Commercial	*228.3*	*227.1*	*232.0*	*245.8*	*250.7*	*228.5*	*233.0*
U.S. Territories	*20.0*	*51.9*	*25.9*	*25.9*	*24.8*	*23.3*	*23.8*
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Biomass-Wood[a]	*215.2*	*206.9*	*212.0*	*220.0*	*217.7*	*200.4*	*204.8*
International Bunker Fuels[b]	*103.6*	*113.3*	*120.2*	*124.3*	*113.6*	*69.6*	*80.2*
Biofuels-Ethanol[a]	*4.2*	*22.9*	*82.1*	*81.9*	*82.6*	*71.8*	*79.1*
Biofuels-Biodiesel[a]	*0.0*	*0.9*	*18.7*	*17.9*	*17.1*	*17.7*	*16.1*
Biomass-MSW[a]	*18.5*	*14.7*	*16.1*	*16.1*	*15.7*	*15.6*	*15.3*
CH_4	**407.0**	**354.7**	**336.5**	**341.7**	**334.1**	**312.0**	**302.3**
Natural Gas Systems	215.1	203.3	186.2	194.3	193.6	185.3	181.4
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.2*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*
N_2O	**61.1**	**67.9**	**44.2**	**43.1**	**41.6**	**37.2**	**39.2**
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.8*	*0.9*	*0.9*	*1.0*	*0.9*	*0.5*	*0.6*
Total	**5,368.0**	**6,351.5**	**5,418.7**	**5,589.5**	**5,460.6**	**4,894.0**	**5,196.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Emissions from biomass and biofuel consumption are not included specifically in Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

[b] Emissions from international bunker fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

Note: Totals may not sum due to independent rounding.

Fossil Fuel Combustion CO_2 Emissions

As the largest contributor to U.S. greenhouse gas emissions, CO_2 from fossil fuel combustion has accounted for approximately 74.8 percent of CO_2-equivalent total gross emissions on average across the time series. Within the United States, fossil fuel combustion accounted for 92.2 percent of CO_2 emissions in 2021. Emissions from this source category include CO_2 associated with the combustion of fossil fuels (coal, natural gas, and petroleum) for energy use. Fossil fuel combustion CO_2 emissions decreased by 1.9 percent (89.1 MMT CO_2 Eq.) from 1990 to 2021 and were responsible for most of the decrease in national emissions during this period. Similarly, CO_2 emissions from fossil fuel combustion have decreased by 1,108.2 MMT CO_2 Eq. since 2005, representing a decrease of 19.3 percent. From 2020 to 2021, these emissions increased by 6.8 percent (294.2 MMT CO_2 Eq.). Historically, changes in emissions from fossil fuel combustion have been the main factor influencing U.S. emission trends.

Changes in CO_2 emissions from fossil fuel combustion since 1990 are affected by many long-term and short-term factors, including population and economic growth, energy price fluctuations and market trends, technological

changes, carbon intensity of energy fuel choices, and seasonal temperatures. Carbon dioxide emissions from coal combustion gradually increased between 1990 and 2007, then began to decrease at a faster rate from 2008 to 2021. Carbon dioxide emissions from natural gas combustion remained relatively constant, with a slight increase between 1990 and 2009, then began to consistently increase between 2010 and 2019. The replacement of coal combustion with natural gas combustion was largely driven by new discoveries of natural gas fields and advancements in drilling technologies, which led to more competitive natural gas prices. On an annual basis, the overall consumption and mix of fossil fuels in the United States fluctuates primarily in response to changes in general economic conditions, overall energy prices, the relative price of different fuels, weather, and the availability of non-fossil alternatives. For example, coal consumption for electric power is influenced by a number of factors, including the relative price of coal and alternative sources, the ability to switch fuels, and longer-term trends in coal markets. Between 2020 and 2021, coal consumption for electric power increased 15.4 percent, a reversal of the overall trend since 2008. However, this followed a 19.2 percent reduction in coal generation between 2019 and 2020 due in part to the COVID-19 pandemic reducing overall demand for fossil fuels across all sectors. There has been a 35.8 percent reduction in overall CO_2 emissions from electric power generation from 2005 to 2021 (see Figure 2-7), reflecting the continued shift in the share of electric power generation from coal to natural gas and renewables since 2005.

Fossil fuel combustion CO_2 emissions also depend on the type of fuel consumed or energy used and its carbon intensity. Producing a unit of heat or electricity using natural gas instead of coal, for example, reduces CO_2 emissions because of the lower C content of natural gas (see Table 3-12 in Chapter 3 for more detail on electricity generation by source and see Table A-19 in Annex 2.1 for more detail on the C content coefficient of different fossil fuels).

Petroleum use is another major driver of CO_2 emissions from fossil fuel combustion, particularly in the transportation sector, which has represented the largest source of CO_2 emissions from fossil fuel combustion since 2017. Emissions from petroleum consumption for transportation increased by 11.5 percent from 2020 to 2021. This trend can be primarily attributed to a 8.1 percent increase in vehicle miles traveled (VMT) from 2020 to 2021 due to the gradual recovery from the COVID-19 pandemic, which limited travel in 2020. From 2019 to 2021, emissions from petroleum consumption for transportation decreased by 4.0 percent following a decrease of 3.7 percent in VMT over that time period. Fuel economy of light-duty vehicles is another important factor. The decline in new light-duty vehicle fuel economy between 1990 and 2004 reflected the increasing market share of light-duty trucks, which grew from about 29.6 percent of new vehicle sales in 1990 to 48.0 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty VMT grew only modestly for much of the period and has slowed the rate of increase of CO_2 emissions.

Overall, across all sectors, there was a 6.8 percent increase in total CO_2 emissions from fossil fuel combustion from 2020 to 2021.

Trends in CO_2 emissions from fossil fuel combustion, separated by end-use sector, are presented in Table 2-5 and Figure 2-6 based on the underlying U.S. energy consumer data collected by the U.S. Energy Information Administration (EIA). Figure 2-7 further describes trends in direct and indirect CO_2 emissions from fossil fuel combustion, separated by end-use sector. Estimates of CO_2 emissions from fossil fuel combustion are calculated from these EIA "end-use sectors" based on total fuel consumption and appropriate fuel properties described below. (Any additional analysis and refinement of the EIA data is further explained in the Energy chapter of this report.)

- *Transportation.* EIA's fuel consumption data for the transportation sector consists of all vehicles whose primary purpose is transporting people and/or goods from one physical location to another.
- *Electric Power.* EIA's fuel consumption data for the electric power sector are comprised of electricity-only and combined-heat-and-power (CHP) plants within the North American Industry Classification System (NAICS) 22 category whose primary business is to sell electricity, or electricity and heat, to the public. (Non-utility power producers are included in this sector as long as they meet the electric power sector definition.)

- *Industry.* EIA statistics for the industrial sector include fossil fuel consumption that occurs in the fields of manufacturing, agriculture, mining, and construction. EIA's fuel consumption data for the industrial sector consist of all facilities and equipment used for producing, processing, or assembling goods. (EIA includes generators that produce electricity and/or useful thermal output primarily to support on-site industrial activities in this sector.)
- *Residential.* EIA's fuel consumption data for the residential sector consist of living quarters for private households.
- *Commercial.* EIA's fuel consumption data for the commercial sector consist of service-providing facilities and equipment from private and public organizations and businesses. (EIA includes generators that produce electricity and/or useful thermal output primarily to support the activities at commercial establishments in this sector.)

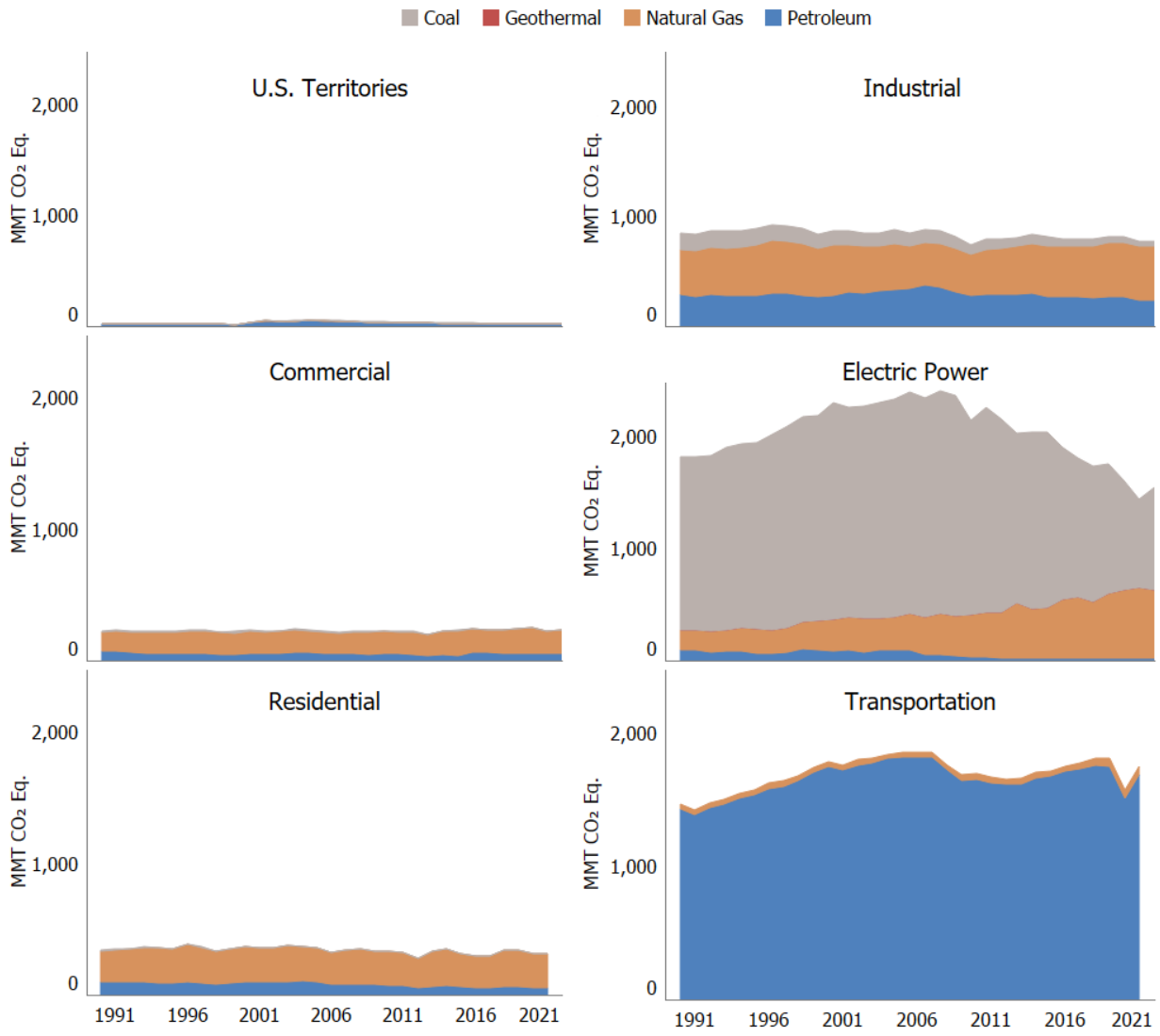
Table 2-5: CO_2 Emissions from Fossil Fuel Combustion by End-Use Sector (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	**1,472.0**	**1,863.3**	**1,784.4**	**1,817.7**	**1,821.2**	**1,576.6**	**1,757.4**
Combustion	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
Electricity	3.0	4.7	4.3	4.8	4.8	4.1	5.0
Industrial	**1,538.9**	**1,587.1**	**1,293.4**	**1,314.9**	**1,281.4**	**1,177.7**	**1,220.7**
Combustion	852.4	850.8	789.0	813.5	815.9	767.9	775.6
Electricity	686.4	736.3	504.4	501.3	465.5	409.8	445.1
Residential	**931.3**	**1,214.9**	**910.5**	**980.5**	**925.1**	**858.5**	**885.6**
Combustion	338.6	358.9	293.4	338.2	341.4	313.2	313.3
Electricity	592.7	856.0	617.1	642.3	583.7	545.3	572.2
Commercial	**766.0**	**1,030.1**	**838.2**	**850.9**	**803.4**	**708.8**	**751.6**
Combustion	228.3	227.1	232.0	245.8	250.7	228.5	233.0
Electricity	537.7	803.0	606.2	605.0	552.7	480.3	518.5
U.S. Territories[a]	**20.0**	**51.9**	**25.9**	**25.9**	**24.8**	**23.3**	**23.8**
Total	**4,728.2**	**5,747.3**	**4,852.5**	**4,989.8**	**4,855.9**	**4,344.9**	**4,639.1**
Electric Power	**1,820.0**	**2,400.1**	**1,732.0**	**1,753.4**	**1,606.7**	**1,439.6**	**1,540.9**

[a] Fuel consumption by U.S. Territories (i.e., American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands) is included in this report.

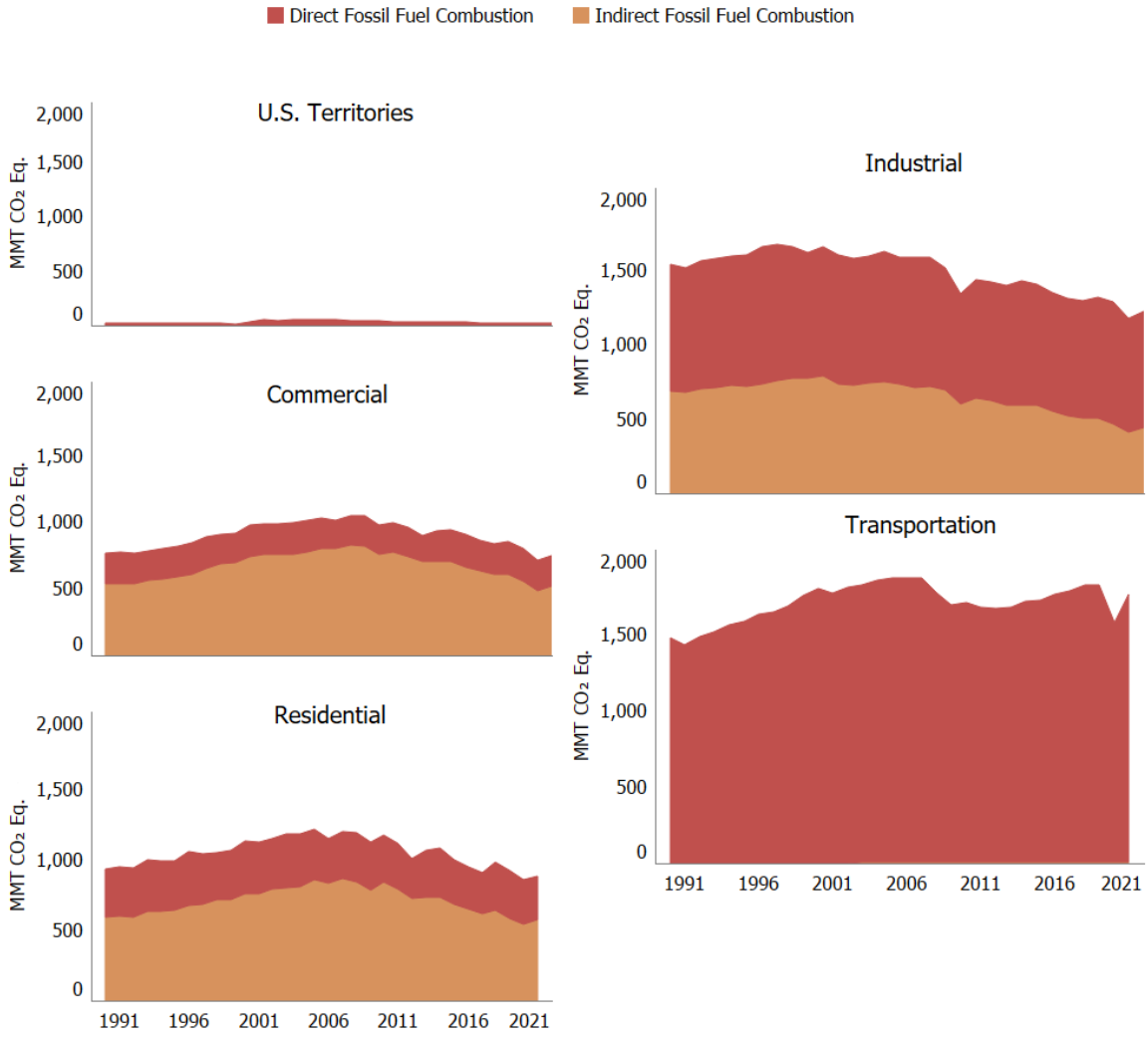
Notes: Combustion-related emissions from electric power are allocated based on aggregate national electricity use by each end-use sector. Totals may not sum due to independent rounding.

Figure 2-6: Trends in CO_2 Emissions from Fossil Fuel Combustion by End-Use Sector and Fuel Type



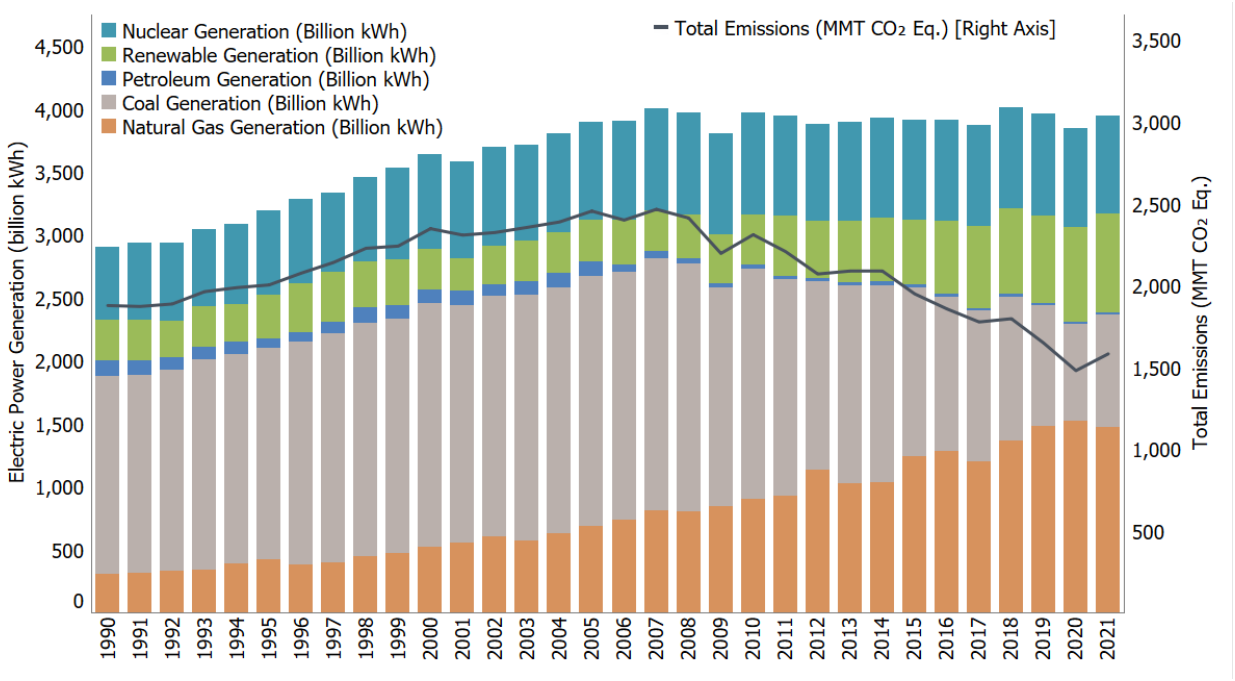
Note: Fossil Fuel Combustion for electric power also includes emissions of less than 0.5 MMT CO_2 Eq. from geothermal-based generation.

Figure 2-7: Trends in End-Use Sector Emissions of CO_2 from Fossil Fuel Combustion



Electric power was the second largest emitter of CO_2 in 2021 (surpassed by transportation in 2017); electric power generators used 30.7 percent of U.S. energy from fossil fuels and emitted 33.2 percent of the CO_2 from fossil fuel combustion in 2021. Changes in electricity demand and the carbon intensity of fuels used for electric power generation have a significant impact on CO_2 emissions. Carbon dioxide emissions from fossil fuel combustion from the electric power sector have decreased by 15.3 percent since 1990, and the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu input, has significantly decreased by 24.9 percent during that same timeframe. This decoupling of electric power generation and the resulting CO_2 emissions is shown below in Figure 2-8.

Figure 2-8: Electric Power Generation (Billion kWh) and Emissions (MMT CO_2 Eq.)



Electric power CO_2 emissions can also be allocated to the end-use sectors that use electricity, as presented in Table 2-5. With electricity CO_2 emissions allocated to end-use sectors, the transportation end-use sector represents the largest source of fossil fuel combustion emissions accounting for 1,757.4 MMT CO_2 Eq. in 2021 or 37.9 percent of total CO_2 emissions from fossil fuel combustion. The industrial end-use sector accounted for 24.8 percent of CO_2 emissions from fossil fuel combustion when including allocated electricity emissions. The residential and commercial end-use sectors accounted for 19.1 and 16.2 percent, respectively, of CO_2 emissions from fossil fuel combustion when including allocated electricity emissions. Both of these end-use sectors were heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances contributing 64.6 and 69.0 percent of emissions from the residential and commercial end-use sectors, respectively.

Other Significant Energy Sector Trends

Energy sector emissions increased 6.2 percent since 2020 and decreased 3.2 percent since 1990. Other significant trends in emissions from energy source categories (Figure 2-6 and Figure 2-7) over the thirty-two-year period from 1990 through 2021 included the following:

- Methane emissions from natural gas systems and petroleum systems (combined here) decreased 34.8 MMT CO_2 Eq. (13.1 percent) from 1990 to 2021, from 266.4 MMT CO_2 Eq. in 1990 to 231.5 MMT CO_2 Eq. in 2021. Natural gas systems CH_4 emissions have decreased by 33.7 MMT CO_2 Eq. (15.7 percent) since 1990, largely due to a decrease in emissions from distribution, transmission and storage, processing, and exploration. The decrease in distribution is largely due to decreased emissions from pipelines and distribution station leaks, and the decrease in transmission and storage emissions is largely due to reduced compressor station emissions (including emissions from compressors and leaks). At the same time, emissions from the natural gas production segment increased. Methane emissions from natural gas systems decreased 2.1 percent between 2020 and 2021. Petroleum systems CH_4 emissions decreased by 1.2 MMT CO_2 Eq. (or 2.2 percent) since 1990 and 7.9 percent between 2020 and 2021. This decrease is due primarily to decreases in emissions from offshore platforms, tanks, and pneumatic controllers. Carbon dioxide emissions from natural gas and petroleum systems increased by 19.1 MMT CO_2 Eq. (45.8 percent) from 1990 to 2021. This increase is due primarily to increases in the production segment, where

flaring emissions from associated gas flaring, tanks, and miscellaneous production flaring have increased over time.

- Methane emissions from coal mining decreased by 63.4 MMT CO_2 Eq. (58.7 percent) from 1990 through 2021 and by 3.2 percent between 2020 and 2021 primarily due to a decrease in the number of active mines and annual coal production over this time period.
- Nitrous oxide emissions from mobile combustion decreased by 21.7 MMT CO_2 Eq. (56.6 percent) from 1990 through 2021, primarily as a result of national vehicle criteria pollutant emissions standards and emission control technologies for on-road vehicles. Emissions increased by 0.6 MMT CO_2 Eq. (3.5 percent) between 2020 and 2021 due to a gradual rebound in travel activity since the reduced travel seen in 2020 due to the COVID-19 pandemic.
- Nitrous oxide emissions from stationary combustion were the second largest source of anthropogenic N_2O emissions in 2021, accounting for 22.1 MMT CO_2 Eq. (5.6 percent of N_2O emissions) and 0.3 percent of total gross U.S. greenhouse gas emissions in 2021. Stationary combustion emissions peaked in 2007, and have steadily decreased since then.
- Carbon dioxide emissions from non-energy uses of fossil fuels increased by 27.8 MMT CO_2 Eq. (24.7 percent) from 1990 through 2021, and 17.6 percent (21.0 MMT CO_2 Eq.) between 2020 and 2021. Emissions from non-energy uses of fossil fuels were 140.2 MMT CO_2 Eq. in 2021, which constituted 2.8 percent of total national CO_2 emissions, approximately the same proportion as in 1990.
- Carbon dioxide emissions from incineration of waste (12.5 MMT CO_2 Eq. in 2021) decreased slightly by 0.4 MMT CO_2 Eq. (3.3 percent) from 1990 through 2021, as the volume of scrap tires and other fossil C-containing materials in waste decreased. Emissions decreased 0.4 MMT CO_2 Eq. (3.3 percent) between 2020 and 2021, consistent with trends across the time series.

Industrial Processes and Product Use

Greenhouse gases can be generated and emitted by industry in two different ways. First, they are generated and emitted as the byproducts of many non-energy-related industrial activities. For example, industrial processes can chemically or physically transform raw materials, which often release waste gases such as CO_2, CH_4, N_2O, and fluorinated gases (e.g., HFC-23). In the case of byproduct emissions, the emissions are generated by an industrial process itself, and are not directly a result of energy consumed during the process.

Second, industrial manufacturing processes and use by end-consumers also release HFCs, PFCs, SF_6, and NF_3 and other man-made compounds. In addition to the use of HFCs and some PFCs as substitutes for ozone depleting substances (ODS), fluorinated compounds such as HFCs, PFCs, SF_6, NF_3, and others are also emitted through use by a number of other industrial sources in the United States. These industries include the electronics industry, electric power transmission and distribution, and magnesium metal production and processing. In addition, N_2O is used in and emitted by the electronics industry and anesthetic and aerosol applications, and CO_2 is consumed and emitted through various end-use applications.

Emission sources in the Industrial Processes and Product Use (IPPU) chapter accounted for 5.9 percent of U.S. greenhouse gas emissions in 2021. Emissions from the IPPU sector increased by 12.2 percent from 1990 to 2021. The use of HFCs and PFCs as substitutes for ODS is the largest source of emissions in this sector, contributing 45.8 percent of IPPU emissions in 2021. Total emissions from IPPU increased 3.6 percent between 2020 and 2021, reversing the emissions reduction trend in 2020 from reduced industrial activity due to the COVID-19 pandemic. Despite the sectoral increase in emissions, emissions from aluminum, ammonia, lead, zinc, adipic acid, and nitric acid production all decreased from 2020 to 2021, along with emissions from other process uses of carbonates and urea consumption for non-agricultural purposes. Figure 2-9 presents greenhouse gas emissions from IPPU by source category.

Figure 2-9: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources

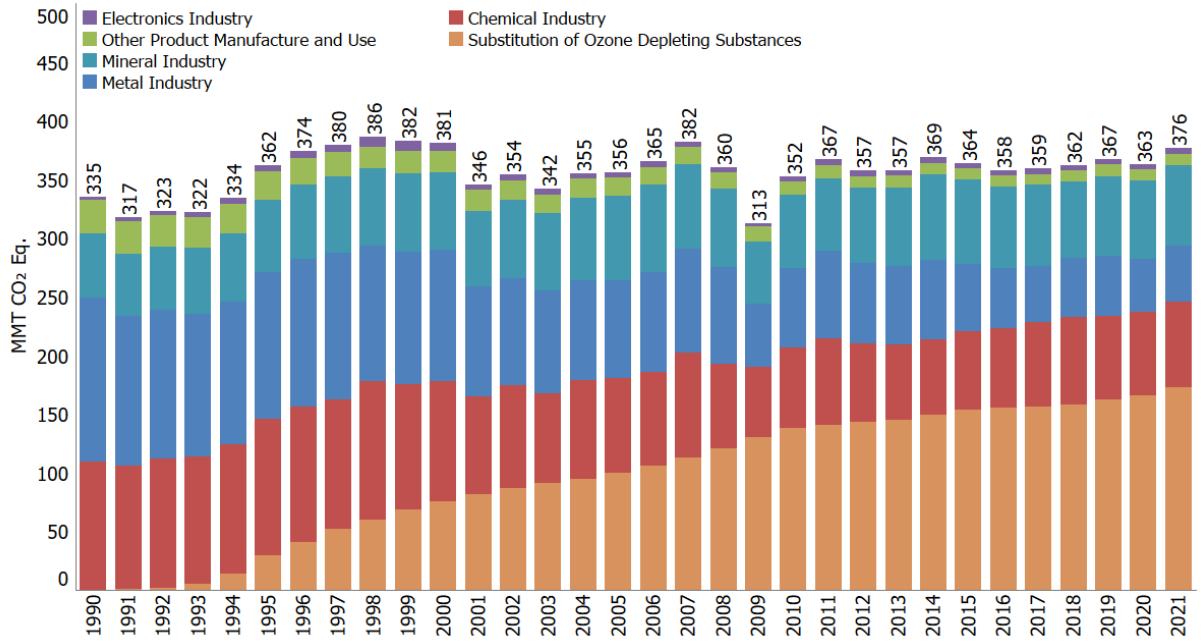


Table 2-6: Emissions from Industrial Processes and Product Use (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**214.0**	**195.4**	**166.2**	**165.9**	**170.0**	**161.8**	**168.9**
Iron and Steel Production & Metallurgical Coke Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Iron and Steel Production	*99.1*	*66.2*	*38.8*	*41.6*	*40.1*	*35.4*	*38.4*
Metallurgical Coke Production	*5.6*	*3.9*	*2.0*	*1.3*	*3.0*	*2.3*	*3.2*
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Substitution of Ozone Depleting Substances[a]	+	+	+	+	+	+	+
Magnesium Production and Processing	0.1	+	+	+	+	+	+
CH_4	**0.3**	**0.1**	**0.3**	**0.4**	**0.4**	**0.4**	**0.4**
Petrochemical Production	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	+	+	+	+	+	+	+

Iron and Steel Production	+	+	+	+	+	+	+
Metallurgical Coke Production	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*
N_2O	**29.6**	**22.2**	**20.2**	**23.1**	**18.7**	**20.8**	**19.7**
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N_2O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Electronics Industry	+	0.1	0.2	0.2	0.2	0.3	0.3
HFCs	**39.0**	**116.4**	**160.8**	**160.9**	**165.4**	**168.2**	**175.1**
Substitution of Ozone Depleting Substances[a]	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4
Magnesium Production and Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	**21.8**	**6.1**	**3.8**	**4.3**	**4.0**	**3.9**	**3.5**
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting Substances	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO	+	+	NO	+	+	+
SF_6	**30.5**	**15.5**	**7.2**	**7.1**	**7.8**	**7.5**	**8.0**
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF_3	**+**	**0.4**	**0.5**	**0.5**	**0.5**	**0.6**	**0.6**
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total	**335.4**	**356.1**	**359.1**	**362.2**	**366.8**	**363.2**	**376.4**

+ Does not exceed 0.05 MMT CO_2 Eq.

NO (Not Occurring)

[a] Small amounts of PFC emissions also result from this source.

Note: Totals may not sum due to independent rounding.

IPPU sector emissions increased 3.6 percent since 2020 and 12.2 percent since 1990. Some significant trends in U.S. emissions from IPPU source categories over the thirty-two-year period from 1990 through 2021 included the following:

- HFC and PFC emissions resulting from the substitution of ODS (e.g., chlorofluorocarbons [CFCs]) have been increasing from small amounts in 1990 to 172.5 MMT CO_2 Eq. in 2021 (68,134.2 percent).
- Combined CO_2 and CH_4 emissions from iron and steel production and metallurgical coke production decreased by 10.5 percent from 2020 to 2021 to 41.7 MMT CO_2 Eq. and have declined overall by 63.1 MMT CO_2 Eq. (60.2 percent) from 1990 through 2021, due to restructuring of the industry. The trend in the United States has been a shift towards fewer integrated steel mills and more electric arc furnaces (EAFs). EAFs use scrap steel as their main input and generally have less on-site emissions.
- Carbon dioxide emissions from petrochemical production increased by 53.3 percent between 1990 and 2021 from 21.6 MMT CO_2 Eq. to 33.2 MMT CO_2 Eq. The increase in emissions is largely driven by a doubling of production of ethylene over that time period.
- Carbon dioxide emissions from ammonia production (12.2 MMT CO_2 Eq. in 2021) decreased by 15.2 percent (2.2 MMT CO_2 Eq.) since 1990. Ammonia production relies on natural gas as both a feedstock and a fuel, and as such, market fluctuations and volatility in natural gas prices affect the production of ammonia from year to year. Emissions from ammonia production have increased since 2016, due to the addition of new ammonia production facilities and new production units at existing facilities. Agricultural demands continue to drive demand for nitrogen fertilizers and the need for new ammonia production capacity.
- Carbon dioxide emissions from cement production increased by 23.4 percent (7.8 MMT CO_2 Eq.) from 1990 through 2021. They rose from 1990 through 2006 and then fell until 2009, due to a decrease in

demand for construction materials during the economic recession. Since 2010, CO_2 emissions from cement production have risen 31.4 percent (9.9 MMT CO_2 Eq.).

- HFC-23 emissions from HCFC-22 production decreased by 36.4 MMT CO_2 Eq. (94.2 percent) from 1990 to 2021 due to a reduction in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced).
- PFC emissions from aluminum production decreased by 18.4 MMT CO_2 Eq. (95.3 percent) from 1990 to 2021, due to both industry emission reduction efforts and lower domestic aluminum production.
- SF_6 emissions from electrical transmission and distribution decreased by 18.7 MMT CO_2 Eq. (75.7 percent) from 1990 to 2021 due to industry emission reduction efforts.

Agriculture

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes, including the following source categories: enteric fermentation in domestic livestock, livestock manure management, rice cultivation, agricultural soil management, liming, urea fertilization, and field burning of agricultural residues. Methane, N_2O, and CO_2 are the primary greenhouse gases emitted by agricultural activities. Carbon stock changes from agricultural soils are included in the LULUCF sector.

In 2021, agricultural activities were responsible for emissions of 598.1 MMT CO_2 Eq., or 9.4 percent of total U.S. greenhouse gas emissions. Agricultural soil management activities, such as the application of synthetic and organic fertilizers, deposition of livestock manure, and growing N-fixing plants, were the largest contributors to agricultural-related emissions (49.2 percent) and were the largest source of U.S. N_2O emissions in 2021, accounting for 74.8 percent. Methane emissions from enteric fermentation and manure management represented 26.8 percent and 9.1 percent of total CH_4 emissions from anthropogenic activities, respectively, in 2021. Carbon dioxide emissions from the application of crushed limestone and dolomite (i.e., soil liming) and urea fertilization represented 0.2 percent of total CO_2 emissions from anthropogenic activities. Figure 2-10 and Table 2-7 illustrate agricultural greenhouse gas emissions by source and gas.

Figure 2-10: Trends in Agriculture Sector Greenhouse Gas Sources

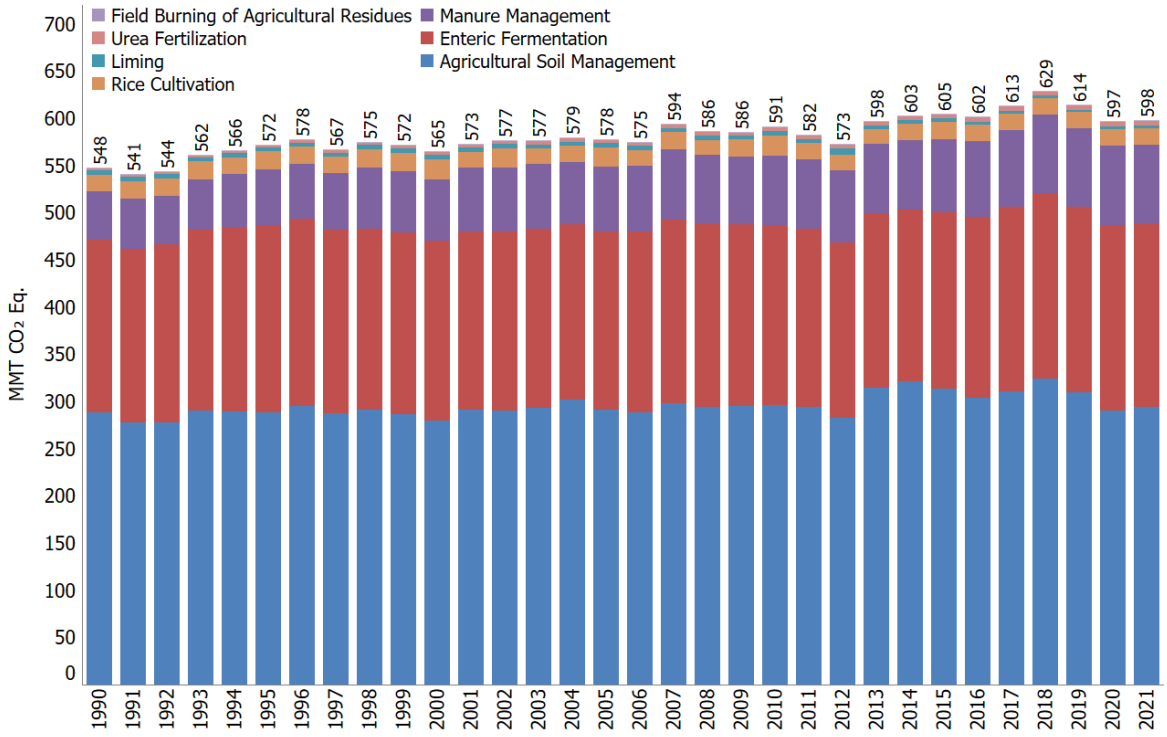


Table 2-7: Emissions from Agriculture (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**7.1**	**7.9**	**7.9**	**7.2**	**7.2**	**8.0**	**8.3**
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
CH_4	**240.4**	**263.7**	**277.5**	**281.2**	**280.4**	**281.0**	**278.2**
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Field Burning of Agricultural Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
N_2O	**300.5**	**306.1**	**327.7**	**341.1**	**326.9**	**308.2**	**311.6**
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Field Burning of Agricultural Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Total	**548.0**	**577.7**	**613.1**	**629.5**	**614.5**	**597.3**	**598.1**

Note: Totals may not sum due to independent rounding.

Agriculture sector emissions increased 0.1 percent since 2020 and 9.1 percent since 1990. Some significant trends in U.S. emissions from Agriculture source categories (Figure 2-10) over the thirty-two-year from 1990 through 2021 included the following:

- Agricultural soils are the largest anthropogenic source of agriculture-related emissions and also N_2O emissions in the United States, accounting for 74.8 percent of N_2O emissions and 4.6 percent of total emissions in the United States in 2021. Estimated emissions from this source in 2021 were 294.0 MMT CO_2 Eq. Annual N_2O emissions from agricultural soils fluctuated between 1990 and 2021, and overall emissions were 6.1 MMT CO_2 Eq. or 2.1 percent higher in 2021 than in 1990. Year-to-year fluctuations are largely a reflection of annual variation in weather patterns, synthetic fertilizer use, and crop production.
- Enteric fermentation is the largest anthropogenic source of CH_4 emissions in the United States. In 2021, enteric fermentation CH_4 emissions were 26.8 percent of total CH_4 emissions (194.9 MMT CO_2 Eq.), which represents an increase of 11.9 MMT CO_2 Eq. (6.5 percent) since 1990. This increase in emissions from enteric fermentation from 1990 to 2021 generally follows the increasing trends in cattle populations. For example, from 1990 to 1995, emissions increased and then generally decreased from 1996 to 2004, mainly due to fluctuations in beef cattle populations and increased digestibility of feed for feedlot cattle. Emissions increased from 2005 to 2007, as both dairy and beef populations increased. Research indicates that the feed digestibility of dairy cow diets decreased during this period. Emissions decreased again from 2008 to 2014 as beef cattle populations again decreased. Emissions increased from 2014 to 2021, consistent with an increase in beef cattle population over those same years.
- Manure management emissions increased 62.3 percent between 1990 and 2021. This encompassed an increase of 69.2 percent for CH_4, from 39.0 MMT CO_2 Eq. in 1990 to 66.0 MMT CO_2 Eq. in 2021; and an increase of 40.5 percent for N_2O, from 12.4 MMT CO_2 Eq. in 1990 to 17.4 MMT CO_2 Eq. in 2021. The majority of the increase observed in CH_4 resulted from swine and dairy cattle manure, where emissions increased 38.3 and 124.3 percent, respectively, from 1990 to 2021. From 2020 to 2021, there was a 1.1 percent decrease in total CH_4 emissions from manure management, mainly due to minor shifts in the animal populations and the resultant effects on manure management system allocations.
- Liming and urea fertilization are the only sources of CO_2 emissions reported in the Agriculture sector. All other CO_2 emissions and removals (e.g., carbon stock changes from the management of croplands, etc.) are characterized in the LULUCF sector. Estimated emissions from these sources were 3.0 and 5.2 MMT CO_2 Eq., respectively. Liming emissions increased by 4.5 percent relative to 2020 and decreased 1.6 MMT CO_2 Eq. or 35.0 percent relative to 1990, while urea fertilization emissions increased by 1.8 percent relative to 2020 and 2.8 MMT CO_2 Eq. or 115.7 percent relative to 1990.

Land Use, Land-Use Change, and Forestry

When humans alter the terrestrial biosphere through land use, changes in land use, and land management practices, they also influence the carbon (C) stock fluxes on these lands and cause emissions of CH_4 and N_2O. Overall, managed land is a net sink for CO_2 (C sequestration) in the United States. The primary driver of fluxes on managed lands is from management of forest lands, but also includes trees in settlements (i.e., urban areas), afforestation, conversion of forest lands to settlements and croplands, the management of croplands and grasslands, flooded lands, and the landfilling of yard trimmings and food scraps. The main drivers for net forest sequestration include net forest growth, increasing forest area, and a net accumulation of C stocks in harvested wood pools. The net sequestration in Settlements Remaining Settlements, is driven primarily by C stock gains in urban forests (i.e., Settlement Trees) through net tree growth and increased urban area, as well as long-term accumulation of C in landfills from additions of yard trimmings and food scraps.

The LULUCF sector in 2021 resulted in a net increase in C stocks (i.e., net CO_2 removals) of 832.0 MMT CO_2 Eq. (Table 2-8).[3] This represents an offset of 13.1 percent of total (i.e., gross) greenhouse gas emissions in 2021. Emissions of CH_4 and N_2O from LULUCF activities in 2021 were 77.8 MMT CO_2 Eq. and represented 1.4 percent of net greenhouse gas emissions.[4] Between 1990 and 2021, total net C sequestration in the LULUCF sector decreased by 11.4 percent, primarily due to a decrease in the rate of net C accumulation in forests and Cropland Remaining Cropland, as well as an increase in CO_2 emissions from Land Converted to Settlements.

Flooded Land Remaining Flooded Land was the largest source of CH_4 emissions from LULUCF in 2021, totaling 45.4 MMT CO_2 Eq. (1,623 kt of CH_4). Forest fires were the second largest source of CH_4 emissions from LULUCF in 2021, totaling 15.5 MMT CO_2 Eq. (554 kt of CH_4). Coastal Wetlands Remaining Coastal Wetlands resulted in CH_4 emissions of 4.3 MMT CO_2 Eq. (154 kt of CH_4). Grassland fires resulted in CH_4 emissions of 0.3 MMT CO_2 Eq. (12 kt of CH_4). Land Converted to Wetlands, drained organic soils, and Peatlands Remaining Peatlands resulted in CH_4 emissions of less than 0.05 MMT CO_2 Eq. each.

Forest fires were the largest source of N_2O emissions from LULUCF in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled to 2.1 MMT CO_2 Eq. (8 kt of N_2O). Additionally, the application of synthetic fertilizers to forest soils in 2021 resulted in N_2O emissions of 0.4 MMT CO_2 Eq. (2 kt of N_2O). Grassland fires resulted in N_2O emissions of 0.3 MMT CO_2 Eq. (1 kt of N_2O). Coastal Wetlands Remaining Coastal Wetlands and drained organic soils resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (0.5 kt of N_2O) and 0.1 MMT CO_2 Eq. (0.2 kt N_2O) respectively. Peatlands Remaining Peatlands resulted in N_2O emissions of less than 0.05 MMT CO_2 Eq. Figure 2-11 and Table 2-8 along with CH_4 and N_2O emissions (purple) for LULUCF source categories.

[3] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[4] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Flooded Land Remaining Flooded Land, Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils.

Figure 2-11: Trends in Emissions and Removals (Net CO_2 Flux) from Land Use, Land-Use Change, and Forestry

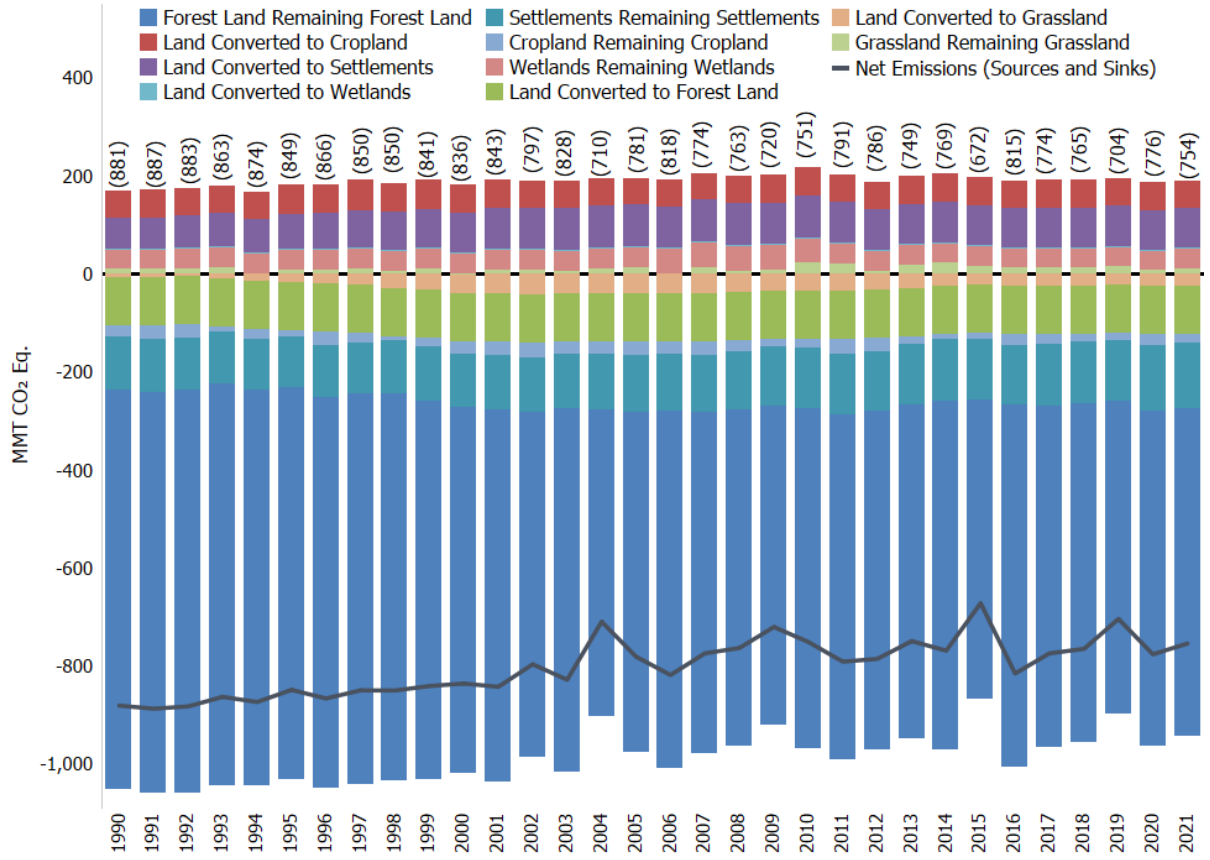


Table 2-8: U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Land	**(815.8)**	**(695.4)**	**(695.2)**	**(692.9)**	**(638.1)**	**(684.0)**	**(670.5)**
Changes in Forest Carbon Stocks[a]	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Non-CO_2 Emissions from Forest Fires[b]	5.5	18.3	15.0	11.0	10.8	23.0	24.4
N_2O Emissions from Forest Soils[c]	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Non-CO_2 Emissions from Drained Organic Soils[d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Forest Land	**(98.5)**	**(98.4)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**
Changes in Forest Carbon Stocks[e]	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	**(23.2)**	**(29.0)**	**(22.3)**	**(16.6)**	**(14.5)**	**(23.3)**	**(18.9)**
Changes in Mineral and Organic Soil Carbon Stocks	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	**54.8**	**54.7**	**56.6**	**56.3**	**56.3**	**56.7**	**56.5**
Changes in all Ecosystem Carbon Stocks[f]	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	**8.8**	**11.7**	**11.6**	**11.9**	**14.6**	**6.7**	**10.6**
Changes in Mineral and Organic Soil Carbon Stocks	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Non-CO_2 Emissions from Grassland Fires[g]	0.2	0.7	0.6	0.6	0.6	0.6	0.6
Land Converted to Grassland	**(6.7)**	**(40.1)**	**(24.5)**	**(24.2)**	**(23.3)**	**(25.9)**	**(24.7)**
Changes in all Ecosystem Carbon Stocks[f]	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	**41.5**	**43.1**	**41.8**	**41.8**	**41.8**	**41.8**	**41.8**

Changes in Organic Soil Carbon Stocks in Peatlands	1.1	1.1	0.8	0.8	0.8	0.7	0.7
Non-CO_2 Emissions from Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Changes in Biomass, DOM, and Soil Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(8.8)
CH_4 Emissions from Coastal Wetlands Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
N_2O Emissions from Coastal Wetlands Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
CH_4 Emissions from Flooded Land Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Land Converted to Wetlands	**3.3**	**1.4**	**0.8**	**0.8**	**0.8**	**0.6**	**0.6**
Changes in Biomass, DOM, and Soil Carbon Stocks in Land Converted to Coastal Wetlands	0.5	0.5	(+)	(+)	(+)	(+)	(+)
CH_4 Emissions from Land Converted to Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Changes in Land Converted to Flooded Land	1.4	0.4	0.4	0.4	0.4	0.3	0.3
CH_4 Emissions from Land Converted to Flooded Land	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Settlements Remaining Settlements	**(107.8)**	**(113.9)**	**(125.6)**	**(125.0)**	**(124.5)**	**(131.6)**	**(132.5)**
Changes in Organic Soil Carbon Stocks	11.3	12.2	16.0	15.9	15.9	15.9	15.9
Changes in Settlement Tree Carbon Stocks	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
N_2O Emissions from Settlement Soils[h]	1.8	2.8	1.9	2.0	2.0	2.0	2.1
Changes in Yard Trimming and Food Scrap Carbon Stocks in Landfills	(24.5)	(11.4)	(13.8)	(13.4)	(13.1)	(12.8)	(12.6)
Land Converted to Settlements	**62.5**	**85.0**	**80.9**	**81.0**	**81.1**	**81.0**	**81.0**
Changes in all Ecosystem Carbon Stocks[f]	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Emissions[i]	**57.9**	**72.4**	**68.3**	**64.4**	**64.2**	**76.4**	**77.8**
CH_4	53.5	61.3	60.1	57.3	56.9	65.4	66.0
N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change[j]	**(938.9)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
LULUCF Sector Net Total[k]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

[a] Includes the net changes to carbon stocks stored in all forest ecosystem pools (estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land.) and harvested wood products.

[b] Estimates include emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land. Carbon stock changes from drained organic soils are included with the Forest Land Remaining Forest Land forest ecosystem pools.

[e] Includes the net changes to carbon stocks stored in all forest ecosystem pools.

[f] Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements.

[g] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[h] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

[i] LULUCF emissions subtotal includes the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils. Emissions values are included in land-use category rows.

[j] LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land-use conversion categories.
[k] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.
Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Overall CH_4 and N_2O emissions from LULUCF increased 1.9 percent from 2020 and 34.4 percent since 1990 while total net sequestration decreased 11.4 percent since 1990 and 2.4 percent from 2020. Other significant trends from 1990 to 2021 in emissions from LULUCF categories (Figure 2-11) over the thirty-two-year period included the following:

- Annual carbon (C) sequestration by forest land (i.e., annual C stock accumulation in the five ecosystem C pools and harvested wood products for Forest Land Remaining Forest Land and Land Converted to Forest Land) has decreased by 13.7 percent since 1990. This is primarily due to decreased C stock gains in Land Converted to Forest Land and the harvested wood products pools within Forest Land Remaining Forest Land.
- Annual C sequestration from Settlements Remaining Settlements (which includes organic soils, settlement trees, and landfilled yard trimmings and food scraps) has increased by 22.8 percent over the period from 1990 to 2021. This is primarily due to an increase in urbanized land area in the United States with trees growing on it.
- Annual emissions from Land Converted to Settlements increased by 29.7 percent from 1990 to 2021 due primarily to C stock losses from Forest Land Converted to Settlements and mineral soils C stocks from Grassland Converted to Settlements.

Waste

Waste management and treatment activities are sources of CH_4 and N_2O emissions (see Figure 2-12 and Table 2-9). In 2021, landfills were the largest source of waste emissions, accounting for 72.5 percent of waste-related emissions. Landfills are also the third-largest source of U.S. anthropogenic CH_4 emissions, generating 122.6 MMT CO_2 Eq. and accounting for 16.9 percent of total U.S. CH_4 emissions in 2021.[5] Additionally, wastewater treatment generated emissions of 42.0 MMT CO_2 Eq. and accounted for 24.8 percent of waste emissions, 2.9 percent of U.S. CH_4 emissions, and 5.3 percent of U.S. N_2O emissions in 2021. Emissions of CH_4 and N_2O from composting are also accounted for in this chapter, generating emissions of 2.6 MMT CO_2 Eq. and 1.8 MMT CO_2 Eq., respectively. Anaerobic digestion at biogas facilities generated CH_4 emissions of 0.2 MMT CO_2 Eq., accounting for 0.1 percent of emissions from the Waste sector. Overall, emission sources accounted for in the Waste chapter generated 169.2 MMT CO_2 Eq., or 2.7 percent of total U.S. greenhouse gas emissions in 2021.

[5] Landfills also store carbon, due to incomplete degradation of organic materials such as wood products and yard trimmings, as described in the Land Use, Land-Use Change, and Forestry chapter.

Figure 2-12: Trends in Waste Sector Greenhouse Gas Sources

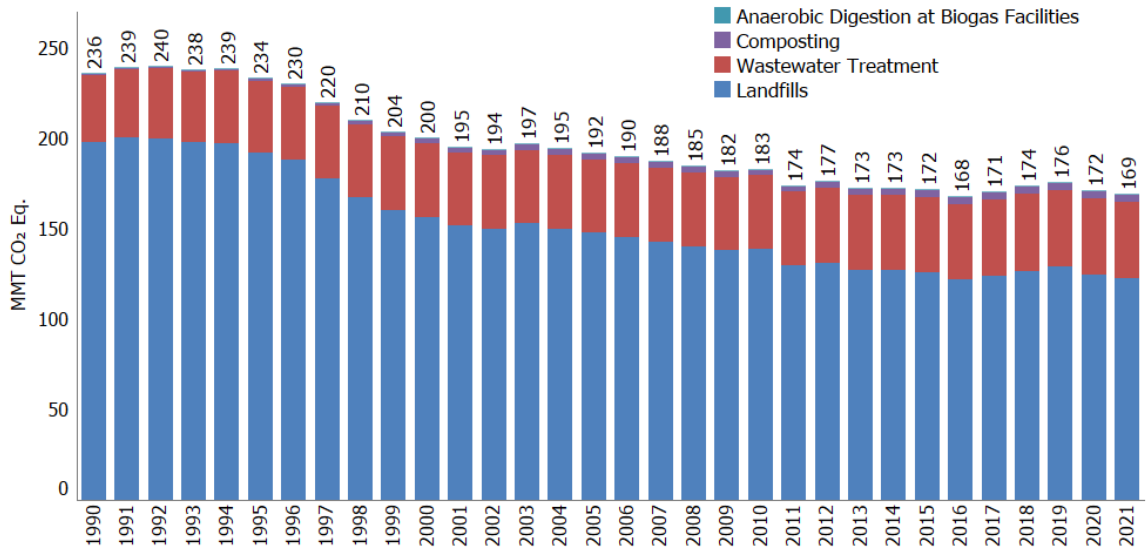


Table 2-9: Emissions from Waste (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH_4	**220.9**	**172.5**	**148.3**	**150.8**	**152.9**	**148.8**	**146.4**
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Composting	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
N_2O	**15.1**	**19.5**	**22.6**	**22.9**	**23.1**	**22.7**	**22.7**
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	**236.0**	**192.1**	**170.9**	**173.7**	**176.0**	**171.5**	**169.2**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Waste sector emissions decreased 1.4 percent since 2020 and 28.3 percent since 1990. Some significant trends in U.S. emissions from waste source categories (Figure 2-12) over the thirty-two-year period from 1990 through 2021 included the following:

- Net CH_4 emissions from landfills decreased by 75.1 MMT CO_2 Eq. (38.0 percent), with small increases occurring in interim years. This downward trend in emissions coincided with increased landfill gas collection and control systems, and a reduction of decomposable materials (i.e., paper and paperboard, food scraps, and yard trimmings) discarded in municipal solid waste (MSW) landfills over the time series.
- Methane and N_2O emissions from wastewater treatment decreased by 1.6 MMT CO_2 Eq. (7.2 percent) and increased by 6.1 MMT CO_2 Eq. (41.6 percent), respectively. Methane emissions from domestic wastewater treatment have decreased since 1999 due to decreasing percentages of wastewater being treated in anaerobic systems, including reduced use of on-site septic systems and central anaerobic treatment systems. Nitrous oxide emissions from wastewater treatment processes gradually increased across the time series as a result of increasing U.S. population and protein consumption.
- Combined CH_4 and N_2O emissions from composting have increased by 3.7 MMT CO_2 Eq. since 1990, from 0.7 MMT CO_2 Eq. to 4.4 MMT CO_2 Eq. in 2021, which represents more than a six-fold increase over the time series. The growth in composting since the 1990s is attributable to primarily four factors: (1) the enactment of legislation by state and local governments that discouraged the disposal of yard trimmings

and food waste in landfills; (2) an increase in yard trimming collection and yard trimming drop off sites provided by local solid waste management districts; (3) an increased awareness of the environmental benefits of composting; and (4) loans or grant programs to establish or expand composting infrastructure.

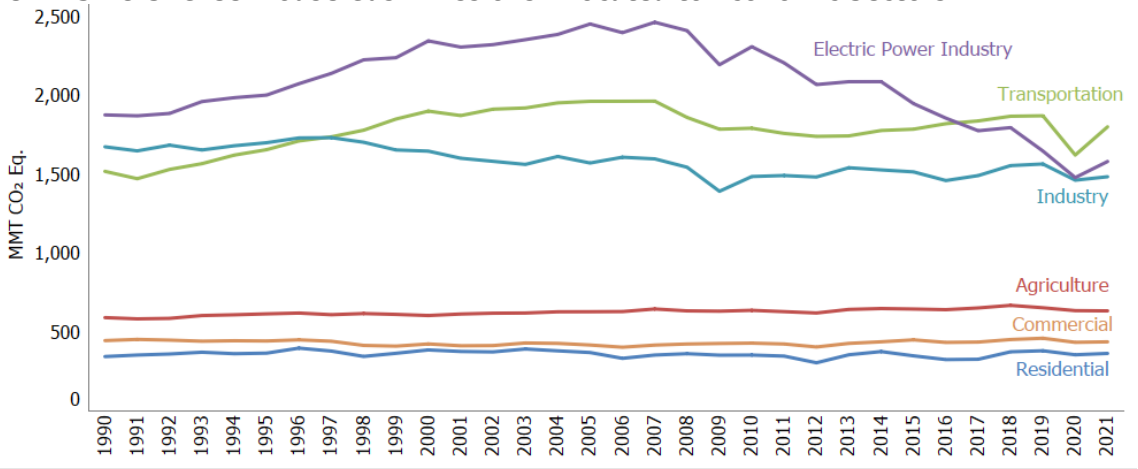
2.2 Emissions by Economic Sector

Throughout this report, emission estimates are grouped into five sectors (i.e., chapters) defined by the IPCC and detailed above: Energy, IPPU, Agriculture, LULUCF, and Waste. It is also useful to characterize emissions according to commonly used economic sector categories: residential, commercial, industry, transportation, electric power, and agriculture. Emissions from U.S. Territories are reported as their own end-use sector due to a lack of specific consumption data for the individual end-use sectors within U.S. Territories. See Box 2-1 for more information on how economic sectors are defined. For more information on trends in the LULUCF sector, see Section 2.1.

Using this categorization, transportation activities accounted for the largest portion (28.5 percent) of total U.S. greenhouse gas emissions in 2021. Emissions from electric power accounted for the second largest portion (25.0 percent), while emissions from industry accounted for the third largest portion (23.5 percent) of total U.S. greenhouse gas emissions in 2021. Emissions from industry have in general declined over the past decade due to a number of factors, including structural changes in the U.S. economy (i.e., shifts from a manufacturing-based to a service-based economy), fuel switching, and efficiency improvements.

The remaining 23.1 percent of U.S. greenhouse gas emissions were contributed by, in order of magnitude, the agriculture, commercial, and residential sectors, plus emissions from U.S. Territories. Activities related to agriculture accounted for roughly 10.0 percent of emissions; unlike other economic sectors, agricultural sector emissions were dominated by N_2O emissions from agricultural soil management and CH_4 emissions from enteric fermentation, rather than CO_2 from fossil fuel combustion. An increasing amount of carbon is stored in agricultural soils each year, but this C sequestration is assigned to the LULUCF sector rather than the agriculture economic sector. The commercial and residential sectors accounted for roughly 6.9 percent and 5.8 percent of greenhouse gas emissions, respectively, and U.S. Territories accounted for 0.4 percent of emissions; emissions from these sectors primarily consisted of CO_2 emissions from fossil fuel combustion. Carbon dioxide was also emitted and sequestered (in the form of C) by a variety of activities related to forest management practices, tree planting in urban areas, the management of agricultural soils, landfilling of yard trimmings, and changes in C stocks in coastal wetlands. Table 2-10 presents a detailed breakdown of emissions from each of these economic sectors by source category, as they are defined in this report. Figure 2-13 shows the trend in emissions by sector from 1990 to 2021.

Figure 2-13: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

Table 2-10: U.S. Greenhouse Gas Emissions Allocated to Economic Sectors (MMT CO_2 Eq. and Percent of Total in 2021)

Sector/Source	1990	2005	2017	2018	2019	2020	2021	Percent[a]
Transportation	**1,521.4**	**1,966.0**	**1,841.6**	**1,871.3**	**1,874.3**	**1,624.9**	**1,804.3**	**28.5%**
CO_2 from Fossil Fuel Combustion	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4	27.6%
Substitution of Ozone Depleting Substances	+	63.1	37.0	35.5	34.0	32.5	31.2	0.5%
Mobile Combustion[b]	40.6	34.2	14.9	13.6	15.0	12.1	12.7	0.2%
Non-Energy Use of Fuels	11.8	10.2	9.6	9.2	8.8	7.8	8.0	0.1%
Electric Power Industry	**1,879.7**	**2,456.9**	**1,779.2**	**1,799.1**	**1,650.5**	**1,481.8**	**1,584.1**	**25.0%**
CO_2 from Fossil Fuel Combustion	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9	24.3%
Stationary Combustion[b]	18.7	27.7	23.2	23.1	20.2	18.9	20.4	0.3%
Incineration of Waste	13.3	13.6	13.5	13.7	13.3	13.3	12.8	0.2%
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0	0.1%
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0	0.1%
Industry	**1,677.3**	**1,574.4**	**1,494.5**	**1,558.0**	**1,568.2**	**1,465.4**	**1,487.3**	**23.5%**
CO_2 from Fossil Fuel Combustion	809.1	800.0	749.2	773.7	776.2	729.3	739.1	11.7%
Natural Gas Systems	247.3	228.3	218.1	227.1	232.2	221.8	217.5	3.4%
Non-Energy Use of Fuels	97.2	111.2	103.1	120.0	118.5	111.2	132.0	2.1%
Petroleum Systems	60.8	61.2	86.4	96.8	106.8	83.6	74.9	1.2%
Coal Mining	112.7	76.0	64.5	62.2	56.0	48.3	47.1	0.7%
Iron and Steel Production	104.8	70.1	40.8	42.9	43.1	37.7	41.7	0.7%
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3	0.7%
Petrochemical Production	21.9	27.5	29.2	29.7	31.1	30.1	33.6	0.5%
Substitution of Ozone Depleting Substances	+	7.9	30.2	32.1	33.3	34.1	32.4	0.5%
Landfills (Industrial)	12.2	16.1	18.4	18.5	18.6	18.8	18.9	0.3%
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2	0.2%
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9	0.2%
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.3	8.3	0.1%
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9	0.1%
Wastewater Treatment	6.6	7.1	7.4	7.5	7.6	7.6	7.6	0.1%
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6	0.1%
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4	0.1%
Mobile Combustion[b]	3.6	5.6	5.4	5.5	5.6	5.4	5.5	0.1%
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0	0.1%
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0	0.1%
Electronics Industry	3.3	4.5	4.6	4.7	4.3	4.4	4.8	0.1%
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0	0.1%
N_2O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8	0.1%
Stationary Combustion[b]	4.7	4.5	3.9	3.9	3.8	3.6	3.6	+%
Aluminum Production	26.1	7.2	2.2	2.9	3.3	3.2	2.5	0.1%
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2	+%
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0	+%
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7	+%
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6	+%
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5	+%
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2	+%
Magnesium Production and Processing	5.5	2.9	1.1	1.1	1.0	0.9	1.2	+%

Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0	+%
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9	+%
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4	+%
Carbide Production and Consumption	0.3	0.2	0.2	0.2	0.2	0.2	0.2	+%
Agriculture	**592.9**	**630.2**	**654.2**	**670.6**	**655.4**	**637.2**	**635.8**	**10.0%**
N_2O from Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0	4.6%
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9	3.1%
Manure Management	51.4	69.4	81.3	83.7	83.1	84.2	83.4	1.3%
CO_2 from Fossil Fuel Combustion	43.4	50.8	39.8	39.8	39.7	38.6	36.5	0.6%
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8	0.3%
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2	0.1%
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0	+%
Mobile Combustion[b]	1.4	1.6	1.2	1.2	1.2	1.2	1.1	+%
Field Burning of Agricultural Residues	0.6	0.7	0.7	0.6	0.6	0.6	0.6	+%
Stationary Combustion[b]	0.1	+	0.1	0.1	0.1	0.1	0.1	+%
Commercial	**447.0**	**418.9**	**437.6**	**453.7**	**462.0**	**436.0**	**439.2**	**6.9%**
CO_2 from Fossil Fuel Combustion	228.3	227.1	232.0	245.8	250.7	228.5	233.0	3.7%
Landfills (Municipal)	185.5	131.6	105.5	108.2	110.4	106.0	103.7	1.6%
Substitution of Ozone Depleting Substances	+	21.4	58.9	58.5	59.8	60.8	61.9	1.0%
Wastewater Treatment	30.9	33.6	34.7	35.0	34.8	34.6	34.3	0.5%
Composting	0.7	3.6	4.7	4.3	4.3	4.4	4.4	0.1%
Stationary Combustion[b]	1.5	1.5	1.6	1.7	1.7	1.6	1.6	+%
Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2	+%
Residential	**345.6**	**371.2**	**328.4**	**375.8**	**382.4**	**356.9**	**365.6**	**5.8%**
CO_2 from Fossil Fuel Combustion	338.6	358.9	293.4	338.2	341.4	313.2	313.3	4.9%
Substitution of Ozone Depleting Substances	0.2	7.0	30.0	31.7	34.8	38.7	46.9	0.7%
Stationary Combustion[b]	6.8	5.3	4.9	5.9	6.2	5.1	5.3	0.1%
U.S. Territories	**23.4**	**59.7**	**26.3**	**26.3**	**25.1**	**23.6**	**24.1**	**0.4%**
CO_2 from Fossil Fuel Combustion	20.0	51.9	25.9	25.9	24.8	23.3	23.8	0.4%
Non-Energy Use of Fuels	3.4	7.6	0.2	0.2	0.2	0.2	0.2	+%
Stationary Combustion[b]	0.1	0.2	0.1	0.1	0.1	0.1	0.1	+%
Total Gross Emissions (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**	**100.0%**
LULUCF Sector Net Total[c]	881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)	(11.9%)
Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**	**88.1%**

+ Does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

[a] Percent of total (gross) emissions excluding emissions from LULUCF for 2021.

[b] Includes CH_4 and N_2O emissions from fuel combustion.

[c] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Total gross emissions presented are without LULUCF. Total net emissions are presented with LULUCF. Totals may not sum due to independent rounding. Parentheses indicate negative values or sequestration.

Box 2-1: Methodology for Aggregating Emissions by Economic Sector

In presenting the Economic Sectors in the annual *Inventory of U.S. Greenhouse Gas Emissions and Sinks*, the Inventory expands upon the standard IPCC sectors common for UNFCCC reporting. Discussing greenhouse gas emissions relevant to U.S.-specific economic sectors improves communication of the report's findings.

The Electric Power economic sector includes CO_2, CH_4 and N_2O emissions from the combustion of fossil fuels that are included in the EIA electric power sector. Carbon dioxide, CH_4, and N_2O emissions from waste incineration are included in the Electric Power economic sector, as the majority of municipal solid waste is combusted in plants that produce electricity. The Electric Power economic sector also includes SF_6 from Electrical Transmission and Distribution, and a portion of CO_2 from Other Process Uses of Carbonates (from pollution control equipment installed in electric power plants).

The Transportation economic sector includes CO_2 emissions from the combustion of fossil fuels that are included in the EIA transportation fuel-consuming sector. (Additional analyses and refinement of the EIA data are further explained in the Energy chapter of this report.) Emissions of CH_4 and N_2O from mobile combustion are also apportioned to the Transportation economic sector based on the EIA transportation fuel-consuming sector. Substitution of Ozone Depleting Substances emissions are apportioned to the Transportation economic sector based on emissions from refrigerated transport and motor vehicle air-conditioning systems. Finally, CO_2 emissions from Non-Energy Uses of Fossil Fuels identified as lubricants for transportation vehicles are included in the Transportation economic sector.

The Industry economic sector includes CO_2 emissions from the combustion of fossil fuels that are included in the EIA industrial fuel-consuming sector, minus the agricultural use of fuel explained below. The CH_4 and N_2O emissions from stationary and mobile combustion are also apportioned to the Industry economic sector based on the EIA industrial fuel-consuming sector, minus emissions apportioned to the Agriculture economic sector. Substitution of Ozone Depleting Substances emissions are apportioned based on their specific end-uses within the source category, with most emissions falling within the Industry economic sector. Finally, CH_4 emissions from industrial landfills and CH_4 and N_2O from industrial wastewater treatment are included in the Industry economic sector.

Additionally, all process-related emissions from sources with methods considered within the IPCC IPPU sector are apportioned to the Industry economic sector. This includes the process-related emissions (i.e., emissions from the actual process to make the material, not from fuels to power the plant) from activities such as Cement Production, Iron and Steel Production and Metallurgical Coke Production, and Ammonia Production. Additionally, fugitive emissions from energy production sources, such as Natural Gas Systems, Coal Mining, and Petroleum Systems are included in the Industry economic sector. A portion of CO_2 from Other Process Uses of Carbonates (from pollution control equipment installed in large industrial facilities) is also included in the Industry economic sector. Finally, all remaining CO_2 emissions from Non-Energy Uses of Fossil Fuels are assumed to be industrial in nature (besides the lubricants for transportation vehicles specified above) and are attributed to the Industry economic sector.

The Agriculture economic sector includes CO_2 emissions from the combustion of fossil fuels that are based on supplementary sources of agriculture fuel use data, because EIA includes agriculture equipment in the industrial fuel-consuming sector. Agriculture fuel use estimates are obtained from U.S. Department of Agriculture survey data, in combination with EIA Fuel Oil and Kerosene Sales (FOKS) data (EIA 1991 through 2022). Agricultural operations are based on annual energy expense data from the Agricultural Resource Management Survey (ARMS) conducted by the National Agricultural Statistics Service (NASS) of the USDA. NASS collects information on farm production expenditures including expenditures on diesel fuel, gasoline, LP gas, natural gas, and electricity use on the farm with the annual ARMS. A USDA publication (USDA/NASS 2022) shows national totals, as well as select States and ARMS production regions. These supplementary data are subtracted from the industrial fuel use reported by EIA to obtain agriculture fuel use. Carbon dioxide emissions from fossil fuel combustion, and CH_4 and N_2O emissions from stationary and mobile combustion, are then apportioned to the Agriculture economic sector based on agricultural fuel use.

The other IPCC Agriculture emission source categories apportioned to the Agriculture economic sector include N_2O emissions from Agricultural Soils, CH_4 from Enteric Fermentation, CH_4 and N_2O from Manure Management, CH_4 from Rice Cultivation, CO_2 emissions from Liming and Urea Application, and CH_4 and N_2O from Field Burning of Agricultural Residues.

The Residential economic sector includes CO_2 emissions from the combustion of fossil fuels that are included in the EIA residential fuel-consuming sector. Stationary combustion emissions of CH_4 and N_2O are also based on

the EIA residential fuel-consuming sector. Substitution of Ozone Depleting Substances are apportioned to the Residential economic sector based on emissions from residential air-conditioning systems. Nitrous oxide emissions from the application of fertilizers to developed land (termed "settlements" by the IPCC) are also included in the Residential economic sector.

The Commercial economic sector includes CO_2 emissions from the combustion of fossil fuels that are included in the EIA commercial fuel-consuming sector. Emissions of CH_4 and N_2O from mobile combustion are also apportioned to the Commercial economic sector based on the EIA commercial fuel-consuming sector. Substitution of Ozone Depleting Substances emissions are apportioned to the Commercial economic sector based on emissions from commercial refrigeration/air-conditioning systems. Public works sources, including direct CH_4 from municipal landfills, CH_4 from anaerobic digestion at biogas facilities, CH_4 and N_2O from domestic wastewater treatment, and composting, are also included in the Commercial economic sector.

Emissions with Electricity Distributed to Economic Sectors

It is also useful to view greenhouse gas emissions from economic sectors with emissions related to electric power distributed into end-use categories (i.e., emissions from electric power are allocated to the economic sectors in which the electricity is used).

The generation, transmission, and distribution of electricity accounted for 25.0 percent of total U.S. greenhouse gas emissions in 2021. Electric power-related emissions decreased by 15.7 percent since 1990 mainly due to fuel switching in the electric power sector. From 2020 to 2021, electric power-related emissions increased by 6.9 percent due to in part to electricity use rebounding after the COVID-19 pandemic. Between 2020 to 2021, the consumption of natural gas for electric power generation decreased by 3.5 percent, while the consumption of coal and petroleum increased by 15.4 and 11.2 percent, respectively. However, even with the increase in 2021, electric power-related emissions are still lower than pre-pandemic 2019 levels.

From 2020 to 2021, electricity sales to the residential end-use sector increased by 0.4 percent. Electricity sales to the commercial end-use and industrial sectors increased by 3.2 percent and 4.3 percent, respectively. Overall, from 2020 to 2021, the amount of electricity retail sales (in kWh) increased by 2.4 percent. Table 2-11 provides a detailed summary of emissions from electric power-related activities.

Table 2-11: Electric Power-Related Greenhouse Gas Emissions (MMT CO_2 Eq.)

Gas/Fuel Type or Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**1,836.0**	**2,417.0**	**1,750.1**	**1,770.4**	**1,623.9**	**1,456.7**	**1,557.3**
Fossil Fuel Combustion	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
Coal	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
Natural Gas	175.4	318.9	505.6	577.9	616.6	634.8	612.9
Petroleum	97.5	98.0	18.9	22.2	16.2	16.2	17.7
Geothermal	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Other Process Uses of Carbonates	3.1	3.7	4.9	3.7	4.2	4.2	4.0
CH_4	**0.5**	**1.0**	**1.2**	**1.4**	**1.4**	**1.4**	**1.4**
Stationary Sources[a]	0.5	1.0	1.2	1.4	1.4	1.4	1.4
Incineration of Waste	+	+	+	+	+	+	+
N_2O	**18.6**	**27.1**	**22.4**	**22.1**	**19.1**	**17.9**	**19.4**
Stationary Sources[a]	18.2	26.7	22.0	21.7	18.8	17.5	19.0
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
SF_6	**24.7**	**11.8**	**5.5**	**5.2**	**6.1**	**5.9**	**6.0**
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
PFCs	**+**	**+**	**+**	**+**	**+**	**+**	**+**

Electrical Transmission and Distribution	+	+	+	+	+	+	+
Total	**1,879.7**	**2,456.9**	**1,779.2**	**1,799.1**	**1,650.5**	**1,481.8**	**1,584.1**

+ Does not exceed 0.05 MMT CO_2 Eq.

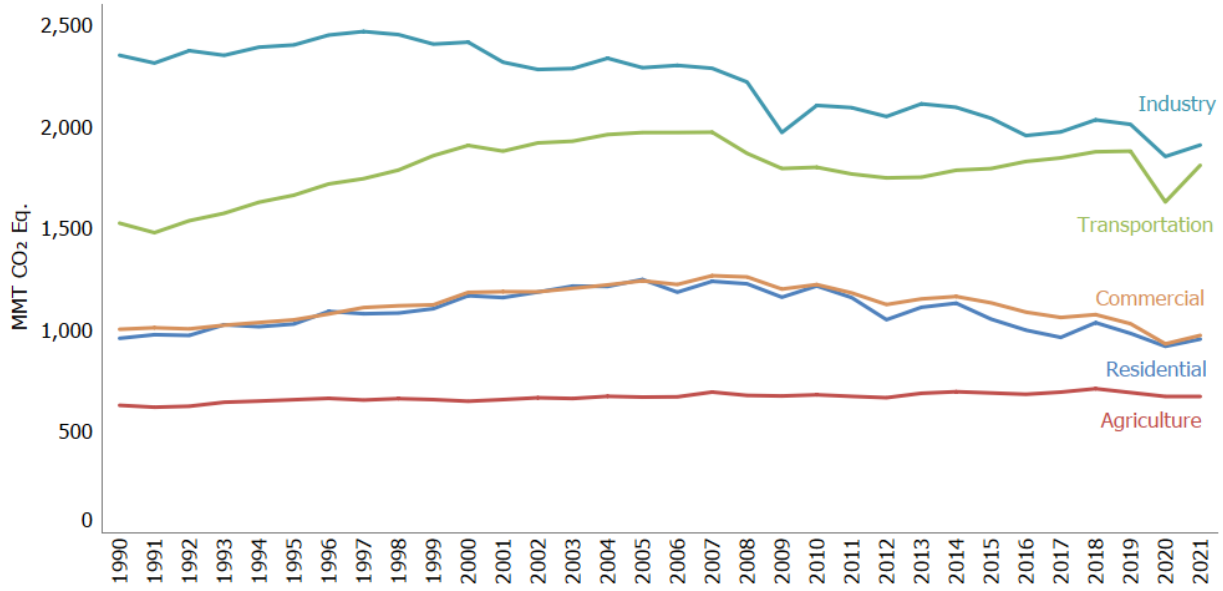
[a] Includes only stationary combustion emissions related to the generation of electricity.

Note: Totals may not sum due to independent rounding.

To distribute electricity emissions among economic end-use sectors, emissions from the source categories assigned to the electric power sector were allocated to the residential, commercial, industry, transportation, and agriculture economic sectors according to each economic sector's share of retail sales of electricity (EIA 2020b; USDA/NASS 2022). These source categories include CO_2 from fossil fuel combustion, CH_4 and N_2O from stationary combustion, incineration of waste, other process uses of carbonates, and SF_6 from electrical transmission and distribution systems. Note that only 50 percent of the other process uses of carbonates emissions were associated with electric power and distributed as described; the remainder of Other Process Uses of Carbonates emissions were attributed to the industry economic end-use sector.[6]

When emissions from electricity use are distributed among these economic end-use sectors, emissions from industrial activities account for the largest share of total U.S. greenhouse gas emissions (30.1 percent), followed closely by emissions from transportation (28.5 percent). Emissions from the commercial and residential sectors also increase substantially when emissions from electricity are included (15.3 and 15.0 percent, respectively). In all economic end-use sectors except agriculture, CO_2 accounts for more than 77 percent of greenhouse gas emissions, primarily from the combustion of fossil fuels. Table 2-12 presents a detailed breakdown of emissions from each of these economic sectors, with emissions from electric power distributed to them. Figure 2-14 shows the trend in these emissions by sector from 1990 to 2021.

Figure 2-14: U.S. Greenhouse Gas Emissions with Electricity-Related Emissions Distributed to Economic Sectors



Note: Emissions and removals from Land Use, Land-Use Change, and Forestry are excluded from figure above. Excludes U.S. Territories.

[6] Emissions were not distributed to U.S. Territories, since the electric power sector only includes emissions related to the generation of electricity in the 50 states and the District of Columbia.

Table 2-12: U.S. Greenhouse Gas Emissions by Economic Sector and Gas with Electricity-Related Emissions Distributed (MMT CO_2 Eq.) and Percent of Total in 2021

Sector/Gas	1990	2005	2017	2018	2019	2020	2021	Percent[a]
Industry	**2,351.1**	**2,289.9**	**1,973.9**	**2,033.2**	**2,011.2**	**1,852.9**	**1,909.2**	**30.1%**
Direct Emissions	**1,677.3**	**1,574.4**	**1,494.5**	**1,558.0**	**1,568.2**	**1,465.4**	**1,487.3**	**23.5%**
CO_2	1,163.5	1,142.3	1,073.0	1,128.0	1,149.0	1,065.8	1,099.3	17.3%
CH_4	411.6	367.3	353.3	357.9	350.3	329.5	319.8	5.0%
N_2O	35.6	29.8	27.3	30.3	26.0	27.7	26.8	0.4%
HFCs, PFCs, SF_6 and NF_3	66.5	35.0	40.9	41.8	42.9	42.3	41.3	0.7%
Electricity-Related	**673.8**	**715.5**	**479.3**	**475.2**	**442.9**	**387.5**	**421.9**	**6.7%**
CO_2	658.1	703.8	471.5	467.7	435.8	380.9	414.8	6.5%
CH_4	0.2	0.3	0.3	0.4	0.4	0.4	0.4	+%
N_2O	6.7	7.9	6.0	5.8	5.1	4.7	5.2	0.1%
SF_6	8.8	3.4	1.5	1.4	1.6	1.5	1.6	+%
Transportation	**1,524.6**	**1,970.9**	**1,846.0**	**1,876.2**	**1,879.2**	**1,629.2**	**1,809.5**	**28.5%**
Direct Emissions	**1,521.4**	**1,966.0**	**1,841.6**	**1,871.3**	**1,874.3**	**1,624.9**	**1,804.3**	**28.5%**
CO_2	1,480.8	1,868.7	1,789.7	1,822.1	1,825.2	1,580.3	1,760.4	27.8%
CH_4	6.4	3.2	1.8	1.7	1.7	1.5	1.5	+%
N_2O	34.3	31.0	13.1	11.9	13.3	10.7	11.1	0.2%
HFCs[b]	+	63.1	37.0	35.5	34.0	32.5	31.2	0.5%
Electricity-Related	**3.1**	**4.8**	**4.4**	**4.9**	**5.0**	**4.2**	**5.2**	**0.1%**
CO_2	3.1	4.8	4.4	4.8	4.9	4.2	5.1	0.1%
CH_4	+	+	+	+	+	+	+	+%
N_2O	+	0.1	0.1	0.1	0.1	0.1	0.1	+%
SF_6	+	+	+	+	+	+	+	+%
Residential	**957.8**	**1,247.5**	**962.3**	**1,034.9**	**982.0**	**918.3**	**953.8**	**15.0%**
Direct Emissions	**345.6**	**371.2**	**328.4**	**375.8**	**382.4**	**356.9**	**365.6**	**5.8%**
CO_2	338.6	358.9	293.4	338.2	341.4	313.2	313.3	4.9%
CH_4	5.9	4.5	4.2	5.1	5.3	4.4	4.6	0.1%
N_2O	0.9	0.8	0.7	0.8	0.8	0.7	0.7	+%
SF_6	0.2	7.0	30.0	31.7	34.8	38.7	46.9	0.7%
Electricity-Related	**612.2**	**876.3**	**633.9**	**659.0**	**599.6**	**561.3**	**588.3**	**9.3%**
CO_2	598.0	862.1	623.6	648.5	590.0	551.8	578.3	9.1%
CH_4	0.2	0.3	0.4	0.5	0.5	0.5	0.5	+%
N_2O	6.1	9.7	8.0	8.1	6.9	6.8	7.2	0.1%
SF_6	8.0	4.2	2.0	1.9	2.2	2.2	2.2	+%
Commercial	**1,002.4**	**1,241.0**	**1,060.4**	**1,074.5**	**1,029.7**	**930.5**	**972.2**	**15.3%**
Direct Emissions	**447.0**	**418.9**	**437.6**	**453.7**	**462.0**	**436.0**	**439.2**	**6.9%**
CO_2	228.3	227.1	232.0	245.8	250.7	228.5	233.0	3.7%
CH_4	203.7	150.9	124.3	126.6	128.5	124.2	121.7	1.9%
N_2O	15.1	19.4	22.4	22.8	23.0	22.5	22.6	0.4%
HFCs	+	21.4	58.9	58.5	59.8	60.8	61.9	1.0%
Electricity-Related	**555.4**	**822.0**	**622.8**	**620.8**	**567.7**	**494.4**	**533.1**	**8.4%**
CO_2	542.5	808.7	612.6	610.9	558.6	486.1	524.1	8.3%
CH_4	0.1	0.3	0.4	0.5	0.5	0.5	0.5	+%
N_2O	5.5	9.1	7.8	7.6	6.6	6.0	6.5	0.1%
SF_6	7.3	4.0	1.9	1.8	2.1	2.0	2.0	+%
Agriculture	**628.0**	**668.5**	**693.0**	**709.8**	**690.7**	**671.5**	**671.5**	**10.6%**
Direct Emissions	**592.9**	**630.2**	**654.2**	**670.6**	**655.4**	**637.2**	**635.8**	**10.0%**
CO_2	50.5	58.7	47.8	47.0	46.9	46.7	44.7	0.7%
CH_4	240.6	263.9	277.7	281.4	280.6	281.2	278.4	4.4%
N_2O	301.7	307.6	328.8	342.2	328.0	309.3	312.6	4.9%
Electricity-Related	**35.2**	**38.3**	**38.7**	**39.2**	**35.2**	**34.4**	**35.7**	**0.6%**
CO_2	34.3	37.7	38.1	38.5	34.6	33.8	35.1	0.6%
CH_4	+	+	+	+	+	+	+	+%
N_2O	0.3	0.4	0.5	0.5	0.4	0.4	0.4	+%
SF_6	0.5	0.2	0.1	0.1	0.1	0.1	0.1	+%
U.S. Territories	**23.4**	**59.7**	**26.3**	**26.3**	**25.1**	**23.6**	**24.1**	**0.4%**

Total Gross Emissions (Sources)	**6,487.3**	**7,477.4**	**6,561.8**	**6,754.8**	**6,617.9**	**6,026.0**	**6,340.2**	**100.0%**
LULUCF Sector Net Total[c]	(881.0)	(781.1)	(774.2)	(765.1)	(704.0)	(776.2)	(754.2)	(11.9%)
Net Emissions (Sources and Sinks)	**5,606.4**	**6,696.3**	**5,787.6**	**5,989.7**	**5,913.9**	**5,249.8**	**5,586.0**	**88.1%**

+ Does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

[a] Percent of total (gross) emissions excluding emissions from LULUCF for year 2021.

[b] Includes primarily HFC-134a.

[c] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Total gross emissions are presented without LULUCF. Net emissions are presented with LULUCF. Emissions from electric power are allocated based on aggregate electricity use in each end-use sector. Totals may not sum due to independent rounding.

Industry

The Industry end-use sector includes CO_2 emissions from fossil fuel combustion from all manufacturing facilities, in aggregate, and with the distribution of electricity-related emissions, accounts for 30.1 percent of U.S. greenhouse gas emissions in 2021. This end-use sector also includes emissions that are produced as a byproduct of the non-energy-related industrial process activities. The variety of activities producing these non-energy-related emissions includes CH_4 emissions from petroleum and natural gas systems, fugitive CH_4 and CO_2 emissions from coal mining, byproduct CO_2 emissions from cement production, and HFC, PFC, SF_6, and NF_3 byproduct emissions from the electronics industry, to name a few.

Since 1990, Industry sector emissions have declined by 18.8 percent. The decline has occurred both in direct emissions and indirect emissions associated with electricity use. Structural changes within the U.S. economy that led to shifts in industrial output away from energy-intensive manufacturing products to less energy-intensive products (e.g., shifts from producing steel to computer equipment) have had a significant effect on industrial emissions.

Transportation

When electricity-related emissions are distributed to economic end-use sectors, transportation activities accounted for 28.5 percent of U.S. greenhouse gas emissions in 2021. The largest sources of transportation greenhouse gas emissions in 2021 were light-duty trucks, which include sport utility vehicles, pickup trucks, and minivans (37.1 percent); medium- and heavy-duty trucks (23.1 percent); passenger cars (20.7 percent); commercial aircraft (6.6 percent); other aircraft (2.0 percent); pipelines (3.5 percent); ships and boats (2.8 percent); and rail (1.9 percent). These figures include direct CO_2, CH_4, and N_2O emissions from fossil fuel combustion used in transportation, indirect emissions from electricity use, and emissions from non-energy use (i.e., lubricants) used in transportation, as well as HFC emissions from mobile air conditioners and refrigerated transport allocated to these vehicle types.

From 1990 to 2021, total transportation emissions from fossil fuel combustion increased by approximately 19.4 percent. From 2020 to 2021, emissions increased by 11.5 percent, which followed a decline of 13.4 percent from 2019 to 2020 due to reduced travel demand during the COVID-19 pandemic. The increase in transportation emissions from 1990 to 2021 was due, in large part, to increased demand for travel. The number of VMT by light-duty motor vehicles (passenger cars and light-duty trucks) increased 45.1 percent from 1990 to 2021 as a result of a confluence of factors including population growth, economic growth, urban sprawl, and periods of low fuel prices.

The decline in new light-duty vehicle fuel economy between 1990 and 2004 reflected the increasing market share of light-duty trucks, which grew from approximately 29.6 percent of new vehicle sales in 1990 to 48.0 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty VMT grew only modestly for much of the period. Light-duty VMT grew by less than one percent or declined each year between

2005 and 2013, then grew at a faster rate until 2016 (2.6 percent from 2014 to 2015, and 2.5 percent from 2015 to 2016). Since 2016, the rate of light-duty VMT growth has slowed to at or less than one percent each year. Average new vehicle fuel economy has increased almost every year since 2005, while light-duty truck market share decreased to 33.0 percent in 2009 and has since varied from year to year between 35.6 and 62.9 percent. Light-duty truck market share was about 62.9 percent of new vehicles in model year 2021 (EPA 2022b).

Table 2-13 provides a detailed summary of greenhouse gas emissions from transportation-related activities with electricity-related emissions included in the totals. Historically, the majority of electricity use in the transportation sector was for rail transport. However, more recently there has been increased electricity use in on-road electric and plug-in hybrid vehicles. For a more detailed breakout of emissions by fuel type by vehicle see Table A-92 in Annex 3.

Almost all of the energy used for transportation was supplied by petroleum-based products, with more than half being related to gasoline consumption in automobiles and other highway vehicles. Other fuel uses, especially diesel fuel for freight trucks and jet fuel for aircraft, accounted for the remainder. The primary driver of transportation-related emissions was CO_2 from fossil fuel combustion, which increased by 19.4 percent from 1990 to 2021 when including electricity distributed. This rise in CO_2 emissions, combined with an increase in HFCs from close to zero emissions in 1990 to 31.2 MMT CO_2 Eq. in 2021, led to an increase in overall greenhouse gas emissions from transportation activities of 18.7 percent.

Figure 2-15: Trends in Transportation-Related Greenhouse Gas Emissions

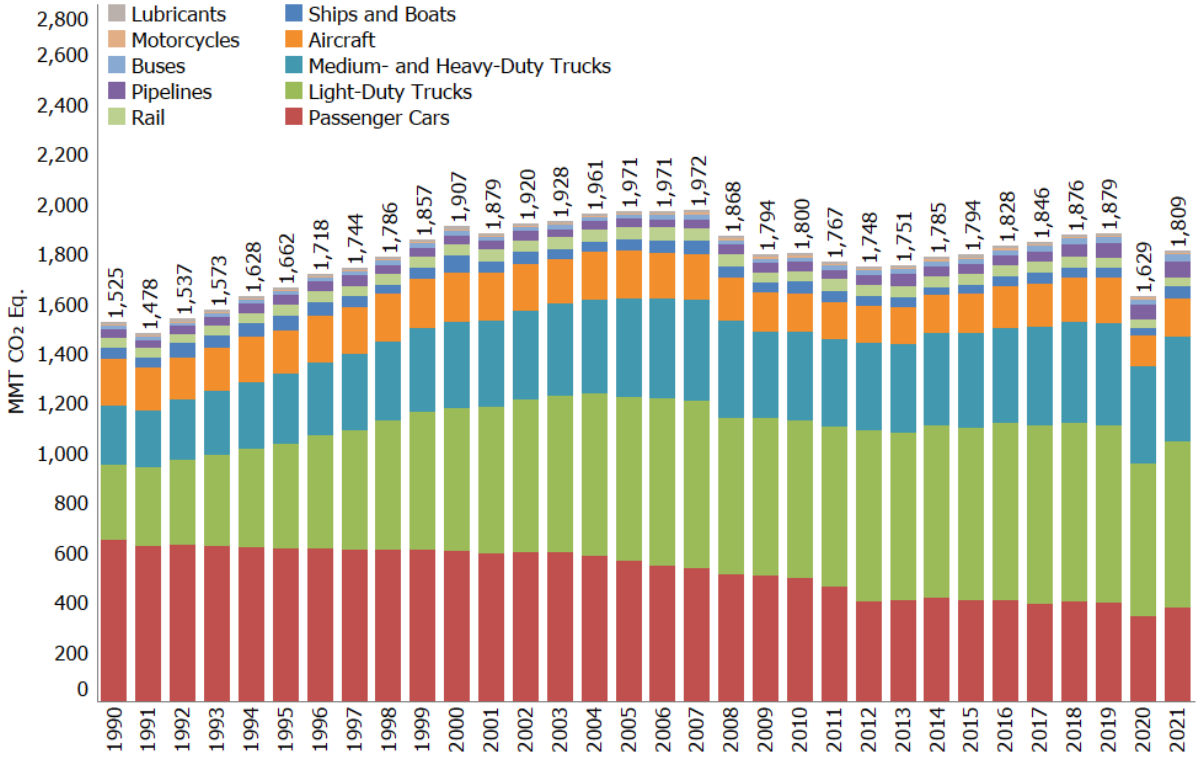


Table 2-13: Transportation-Related Greenhouse Gas Emissions (MMT CO_2 Eq.)

Gas/Vehicle	1990	2005	2017	2018	2019	2020	2021
Passenger Cars	**648.4**	**564.4**	**392.7**	**398.7**	**395.5**	**341.7**	**374.2**
CO_2	622.2	521.1	379.0	386.5	384.2	331.9	365.0
CH_4	3.8	1.2	0.3	0.3	0.3	0.3	0.3
N_2O	22.5	13.3	3.0	2.5	2.6	2.0	1.9
HFCs	0.0	28.8	10.4	9.4	8.4	7.6	7.0
Light-Duty Trucks	**302.5**	**659.5**	**716.2**	**720.6**	**711.8**	**615.4**	**671.8**

CO_2	292.2	614.2	692.7	699.1	690.2	596.3	654.0
CH_4	1.5	1.0	0.6	0.6	0.6	0.5	0.5
N_2O	8.7	14.0	5.4	4.6	5.6	4.4	4.2
HFCs	0.0	30.2	17.5	16.4	15.4	14.2	13.0
Medium- and Heavy-Duty Trucks	**234.3**	**391.3**	**395.6**	**406.7**	**409.5**	**386.7**	**417.1**
CO_2	232.8	386.5	387.5	398.2	400.6	377.9	407.8
CH_4	0.5	0.2	0.1	0.1	0.1	0.1	0.1
N_2O	1.0	1.5	2.6	2.7	3.0	2.7	3.0
HFCs	0.0	3.2	5.4	5.6	5.8	6.1	6.3
Buses	**13.4**	**17.7**	**23.4**	**24.4**	**24.8**	**23.6**	**25.7**
CO_2	13.3	17.2	22.8	23.7	24.2	23.0	25.1
CH_4	+	0.1	0.1	0.1	0.1	+	+
N_2O	+	0.1	0.2	0.2	0.2	0.2	0.2
HFCs	0.0	0.2	0.4	0.4	0.4	0.4	0.4
Motorcycles	**3.4**	**5.0**	**7.2**	**7.4**	**7.5**	**6.7**	**7.5**
CO_2	3.4	4.9	7.0	7.3	7.4	6.6	7.4
CH_4	+	+	+	+	+	+	+
N_2O	+	+	0.1	0.1	0.1	0.1	0.1
Commercial Aircraft[a]	**110.8**	**133.8**	**129.0**	**130.7**	**137.8**	**92.0**	**120.0**
CO_2	109.9	132.7	128.0	129.6	136.7	91.3	119.0
CH_4	0.0	0.0	0.0	0.0	0.0	0.0	0.0
N_2O	0.9	1.1	1.0	1.1	1.1	0.7	1.0
Other Aircraft[b]	**78.0**	**59.5**	**45.5**	**44.6**	**45.6**	**31.0**	**35.5**
CO_2	77.3	59.0	45.1	44.2	45.2	30.7	35.1
CH_4	0.1	0.1	+	+	+	+	+
N_2O	0.6	0.5	0.4	0.4	0.4	0.2	0.3
Ships and Boats[c]	**47.0**	**45.5**	**43.8**	**41.1**	**40.0**	**32.4**	**50.2**
CO_2	46.3	44.3	39.9	36.9	35.5	27.6	45.0
CH_4	0.4	0.5	0.5	0.5	0.4	0.4	0.5
N_2O	0.2	0.2	0.2	0.2	0.2	0.1	0.3
HFCs	0.0	0.5	3.2	3.6	3.9	4.2	4.5
Rail	**39.0**	**51.4**	**41.3**	**42.5**	**39.7**	**34.0**	**35.2**
CO_2	38.5	50.8	40.7	41.9	39.1	33.5	34.7
CH_4	0.1	0.1	0.1	0.1	0.1	0.1	0.1
N_2O	0.3	0.4	0.3	0.3	0.3	0.3	0.3
HFCs	0.0	0.1	0.1	0.1	0.1	0.1	0.1
Other Emissions from Electric Power[d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Pipelines[e]	**36.0**	**32.6**	**41.6**	**50.2**	**58.2**	**57.9**	**64.2**
CO_2	36.0	32.6	41.6	50.2	58.2	57.9	64.2
Lubricants	**11.8**	**10.2**	**9.6**	**9.2**	**8.8**	**7.8**	**8.0**
CO_2	11.8	10.2	9.6	9.2	8.8	7.8	8.0
Total Transportation	**1,524.6**	**1,970.9**	**1,846.0**	**1,876.2**	**1,879.2**	**1,629.2**	**1,809.5**
International Bunker Fuels[f]	*54.7*	*44.6*	*34.5*	*32.4*	*26.2*	*22.7*	*22.7*
Ethanol CO_2[g]	*4.1*	*21.6*	*77.7*	*78.6*	*78.7*	*68.1*	*75.4*
Biodisel CO_2[g]	*0.0*	*0.9*	*18.7*	*17.9*	*17.1*	*17.7*	*16.1*

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Consists of emissions from jet fuel consumed by domestic operations of commercial aircraft (no bunkers).

[b] Consists of emissions from jet fuel and aviation gasoline consumption by general aviation and military aircraft.

[c] Fluctuations in emission estimates are associated with fluctuations in reported fuel consumption and may reflect issues with data sources.

[d] Other emissions from electric power are a result of waste incineration (as the majority of municipal solid waste is combusted in "trash-to-steam" electric power plants), electrical transmission and distribution, and a portion of Other Process Uses of Carbonates (from pollution control equipment installed in electric power plants).

[e] CO_2 estimates reflect natural gas used to power pipelines, but not electricity. While the operation of pipelines produces CH_4 and N_2O, these emissions are not directly attributed to pipelines in the Inventory.
[f] Emissions from International Bunker Fuels include emissions from both civilian and military activities; these emissions are not included in the transportation totals.
[g] Ethanol and biodiesel CO_2 estimates are presented for informational purposes only. See Section 3.11 and the estimates in Land Use, Land-Use Change, and Forestry (see Chapter 6), in line with IPCC methodological guidance and UNFCCC reporting obligations, for more information on ethanol and biodiesel.
Notes: Passenger cars and light-duty trucks include vehicles typically used for personal travel and less than 8,500 lbs; medium- and heavy-duty trucks include vehicles larger than 8,500 lbs. HFC emissions primarily reflect HFC-134a. Totals may not sum due to independent rounding.

Residential

The residential end-use sector, with electricity-related emissions distributed, accounts for 15.0 percent of U.S. greenhouse gas emissions in 2021 and similarly, is heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances. The remaining emissions were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Emissions from the residential sector have generally been increasing since 1990, and annual variations are often correlated with short-term fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. In the long term, the residential sector is also affected by population growth, migration trends toward warmer areas, and changes in housing and building attributes (e.g., larger sizes and improved insulation). A shift toward energy-efficient products and more stringent energy efficiency standards for household equipment has also contributed to recent trends in energy demand in household.

Commercial

The commercial end-use sector, with electricity-related emissions distributed, accounts for 15.3 percent of U.S. greenhouse gas emissions in 2021 and is heavily reliant on electricity for meeting energy needs, with electricity use for lighting, heating, air conditioning, and operating appliances. The remaining emissions were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Energy-related emissions from the commercial sector have generally been increasing since 1990, and annual variations are often correlated with short-term fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. Decreases in energy-related emissions in the commercial sector in recent years can be largely attributed to an overall reduction in energy use driven by a reduction in heating degree days and increases in energy efficiency.

Municipal landfills and wastewater treatment are included in the commercial sector, with landfill emissions decreasing since 1990 and wastewater treatment emissions increasing slightly.

Agriculture

The agriculture end-use sector accounts for 10.6 percent of U.S. greenhouse gas emissions in 2021 when electricity-related emissions are distributed, and includes a variety of processes, including enteric fermentation in domestic livestock, livestock manure management, and agricultural soil management. In 2021, agricultural soil management was the largest source of N_2O emissions, and enteric fermentation was the largest source of CH_4 emissions in the United States. This sector also includes small amounts of CO_2 emissions from fossil fuel combustion by motorized farm equipment such as tractors.

Box 2-2: Trends in Various U.S. Greenhouse Gas Emissions-Related Data

Total (gross) greenhouse gas emissions can be compared to other economic and social indices to highlight changes over time. These comparisons include: (1) emissions per unit of aggregate energy use, because energy-related activities are the largest sources of emissions; (2) emissions per unit of fossil fuel consumption, because

almost all energy-related emissions involve the combustion of fossil fuels; (3) emissions per unit of total gross domestic product as a measure of national economic activity; and (4) emissions per capita.

Table 2-14 provides data on various statistics related to U.S. greenhouse gas emissions normalized to 1990 as a baseline year. These values represent the relative change in each statistic since 1990. Greenhouse gas emissions in the United States have decreased at an average annual rate of 0.03 percent since 1990, although changes from year to year have been significantly larger. This growth rate is slightly slower than that for total energy use, overall gross domestic product (GDP) and national population (see Table 2-14 and Figure 2-16). The direction of these trends started to change after 2005, when greenhouse gas emissions, total energy use and associated fossil fuel consumption began to peak. Greenhouse gas emissions in the United States have decreased at an average annual rate of 1.0 percent since 2005. Fossil fuel consumption has also decreased at a slower rate than emissions since 2005, while total energy use, GDP, and national population, generally continued to increase, noting 2020 was impacted by the COVID-19 pandemic.

Table 2-14: Recent Trends in Various U.S. Data (Index 1990 = 100)

Variable	1990	2005	2017	2018	2019	2020	2021	Avg. Annual Change	Avg. Annual Change
Greenhouse Gas Emissions[b]	100	115	101	104	102	93	98	(+)%	-1.0%
Energy Use[c]	100	119	116	120	119	109	115	0.5%	-0.1%
GDP[d]	100	159	193	199	203	198	209	2.4%	1.8%
Population[e]	100	118	130	130	131	133	134	0.9%	0.8%

+ Absolute value does not exceed 0.05 percent.

[a] Average annual growth rate.

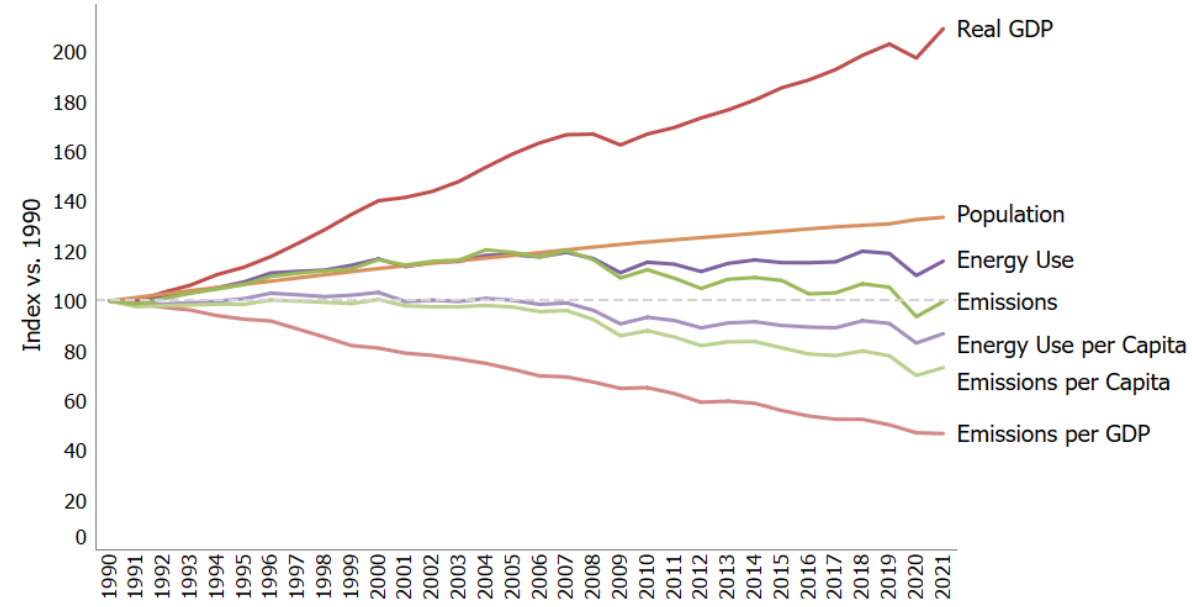
[b] Gross total GWP-weighted values.

[c] Energy-content-weighted values (EIA 2023).

[d] GDP in chained 2012 dollars (BEA 2022).

[e] U.S. Census Bureau (2021).

Figure 2-16: U.S. Greenhouse Gas Emissions Per Capita and Per Dollar of Gross Domestic Product



Source: BEA (2022), U.S. Census Bureau (2021), and gross emission estimates in this report.

2.3 Precursor Greenhouse Gas Emissions (CO, NO_x, NMVOCs, and SO_2)

The reporting requirements of the UNFCCC[7] request that information be provided on emissions of compounds that are precursors to greenhouse gases, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO_2). These gases are not direct greenhouse gases, but can indirectly impact Earth's radiative balance, by altering the concentrations of other greenhouse gases (e.g., tropospheric ozone) and atmospheric aerosol (e.g., particulate sulfate). Carbon monoxide is produced when carbon-containing fuels are combusted incompletely in energy, transportation, and industrial processes, and is also emitted from practices such as agricultural burning and waste disposal and treatment. Anthropogenic sources of nitrogen oxides (i.e., NO and NO_2) are primarily fossil fuel combustion (for energy, transportation, industrial process) and agricultural burning. Anthropogenic sources of NMVOCs, which include hundreds of organic compounds that participate in atmospheric chemical reactions (i.e., propane, butane, xylene, toluene, ethane, and many others)—are emitted primarily from transportation, industrial processes, oil and natural gas production, waste practices, agricultural burning, and non-industrial consumption of organic solvents. In the United States, SO_2 is primarily emitted from coal combustion for electric power generation and the metals industry.

As noted above and summarized in Chapter 6 of IPCC (2021), these compounds can have important indirect effects of Earth's radiative balance. For example, reactions between NMVOCs and NO_x in the presence of sunlight lead to tropospheric ozone formation, a greenhouse gas. Concentrations of NMVOCs, NO_x, and CO can also impact the abundance and lifetime of primary greenhouse gases. This largely occurs by altering the atmospheric concentrations of the hydroxyl radical (OH), which is the main sink for atmospheric CH_4. For example, NO_x emissions can lead to increases in O_3 concentrations and subsequent OH production, which will increase the amount of OH molecules that are available to destroy CH_4. In contrast, NMVOCs and CO can both react directly with OH, leading to lower OH concentrations, a longer atmospheric lifetime of CH_4, and a decrease in CO_2 production (i.e., CO+OH→ CO_2). Changes in atmospheric CH_4 can also feedback on background concentrations of tropospheric O_3. Other indirect impacts include the formation of sulfate and nitrate aerosol from emissions of NO_x and SO_2, both of which have a net negative impact on radiative forcing.

Since 1970, the United States has published triennial estimates of emissions of CO, NO_x, NMVOCs, and SO_2 (EPA 2023), which are regulated under the Clean Air Act. Emissions of each of these precursor greenhouse gases has decreased significantly since 1990 as a result of implementation of Clean Air Act programs, as well as technological improvements.[8] Precursor emission estimates for this report for 1990 through 2021 were obtained from data published on EPA's National Emissions Inventory (NEI) Air Pollutants Emissions Trends Data website (EPA 2023c). For Table 2-15, NEI-reported emissions of CO, NO_x, SO_2, and NMVOCs are recategorized from NEI Emissions Inventory System (EIS) source categories to those more closely aligned with UNFCCC reporting sectors and categories, based on and the cross walk detailed in Annex 6.3. Table 2-15 shows that fuel combustion accounts for the majority of emissions of these precursors. Industrial processes—such as the manufacture of chemical and allied products, metals processing, and industrial uses of solvents—are also significant sources of CO, NO_x, and NMVOCs. Precursor emissions from Agriculture and LULUCF categories are estimated separately and therefore are not taken from EPA (2023).

[7] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

[8] More information is available online at: https://www.epa.gov/clean-air-act-overview/progress-cleaning-air-and-improving-peoples-health and https://gispub.epa.gov/neireport/2017/.

Table 2-15: Emissions of NO_x, CO, NMVOCs, and SO_2 (kt)

Gas/Activity	1990	2005	2017	2018	2019	2020	2021
NO_x	**22,889**	**19,768**	**8,424**	**8,052**	**7,684**	**6,909**	**6,995**
Energy	21,966	18,863	7,739	7,384	7,048	6,235	6,289
IPPU	774	672	455	461	440	393	394
Agriculture	13	15	14	14	14	14	14
LULUCF	53	166	143	120	110	191	222
Waste	84	51	74	73	73	76	76
CO	**133,225**	**78,095**	**41,290**	**38,980**	**39,105**	**42,375**	**43,980**
Energy	124,713	64,455	31,127	30,760	30,349	28,427	29,311
IPPU	4,099	1,701	999	1,022	1,011	855	855
Agriculture	315	363	339	338	337	336	336
LULUCF	3,069	10,397	7,643	5,678	6,226	11,415	12,136
Waste	1,028	1,178	1,182	1,182	1,182	1,342	1,342
NMVOCs	**20,918**	**12,708**	**8,951**	**8,987**	**8,804**	**9,040**	**9,037**
Energy	13,067	8,694	5,467	5,506	5,444	5,306	5,302
IPPU	6,982	3,668	3,126	3,119	2,996	3,366	3,366
Agriculture	+	194	202	206	208	196	196
LULUCF	NA	NA	NA	NA	NA	NA	NA
Waste	870	152	156	156	157	173	173
SO_2	**20,924**	**13,108**	**2,093**	**2,001**	**1,676**	**1,471**	**1,628**
Energy	19,400	12,312	1,717	1,643	1,344	1,173	1,330
IPPU	1,488	776	353	335	309	266	266
Agriculture	+	NO	NO	NO	NO	+	+
LULUCF	NA	NA	NA	NA	NA	NA	NA
Waste	36	20	23	23	23	33	33

+ Does not exceed 0.5 kt.
NA (Not Available)
NO (Not Occurring)
Note: Totals by gas may not sum due to independent rounding.
Source: (EPA 2023) except for estimates from forest fires, grassland fires, and field burning of agricultural residues. Emission categories from EPA (2023) are aggregated into UNFCCC reporting sectors and categories

3. Energy

Energy-related activities were the primary sources of U.S. anthropogenic greenhouse gas emissions, accounting for 82.0 percent of total greenhouse gas emissions on a carbon dioxide (CO_2) equivalent basis in 2021.[1] This included 96.5, 41.6, and 10.0 percent of the nation's CO_2, methane (CH_4), and nitrous oxide (N_2O) emissions, respectively. Energy-related CO_2 emissions alone constituted 76.6 percent of U.S. greenhouse gas emissions from all sources on a CO_2-equivalent basis, while the non-CO_2 emissions from energy-related activities represented a much smaller portion of total national emissions (5.4 percent collectively).

Emissions from fossil fuel combustion comprise the vast majority of energy-related emissions, with CO_2 being the primary gas emitted (see Figure 3-1 and Figure 3-2). Globally, approximately 33,000 million metric tons (MMT) of CO_2 were added to the atmosphere through the combustion of fossil fuels in 2021, of which the United States accounted for approximately 14 percent.[2] Due to their relative importance over time (see Figure 3-2), fossil fuel combustion-related CO_2 emissions are considered in more detail than other energy-related emissions in this report (see Figure 3-3).

Fossil fuel combustion also emits CH_4 and N_2O. Stationary combustion of fossil fuels was the second largest source of N_2O emissions in the United States and mobile fossil fuel combustion was the fifth largest source. Energy-related activities other than fuel combustion, such as the production, transmission, storage, and distribution of fossil fuels, also emit greenhouse gases. These emissions consist primarily of fugitive CH_4 emissions from natural gas systems, coal mining, and petroleum systems.

[1] Estimates are presented in units of million metric tons of carbon dioxide equivalent (MMT CO_2 Eq.), which weight each gas by its global warming potential, or GWP, value. See section on global warming potentials in the Executive Summary.

[2] Global CO_2 emissions from fossil fuel combustion were taken from International Energy Agency *Global energy-related CO_2 emissions, 1990-2021 – Charts* Available at: https://www.iea.org/data-and-statistics/charts/global-energy-related-co2-emissions-1990-2021 (IEA 2022).

Figure 3-1: 2021 Energy Sector Greenhouse Gas Sources

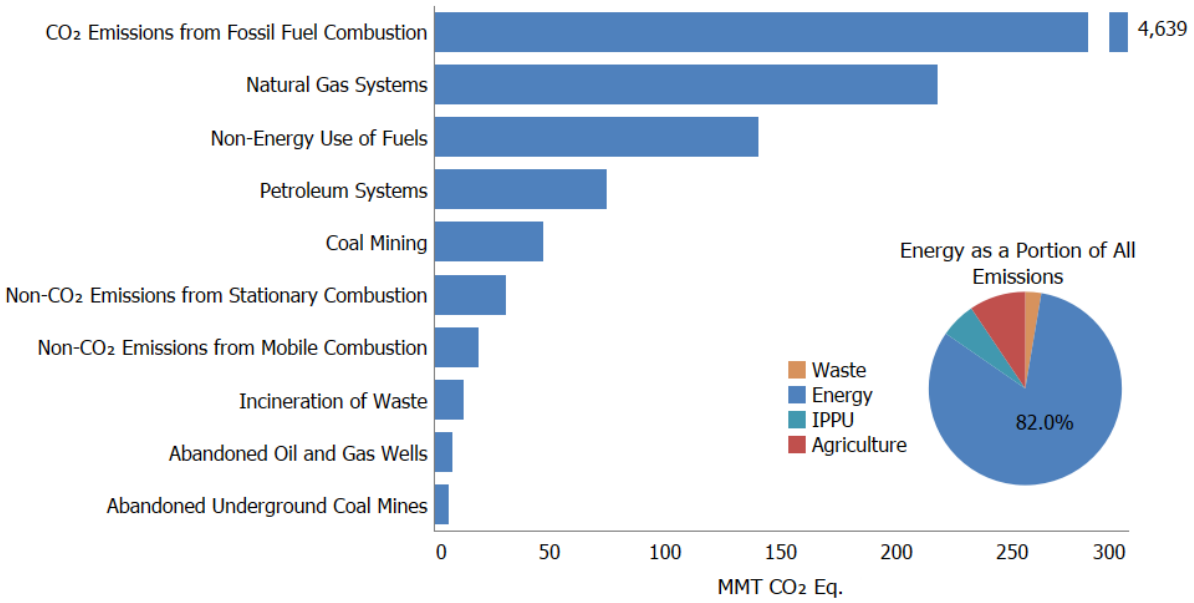


Figure 3-2: Trends in Energy Sector Greenhouse Gas Sources

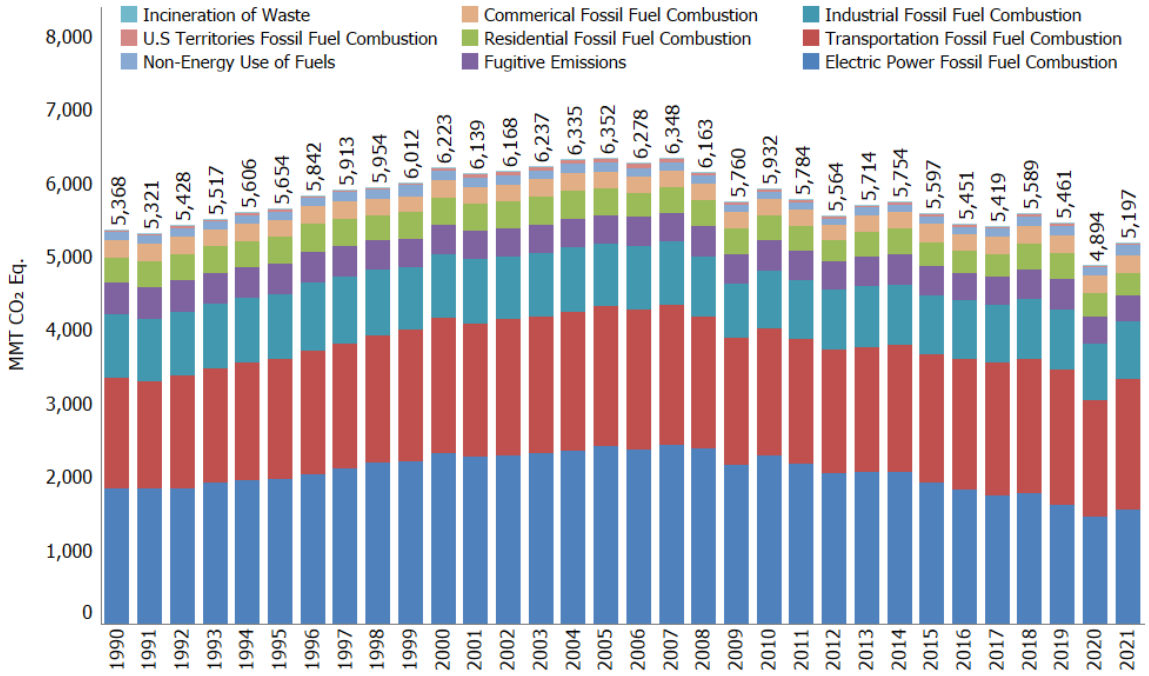


Figure 3-3: 2021 U.S. Fossil Carbon Flows

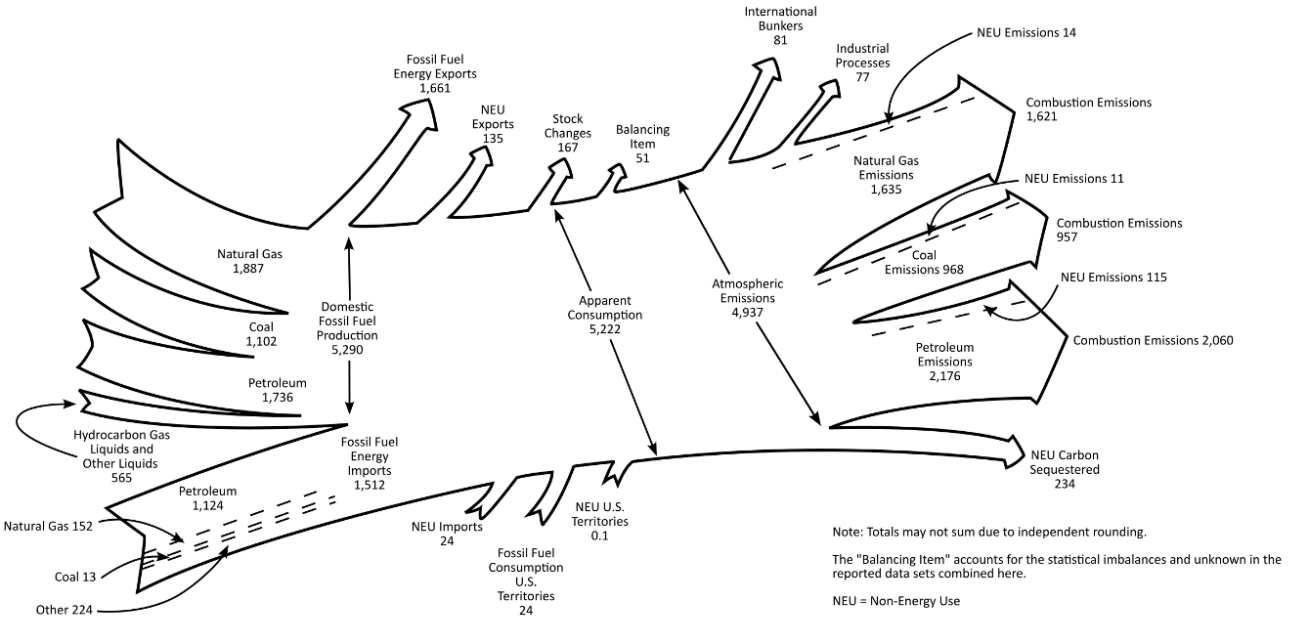


Table 3-1 summarizes emissions from the Energy sector in units of MMT CO_2 Eq., while unweighted gas emissions in kilotons (kt) are provided in Table 3-2. Overall, emissions due to energy-related activities were 5,196.6 MMT CO_2 Eq. in 2021,[3] a decrease of 3.2 percent since 1990 and an increase of 6.2 percent since 2020. The increase in 2021 emissions was due to rebounding activity levels after the coronavirus (COVID-19) pandemic reduced overall demand for fossil fuels across all sectors in 2020. Longer term trends are driven by a number of factors including a shift from coal to natural gas and renewables in the electric power sector.

Table 3-1: CO_2, CH_4, and N_2O Emissions from Energy (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**4,899.8**	**5,928.9**	**5,038.0**	**5,204.7**	**5,084.9**	**4,544.8**	**4,855.0**
Fossil Fuel Combustion	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
Transportation	*1,468.9*	*1,858.6*	*1,780.1*	*1,812.9*	*1,816.4*	*1,572.5*	*1,752.4*
Electricity Generation	*1,820.0*	*2,400.1*	*1,732.0*	*1,753.4*	*1,606.7*	*1,439.6*	*1,540.9*
Industrial	*852.4*	*850.8*	*789.0*	*813.5*	*815.9*	*767.9*	*775.6*
Residential	*338.6*	*358.9*	*293.4*	*338.2*	*341.4*	*313.2*	*313.3*
Commercial	*228.3*	*227.1*	*232.0*	*245.8*	*250.7*	*228.5*	*233.0*
U.S. Territories	*20.0*	*51.9*	*25.9*	*25.9*	*24.8*	*23.3*	*23.8*
Non-Energy Use of Fuels	112.4	128.9	112.8	129.4	127.6	119.2	140.2
Natural Gas Systems	32.2	25.0	31.9	32.8	38.6	36.5	36.2
Petroleum Systems	9.5	10.2	24.5	36.1	46.9	29.1	24.7
Incineration of Waste	12.9	13.3	13.2	13.3	12.9	12.9	12.5
Coal Mining	4.6	4.2	3.2	3.1	3.0	2.2	2.5
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Biomass-Wood[a]	*215.2*	*206.9*	*212.0*	*220.0*	*217.7*	*200.4*	*204.8*
Biofuels-Ethanol[a]	*103.6*	*113.3*	*120.2*	*124.3*	*113.6*	*69.6*	*80.2*
International Bunker Fuels[b]	*4.2*	*22.9*	*82.1*	*81.9*	*82.6*	*71.8*	*79.1*
Biofuels-Biodiesel[a]	*0.0*	*0.9*	*18.7*	*17.9*	*17.1*	*17.7*	*16.1*

[3] Following the current reporting requirements under the UNFCCC, this Inventory report presents CO_2 equivalent values based on the IPCC *Fifth Assessment Report* (AR5) GWP values. See Chapter 1, Introduction for more information.

Biomass-MSW[a]	*18.5*	*14.7*	*16.1*	*16.1*	*15.7*	*15.6*	*15.3*
CH_4	**407.0**	**354.7**	**336.5**	**341.7**	**334.1**	**312.0**	**302.3**
Natural Gas Systems	215.1	203.3	186.2	194.3	193.6	185.3	181.4
Petroleum Systems	51.3	50.9	61.9	60.6	59.9	54.5	50.2
Coal Mining	108.1	71.8	61.4	59.1	53.0	46.2	44.7
Stationary Combustion	9.6	8.8	8.6	9.6	9.8	8.8	8.9
Abandoned Oil and Gas Wells	7.7	8.1	8.3	8.3	8.3	8.2	8.2
Abandoned Underground Coal Mines	8.1	7.4	7.2	6.9	6.6	6.5	6.4
Mobile Combustion	7.2	4.4	2.9	2.9	2.9	2.6	2.6
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.2*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*	*0.1*
N_2O	**61**	**68**	**44**	**43**	**42**	**37**	**39**
Stationary Combustion	22.3	30.5	25.3	25.1	22.2	20.7	22.1
Mobile Combustion	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Incineration of Waste	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	*0.8*	*0.9*	*0.9*	*1.0*	*0.9*	*0.5*	*0.6*
Total	**5,368.0**	**6,351.5**	**5,418.7**	**5,589.5**	**5,460.6**	**4,894.0**	**5,196.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Emissions from biomass and biofuel consumption are not included specifically in summing energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

[b] Emissions from International Bunker Fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

Note: Totals may not sum due to independent rounding.

Table 3-2: CO_2, CH_4, and N_2O Emissions from Energy (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**4,899,841**	**5,928,911**	**5,038,003**	**5,204,696**	**5,084,935**	**4,544,784**	**4,855,040**
Fossil Fuel Combustion	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
Non-Energy Use of Fuels	112,407	128,920	112,841	129,441	127,621	119,208	140,197
Natural Gas Systems	32,207	25,033	31,864	32,815	38,563	36,463	36,161
Petroleum Systems	9,519	10,221	24,462	36,102	46,874	29,081	24,669
Incineration of Waste	12,900	13,254	13,161	13,339	12,948	12,921	12,476
Coal Mining	4,606	4,170	3,153	3,141	2,992	2,198	2,456
Abandoned Oil and Gas Wells	7	7	7	7	8	7	7
Biomass-Wood[a]	*215,186*	*206,901*	*211,965*	*220,005*	*217,692*	*200,421*	*204,848*
Biofuels-Ethanol[a]	*103,634*	*113,328*	*120,192*	*124,279*	*113,632*	*69,638*	*80,180*
International Bunker Fuels[b]	*4,227*	*22,943*	*82,088*	*81,917*	*82,578*	*71,848*	*79,064*
Biofuels-Biodiesel[a]	*0*	*856*	*18,705*	*17,936*	*17,080*	*17,678*	*16,112*
Biomass-MSW[a]	*18,534*	*14,722*	*16,130*	*16,115*	*15,709*	*15,614*	*15,329*
CH_4	**14,536**	**12,668**	**12,018**	**12,204**	**11,933**	**11,144**	**10,798**
Natural Gas Systems	7,680	7,260	6,652	6,939	6,914	6,619	6,478
Petroleum Systems	1,833	1,819	2,209	2,165	2,138	1,945	1,791
Coal Mining	3,860	2,566	2,192	2,110	1,893	1,648	1,595

Stationary Combustion	344	313	307	344	351	313	319
Abandoned Oil and Gas Wells	274	289	295	296	297	295	295
Abandoned Underground Coal Mines	288	264	257	247	237	232	228
Mobile Combustion	258	158	105	102	103	92	93
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	*7*	*5*	*4*	*4*	*4*	*3*	*3*
N_2O	**231**	**256**	**167**	**163**	**157**	**140**	**148**
Stationary Combustion	84	115	95	95	84	78	84
Mobile Combustion	145	140	70	66	72	61	63
Incineration of Waste	2	1	1	1	1	1	1
Petroleum Systems	+	+	+	+	+	+	+
Natural Gas Systems	+	+	+	+	+	+	+
International Bunker Fuels[b]	*3*	*3*	*4*	*4*	*3*	*2*	*2*

+ Does not exceed 0.5 kt.

[a] Emissions from biomass and biofuel consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF.

[b] Emissions from international bunker fuels are not included in totals. These values are presented for informational purposes only, in line with the *2006 IPCC Guidelines* and UNFCCC reporting obligations.

Note: Totals by gas may not sum due to independent rounding.

Emissions estimates reported in the Energy chapter from fossil fuel combustion and fugitive sources include those from all 50 states, including Hawaii and Alaska, and the District of Columbia. Emissions are also included from U.S. Territories to the extent they are known to occur (e.g., coal mining does not occur in U.S. Territories). For some sources there is a lack of detailed information on U.S. Territories including some non-CO_2 emissions from biomass combustion. As part of continuous improvement efforts, EPA reviews this on an ongoing basis to ensure emission sources are included across all geographic areas including U.S. Territories if they are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Each year, some emission and sink estimates in the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Key updates in this year's Inventory include, updates to the transportation methodology which use distributions of vehicle miles traveled (VMT) and fuel use from EPA's MOVES3 model to estimate vehicle emissions by vehicle class, updates to the CH_4 and N_2O emission factors for alternative fuel vehicles based on the GREET2022 model, revisions to methods for estimating CH_4 from both Natural Gas Systems and Petroleum Systems to incorporate additional basin-level data from GHGRP Subpart W for several emission sources in the onshore production segment, changes to the Non-Energy Use of Fossil Fuel methodology (e.g., updated energy consumption statistics, updated polyester fiber and acetic acid production data, updated import and export data, and updated shipment data from the U.S census Bureau), and accounting for biogenic emissions from combusted MSW within Biomass estimates. The impact of these recalculations averaged 9.6 MMT CO_2 Eq. (+0.2 percent) per year across the time series. In addition, the GWPs for calculating CO_2-equivalent totals emissions of CH_4 and N_2O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment*

Report (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The combined impact of these recalculations resulted in an average increase of 40.2 MMT CO_2 Eq. (0.7 percent) across the time series. For more information on specific methodological updates, please see the Recalculations Discussion section for each category in this chapter.

Box 3-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to EPA's Greenhouse Gas Reporting Program

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)*. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the Energy chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from energy-related activities.

Energy Data from EPA's Greenhouse Gas Reporting Program

EPA's Greenhouse Gas Reporting Program (GHGRP)[4] dataset and the data presented in this Inventory are complementary. The Inventory was used to guide the development of the GHGRP, particularly in terms of scope and coverage of both sources and gases. The GHGRP dataset continues to be an important resource for the Inventory, providing not only annual emissions information, but also other annual information, such as activity data and emission factors that can improve and refine national emission estimates and trends over time. GHGRP data also allow EPA to disaggregate national inventory estimates in new ways that can highlight differences across regions and sub-categories of emissions, along with enhancing application of QA/QC procedures and assessment of uncertainties.

EPA uses annual GHGRP data in a number of Energy sector categories to improve the national estimates presented in this Inventory consistent with IPCC guidelines (see Box 3-3 of this chapter, and Sections 3.3 Incineration of Waste, 3.4 Coal Mining, 3.6 Petroleum Systems, and 3.7 Natural Gas Systems).[5] Methodologies used in EPA's GHGRP are consistent with IPCC guidelines, including higher tier methods. Under EPA's GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards. It should be noted that the definitions and provisions for reporting fuel types in EPA's GHGRP may differ from those used in the Inventory in meeting the UNFCCC reporting guidelines. In line with the UNFCCC reporting guidelines, the Inventory report is a comprehensive accounting of all emissions from fuel types identified in the IPCC guidelines and provides a separate reporting of emissions from biomass.

In addition to using GHGRP data to estimate emissions (Sections 3.3 Incineration of Waste, 3.4 Coal Mining, 3.6 Petroleum Systems, and 3.7 Natural Gas Systems), EPA also uses the GHGRP fuel consumption activity data in the Energy sector to disaggregate industrial end-use sector emissions in the category of CO_2 Emissions from Fossil Fuel Combustion, for use in reporting emissions in Common Reporting Format (CRF) tables (See Box 3-3). The industrial end-use sector activity data collected for the Inventory (EIA 2022) represent aggregated data for the industrial end-use sector. EPA's GHGRP collects industrial fuel consumption activity data by individual

[4] On October 30, 2009, the U.S. Environmental Protection Agency (EPA) published a rule requiring annual reporting of greenhouse gas data from large greenhouse gas emission sources in the United States. Implementation of the rule, codified at 40 CFR Part 98, is referred to as EPA's Greenhouse Gas Reporting Program (GHGRP).

[5] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

categories within the industrial end-use sector. Therefore, GHGRP data are used to provide a more detailed breakout of total emissions in the industrial end-use sector within that source category.

As indicated in the respective Planned Improvements sections for source categories in this chapter, EPA continues to examine the uses of facility-level GHGRP data to improve the national estimates presented in this Inventory. See Annex 9 for more information on use of EPA's GHGRP in the Inventory.

3.1 Fossil Fuel Combustion (CRF Source Category 1A)

Emissions from the combustion of fossil fuels for energy include the greenhouse gases CO_2, CH_4, and N_2O. Given that CO_2 is the primary gas emitted from fossil fuel combustion and represents the largest share of U.S. total emissions, CO_2 emissions from fossil fuel combustion are discussed at the beginning of this section. An overview of CH_4 and N_2O emissions from the combustion of fuels in stationary sources is then presented, followed by fossil fuel combustion emissions for all three gases by sector: electric power, industrial, residential, commercial, U.S. Territories, and transportation.

Methodologies for estimating CO_2 emissions from fossil fuel combustion differ from the estimation of CH_4 and N_2O emissions from stationary combustion and mobile combustion. Thus, three separate descriptions of methodologies, uncertainties, recalculations, and planned improvements are provided at the end of this section. Total CO_2, CH_4, and N_2O emissions from fossil fuel combustion are presented in Table 3-3 and Table 3-4.

Table 3-3: CO_2, CH_4, and N_2O Emissions from Fossil Fuel Combustion (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	4,728.2	5,747.3	4,852.5	4,989.8	4,855.9	4,344.9	4,639.1
CH_4	16.8	13.2	11.5	12.5	12.7	11.3	11.5
N_2O	60.7	67.6	43.8	42.6	41.2	36.8	38.8
Total	**4,805.7**	**5,828.0**	**4,907.9**	**5,045.0**	**4,909.8**	**4,393.0**	**4,689.4**

Note: Totals may not sum due to independent rounding.

Table 3-4: CO_2, CH_4, and N_2O Emissions from Fossil Fuel Combustion (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	4,728,194	5,747,307	4,852,515	4,989,849	4,855,930	4,344,906	4,639,073
CH_4	601	471	412	446	454	405	412
N_2O	229	255	165	161	155	139	146

CO_2 from Fossil Fuel Combustion

Carbon dioxide is the primary gas emitted from fossil fuel combustion and represents the largest share of U.S. total greenhouse gas emissions. Carbon dioxide emissions from fossil fuel combustion are presented in Table 3-5. In 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent relative to the previous year (as shown in Table 3-6). The increase in CO_2 emissions from fossil fuel consumption was a result of a 5.7 percent increase in fossil fuel energy use. This increase in fossil fuel consumption was due primarily to rebounding economic activity after the COVID-19 pandemic. Carbon dioxide emissions from natural gas increased by 8.6 MMT CO_2 Eq., a 0.5 percent increase from 2020. In a shift from recent trends, CO_2 emissions from coal consumption increased by 121.7 MMT CO_2 Eq., a 14.6 percent increase from 2020. The increase in natural gas consumption and emissions in 2021 is observed across all sectors except the Electric Power sector and U.S. Territories, while the coal increase is primarily in the Electric Power sector. Emissions from petroleum use also increased 163.9 MMT CO_2 Eq. (8.6

percent) from 2020 to 2021. In 2021, CO_2 emissions from fossil fuel combustion were 4,639.1 MMT CO_2 Eq., or 1.9 percent below emissions in 1990 (see Table 3-5).[6]

Table 3-5: CO_2 Emissions from Fossil Fuel Combustion by Fuel Type and Sector (MMT CO_2 Eq.)

Fuel/Sector	1990	2005	2017	2018	2019	2020	2021
Coal	**1,719.8**	**2,113.7**	**1,270.0**	**1,211.6**	**1,028.2**	**835.6**	**957.3**
Residential	3.0	0.8	NO	NO	NO	NO	NO
Commercial	12.0	9.3	2.0	1.8	1.6	1.4	1.4
Industrial	157.8	117.8	58.7	54.4	49.5	43.0	43.0
Transportation	NO	NO	NO	NO	NO	NO	NO
Electric Power	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
U.S. Territories	0.5	3.0	2.3	2.6	3.6	3.1	2.9
Natural Gas	**998.6**	**1,166.2**	**1,433.2**	**1,592.0**	**1,649.3**	**1,612.4**	**1,621.0**
Residential	237.8	262.2	241.5	273.8	275.5	256.4	258.6
Commercial	142.0	162.9	173.2	192.5	192.9	173.8	180.9
Industrial	407.4	387.8	468.1	493.5	501.5	486.1	499.6
Transportation	36.0	33.1	42.3	50.9	58.9	58.7	65.1
Electric Power	175.4	318.9	505.6	577.9	616.6	634.8	612.9
U.S. Territories	NO	1.3	2.5	3.3	3.8	2.6	3.9
Petroleum	**2,009.2**	**2,467.0**	**2,148.8**	**2,185.8**	**2,178.1**	**1,896.5**	**2,060.4**
Residential	97.8	95.9	51.9	64.4	65.9	56.8	54.7
Commercial	74.3	54.9	56.8	51.5	56.2	53.2	50.7
Industrial	287.1	345.2	262.2	265.6	264.9	238.9	232.9
Transportation	1,432.9	1,825.5	1,737.8	1,762.0	1,757.5	1,513.9	1,687.3
Electric Power	97.5	98.0	18.9	22.2	16.2	16.2	17.7
U.S. Territories	19.5	47.6	21.1	20.1	17.5	17.6	17.0
Geothermal[a]	**0.5**	**0.5**	**0.4**	**0.4**	**0.4**	**0.4**	**0.4**
Electric Power	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Total	**4,728.2**	**5,747.3**	**4,852.5**	**4,989.8**	**4,855.9**	**4,344.9**	**4,639.1**

NO (Not Occurring)

[a] Although not technically a fossil fuel, geothermal energy-related CO_2 emissions are included for reporting purposes. The source of CO_2 is non-condensable gases in subterranean heated water.

Note: Totals may not sum due to independent rounding.

Trends in CO_2 emissions from fossil fuel combustion are influenced by many long-term and short-term factors. On a year-to-year basis, the overall demand for fossil fuels in the United States and other countries generally fluctuates in response to changes in general economic conditions, energy prices, weather, and the availability of non-fossil alternatives. For example, in a year with increased consumption of goods and services, low fuel prices, severe summer and winter weather conditions, nuclear plant closures, and lower precipitation feeding hydroelectric dams, there would likely be proportionally greater fossil fuel consumption than a year with poor economic performance, high fuel prices, mild temperatures, and increased output from nuclear and hydroelectric plants. The 2020 to 2021 trends reflect impacts of the COVID-19 pandemic which generally led to a reduction in demand for fossil fuels in 2020, but an increase in demand as activities rebounded in 2021.

Longer-term changes in energy usage patterns, however, tend to be more a function of aggregate societal trends that affect the scale of energy use (e.g., population, number of cars, size of houses, and number of houses), the efficiency with which energy is used in equipment (e.g., cars, HVAC systems, power plants, steel mills, and light bulbs), and social planning and consumer behavior (e.g., walking, bicycling, or telecommuting to work instead of driving).

[6] An additional discussion of fossil fuel emission trends is presented in the Trends in U.S. Greenhouse Gas Emissions chapter.

Carbon dioxide emissions also depend on the source of energy and its carbon (C) intensity. The amount of C in fuels varies significantly by fuel type. For example, coal contains the highest amount of C per unit of useful energy. Petroleum has roughly 75 percent of the C per unit of energy as coal, and natural gas has only about 55 percent.[7] Table 3-6 shows annual changes in emissions during the last five years for coal, petroleum, and natural gas in selected sectors.

Table 3-6: Annual Change in CO_2 Emissions and Total 2021 CO_2 Emissions from Fossil Fuel Combustion for Selected Fuels and Sectors (MMT CO_2 Eq. and Percent)

Sector	Fuel Type	2017 to 2018		2018 to 2019		2019 to 2020		2020 to 2021		Total 2021
Transportation	Petroleum	24.1	1.4%	-4.5	-0.3%	-243.6	-13.9%	173.5	11.5%	1,687.3
Electric Power	Coal	-54.2	-4.5%	-179.3	-15.6%	-185.4	-19.0%	121.8	15.5%	909.9
Electric Power	Natural Gas	72.3	14.3%	38.7	6.7%	18.2	3.0%	-22.0	-3.5%	612.9
Industrial	Natural Gas	25.3	5.4%	8.0	1.6%	-15.5	-3.1%	13.6	2.8%	499.6
Residential	Natural Gas	32.3	13.4%	1.7	0.6%	-19.1	-6.9%	2.3	0.9%	258.6
Commercial	Natural Gas	19.3	11.2%	0.4	0.2%	-19.1	-9.9%	7.0	4.0%	180.9
Transportation	**All Fuels[a]**	**32.8**	**1.8%**	**3.5**	**0.2%**	**-243.9**	**-13.4%**	**179.9**	**11.4%**	**1,752.4**
Electric Power	**All Fuels[a]**	**21.4**	**1.2%**	**-146.7**	**-8.4%**	**-167.2**	**-10.4%**	**101.3**	**7.0%**	**1,540.9**
Industrial	**All Fuels[a]**	**24.5**	**3.1%**	**2.4**	**0.3%**	**-48.0**	**-5.9%**	**7.7**	**1.0%**	**775.6**
Residential	**All Fuels[a]**	**44.8**	**15.3%**	**3.2**	**0.9%**	**-28.2**	**-8.3%**	**0.2**	**0.1%**	**313.3**
Commercial	**All Fuels[a]**	**13.8**	**6.0%**	**4.9**	**2.0%**	**-22.2**	**-8.9%**	**4.6**	**2.0%**	**233.0**
All Sectors[a,b]	**All Fuels[a]**	**137.3**	**2.8%**	**-133.9**	**-2.7%**	**-511.0**	**-10.5%**	**294.2**	**6.8%**	**4,639.1**

[a] Includes sector and fuel combinations not shown in this table.

[b] Includes U.S. Territories.

As shown in Table 3-6, recent trends in CO_2 emissions from fossil fuel combustion show a 2.8 percent increase from 2017 to 2018, a 2.7 percent decrease from 2018 to 2019, a 10.5 percent decrease from 2019 to 2020, and a 6.8 percent increase from 2020 to 2021. These changes contributed to an overall 4.4 percent decrease in CO_2 emissions from fossil fuel combustion from 2017 to 2021.

Recent trends in CO_2 emissions from fossil fuel combustion are largely driven by the electric power sector, which until 2017 has accounted for the largest portion of these emissions. The types of fuels consumed to produce electricity have changed in recent years. Electric power sector consumption of natural gas primarily increased due to increased production capacity as natural gas-fired plants replaced coal-fired plants and increased electricity demand related to heating and cooling needs (EIA 2018; EIA 2023d). Total net electric power generation from all fossil and non-fossil sources increased by 3.6 percent from 2017 to 2018, decreased by 1.3 percent from 2018 to 2019, decreased by 2.9 percent from 2019 to 2020, and increased by 2.7 percent from 2020 to 2021 (EIA 2023a). Carbon dioxide emissions from the electric power sector increased from 2020 to 2021 by 7.0 percent due to increased production and the increased use of coal for electric power generation. Carbon dioxide emissions from coal consumption for electric power generation decreased by 24.6 percent overall since 2017, but increased by 15.5 percent from 2020 to 2021.

The recent trends in CO_2 emissions from fossil fuel combustion also follow changes in heating degree days (see Box 3-2). Emissions from natural gas consumption in the residential and commercial sectors increased by 7.1 percent and 4.4 percent from 2017 to 2021, respectively. This trend can be partially attributed to a 2.5 percent increase in heating degree days from 2017 to 2021, which led to an increased demand for heat in these sectors. Industrial consumption of natural gas is dependent on market effects of supply and demand in addition to weather-related heating needs.

Petroleum use in the transportation sector is another major driver of emissions, representing the largest source of CO_2 emissions from fossil fuel combustion in 2021. Emissions from petroleum consumption for transportation have

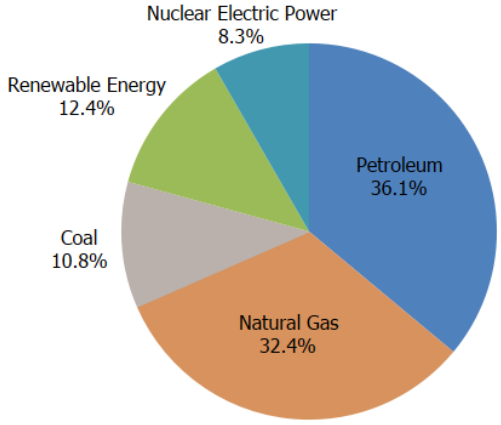
[7] Based on national aggregate carbon content of all coal, natural gas, and petroleum fuels combusted in the United States. See Annex 2.2 for more details on fuel carbon contents.

decreased by 2.9 percent since 2017 and are primarily attributed to a 0.5 percent decrease in VMT over the same time period. Beginning with 2017, the transportation sector is the largest source of national CO_2 emissions–whereas in prior years, electric power was the largest source sector.

The overall 2020 to 2021 trends were largely driven by the gradual recovery from the COVID-19 pandemic, which saw reduced economic activity in 2020 and caused changes in energy demand and supply patterns across different sectors. The recovery from the COVID-19 pandemic generally led to increased energy use and emissions across all economic sectors from 2020 to 2021. The increase in emissions from 2020 to 2021 was also due to a reversal in recent trends in coal use. In recent years the trend has been one of decreased coal use however, from 2020 to 2021 overall use of coal increased by 14.6 percent (EIA 2023a).

In the United States, 79.3 percent of the energy used in 2021 was produced through the combustion of fossil fuels such as petroleum, natural gas, and coal (see Figure 3-4 and Figure 3-5). Specifically, petroleum supplied the largest share of domestic energy demands, accounting for 36 percent of total U.S. energy used in 2021. Natural gas and coal followed in order of fossil fuel energy demand importance, accounting for approximately 32 percent and 11 percent of total U.S. energy used, respectively. Petroleum was consumed primarily in the transportation end-use sector and the majority of coal was used in the electric power sector. Natural gas was broadly consumed in all end-use sectors except transportation (see Figure 3-6) (EIA 2022a). The remaining portion of energy used in 2021 was supplied by nuclear electric power (8 percent) and by a variety of renewable energy sources (12 percent), primarily wind energy, hydroelectric power, solar, geothermal and biomass (EIA 2022a).[8]

Figure 3-4: 2021 U.S. Energy Use by Energy Source



[8] Renewable energy, as defined in EIA's energy statistics, includes the following energy sources: hydroelectric power, geothermal energy, biomass, solar energy, and wind energy.

Figure 3-5: Annual U.S. Energy Use

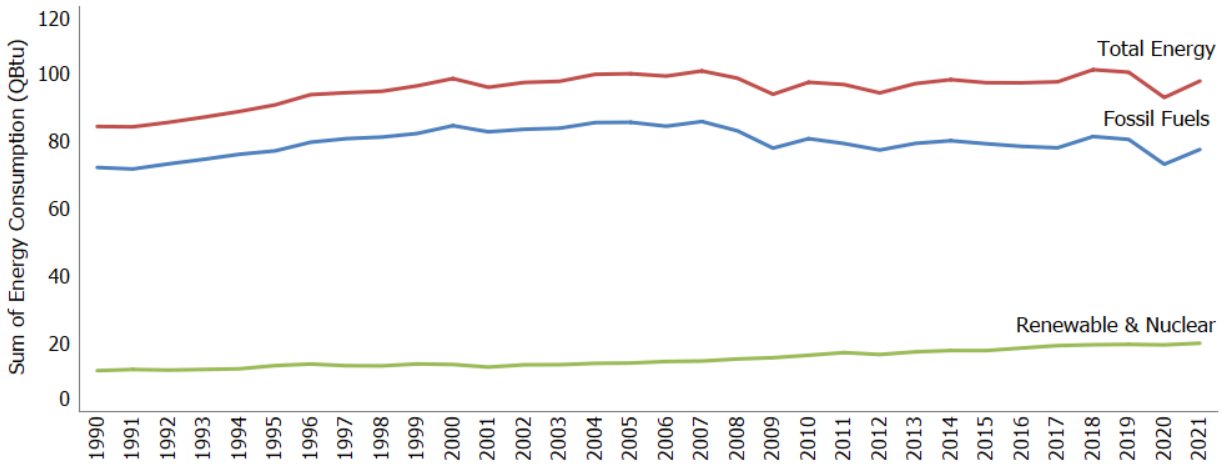
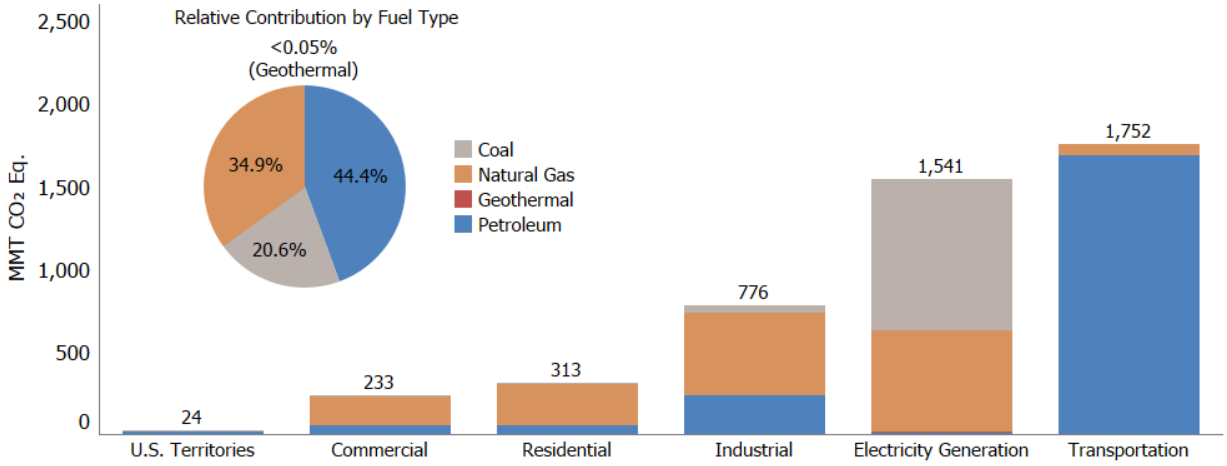


Figure 3-6: 2021 CO_2 Emissions from Fossil Fuel Combustion by Sector and Fuel Type



Fossil fuels are generally combusted for the purpose of producing energy for useful heat and work. During the combustion process, the C stored in the fuels is oxidized and emitted as CO_2 and smaller amounts of other gases, including CH_4, carbon monoxide (CO), and non-methane volatile organic compounds (NMVOCs).[9] These other C-containing non-CO_2 gases are emitted as a byproduct of incomplete fuel combustion, but are, for the most part, eventually oxidized to CO_2 in the atmosphere. Therefore, as per IPCC guidelines it is assumed all of the C in fossil fuels used to produce energy is eventually converted to atmospheric CO_2.

Box 3-2: Weather and Non-Fossil Energy Effects on CO_2 Emissions from Fossil Fuel Combustion Trends

The United States in 2021 experienced a colder winter overall compared to 2020, as heating degree days increased 0.5 percent. Colder winter conditions compared to 2020 impacted the amount of energy required for heating. In 2021 heating degree days in the United States were 9.1 percent below normal (see Figure 3-7). Cooling degree days decreased by 1.8 percent compared to 2020, which decreased demand for air conditioning in the residential and commercial sector. Cooler summer conditions compared to 2020 impacted the amount of

[9] See the sections entitled Stationary Combustion and Mobile Combustion in this chapter for information on non-CO_2 gas emissions from fossil fuel combustion.

energy required for cooling. 2020 cooling degree days in the United States were 11.4 percent above normal (see Figure 3-8) (EIA 2023a).[10] The combination of colder winter and summer conditions led to an overall increase in residential and commercial energy consumption of 0.1 and 2.0 percent, respectively, relative to 2020.

Figure 3-7: Annual Deviations from Normal Heating Degree Days for the United States (1970–2021, Index Normal = 100)

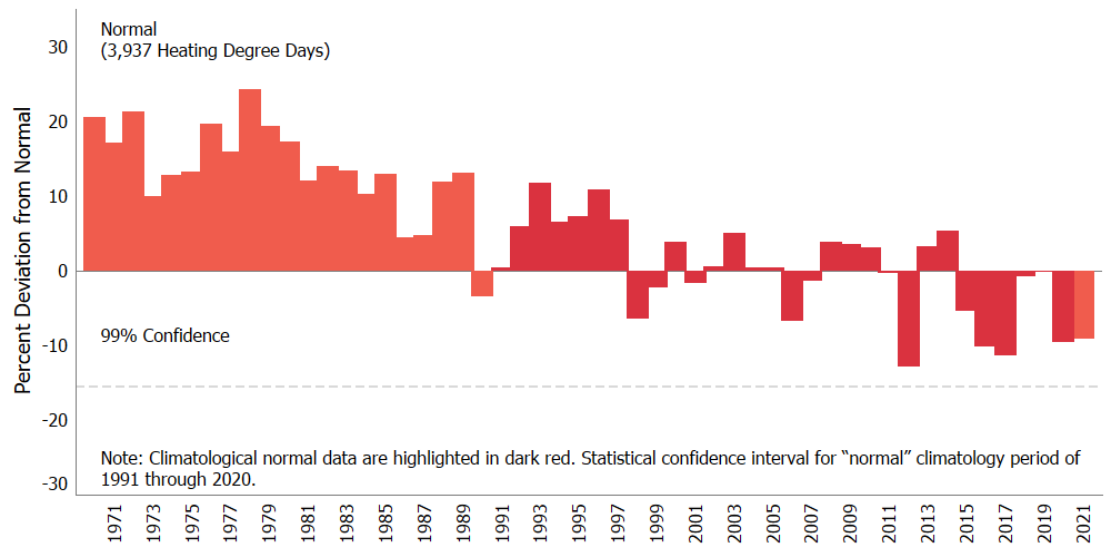
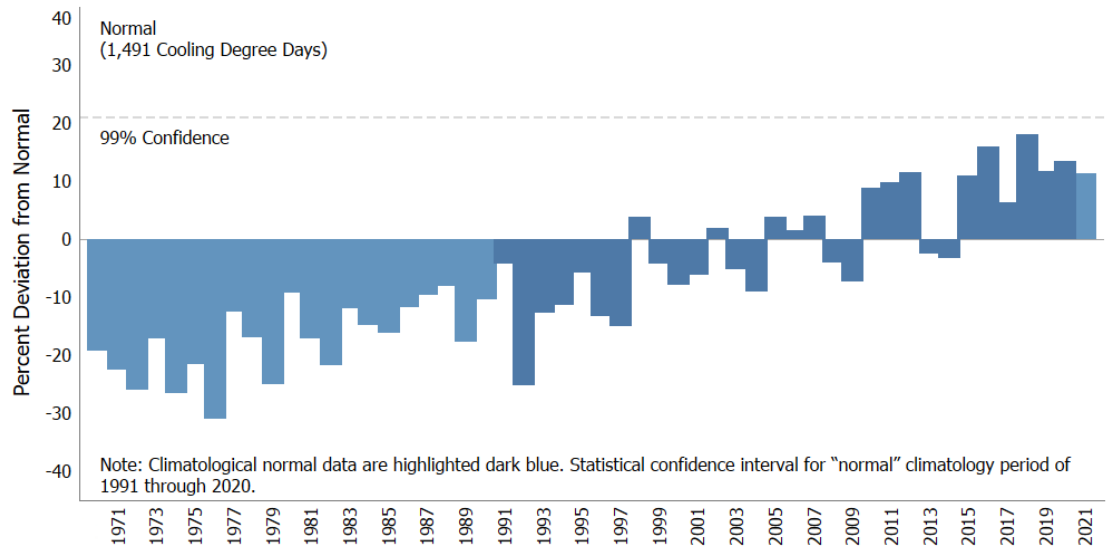


Figure 3-8: Annual Deviations from Normal Cooling Degree Days for the United States (1970–2021, Index Normal = 100)



[10] Degree days are relative measurements of outdoor air temperature. Heating degree days are deviations of the mean daily temperature below 65 degrees Fahrenheit, while cooling degree days are deviations of the mean daily temperature above 65 degrees Fahrenheit. Heating degree days have a considerably greater effect on energy demand and related emissions than do cooling degree days. Excludes Alaska and Hawaii. Normals are based on data from 1991 through 2020. The variation in these normals during this time period was ±16 percent and ±27 percent for heating and cooling degree days, respectively (99 percent confidence interval).

The carbon intensity of the electric power sector is impacted by the amount of non-fossil energy sources of electricity. The utilization (i.e., capacity factors)[11] of nuclear power plants in 2021 remained high at 93 percent. In 2021, nuclear power represented 20 percent of total electricity generation. Since 1990, the wind and solar power sectors have shown strong growth and have become relatively important electricity sources. Between 1990 and 2021, renewable energy generation (in kWh) from solar and wind energy have increased from 0.1 percent in 1990 to 12 percent in 2021 of total electricity generation, which helped drive the decrease in the carbon intensity of the electricity supply in the United States.

Stationary Combustion

The direct combustion of fuels by stationary sources in the electric power, industrial, commercial, and residential sectors represent the greatest share of U.S. greenhouse gas emissions. Table 3-7 presents CO_2 emissions from fossil fuel combustion by stationary sources. The CO_2 emitted is closely linked to the type of fuel being combusted in each sector (see Methodology section of CO_2 from Fossil Fuel Combustion). In addition to the CO_2 emitted from fossil fuel combustion, CH_4 and N_2O are emitted as well. Table 3-8 and Table 3-9 present CH_4 and N_2O emissions from the combustion of fuels in stationary sources. The CH_4 and N_2O emissions are linked to the type of fuel being combusted as well as the combustion technology (see Methodology section for CH_4 and N_2O from Stationary Combustion).

Table 3-7: CO_2 Emissions from Stationary Fossil Fuel Combustion (MMT CO_2 Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	**1,820.0**	**2,400.1**	**1,732.0**	**1,753.4**	**1,606.7**	**1,439.6**	**1,540.9**
Coal	1,546.5	1,982.8	1,207.1	1,152.9	973.5	788.2	909.9
Natural Gas	175.4	318.9	505.6	577.9	616.6	634.8	612.9
Fuel Oil	97.5	98.0	18.9	22.2	16.2	16.2	17.7
Geothermal	0.5	0.5	0.4	0.4	0.4	0.4	0.4
Industrial	**852.4**	**850.8**	**789.0**	**813.5**	**815.9**	**767.9**	**775.6**
Coal	157.8	117.8	58.7	54.4	49.5	43.0	43.0
Natural Gas	407.4	387.8	468.1	493.5	501.5	486.1	499.6
Fuel Oil	287.1	345.2	262.2	265.6	264.9	238.9	232.9
Residential	**338.6**	**358.9**	**293.4**	**338.2**	**341.4**	**313.2**	**313.3**
Coal	3.0	0.8	NO	NO	NO	NO	NO
Natural Gas	237.8	262.2	241.5	273.8	275.5	256.4	258.6
Fuel Oil	97.8	95.9	51.9	64.4	65.9	56.8	54.7
Commercial	**228.3**	**227.1**	**232.0**	**245.8**	**250.7**	**228.5**	**233.0**
Coal	12.0	9.3	2.0	1.8	1.6	1.4	1.4
Natural Gas	142.0	162.9	173.2	192.5	192.9	173.8	180.9
Fuel Oil	74.3	54.9	56.8	51.5	56.2	53.2	50.7
U.S. Territories	**20.0**	**51.9**	**25.9**	**25.9**	**24.8**	**23.3**	**23.8**
Coal	0.5	3.0	2.3	2.6	3.6	3.1	2.9
Natural Gas	NO	1.3	2.5	3.3	3.8	2.6	3.9
Fuel Oil	19.5	47.6	21.1	20.1	17.5	17.6	17.0
Total	**3,259.3**	**3,888.8**	**3,072.4**	**3,176.9**	**3,039.5**	**2,772.4**	**2,886.6**

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

[11] The capacity factor equals generation divided by net summer capacity. Summer capacity is defined as "The maximum output that generating equipment can supply to system load, as demonstrated by a multi-hour test, at the time of summer peak demand (period of June 1 through September 30)" (EIA 2020a). Data for both the generation and net summer capacity are from EIA (2023a).

Table 3-8: CH_4 Emissions from Stationary Combustion (MMT CO_2 Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	**0.5**	**1.0**	**1.2**	**1.4**	**1.4**	**1.4**	**1.4**
Coal	0.4	0.4	0.3	0.3	0.2	0.2	0.2
Fuel Oil	+	+	+	+	+	+	+
Natural gas	0.1	0.5	1.0	1.1	1.2	1.2	1.2
Wood	+	+	+	+	+	+	+
Industrial	**2.0**	**1.9**	**1.7**	**1.7**	**1.7**	**1.6**	**1.6**
Coal	0.5	0.3	0.2	0.2	0.1	0.1	0.1
Fuel Oil	0.2	0.2	0.2	0.2	0.2	0.2	0.1
Natural gas	0.2	0.2	0.2	0.2	0.3	0.2	0.3
Wood	1.2	1.2	1.2	1.1	1.1	1.1	1.1
Commercial	**1.2**	**1.2**	**1.3**	**1.4**	**1.4**	**1.3**	**1.3**
Coal	+	+	+	+	+	+	+
Fuel Oil	0.3	0.2	0.2	0.2	0.2	0.2	0.2
Natural gas	0.4	0.4	0.4	0.5	0.5	0.4	0.5
Wood	0.5	0.6	0.7	0.7	0.7	0.7	0.7
Residential	**5.9**	**4.5**	**4.2**	**5.1**	**5.3**	**4.4**	**4.6**
Coal	0.3	0.1	NO	NO	NO	NO	NO
Fuel Oil	0.4	0.4	0.2	0.3	0.3	0.2	0.2
Natural Gas	0.6	0.7	0.6	0.7	0.7	0.6	0.6
Wood	4.6	3.4	3.4	4.2	4.4	3.5	3.7
U.S. Territories	**+**	**0.1**	**+**	**+**	**+**	**+**	**+**
Coal	+	+	+	+	+	+	+
Fuel Oil	+	0.1	+	+	+	+	+
Natural Gas	NO	+	+	+	+	+	+
Wood	NE	NE	NE	NE	NE	NE	NE
Total	**9.6**	**8.8**	**8.6**	**9.6**	**9.8**	**8.8**	**8.9**

+ Does not exceed 0.05 MMT CO_2 Eq.

NO (Not Occurring)

NE (Not Estimated)

Note: Totals may not sum due to independent rounding.

Table 3-9: N_2O Emissions from Stationary Combustion (MMT CO_2 Eq.)

Sector/Fuel Type	1990	2005	2017	2018	2019	2020	2021
Electric Power	**18.2**	**26.7**	**22.0**	**21.7**	**18.8**	**17.5**	**19.0**
Coal	17.9	24.9	18.8	18.1	14.8	13.5	15.1
Fuel Oil	0.1	0.1	+	+	+	+	+
Natural Gas	0.3	1.7	3.2	3.6	3.9	4.0	3.9
Wood	+	+	+	+	+	+	+
Industrial	**2.7**	**2.6**	**2.3**	**2.2**	**2.2**	**2.1**	**2.1**
Coal	0.7	0.5	0.2	0.2	0.2	0.2	0.2
Fuel Oil	0.4	0.5	0.3	0.3	0.3	0.3	0.3
Natural Gas	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Wood	1.5	1.5	1.5	1.4	1.4	1.4	1.4
Commercial	**0.3**	**0.3**	**0.3**	**0.3**	**0.3**	**0.3**	**0.3**
Coal	+	+	+	+	+	+	+
Fuel Oil	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Natural Gas	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Wood	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Residential	**0.9**	**0.8**	**0.7**	**0.8**	**0.8**	**0.7**	**0.7**
Coal	+	+	NO	NO	NO	NO	NO
Fuel Oil	0.2	0.2	0.1	0.2	0.2	0.1	0.1

Natural Gas	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Wood	0.6	0.4	0.4	0.5	0.5	0.4	0.5
U.S. Territories	**+**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Coal	+	+	+	+	+	+	+
Fuel Oil	+	0.1	+	+	+	+	+
Natural Gas	NO	+	+	+	+	+	+
Wood	NE	NE	NE	NE	NE	NE	NE
Total	**22.3**	**30.5**	**25.3**	**25.1**	**22.2**	**20.7**	**22.1**

+ Does not exceed 0.05 MMT CO_2 Eq.
NO (Not Occurring)
NE (Not Estimated)
Note: Totals may not sum due to independent rounding.

Fossil Fuel Combustion Emissions by Sector

Table 3-10 provides an overview of the CO_2, CH_4, and N_2O emissions from fossil fuel combustion by sector, including transportation, electric power, industrial, residential, commercial, and U.S. Territories.

Table 3-10: CO_2, CH_4, and N_2O Emissions from Fossil Fuel Combustion by Sector (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	**1,514.6**	**1,900.0**	**1,801.6**	**1,833.3**	**1,838.3**	**1,591.2**	**1,771.7**
CO_2	1,468.9	1,858.6	1,780.1	1,812.9	1,816.4	1,572.5	1,752.4
CH_4	7.2	4.4	2.9	2.9	2.9	2.6	2.6
N_2O	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Electric Power	**1,838.7**	**2,427.8**	**1,755.3**	**1,776.5**	**1,626.9**	**1,458.5**	**1,561.3**
CO_2	1,820.0	2,400.1	1,732.0	1,753.4	1,606.7	1,439.6	1,540.9
CH_4	0.5	1.0	1.2	1.4	1.4	1.4	1.4
N_2O	18.2	26.7	22.0	21.7	18.8	17.5	19.0
Industrial	**857.2**	**855.4**	**793.0**	**817.5**	**819.8**	**771.6**	**779.3**
CO_2	852.4	850.8	789.0	813.5	815.9	767.9	775.6
CH_4	2.0	1.9	1.7	1.7	1.7	1.6	1.6
N_2O	2.7	2.6	2.3	2.2	2.2	2.1	2.1
Residential	**345.4**	**364.2**	**298.3**	**344.2**	**347.6**	**318.3**	**318.6**
CO_2	338.6	358.9	293.4	338.2	341.4	313.2	313.3
CH_4	5.9	4.5	4.2	5.1	5.3	4.4	4.6
N_2O	0.9	0.8	0.7	0.8	0.8	0.7	0.7
Commercial	**229.8**	**228.6**	**233.6**	**247.5**	**252.4**	**230.1**	**234.6**
CO_2	228.3	227.1	232.0	245.8	250.7	228.5	233.0
CH_4	1.2	1.2	1.3	1.4	1.4	1.3	1.3
N_2O	0.3	0.3	0.3	0.3	0.3	0.3	0.3
U.S. Territories[a]	**20.1**	**52.1**	**26.0**	**26.0**	**24.9**	**23.4**	**23.9**
Total	**4,805.7**	**5,828.0**	**4,907.9**	**5,045.0**	**4,909.8**	**4,393.0**	**4,689.4**

[a] U.S. Territories are not apportioned by sector, and emissions shown in the table are total greenhouse gas emissions from all fuel combustion sources.
Note: Totals may not sum due to independent rounding.

Other than greenhouse gases CO_2, CH_4, and N_2O, gases emitted from stationary combustion include the greenhouse gas precursors nitrogen oxides (NO_x), CO, NMVOCs, and SO_2. Methane and N_2O emissions from stationary combustion sources depend upon fuel characteristics, size and vintage of combustion device, along with combustion technology, pollution control equipment, ambient environmental conditions, and operation and maintenance practices. Nitrous oxide emissions from stationary combustion are closely related to air-fuel mixes and combustion temperatures, as well as the characteristics of any pollution control equipment that is employed.

Methane emissions from stationary combustion are primarily a function of the CH_4 content of the fuel and combustion efficiency.

Mobile combustion also produces emissions of CH_4, N_2O, and greenhouse gas precursors including NO_x, CO, and NMVOCs. As with stationary combustion, N_2O and NO_x emissions from mobile combustion are closely related to fuel characteristics, air-fuel mixes, combustion temperatures, and the use of pollution control equipment. Nitrous oxide from mobile sources, in particular, can be formed by the catalytic processes used to control NO_x, CO, and hydrocarbon emissions. Carbon monoxide emissions from mobile combustion are significantly affected by combustion efficiency and the presence of post-combustion emission controls. Carbon monoxide emissions are highest when air-fuel mixtures have less oxygen than required for complete combustion. These emissions occur especially in vehicle idle, low speed, and cold start conditions. Methane and NMVOC emissions from motor vehicles are a function of the CH_4 content of the motor fuel, the amount of hydrocarbons passing uncombusted through the engine, and any post-combustion control of hydrocarbon emissions (such as catalytic converters).

An alternative method of presenting combustion emissions is to allocate emissions associated with electric power to the sectors in which it is used. Four end-use sectors are defined: transportation, industrial, residential, and commercial. In Table 3-11 below, electric power emissions have been distributed to each end-use sector based upon the sector's share of national electricity use, with the exception of CH_4 and N_2O from transportation electricity use.[12] Emissions from U.S. Territories are also calculated separately due to a lack of end-use-specific consumption data.[13] This method assumes that emissions from combustion sources are distributed across the four end-use sectors based on the ratio of electricity use in that sector. The results of this alternative method are presented in Table 3-11.

Table 3-11: CO_2, CH_4, and N_2O Emissions from Fossil Fuel Combustion by End-Use Sector with Electricity Emissions Distributed (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	**1,517.6**	**1,904.7**	**1,805.9**	**1,838.1**	**1,843.1**	**1,595.3**	**1,776.7**
CO_2	1,472.0	1,863.3	1,784.4	1,817.7	1,821.2	1,576.6	1,757.4
CH_4	7.2	4.4	2.9	2.9	2.9	2.6	2.6
N_2O	38.4	37.0	18.5	17.5	19.0	16.1	16.7
Industrial	**1,550.7**	**1,600.2**	**1,304.2**	**1,325.5**	**1,291.1**	**1,186.8**	**1,230.3**
CO_2	1,538.9	1,587.1	1,293.4	1,314.9	1,281.4	1,177.7	1,220.7
CH_4	2.2	2.2	2.1	2.1	2.1	2.0	2.0
N_2O	9.6	10.8	8.7	8.5	7.6	7.1	7.6
Residential	**944.2**	**1,230.1**	**923.8**	**994.9**	**938.6**	**870.8**	**898.5**
CO_2	931.3	1,214.9	910.5	980.5	925.1	858.5	885.6
CH_4	6.0	4.9	4.7	5.6	5.8	4.9	5.1
N_2O	6.9	10.3	8.5	8.8	7.7	7.4	7.8
Commercial	**773.1**	**1,040.9**	**848.0**	**860.5**	**812.0**	**716.8**	**760.1**
CO_2	766.0	1,030.1	838.2	850.9	803.4	708.8	751.6
CH_4	1.3	1.5	1.8	1.8	1.9	1.8	1.8
N_2O	5.7	9.3	8.0	7.8	6.8	6.2	6.7
U.S. Territories[a]	**20.1**	**52.1**	**26.0**	**26.0**	**24.9**	**23.4**	**23.9**
Total	**4,805.7**	**5,828.0**	**4,907.9**	**5,045.0**	**4,909.8**	**4,393.0**	**4,689.4**

[a] U.S. Territories are not apportioned by sector, and emissions are total greenhouse gas emissions from all fuel combustion sources.

[12] Separate calculations are performed for transportation-related CH_4 and N_2O. The methodology used to calculate these emissions is discussed in the Mobile Combustion section.

[13] U.S. Territories (including American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands) consumption data obtained from EIA are only available at the aggregate level and cannot be broken out by end-use sector. The distribution of emissions to each end-use sector for the 50 states does not apply to territories data.

Notes: Totals may not sum due to independent rounding. Emissions from fossil fuel combustion by electric power are allocated based on aggregate national electricity use by each end-use sector.

Electric Power Sector

The process of generating electricity is the largest stationary source of CO_2 emissions in the United States, representing 28.6 percent of total CO_2 emissions from all CO_2 emissions sources across the United States. Methane and N_2O accounted for a small portion of total greenhouse gas emissions from electric power, representing 0.1 percent and 1.2 percent, respectively. Electric power also accounted for 33.2 percent of CO_2 emissions from fossil fuel combustion in 2021. Methane and N_2O from electric power represented 12.1 and 48.7 percent of total CH_4 and N_2O emissions from fossil fuel combustion in 2021, respectively.

For the underlying energy data used in this chapter, the Energy Information Administration (EIA) places electric power generation into three functional categories: the electric power sector, the commercial sector, and the industrial sector. The energy use and emissions associated with the electric power sector are included here. The electric power sector consists of electric utilities and independent power producers whose primary business is the production of electricity. This includes both regulated utilities and non-utilities (e.g., independent power producers, qualifying co-generators, and other small power producers). Energy use and emissions associated with electric generation in the commercial and industrial sectors is reported in those other sectors where the producer of the power indicates that its primary business is something other than the production of electricity.[14]

Total greenhouse gas emissions from the electric power sector have decreased by 15.1 percent since 1990. From 1990 to 2007, electric power sector emissions increased by 33 percent, driven by a significant increase in electricity demand (39 percent) while the carbon intensity of electricity generated showed a modest decline (3.2 percent). From 2008 to 2021, as electricity demand increased by 1.9 percent, electric power sector emissions decreased by 35 percent, driven by a significant drop (22 percent) in the carbon intensity of electricity generated. Overall, the carbon intensity of the electric power sector, in terms of CO_2 Eq. per QBtu, decreased by 25 percent from 1990 to 2020 with additional trends detailed in Box 3-4. This decoupling of electric power generation and the resulting CO_2 emissions is shown in Figure 3-9. This recent decarbonization of the electric power sector is a result of several key drivers.

Coal-fired electric generation (in kilowatt-hours [kWh]) decreased from 54 percent of generation in 1990 to 23 percent in 2021.[15] This corresponded with an increase in natural gas generation and renewable energy generation, largely from wind and solar energy. Natural gas generation (in kWh) represented 11 percent of electric power generation in 1990 and increased over the 32-year period to represent 37 percent of electric power sector generation in 2021 (see Table 3-12). Natural gas has a much lower carbon content than coal and is generated in power plants that are generally more efficient in terms of kWh produced per Btu of fuel combusted, which has led to lower emissions as natural gas replaces coal-powered electricity generation. Natural gas and coal used in the United States in 2021 had an average carbon content of 14.43 MMT C/QBtu and 26.13 MMT C/QBtu respectively.

Table 3-12: Electric Power Generation by Fuel Type (Percent)

Fuel Type	1990	2005	2017	2018	2019	2020	2021
Coal	54.1%	51.1%	30.9%	28.4%	24.2%	19.9%	22.6%
Natural Gas	10.7%	17.5%	30.9%	34.0%	37.3%	39.5%	37.3%
Nuclear	19.9%	20.0%	20.8%	20.1%	20.4%	20.5%	19.7%
Renewables	11.3%	8.3%	16.8%	16.8%	17.6%	19.5%	19.9%
Petroleum	4.1%	3.0%	0.5%	0.6%	0.4%	0.4%	0.5%

[14] Utilities primarily generate power for the U.S. electric grid for sale to retail customers. Non-utilities typically generate electricity for sale on the wholesale electricity market (e.g., to utilities for distribution and resale to retail customers). Where electricity generation occurs outside the EIA-defined electric power sector, it is typically for the entity's own use.

[15] Values represent electricity *net* generation from the electric power sector (EIA 2023a).

Other Gases[a]	0.0%		0.1%		0.1%	0.1%	0.1%	0.1%	0.1%
Net Electricity Generation (Billion kWh)[b]	2,905		3,902		*3,878*	*4,020*	*3,966*	*3,851*	*3,954*

+ Does not exceed 0.05 percent.

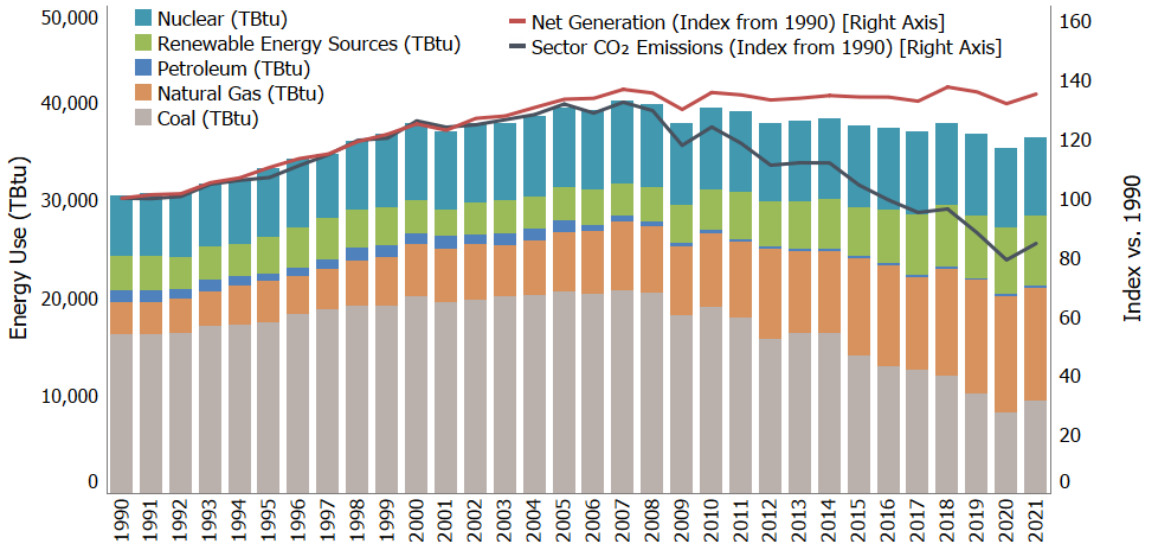
[a] Other gases include blast furnace gas, propane gas, and other manufactured and waste gases derived from fossil fuels.

[b] Represents net electricity generation from the electric power sector. Excludes net electricity generation from commercial and industrial combined-heat-and-power and electricity-only plants. Does not include electricity generation from purchased steam as the fuel used to generate the steam cannot be determined.

In 2021, CO_2 emissions from the electric power sector increased by 7.0 percent relative to 2020. This increase in CO_2 emissions was primarily driven by an increase in coal consumed to produce electricity in the electric power sector. Consumption of coal for electric power increased by 15.4 percent while consumption of natural gas decreased 3.5 percent from 2020 to 2021, leading to an overall increase in emissions. There has also been a rapid increase in renewable energy electricity generation in the electric power sector in recent years. Electricity generation from renewable sources increased by 4 percent from 2020 to 2021 (see Table 3-12). A decrease in coal-powered electricity generation and increase in natural gas and renewable energy electricity generation contributed to a decoupling of emissions trends from electric power generation trends over the recent time series (see Figure 3-9).

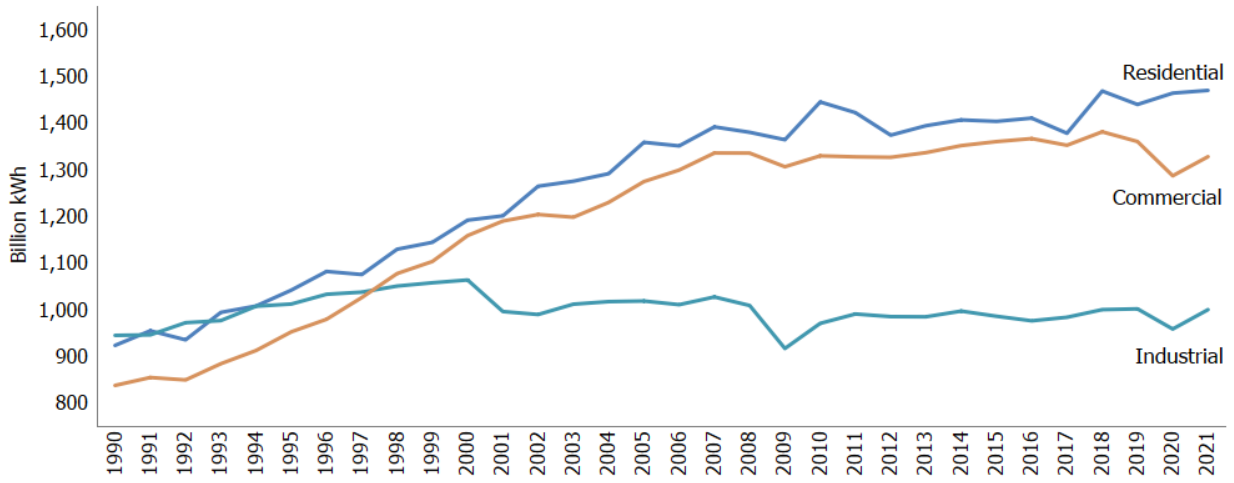
Decreases in natural gas prices and the associated increase in natural gas generation, particularly between 2005 and 2021, was one of the main drivers of the recent fuel switching and decrease in electric power sector carbon intensity. During this time period, the cost of natural gas (in $/MMBtu) decreased by 22 percent while the cost of coal (in $/MMBtu) increased by 71 percent (EIA 2022a). Also, between 1990 and 2021, renewable energy generation (in kWh) from wind and solar energy increased from 0.1 percent of total generation in 1990 to 12 percent in 2021, which also helped drive the decrease in electric power sector carbon intensity. This decrease in carbon intensity occurred even as total electricity retail sales increased 40 percent, from 2,713 billion kWh in 1990 to 3,806 billion kWh in 2021.

Figure 3-9: Fuels Used in Electric Power Generation and Total Electric Power Sector CO_2 Emissions



Electricity was used primarily in the residential, commercial, and industrial end-use sectors for lighting, heating, electric motors, appliances, electronics, and air conditioning (see Figure 3-10). Note that transportation is an end-use sector as well but is not shown in Figure 3-10 due to the sector's relatively low percentage of electricity use. Table 3-13 provides a break-out of CO_2 emissions from electricity use in the transportation end-use sector.

Figure 3-10: Electric Power Retail Sales by End-Use Sector



In 2021, electricity sales to the residential and commercial end-use sectors, as presented in Figure 3-10, increased by 0.4 percent and 3.2 percent relative to 2020, respectively. Electricity sales to the industrial sector in 2021 increased by approximately 4.3 percent relative to 2020. The sections below describe end-use sector energy use in more detail. Overall, in 2021, the amount of electricity retail sales (in kWh) increased by 2.4 percent relative to 2020.

Industrial Sector

Industrial sector CO_2, CH_4, and N_2O emissions accounted for 17, 14, and 5 percent of CO_2, CH_4, and N_2O emissions from fossil fuel combustion, respectively in 2021. Carbon dioxide, CH_4, and N_2O emissions resulted from the direct consumption of fossil fuels for steam and process heat production.

The industrial end-use sector, per the underlying energy use data from EIA, includes activities such as manufacturing, construction, mining, and agriculture. The largest of these activities in terms of energy use is manufacturing, of which six industries—Petroleum Refineries, Chemicals, Paper, Primary Metals, Food, and Nonmetallic Mineral Products—represent the majority of the energy use (EIA 2022a; EIA 2009b).

There are many dynamics that impact emissions from the industrial sector including economic activity, changes in the make-up of the industrial sector, changes in the emissions intensity of industrial processes, and weather-related impacts on heating and cooling of industrial buildings.[16] Structural changes within the U.S. economy that lead to shifts in industrial output away from energy-intensive manufacturing products to less energy-intensive products (e.g., from steel to computer equipment) have had a significant effect on industrial emissions.

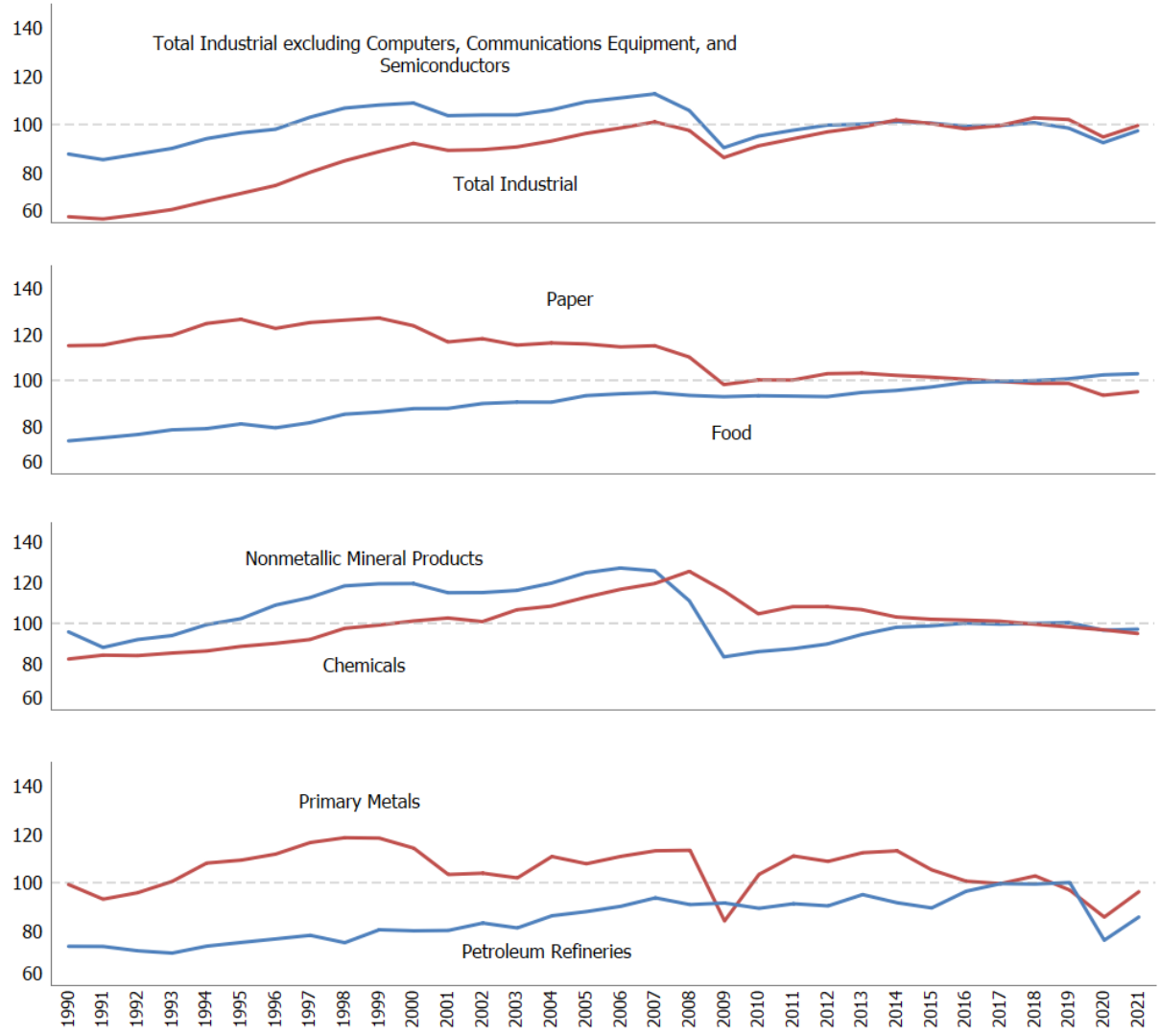
From 2020 to 2021, total industrial production and manufacturing output increased by 4.9 percent (FRB 2022). Over this period, output increased slightly across production indices for Food, Nonmetallic Mineral Products, Paper, Petroleum Refineries, and Primary Metals. Production of chemicals declined slightly between 2020 and 2021 (see Figure 3-11). From 2020 to 2021, total energy use in the industrial sector increased by 1.6 percent, driven mainly by a 2.8 percent increase in the consumption of renewables, while energy use from fossil fuels in the industrial sector increased by 1.4 percent. Due to the relative increases and decreases of individual indices there was an increase in natural gas and an increase in electricity used by the sector (see Figure 3-12). In 2021, CO_2, CH_4,

[16] Some commercial customers are large enough to obtain an industrial price for natural gas and/or electricity and are consequently grouped with the industrial end-use sector in U.S. energy statistics. These misclassifications of large commercial customers likely cause the industrial end-use sector to appear to be more sensitive to weather conditions.

and N_2O emissions from fossil fuel combustion and electricity use within the industrial end-use sector totaled 1,230.3 MMT CO_2 Eq., a 3.7 percent increase from 2020 emissions.

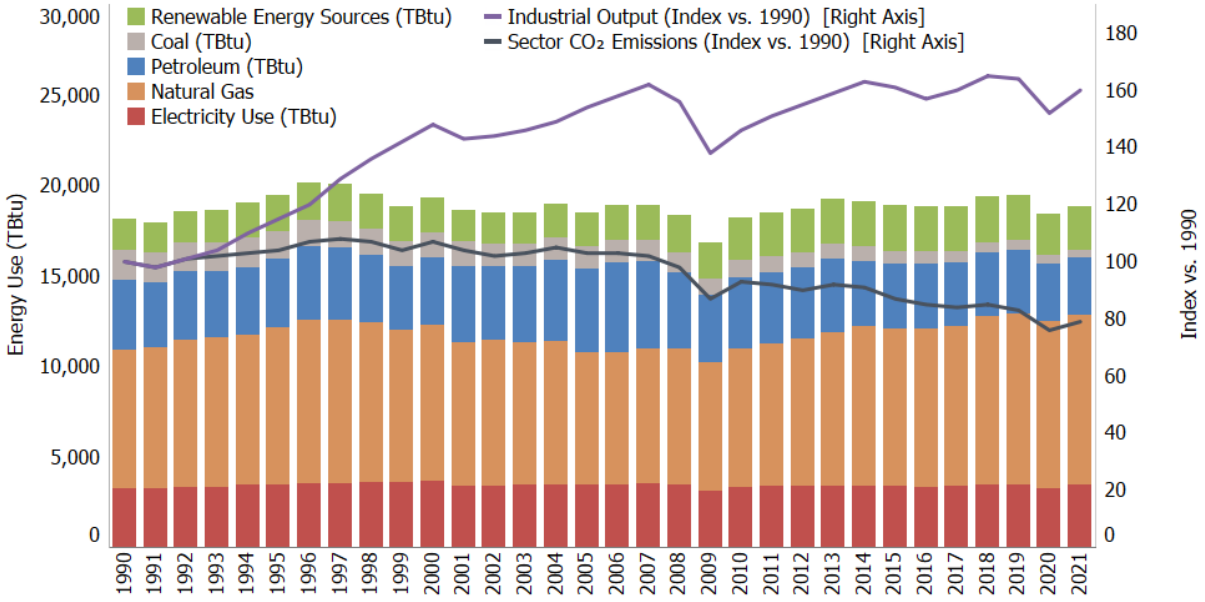
Through EPA's Greenhouse Gas Reporting Program (GHGRP), specific industrial sector trends can be discerned from the overall total EIA industrial fuel consumption data used for these calculations. For example, from 2020 to 2021, the underlying EIA data showed increased consumption of coal and natural gas and decreased consumption of petroleum in the industrial sector. The GHGRP data highlights that several industries contributed to these trends, including chemical manufacturing; pulp, paper and print; food processing, beverages and tobacco; minerals manufacturing; and agriculture-forest-fisheries.[17]

Figure 3-11: Industrial Production Indices (Index 2017=100)



[17] Further details on industrial sector combustion emissions are provided by EPA's GHGRP. See http://ghgdata.epa.gov/ghgp/main.do.

Figure 3-12: Fuels and Electricity Used in Industrial Sector, Industrial Output, and Total Sector CO_2 Emissions (Including Electricity)



Despite the growth in industrial output (60 percent) and the overall U.S. economy (109 percent) from 1990 to 2021, direct CO_2 emissions from fossil fuel combustion in the industrial sector decreased by 9.0 percent over the same time series. A number of factors are assumed to result in decoupling of growth in industrial output from industrial greenhouse gas emissions, for example: (1) more rapid growth in output from less energy-intensive industries relative to traditional manufacturing industries, and (2) energy-intensive industries such as steel are employing new methods, such as electric arc furnaces, that are less carbon intensive than the older methods.

Box 3-3: Uses of Greenhouse Gas Reporting Program Data and Improvements in Reporting Emissions from Industrial Sector Fossil Fuel Combustion

As described in the calculation methodology, total fossil fuel consumption for each year is based on aggregated end-use sector consumption published by the EIA. The availability of facility-level combustion emissions through EPA's GHGRP has provided an opportunity to better characterize the industrial sector's energy consumption and emissions in the United States, through a disaggregation of EIA's industrial sector fuel consumption data from select industries.

For GHGRP 2010 through 2021 reporting years, facility-level fossil fuel combustion emissions reported through EPA's GHGRP were categorized and distributed to specific industry types by utilizing facility-reported NAICS codes (as published by the U.S. Census Bureau). As noted previously in this report, the definitions and provisions for reporting fuel types in EPA's GHGRP include some differences from the Inventory's use of EIA national fuel statistics to meet the UNFCCC reporting guidelines. The IPCC has provided guidance on aligning facility-level reported fuels and fuel types published in national energy statistics, which guided this exercise.[18]

As with previous Inventory reports, the current effort represents an attempt to align, reconcile, and coordinate the facility-level reporting of fossil fuel combustion emissions under EPA's GHGRP with the national-level approach presented in this report. Consistent with recommendations for reporting the Inventory to the UNFCCC, progress was made on certain fuel types for specific industries and has been included in the CRF tables

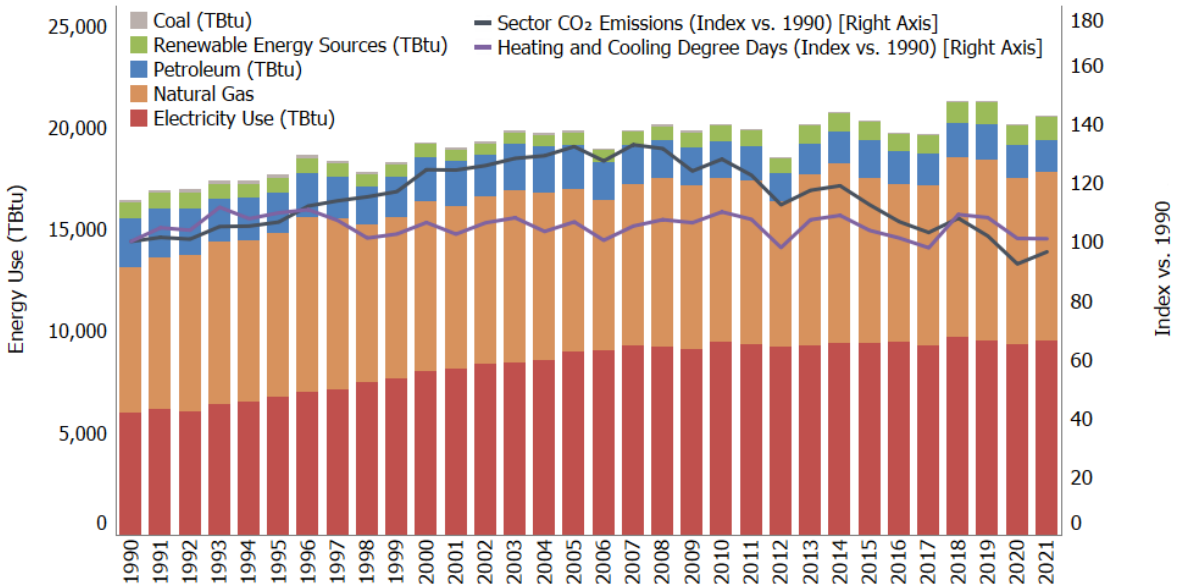
[18] See Section 4 "Use of Facility-Level Data in Good Practice National Greenhouse Gas Inventories" of the IPCC meeting report, and specifically the section on using facility-level data in conjunction with energy data, at http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

that are submitted to the UNFCCC along with this report.[19] The efforts in reconciling fuels focus on standard, common fuel types (e.g., natural gas, distillate fuel oil) where the fuels in EIA's national statistics aligned well with facility-level GHGRP data. For these reasons, the current information presented in the Common Reporting Format (CRF) tables should be viewed as an initial attempt at this exercise. Additional efforts will be made for future Inventory reports to improve the mapping of fuel types and examine ways to reconcile and coordinate any differences between facility-level data and national statistics. The current analysis includes the full time series presented in the CRF tables. Analyses were conducted linking GHGRP facility-level reporting with the information published by EIA in its MECS data in order to disaggregate the full 1990 through 2021 time period in the CRF tables. It is believed that the current analysis has led to improvements in the presentation of data in the Inventory, but further work will be conducted, and future improvements will be realized in subsequent Inventory reports. This includes incorporating the latest MECS data as it becomes available.

Residential and Commercial Sectors

Emissions from the residential and commercial sectors have generally decreased since 2005. Short-term trends are often correlated with seasonal fluctuations in energy use caused by weather conditions, rather than prevailing economic conditions. Population growth and a trend towards larger houses has led to increasing energy use over the time series, while population migration to warmer areas and improved energy efficiency and building insulation have slowed the increase in energy use in recent years. Starting in around 2014, energy use and emissions begin to decouple due to decarbonization of the electric power sector (see Figure 3-13).

Figure 3-13: Fuels and Electricity Used in Residential and Commercial Sectors, Heating and Cooling Degree Days, and Total Sector CO_2 Emissions (Including Electricity)



In 2021 the residential and commercial sectors accounted for 7 and 5 percent of CO_2 emissions from fossil fuel combustion, respectively; 40 and 11 percent of CH_4 emissions from fossil fuel combustion, respectively; and 2 and 1 percent of N_2O emissions from fossil fuel combustion, respectively. Emissions from these sectors were largely due to the direct consumption of natural gas and petroleum products, primarily for heating and cooking needs. Coal consumption was a minor component of energy use in the commercial sector and did not contribute to any

[19] See https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

energy use in the residential sector. In 2021, total emissions (CO_2, CH_4, and N_2O) from fossil fuel combustion and electricity use within the residential and commercial end-use sectors were 898.5 MMT CO_2 Eq. and 760.1 MMT CO_2 Eq., respectively. Total CO_2, CH_4, and N_2O emissions from combined fossil fuel combustion and electricity use within the residential and commercial end-use sectors increased by 3.2 and 6.0 percent from 2020 to 2021, respectively. An increase in heating degree days (0.5 percent) increased energy demand for heating in the residential and commercial sectors. This was partially offset by a 1.8 percent decrease in cooling degree days compared to 2020, which impacted demand for air conditioning in the residential and commercial sectors. This resulted in a 0.4 percent increase in residential sector electricity use. From 2020 to 2021 there was a 2.4 percent higher direct energy use in the commercial sector. In addition, a shift toward energy efficient products and more stringent energy efficiency standards for household equipment has contributed to a decrease in energy demand in households (EIA 2022d), resulting in a decrease in energy-related emissions. In the long term, the residential sector is also affected by population growth, migration trends toward warmer areas, and changes in total housing units and building attributes (e.g., larger sizes and improved insulation).

In 2021, combustion emissions from natural gas consumption represented 83 and 78 percent of the direct fossil fuel CO_2 emissions from the residential and commercial sectors, respectively. Carbon dioxide emissions from natural gas combustion in the residential and commercial sectors in 2021 increased by 0.9 percent and increased by 4.0 percent from 2020, respectively.

U.S. Territories

Emissions from U.S. Territories are based on the fuel consumption in American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other outlying U.S. Pacific Islands. As described in the Methodology section of CO_2 from Fossil Fuel Combustion, this data is collected separately from the sectoral-level data available for the general calculations. As sectoral information is not available for U.S. Territories, CO_2, CH_4, and N_2O emissions are not presented for U.S. Territories in the tables above by sector, though the emissions will occur across all sectors and sources including stationary, transportation and mobile combustion sources.

Transportation Sector and Mobile Combustion

This discussion of transportation emissions follows the alternative method of presenting combustion emissions by allocating emissions associated with electricity generation to the transportation end-use sector, as presented in Table 3-11. Table 3-10 presents direct CO_2, CH_4, and N_2O emissions from all transportation sources (i.e., excluding emissions allocated to electricity consumption in the transportation end-use sector).

The transportation end-use sector and other mobile combustion accounted for 1,776.8 MMT CO_2 Eq. in 2021, which represented 36 percent of CO_2 emissions, 23 percent of CH_4 emissions, and 43 percent of N_2O emissions from fossil fuel combustion, respectively.[20] Fuel purchased in the United States for international aircraft and marine travel accounted for an additional 80.9 MMT CO_2 Eq. in 2021; these emissions are recorded as international bunkers and are not included in U.S. totals according to UNFCCC reporting protocols.

Transportation End-Use Sector

From 1990 to 2019, transportation emissions from fossil fuel combustion rose by 21 percent, followed by a 13 percent reduction from 2019 to 2020. Emissions then increased 11 percent from 2020 to 2021. Overall, from 1990 to 2021, transportation emissions from fossil fuel combustion increased by 17 percent. The increase in transportation emissions from fossil fuel combustion from 1990 to 2021 was due, in large part, to increased demand for travel (see Figure 3-14). The number of vehicle miles traveled (VMT) by light-duty motor vehicles (passenger cars and light-duty trucks) increased 44 percent from 1990 to 2021, as a result of a confluence of factors including population growth, economic growth, urban sprawl, and periods of low fuel prices. Between 2019 and 2020, emissions from light-duty vehicles fell by 11 percent, primarily the result of the COVID-19 pandemic and

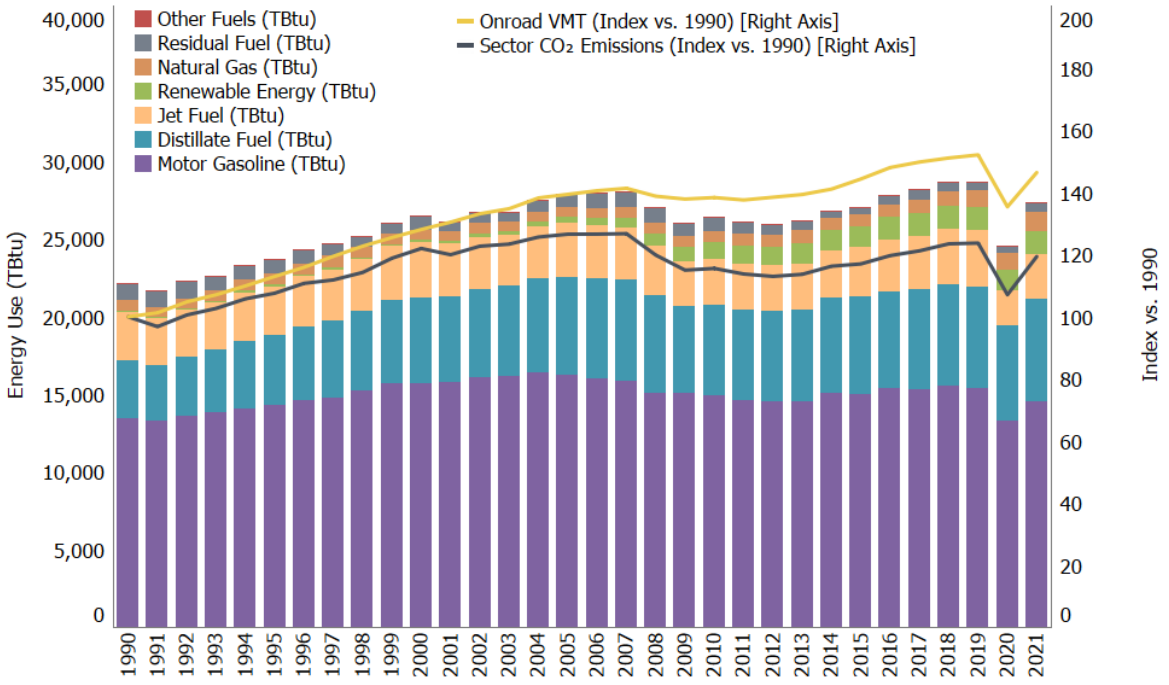
[20] Note that these totals include CO_2, CH_4 and N_2O emissions from some sources in the U.S. Territories (ships and boats, recreational boats, non-transportation mobile sources) and CH_4 and N_2O emissions from transportation rail electricity.

associated restrictions, such as people working from home and traveling less. Light-duty vehicle VMT rebounded in 2021 but is still estimated to be 4 percent below 2019 levels.

Commercial aircraft emissions decreased by 13 percent between 2019 and 2021, and have decreased 15 percent since 2007 (FAA 2022 and DOT 1991 through 2021).[21] Decreases in jet fuel emissions (excluding bunkers) started in 2007 due in part to improved operational efficiency that results in more direct flight routing, improvements in aircraft and engine technologies to reduce fuel burn and emissions, and the accelerated retirement of older, less fuel-efficient aircraft; however, the sharp decline in commercial aircraft emissions from 2019 to 2021 is primarily due to COVID-19 impacts on scheduled passenger air travel.

Almost all of the energy consumed for transportation was supplied by petroleum-based products, with more than half being related to gasoline consumption in automobiles and other highway vehicles. Other fuel uses, especially diesel fuel for freight trucks and jet fuel for aircraft, accounted for the remainder. The primary driver of transportation-related emissions was CO_2 from fossil fuel combustion, which increased by 19 percent from 1990 to 2021. Annex 3.2 presents the total emissions from all transportation and mobile sources, including CO_2, N_2O, CH_4, and HFCs.

Figure 3-14: Fuels Used in Transportation Sector, On-road VMT, and Total Sector CO_2 Emissions



Notes: Distillate fuel, residual fuel, and jet fuel include adjustments for international bunker fuels. Distillate fuel and motor gasoline include adjustments for the sectoral allocation of these fuels. Other Fuels includes aviation gasoline and propane.
Source: Information on fuel consumption was obtained from EIA (2022).

Transportation Fossil Fuel Combustion CO_2 Emissions

Domestic transportation CO_2 emissions increased by 19 percent (285.5 MMT CO_2) between 1990 and 2021, an annualized increase of 0.6 percent. This includes a 24 percent increase in CO_2 emissions between 1990 and 2019, followed by a 13 percent decrease between 2019 and 2020. Carbon dioxide emissions then increased by 11 percent between 2020 and 2021. Among domestic transportation sources in 2021, light-duty vehicles (including

[21] Commercial aircraft consists of passenger aircraft, cargo, and other chartered flights.

passenger cars and light-duty trucks) represented 58 percent of CO_2 emissions from fossil fuel combustion, medium- and heavy-duty trucks and buses 25 percent, commercial aircraft 7 percent, and other sources 11 percent. See Table 3-13 for a detailed breakdown of transportation CO_2 emissions by mode and fuel type.

Almost all of the energy consumed by the transportation sector is petroleum-based, including motor gasoline, diesel fuel, jet fuel, and residual oil. Carbon dioxide emissions from the combustion of ethanol and biodiesel for transportation purposes, along with the emissions associated with the agricultural and industrial processes involved in the production of biofuel, are captured in other Inventory sectors.[22] Ethanol consumption by the transportation sector has increased from 0.7 billion gallons in 1990 to 13.0 billion gallons in 2021, while biodiesel consumption has increased from 0.01 billion gallons in 2001 to 1.7 billion gallons in 2021. For additional information, see Section 3.11 on biofuel consumption at the end of this chapter and Table A-76 in Annex 3.2.

Carbon dioxide emissions from passenger cars and light-duty trucks totaled 1,019.0 MMT CO_2 in 2021, an increase of 11 percent (104.6 MMT CO_2) from 1990. The increase in CO_2 emissions from passenger cars and light-duty trucks from 1990 to 2021 was due, in large part, to increased demand for travel as fleet-wide light-duty vehicle fuel economy was relatively stable (average new vehicle fuel economy declined slowly from 1990 through 2004 and then increased more rapidly from 2005 through 2021). Carbon dioxide emissions from passenger cars and light-duty trucks peaked at 1,145.7 MMT in 2004, and since then have declined about 11 percent. The decline in new light-duty vehicle fuel economy between 1990 and 2004 (Figure 3-15) reflects the increasing market share of light-duty trucks, which grew from about 30 percent of new vehicle sales in 1990 to 48 percent in 2004. Starting in 2005, average new vehicle fuel economy began to increase while light-duty vehicle VMT grew only modestly for much of the period. Light-duty vehicle VMT grew by less than one percent or declined each year between 2005 and 2013, and again between 2017 and 2019.[23] VMT grew at faster rates of 2.6 percent from 2014 to 2015 and 2.5 percent from 2015 to 2016. From 2019 to 2020, light-duty vehicle VMT declined by 11 percent due to the COVID-19 pandemic; from 2020 to 2021 light-duty vehicle VMT rebounded, increasing by 8.1 percent.

Average new vehicle fuel economy has increased almost every year since 2005, while the light-duty truck share of new vehicle sales decreased to about 33 percent in 2009 and has since varied from year to year between 36 and 63 percent. Since 2014, the light-duty truck share has steadily increased, reaching 63 percent of new vehicles sales in model year 2021 (EPA 2022b). See Annex 3.2 for data by vehicle mode and information on VMT and the share of new vehicles (in VMT).

Medium- and heavy-duty truck CO_2 emissions increased by 75 percent from 1990 to 2021. This increase was largely due to a substantial growth in medium- and heavy-duty truck VMT, which increased by 66 percent between 1990 and 2021.

Carbon dioxide emissions from the domestic operation of commercial aircraft decreased by 8 percent (9.1 MMT CO_2) from 1990 to 2021. Across all categories of aviation, excluding international bunkers, CO_2 emissions decreased by 18 percent (33 MMT CO_2) between 1990 and 2021.[24] Emissions from military aircraft decreased 65 percent between 1990 and 2021. Commercial aircraft emissions increased 27 percent between 1990 and 2007, dropped 2 percent from 2007 to 2019, dropped another 33 percent from 2019 to 2020, followed by an increase of

[22] Biofuel estimates are presented in the Energy chapter for informational purposes only, in line with IPCC methodological guidance and UNFCCC reporting obligations. Net carbon fluxes from changes in biogenic carbon reservoirs in croplands are accounted for in the estimates for Land Use, Land-Use Change, and Forestry (see Chapter 6). More information and additional analyses on biofuels are available at EPA's Renewable Fuels Standards website. See https://www.epa.gov/renewable-fuel-standard-program.

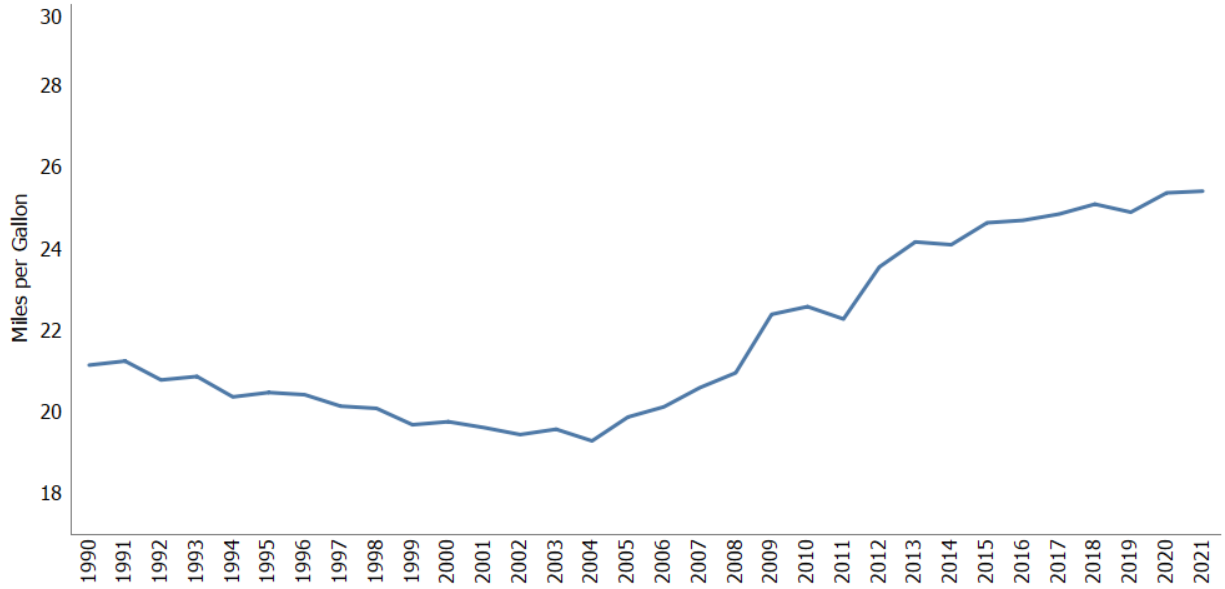
[23] VMT estimates are based on data from FHWA Highway Statistics Table VM-1 (FHWA 1996 through 2023). VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

[24] Includes consumption of jet fuel and aviation gasoline. Does not include aircraft bunkers, which are not included in national emission totals, in line with IPCC methodological guidance and UNFCCC reporting obligations.

23 percent from 2020 to 2021. Overall, this represents a change of approximately 8 percent between 1990 and 2021.

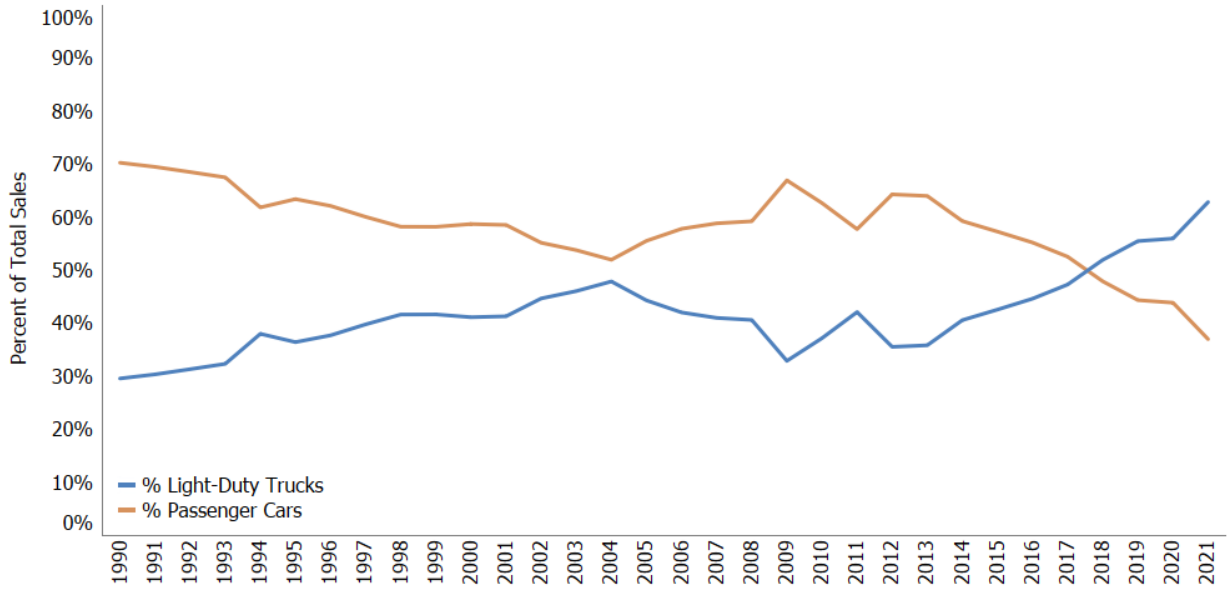
Transportation sources also produce CH_4 and N_2O; these emissions are included in Figure 3-14 and Table 3-15 and in the CH_4 and N_2O from Mobile Combustion section. Annex 3.2 presents total emissions from all transportation and mobile sources, including CO_2, CH_4, N_2O, and HFCs.

Figure 3-15: Sales-Weighted Fuel Economy of New Passenger Cars and Light-Duty Trucks, 1990–2021



Source: EPA (2022a).

Figure 3-16: Sales of New Passenger Cars and Light-Duty Trucks, 1990–2021



Source: EPA (2022b).

Table 3-13: CO_2 Emissions from Fossil Fuel Combustion in Transportation End-Use Sector (MMT CO_2 Eq.)

Fuel/Vehicle Type	1990	2005	2017	2018	2019	2020	2021
Gasoline[a]	**958.9**	**1,150.1**	**1,081.8**	**1,097.0**	**1,086.5**	**937.0**	**1,028.7**
Passenger Cars	612.8	518.9	375.2	382.5	380.0	328.0	360.5
Light-Duty Trucks	283.6	583.4	661.5	667.6	658.6	565.7	619.9
Medium- and Heavy-Duty Trucks[b]	42.8	28.1	24.9	26.2	27.0	24.1	27.4
Buses	2.1	1.1	2.5	2.7	2.8	2.5	2.9
Motorcycles	3.4	4.9	7.0	7.3	7.4	6.6	7.4
Recreational Boats[c]	14.3	13.7	10.6	10.7	10.7	10.1	10.6
Distillate Fuel Oil (Diesel)[a]	**262.9**	**462.6**	**465.9**	**476.6**	**474.0**	**447.2**	**480.4**
Passenger Cars	9.4	2.2	3.0	2.8	2.7	2.5	2.7
Light-Duty Trucks	8.4	30.4	31.1	31.2	31.2	30.2	33.3
Medium- and Heavy-Duty Trucks[b]	189.0	357.2	362.0	371.5	373.0	353.4	380.1
Buses	11.1	15.5	19.7	20.4	20.7	19.8	21.4
Rail	35.5	46.1	37.4	38.5	36.0	31.0	32.2
Recreational Boats[c]	2.7	2.9	2.8	2.8	2.9	2.7	2.8
Ships and Non-Recreational Boats[d]	6.8	8.4	10.0	9.3	7.5	7.6	7.8
International Bunker Fuels[e]	11.7	9.5	9.0	10.0	10.1	7.8	7.4
Jet Fuel	**184.1**	**189.2**	**171.7**	**172.3**	**180.3**	**120.6**	**152.6**
Commercial Aircraft[f]	109.9	132.7	128.0	129.6	136.7	91.3	119.0
Military Aircraft	35.7	19.8	12.5	12.1	12.2	11.7	12.5
General Aviation Aircraft	38.5	36.8	31.2	30.6	31.4	17.6	21.1
International Bunker Fuels[e]	*38.2*	*60.2*	77.8	80.9	78.3	39.8	50.8
International Bunker Fuels from Commercial Aviation	*30.0*	*55.6*	*74.5*	*79.8*	75.1	36.7	47.6
Aviation Gasoline	**3.1**	**2.4**	**1.4**	**1.5**	**1.6**	**1.4**	**1.5**
General Aviation Aircraft	3.1	2.4	1.4	1.5	1.6	1.4	1.5
Residual Fuel Oil	**22.6**	**19.3**	**16.5**	**14.0**	**14.5**	**7.3**	**23.9**
Ships and Non-Recreational Boats[e]	22.6	19.3	16.5	14.0	14.5	7.3	23.9
International Bunker Fuels[e]	53.7	43.6	33.4	31.4	25.2	22.1	21.9
Natural Gas[i]	**36.0**	**33.1**	**42.3**	**50.9**	**58.9**	**58.7**	**65.1**
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	+	+	+	+	+
Medium- and Heavy-Duty Trucks	+	0.1	0.1	0.1	0.1	0.1	0.1
Buses	+	0.3	0.5	0.6	0.6	0.6	0.7
Pipeline[g]	36.0	32.6	41.6	50.2	58.2	57.9	64.2
LPG[i]	**1.4**	**1.8**	**0.6**	**0.6**	**0.5**	**0.3**	**0.3**
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	0.2	0.3	+	0.1	0.1	+	0.1
Medium- and Heavy-Duty Trucks[b]	1.1	1.1	0.4	0.4	0.4	0.2	0.2
Buses	0.2	0.3	0.1	0.1	0.1	+	+
Electricity[k]	**3.0**	**4.7**	**4.3**	**4.8**	**4.8**	**4.1**	**5.0**
Passenger Cars	+	+	0.8	1.2	1.4	1.3	1.8
Light-Duty Trucks	+	+	0.1	0.2	0.2	0.3	0.7
Buses	+	+	+	+	+	0.1	0.1
Rail	3.0	4.7	3.4	3.4	3.1	2.4	2.5

Total [e,j]	**1,472.0**	**1,863.3**	**1,784.4**	**1,817.7**	**1,821.2**	**1,576.6**	**1,757.4**
International Bunker Fuels	*104.6*	*114.3*	*121.2*	*125.3*	*114.6*	*70.3*	*80.9*
Biofuels-Ethanol[h]	*4.1*	*21.6*	*77.7*	*78.6*	*78.7*	*68.1*	*75.4*
Biofuels-Biodiesel[h]	*+*	*0.9*	*18.7*	*17.9*	*17.1*	*17.7*	*16.1*

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] On-road fuel consumption data from FHWA Table MF-21 and MF-27 were used to determine total on-road use of motor gasoline and diesel fuel (FHWA 1996 through 2023). Ratios developed from MOVES3 output are used to apportion FHWA fuel consumption data to vehicle type and fuel type (see Annex 3.2 for information about the MOVES model).

[b] Includes medium- and heavy-duty trucks over 8,500 lbs.

[c] In 2014, EPA incorporated the NONROAD2008 model into the MOVES model framework. The current Inventory uses the Nonroad component of MOVES3 for years 1999 through 2021. See Annex 3.2 for information about the MOVES model.

[d] Note that large year over year fluctuations in emission estimates partially reflect nature of data collection for these sources.

[e] Official estimates exclude emissions from the combustion of both aviation and marine international bunker fuels; however, estimates of international bunker fuel-related emissions are presented for informational purposes.

[f] Commercial aircraft, as modeled in FAA's Aviation Environmental Design Tool (AEDT), consists of passenger aircraft, cargo, and other chartered flights.

[g] Pipelines reflect CO_2 emissions from natural gas-powered pipelines transporting natural gas.

[h] Ethanol and biodiesel estimates are presented for informational purposes only. See Section 3.10 of this chapter and the estimates in Land Use, Land-Use Change, and Forestry (see Chapter 6), in line with IPCC methodological guidance and UNFCCC reporting obligations, for more information on ethanol and biodiesel.

[i] Transportation sector natural gas and LPG consumption are based on data from EIA (2021b). Prior to the 1990 to 2015 Inventory, data from DOE TEDB were used to estimate each vehicle class's share of the total natural gas and LPG consumption. Since TEDB does not include estimates for natural gas use by medium and heavy-duty trucks or LPG use by passenger cars, EIA Alternative Fuel Vehicle Data (Browning 2017) is now used to determine each vehicle class's share of the total natural gas and LPG consumption. These changes were first incorporated in the 1990 to 2016 Inventory and apply to the 1990 to 2021 time period.

[j] Includes emissions from rail electricity.

[k] Electricity consumption by passenger cars, light-duty trucks (SUVs), and buses is based on plug-in electric vehicle sales and engine efficiency data, as outlined in Browning (2018a). In prior Inventory years, CO_2 emissions from electric vehicle charging were allocated to the residential and commercial sectors. They are now allocated to the transportation sector. These changes apply to the 2010 through 2021 time period.

Notes: This table does not include emissions from non-transportation mobile sources, such as agricultural equipment and construction/mining equipment; it also does not include emissions associated with electricity consumption by pipelines or lubricants used in transportation. In addition, this table does not include CO_2 emissions from U.S. Territories, since these are covered in a separate chapter of the Inventory. Totals may not sum due to independent rounding.

Mobile Fossil Fuel Combustion CH_4 and N_2O Emissions

Mobile combustion includes emissions of CH_4 and N_2O from all transportation sources identified in the U.S. Inventory with the exception of pipelines and electric locomotives;[25] mobile sources also include non-transportation sources such as construction/mining equipment, agricultural equipment, vehicles used off-road, and other sources (e.g., snowmobiles, lawnmowers, etc.).[26] Annex 3.2 includes a summary of all emissions from

[25] Emissions of CH_4 from natural gas systems are reported separately. More information on the methodology used to calculate these emissions are included in this chapter and Annex 3.4.

[26] See the methodology sub-sections of the CO_2 from Fossil Fuel Combustion and CH_4 and N_2O from Mobile Combustion sections of this chapter. Note that N_2O and CH_4 emissions are reported using different categories than CO_2. CO_2 emissions are reported by end-use sector (Transportation, Industrial, Commercial, Residential, U.S. Territories), and generally adhere to a top-down approach to estimating emissions. CO_2 emissions from non-transportation sources (e.g., lawn and garden equipment, farm equipment, construction equipment) are allocated to their respective end-use sector (i.e., construction equipment CO_2 emissions are included in the Industrial end-use sector instead of the Transportation end-use sector). CH_4 and N_2O emissions are reported using the "Mobile Combustion" category, which includes non-transportation mobile sources. CH_4 and N_2O emission estimates are bottom-up estimates, based on total activity (fuel use, VMT) and emissions factors by source and technology type. These reporting schemes are in accordance with IPCC guidance. For informational purposes only, CO_2 emissions from non-transportation mobile sources are presented separately from their overall end-use sector in Annex 3.2.

both transportation and mobile sources. Table 3-14 and Table 3-15 provide mobile fossil fuel CH_4 and N_2O emission estimates in MMT CO_2 Eq.[27]

Mobile combustion was responsible for a small portion of national CH_4 emissions (0.4 percent) and was the fifth largest source of national N_2O emissions (4.2 percent). From 1990 to 2021, mobile source CH_4 emissions declined by 64 percent, to 2.6 MMT CO_2 Eq. (93 kt CH_4), due largely to emissions control technologies employed in on-road vehicles since the mid-1990s to reduce CO, NO_x, NMVOC, and CH_4 emissions. Mobile source emissions of N_2O decreased by 57 percent from 1990 to 2021, to 16.7 MMT CO_2 Eq. (63 kt N_2O). Earlier generation emissions control technologies initially resulted in higher N_2O emissions, causing a 31 percent increase in N_2O emissions from mobile sources between 1990 and 1997. Improvements in later-generation emissions control technologies have reduced N_2O emissions, resulting in a 67 percent decrease in mobile source N_2O emissions from 1997 to 2021 (Figure 3-17). Overall, CH_4 and N_2O emissions were predominantly from gasoline-fueled passenger cars, light-duty trucks and non-highway sources. See Annex 3.2 for data by vehicle mode and information on VMT and the share of new vehicles.

Figure 3-17: Mobile Source CH_4 and N_2O Emissions

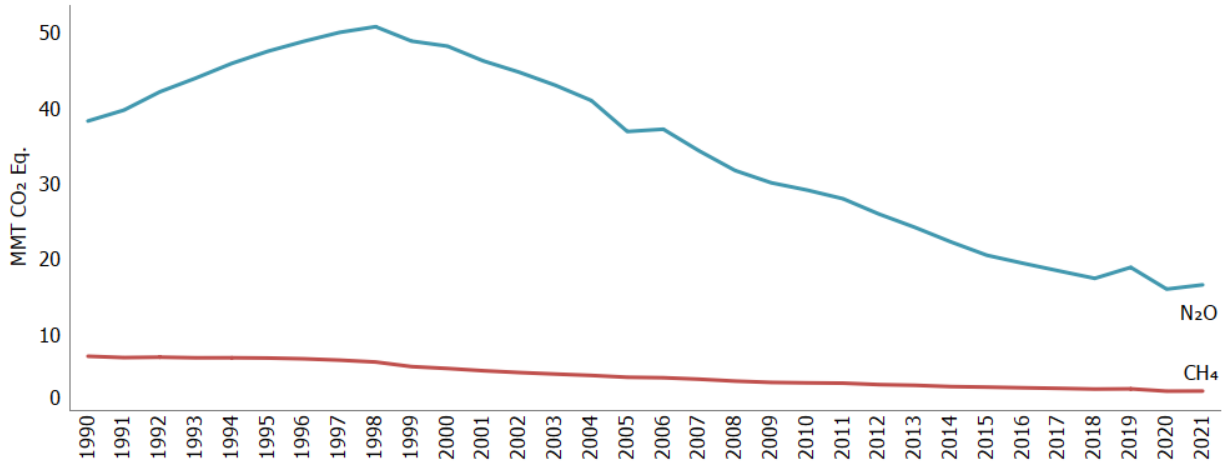


Table 3-14: CH_4 Emissions from Mobile Combustion (MMT CO_2 Eq.)

Fuel Type/Vehicle Type[a]	1990	2005	2017	2018	2019	2020	2021
Gasoline On-Road[b]	**5.8**	**2.4**	**1.0**	**0.9**	**1.0**	**0.8**	**0.8**
Passenger Cars	3.8	1.2	0.3	0.3	0.3	0.2	0.2
Light-Duty Trucks	1.5	1.0	0.6	0.5	0.6	0.5	0.5
Medium- and Heavy-Duty Trucks and Buses	0.5	0.1	+	+	+	+	+
Motorcycles	+	+	+	+	+	+	+
Diesel On-Road[b]	**+**	**+**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	+	+	+	+	+
Medium- and Heavy-Duty Trucks	+	+	0.1	0.1	0.1	0.1	0.1
Medium- and Heavy-Duty Buses	+	+	+	+	+	+	+
Alternative Fuel On-Road	**+**	**0.2**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Non-Road[c]	**1.4**	**1.8**	**1.7**	**1.8**	**1.7**	**1.6**	**1.6**
Ships and Boats	0.4	0.5	0.5	0.5	0.4	0.4	0.5

[27] See Annex 3.2 for a complete time series of emission estimates for 1990 through 2021.

Rail [d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Aircraft	0.1	0.1	+	+	+	+	+
Agricultural Equipment[e]	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Construction/Mining Equipment[f]	0.2	0.3	0.2	0.2	0.2	0.2	0.2
Other[g]	0.5	0.7	0.8	0.8	0.8	0.8	0.7
Total	**7.2**	**4.4**	**3.0**	**2.9**	**2.9**	**2.6**	**2.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] See Annex 3.2 for definitions of on-road vehicle types.

[b] Gasoline and diesel highway vehicle mileage estimates are based on data from FHWA Highway Statistics Table VM-1. VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

[c] Nonroad fuel consumption estimates for 2020 are adjusted to account for the COVID-19 pandemic and associated restrictions. For agricultural equipment and airport equipment, sector specific adjustment factors were applied to the 2019 data. For all other sectors, a 7.7 percent reduction factor is used, based on transportation diesel use (EIA 2022).

[d] Rail emissions do not include emissions from electric powered locomotives. Class II and Class III diesel consumption data for 2014 to 2021 is estimated by applying the historical average fuel usage per carload factor to the annual number of carloads.

[e] Includes equipment, such as tractors and combines, as well as fuel consumption from trucks that are used off-road in agriculture.

[f] Includes equipment, such as cranes, dumpers, and excavators, as well as fuel consumption from trucks that are used off-road in construction.

[g] "Other" includes snowmobiles and other recreational equipment, logging equipment, lawn and garden equipment, railroad equipment, airport equipment, commercial equipment, and industrial equipment, as well as fuel consumption from trucks that are used off-road for commercial/industrial purposes.

Table 3-15: N_2O Emissions from Mobile Combustion (MMT CO_2 Eq.)

Fuel Type/Vehicle Type[a]	1990	2005	2017	2018	2019	2020	2021
Gasoline On-Road[b]	**32.0**	**28.5**	**8.4**	**7.0**	**8.1**	**6.4**	**6.0**
Passenger Cars	22.4	13.3	2.9	2.5	2.5	2.0	1.9
Light-Duty Trucks	8.7	14.0	5.2	4.3	5.4	4.2	3.9
Medium- and Heavy-Duty Trucks and Buses	0.8	1.2	0.2	0.2	0.2	0.1	0.1
Motorcycles	+	+	0.1	0.1	0.1	0.1	0.1
Diesel On-Road[b]	**0.2**	**0.4**	**2.8**	**3.0**	**3.2**	**3.0**	**3.3**
Passenger Cars	+	+	+	+	+	+	+
Light-Duty Trucks	+	+	0.2	0.3	0.2	0.2	0.3
Medium- and Heavy-Duty Trucks	0.2	0.3	2.5	2.7	2.9	2.7	2.7
Medium- and Heavy-Duty Buses	+	+	0.2	0.2	0.3	0.2	0.3
Alternative Fuel On-Road	**+**	**+**	**+**	**+**	**+**	**+**	**+**
Non-Road[c]	**6.2**	**8.2**	**7.4**	**7.5**	**7.7**	**6.8**	**7.4**
Ships and Boats	0.2	0.2	0.2	0.2	0.2	0.1	0.3
Rail[d]	0.2	0.4	0.3	0.3	0.3	0.2	0.3
Aircraft	1.5	1.6	1.4	1.4	1.5	1.0	1.3
Agricultural Equipment[e]	1.2	1.4	1.1	1.1	1.1	1.1	1.0
Construction/Mining Equipment[f]	1.2	1.9	1.6	1.6	1.7	1.6	1.7
Other[g]	1.8	2.8	2.8	2.9	2.9	2.8	2.9
Total	**38.4**	**37.1**	**18.6**	**17.6**	**19.1**	**16.2**	**16.7**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] See Annex 3.2 for definitions of on-road vehicle types.

[b] Gasoline and diesel highway vehicle mileage estimates are based on data from FHWA Highway Statistics Table VM-1. VMT estimates from FHWA are allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model).

[c] Nonroad fuel consumption estimates for 2020 are adjusted to account for the COVID-19 pandemic and associated restrictions. For agricultural equipment and airport equipment, sector specific adjustment factors were applied to the 2019 data. For all other sectors, a 7.7 percent reduction factor is used, based on transportation diesel use (EIA 2022).

[d] Rail emissions do not include emissions from electric powered locomotives. Class II and Class III diesel consumption data for 2014 through 2021 is estimated by applying the historical average fuel usage per carload factor to the annual number of carloads.
[e] Includes equipment, such as tractors and combines, as well as fuel consumption from trucks that are used off-road in agriculture.
[f] Includes equipment, such as cranes, dumpers, and excavators, as well as fuel consumption from trucks that are used off-road in construction.
[g] "Other" includes snowmobiles and other recreational equipment, logging equipment, lawn and garden equipment, railroad equipment, airport equipment, commercial equipment, and industrial equipment, as well as fuel consumption from trucks that are used off-road for commercial/industrial purposes.
Note: Totals may not sum due to independent rounding.

CO_2 from Fossil Fuel Combustion

Methodology and Time-Series Consistency

CO_2 emissions from fossil fuel combustion are estimated in line with a Tier 2 method described by the IPCC in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006) with some exceptions as discussed below.[28] A detailed description of the U.S. methodology is presented in Annex 2.1, and is characterized by the following steps:

1. *Determine total fuel consumption by fuel type and sector*. Total fossil fuel consumption for each year is estimated by aggregating consumption data by end-use sector (e.g., commercial, industrial), primary fuel type (e.g., coal, petroleum, gas), and secondary fuel category (e.g., motor gasoline, distillate fuel oil). Fuel consumption data for the United States were obtained directly from the EIA of the U.S. Department of Energy (DOE), primarily from the *Monthly Energy Review* (EIA 2023a). EIA data include fuel consumption statistics from the 50 U.S. states and the District of Columbia, including tribal lands. The EIA does not include territories in its national energy statistics, so fuel consumption data for territories were collected separately from EIA's International Energy Statistics (EIA 2023b).[29]

   For consistency of reporting, the IPCC has recommended that countries report energy data using the International Energy Agency (IEA) reporting convention and/or IEA data. Data in the IEA format are presented "top down"—that is, energy consumption for fuel types and categories are estimated from energy production data (accounting for imports, exports, stock changes, and losses). The resulting quantities are referred to as "apparent consumption." The data collected in the United States by EIA on an annual basis and used in this Inventory are predominantly from mid-stream or conversion energy consumers such as refiners and electric power generators. These annual surveys are supplemented with end-use energy consumption surveys, such as the Manufacturing Energy Consumption Survey, that are conducted on a periodic basis (every four years). These consumption datasets help inform the annual surveys to arrive at the national total and sectoral breakdowns for that total.[30]

   Also, note that U.S. fossil fuel energy statistics are generally presented using gross calorific values (GCV) (i.e., higher heating values). Fuel consumption activity data presented here have not been adjusted to

[28] The IPCC Tier 3B methodology is used for estimating emissions from commercial aircraft.

[29] Fuel consumption by U.S. Territories (i.e., American Samoa, Guam, Puerto Rico, U.S. Virgin Islands, Wake Island, and other U.S. Pacific Islands) is included in this report and contributed total emissions of 23.8 MMT CO_2 Eq. in 2021.

[30] See IPCC Reference Approach for Estimating CO_2 Emissions from Fossil Fuel Combustion in Annex 4 for a comparison of U.S. estimates using top-down and bottom-up approaches.

correspond to international standards, which are to report energy statistics in terms of net calorific values (NCV) (i.e., lower heating values).[31]

2. *Subtract uses accounted for in the Industrial Processes and Product Use chapter*. Portions of the fuel consumption data for seven fuel categories—coking coal, distillate fuel, industrial other coal, petroleum coke, natural gas, residual fuel oil, and other oil—were reallocated to the Industrial Processes and Product Use chapter, as they were consumed during non-energy-related industrial activity. To make these adjustments, additional data were collected from AISI (2004 through 2021), Coffeyville (2012), U.S. Census Bureau (2001 through 2011), EIA (2023a, 2022b, 2022c), USAA (2008 through 2021), USGS (1991 through 2020), (USGS 2019), USGS (2014 through 2021a), USGS (2014 through 2021b), USGS (1995 through 2013), USGS (1995, 1998, 2000, 2001, 2002, 2007), USGS (2021a), USGS (1991 through 2015a), USGS (1991 through 2020), USGS (2014 through 2021a), USGS (1991 through 2015b), USGS (2021b), USGS (1991 through 2020).[32]

3. *Adjust for biofuels and petroleum denaturant*. Fossil fuel consumption estimates are adjusted downward to exclude fuels with biogenic origins and avoid double counting in petroleum data statistics. Carbon dioxide emissions from ethanol added to motor gasoline and biodiesel added to diesel fuel are not included specifically in summing energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for LULUCF, therefore, fuel consumption estimates are adjusted to remove ethanol and biodiesel.[33] For the years 1993 through 2008, petroleum denaturant is currently included in EIA statistics for both natural gasoline and finished motor gasoline. To avoid double counting, petroleum denaturant is subtracted from finished motor gasoline for these years.[34]

4. *Adjust for exports of CO_2.* Since October 2000, the Dakota Gasification Plant has been exporting CO_2 produced in the coal gasification process to Canada by pipeline. Because this CO_2 is not emitted to the atmosphere in the United States, the associated fossil fuel (lignite coal) that is gasified to create the exported CO_2 is subtracted from EIA (2022c) coal consumption statistics that are used to calculate greenhouse gas emissions from the Energy Sector. The associated fossil fuel is the total fossil fuel burned at the plant with the CO_2 capture system multiplied by the fraction of the plant's total site-generated CO_2 that is recovered by the capture system. To make these adjustments, data for CO_2 exports were collected from Environment and Climate Change Canada (2022). A discussion of the methodology used to estimate the amount of CO_2 captured and exported by pipeline is presented in Annex 2.1.

5. *Adjust sectoral allocation of distillate fuel oil and motor gasoline.* EPA conducted a separate bottom-up analysis of transportation fuel consumption based on data from the Federal Highway Administration that indicated that the amount of distillate and motor gasoline consumption allocated to the transportation sector in the EIA statistics should be adjusted. Therefore, for these estimates, the transportation sector's distillate fuel and motor gasoline consumption were adjusted to match the value obtained from the bottom-up analysis. As the total distillate and motor gasoline consumption estimate from EIA are considered to be accurate at the national level, the distillate and motor gasoline consumption totals for the residential, commercial, and industrial sectors were adjusted proportionately. The data sources used in the bottom-up analysis of transportation fuel consumption include AAR (2008 through 2022), Benson

[31] A crude convention to convert between gross and net calorific values is to multiply the heat content of solid and liquid fossil fuels by 0.95 and gaseous fuels by 0.9 to account for the water content of the fuels. Biomass-based fuels in U.S. energy statistics, however, are generally presented using net calorific values.

[32] See sections on Iron and Steel Production and Metallurgical Coke Production, Ammonia Production and Urea Consumption, Petrochemical Production, Titanium Dioxide Production, Ferroalloy Production, Aluminum Production, and Silicon Carbide Production and Consumption in the Industrial Processes and Product Use chapter.

[33] Natural gas energy statistics from EIA (2023d) are already adjusted downward to account for biogas in natural gas.

[34] These adjustments are explained in greater detail in Annex 2.1.

(2002 through 2004), DOE (1993 through 2020), EIA (2007), EIA (2023a), EPA (2022c), and FHWA (1996 through 2021).[35]

6. *Adjust for fuels consumed for non-energy uses*. U.S. aggregate energy statistics include consumption of fossil fuels for non-energy purposes. These are fossil fuels that are manufactured into plastics, asphalt, lubricants, or other products. Depending on the end-use, this can result in storage of some or all of the C contained in the fuel for a period of time. As the emission pathways of C used for non-energy purposes are vastly different than fuel combustion (since the C in these fuels ends up in products instead of being combusted), these emissions are estimated separately in Section 3.2 – Carbon Emitted and Stored in Products from Non-Energy Uses of Fossil Fuels. Therefore, the amount of fuels used for non-energy purposes was subtracted from total fuel consumption. Data on non-fuel consumption were provided by EIA (2022b).

7. *Subtract consumption of international bunker fuels.* According to the UNFCCC reporting guidelines emissions from international transport activities, or bunker fuels, should not be included in national totals. U.S. energy consumption statistics include these bunker fuels (e.g., distillate fuel oil, residual fuel oil, and jet fuel) as part of consumption by the transportation end-use sector, however, so emissions from international transport activities were calculated separately following the same procedures used to calculate emissions from consumption of all fossil fuels (i.e., estimation of consumption, and determination of carbon content).[36] The Office of the Under Secretary of Defense (Installations and Environment) and the Defense Logistics Agency Energy (DLA Energy) of the U.S. Department of Defense (DoD) (DLA Energy 2022) supplied data on military jet fuel and marine fuel use. Commercial jet fuel use was estimated based on data from FAA (2023) and DOT (1991 through 2022); residual and distillate fuel use for civilian marine bunkers was obtained from DOC (1991 through 2022) for 1990 through 2001 and 2007 through 2020, and DHS (2008) for 2003 through 2006.[37] Consumption of these fuels was subtracted from the corresponding fuels totals in the transportation end-use sector. Estimates of international bunker fuel emissions for the United States are discussed in detail in Section 3.9 – International Bunker Fuels.

8. *Determine the total carbon content of fuels consumed.* Total C was estimated by multiplying the amount of fuel consumed by the amount of C in each fuel. This total C estimate defines the maximum amount of C that could potentially be released to the atmosphere if all of the C in each fuel was converted to CO_2. A discussion of the methodology and sources used to develop the C content coefficients are presented in Annexes 2.1 and 2.2.

9. *Estimate CO_2 Emissions.* Total CO_2 emissions are the product of the adjusted energy consumption (from the previous methodology steps 1 through 7), the carbon content of the fuels consumed, and the fraction of C that is oxidized. The fraction oxidized was assumed to be 100 percent for petroleum, coal, and natural gas based on guidance in IPCC (2006) (see Annex 2.1). Carbon emissions were multiplied by the molecular-to-atomic weight ratio of CO_2 to C (44/12) to obtain total CO_2 emitted from fossil fuel combustion in million metric tons (MMT).

10. *Allocate transportation emissions by vehicle type.* This report provides a more detailed accounting of emissions from transportation because it is such a large consumer of fossil fuels in the United States. For fuel types other than jet fuel, fuel consumption data by vehicle type and transportation mode were used

[35] Bottom-up gasoline and diesel highway vehicle fuel consumption estimates are based on data from FHWA Highway Statistics Table MF-21, MF-27, and VM-1 (FHWA 1996 through 2021).

[36] See International Bunker Fuels section in this chapter for a more detailed discussion.

[37] Data for 2002 were interpolated due to inconsistencies in reported fuel consumption data.

to allocate emissions by fuel type calculated for the transportation end-use sector. Heat contents and densities were obtained from EIA (2022b) and USAF (1998).[38]

- For on-road vehicles, annual estimates of combined motor gasoline and diesel fuel consumption by vehicle category were obtained from FHWA (1996 through 2021); for each vehicle category, the percent gasoline, diesel, and other (e.g., CNG, LPG) fuel consumption are estimated using data from EPA's MOVES model and DOE (1993 through 2022). [39,40]
- For non-road vehicles, activity data were obtained from AAR (2008 through 2022), APTA (2007 through 2021), APTA (2006), BEA (1991 through 2015), Benson (2002 through 2004), DLA Energy (2022), DOC (1991 through 2022), DOE (1993 through 2022), DOT (1991 through 2022), EIA (2009a), EIA (2023d), EIA (2002), EIA (1991 through 2022), EPA (2022c),[41] and Gaffney (2007).
- For jet fuel used by aircraft, CO_2 emissions from commercial aircraft were developed by the U.S. Federal Aviation Administration (FAA) using a Tier 3B methodology, consistent IPCC (2006) (see Annex 3.3). Carbon dioxide emissions from other aircraft were calculated directly based on reported consumption of fuel as reported by EIA. Allocation to domestic military uses was made using DoD data (see Annex 3.8). General aviation jet fuel consumption is calculated as the remainder of total jet fuel use (as determined by EIA) nets all other jet fuel use as determined by FAA and DoD. For more information, see Annex 3.2.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. Due to data availability and sources, some adjustments outlined in the methodology above are not applied consistently across the full 1990 to 2021 time series. As described in greater detail in Annex 2.1, to align with EIA's methodology for calculating motor gasoline consumption, petroleum denaturant adjustments are applied to motor gasoline consumption only for the period 1993 through 2008. In addition to ensuring time-series consistency, to ensure consistency in reporting between the Inventory and the Canadian National Greenhouse Gas Inventory, the amount of associated fossil fuel (lignite coal) that is gasified to create the exported CO_2 from the Dakota Gasification Plant is adjusted to align with the Canadian National Greenhouse Gas Inventory (Environment and Climate Change Canada 2022). This adjustment is explained in greater detail in Annex 2.1. As discussed in Annex 5, data are unavailable to include estimates of CO_2 emissions from any liquid fuel used in pipeline transport or non-hazardous industrial waste incineration, but those emissions are assumed to be insignificant.

Box 3-4: Carbon Intensity of U.S. Energy Consumption

The amount of C emitted from the combustion of fossil fuels is dependent upon the carbon content of the fuel and the fraction of that C that is oxidized. Fossil fuels vary in their average carbon content, ranging from about

[38] For a more detailed description of the data sources used for the analysis of the transportation end use sector see the Mobile Combustion (excluding CO_2) and International Bunker Fuels sections of the Energy chapter, Annex 3.2, and Annex 3.8, respectively.

[39] On-road fuel consumption data from FHWA Table MF-21 and MF-27 were used to determine total on-road use of motor gasoline and diesel fuel (FHWA 1996 through 2020). Data for 2021 is proxied using FHWA Traffic Volume Travel Trends. Ratios developed from MOVES3 output are used to apportion FHWA fuel consumption data to vehicle type and fuel type (see Annex 3.2 for information about the MOVES model).

[40] Transportation sector natural gas and LPG consumption are based on data from EIA (2023a). In previous Inventory years, data from DOE (1993 through 2022) TEDB was used to estimate each vehicle class's share of the total natural gas and LPG consumption. Since TEDB does not include estimates for natural gas use by medium- and heavy-duty trucks or LPG use by passenger cars, EIA Alternative Fuel Vehicle Data (Browning 2017) is now used to determine each vehicle class's share of the total natural gas and LPG consumption. These changes were first incorporated in the 1990 through 2015 Inventory and apply to the time period from 1990 to 2015.

[41] In 2014, EPA incorporated the NONROAD2008 model into the MOVES model framework (EPA 2022c). The current Inventory uses the Nonroad component of MOVES3 for years 1999 through 2021.

53 MMT CO_2 Eq./QBtu for natural gas to upwards of 95 MMT CO_2 Eq./QBtu for coal and petroleum coke (see Tables A-42 and A-43 in Annex 2.1 for carbon contents of all fuels). In general, the carbon content per unit of energy of fossil fuels is the highest for coal products, followed by petroleum, and then natural gas. The overall carbon intensity of the U.S. economy is thus dependent upon the quantity and combination of fuels and other energy sources employed to meet demand.

Table 3-16 provides a time series of the carbon intensity of direct emissions for each sector of the U.S. economy. The time series incorporates only the energy from the direct combustion of fossil fuels in each sector. For example, the carbon intensity for the residential sector does not include the energy from or emissions related to the use of electricity for lighting, as it is instead allocated to the electric power sector. For the purposes of maintaining the focus of this section, renewable energy and nuclear energy are not included in the energy totals used in Table 3-16 in order to focus attention on fossil fuel combustion as detailed in this chapter. Looking only at this direct consumption of fossil fuels, the residential sector exhibited the lowest carbon intensity, which is related to the large percentage of its energy derived from natural gas for heating. The carbon intensity of the commercial sector has predominantly declined since 1990 as commercial businesses shift away from petroleum to natural gas. The industrial sector was more dependent on petroleum and coal than either the residential or commercial sectors, and thus had higher C intensities over this period. The carbon intensity of the transportation sector was closely related to the carbon content of petroleum products (e.g., motor gasoline and jet fuel, both around 70 MMT CO_2 Eq./QBtu), which were the primary sources of energy. Lastly, the electric power sector had the highest carbon intensity due to its heavy reliance on coal for generating electricity.

Table 3-16: Carbon Intensity from Direct Fossil Fuel Combustion by Sector (MMT CO_2 Eq./QBtu)

Sector	1990	2005	2017	2018	2019	2020	2021
Residential[a]	57.4	56.8	55.1	55.3	55.2	55.1	55.0
Commercial[a]	59.7	57.8	56.6	56.0	56.1	56.2	56.0
Industrial[a]	64.6	64.7	60.8	60.5	60.3	59.8	59.5
Transportation[a]	71.1	71.5	71.2	71.0	70.9	70.8	70.9
Electric Power[b]	87.3	85.8	77.3	75.5	72.9	70.5	72.4
U.S. Territories[c]	73.1	73.4	71.0	70.4	70.8	71.7	70.1
All Sectors[c]	**73.1**	**73.6**	**69.1**	**68.3**	**67.3**	**66.3**	**67.0**

[a] Does not include electricity or renewable energy consumption.

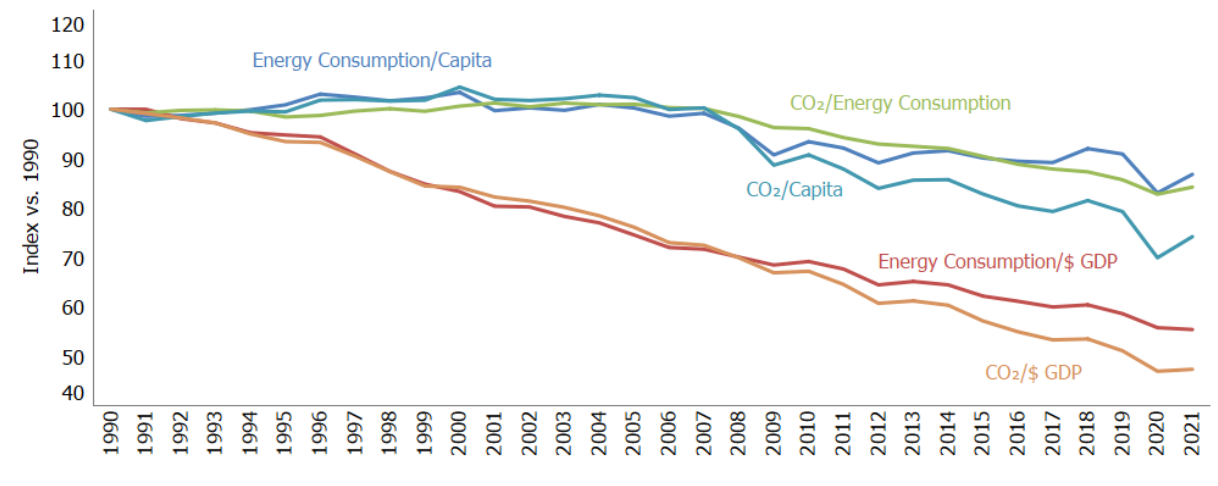
[b] Does not include electricity produced using nuclear or renewable energy.

[c] Does not include nuclear or renewable energy consumption.

Note: Excludes non-energy fuel use emissions and consumption.

For the time period of 1990 through about 2008, the carbon intensity of U.S. energy consumption was fairly constant, as the proportion of fossil fuels used by the individual sectors did not change significantly over that time. Starting in 2008 the carbon intensity has decreased, reflecting the shift from coal to natural gas in the electric power sector during that time period. Per capita energy consumption fluctuated little from 1990 to 2007, but then started decreasing after 2007 and, in 2021, was approximately 13.2 percent below levels in 1990 (see Figure 3-18). To differentiate these estimates from those of Table 3-16, the carbon intensity trend shown in Figure 3-18 and described below includes nuclear and renewable energy EIA data to provide a comprehensive economy-wide picture of energy consumption. Due to a general shift from a manufacturing-based economy to a service-based economy, as well as overall increases in efficiency, energy consumption and energy-related CO_2 emissions per dollar of gross domestic product (GDP) have both declined since 1990 (BEA 2022).

Figure 3-18: U.S. Energy Consumption and Energy-Related CO_2 Emissions Per Capita and Per Dollar GDP



Carbon intensity estimates were developed using nuclear and renewable energy data from EIA (2022b), EPA (2010), and fossil fuel consumption data as discussed above and presented in Annex 2.1.

Uncertainty

For estimates of CO_2 from fossil fuel combustion, the amount of CO_2 emitted is directly related to the amount of fuel consumed, the fraction of the fuel that is oxidized, and the carbon content of the fuel. Therefore, a careful accounting of fossil fuel consumption by fuel type, average carbon contents of fossil fuels consumed, and production of fossil fuel-based products with long-term carbon storage should yield an accurate estimate of CO_2 emissions.

Nevertheless, there are uncertainties in the consumption data, carbon content of fuels and products, and carbon oxidation efficiencies. For example, given the same primary fuel type (e.g., coal, petroleum, or natural gas), the amount of carbon contained in the fuel per unit of useful energy can vary. For the United States, however, the impact of these uncertainties on overall CO_2 emission estimates is believed to be relatively small. See, for example, Marland and Pippin (1990). See also Annex 2.2 for a discussion of uncertainties associated with fuel carbon contents. Recent updates to carbon factors for natural gas and coal utilized the same approach as previous Inventories with updated recent data, therefore, the uncertainty estimates around carbon contents of the different fuels as outlined in Annex 2.2 were not impacted and the historic uncertainty ranges still apply.

Although national statistics of total fossil fuel and other energy consumption are relatively accurate, the allocation of this consumption to individual end-use sectors (i.e., residential, commercial, industrial, and transportation) is less certain. For example, for some fuels the sectoral allocations are based on price rates (i.e., tariffs), but a commercial establishment may be able to negotiate an industrial rate or a small industrial establishment may end up paying an industrial rate, leading to a misallocation of emissions. Also, the deregulation of the natural gas industry and the more recent deregulation of the electric power industry have likely led to some minor challenges in collecting accurate energy statistics as firms in these industries have undergone significant restructuring.

To calculate the total CO_2 emission estimate from energy-related fossil fuel combustion, the amount of fuel used in non-energy production processes were subtracted from the total fossil fuel consumption. The amount of CO_2 emissions resulting from non-energy related fossil fuel use has been calculated separately and reported in the Carbon Emitted from Non-Energy Uses of Fossil Fuels section of this report (Section 3.2). These factors all contribute to the uncertainty in the CO_2 estimates. Detailed discussions on the uncertainties associated with C emitted from non-energy uses of fossil fuels can be found within that section of this chapter.

Various sources of uncertainty surround the estimation of emissions from international bunker fuels, which are subtracted from the U.S. totals (see the detailed discussions on these uncertainties provided in Section 3.9 – International Bunker Fuels). Another source of uncertainty is fuel consumption by U.S. Territories. The United States does not collect energy statistics for its territories at the same level of detail as for the fifty states and the District of Columbia. Therefore, estimating both emissions and bunker fuel consumption by these territories is difficult.

Uncertainties in the emission estimates presented above also result from the data used to allocate CO_2 emissions from the transportation end-use sector to individual vehicle types and transport modes. In many cases, bottom-up estimates of fuel consumption by vehicle type do not match aggregate fuel-type estimates from EIA. Further research is planned to improve the allocation into detailed transportation end-use sector emissions.

The uncertainty analysis was performed by primary fuel type for each end-use sector, using the IPCC-recommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, with @RISK software. For this uncertainty estimation, the inventory estimation model for CO_2 from fossil fuel combustion was integrated with the relevant variables from the inventory estimation model for International Bunker Fuels, to realistically characterize the interaction (or endogenous correlation) between the variables of these two models. About 170 input variables were modeled for CO_2 from energy-related fossil fuel combustion (including about 20 for non-energy fuel consumption and about 20 for International Bunker Fuels).

In developing the uncertainty estimation model, uniform distributions were assumed for all activity-related input variables and emission factors, based on the SAIC/EIA (2001) report.[42] Triangular distributions were assigned for the oxidization factors (or combustion efficiencies). The uncertainty ranges were assigned to the input variables based on the data reported in SAIC/EIA (2001) and on conversations with various agency personnel.[43]

The uncertainty ranges for the activity-related input variables were typically asymmetric around their inventory estimates; the uncertainty ranges for the emissions factors were symmetric. Bias (or systematic uncertainties) associated with these variables accounted for much of the uncertainties associated with these variables (SAIC/EIA 2001).[44] For purposes of this uncertainty analysis, each input variable was simulated 10,000 times through Monte Carlo sampling.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-17. Fossil fuel combustion CO_2 emissions in 2021 were estimated to be between 4,408.8 and 4,994.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 2 percent below to 4 percent above the 2021 emission estimate of 4,639.1 MMT CO_2 Eq.

[42] SAIC/EIA (2001) characterizes the underlying probability density function for the input variables as a combination of uniform and normal distributions (the former to represent the bias component and the latter to represent the random component). However, for purposes of the current uncertainty analysis, it was determined that uniform distribution was more appropriate to characterize the probability density function underlying each of these variables.

[43] In the SAIC/EIA (2001) report, the quantitative uncertainty estimates were developed for each of the three major fossil fuels used within each end-use sector; the variations within the sub-fuel types within each end-use sector were not modeled. However, for purposes of assigning uncertainty estimates to the sub-fuel type categories within each end-use sector in the current uncertainty analysis, SAIC/EIA (2001)-reported uncertainty estimates were extrapolated.

[44] Although, in general, random uncertainties are the main focus of statistical uncertainty analysis, when the uncertainty estimates are elicited from experts, their estimates include both random and systematic uncertainties. Hence, both these types of uncertainties are represented in this uncertainty analysis.

Table 3-17: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Energy-Related Fossil Fuel Combustion by Fuel Type and Sector (MMT CO_2 Eq. and Percent)

Fuel/Sector	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Coal[b]	**957.3**	**908.1**	**1,068.6**	**-3%**	**9%**
Residential	NO	NO	NO	NO	NO
Commercial	1.4	1.3	1.7	-5%	15%
Industrial	43.0	39.9	50.9	-5%	16%
Transportation	NO	NO	NO	NO	NO
Electric Power	909.9	857.6	1015.8	-4%	10%
U.S. Territories	2.9	2.4	3.6	-12%	19%
Natural Gas[b]	**1,621.0**	**1,569.54**	**1,728.7**	**-1%**	**5%**
Residential	258.6	249.0	279.3	-3%	7%
Commercial	180.9	174.0	195.1	-3%	7%
Industrial	499.6	477.2	543.5	-3%	7%
Transportation	65.1	62.6	70.3	-3%	7%
Electric Power	612.9	589.0	649.3	-3%	5%
U.S. Territories	3.9	3.4	4.6	-12%	17%
Petroleum[b]	**2,060.4**	**1,859.1**	**2,253.1**	**-6%**	**6%**
Residential	54.7	49.8	59.6	-6%	6%
Commercial	50.7	46.2	55.2	-5%	5%
Industrial	232.9	158.6	310.3	-23%	23%
Transportation	1,687.3	1,530.6	1,846.3	-6%	6%
Electric Power	17.7	16.3	19.7	-5%	8%
U.S. Territories	17.0	14.9	19.6	-7%	10%
Geothermal	**0.4**	**0.1**	**1.2**	**-47%**	**172%**
Electric Power	0.4	0.1	1.2	-47%	172%
Total (including Geothermal)[b]	**4,639.1**	**4,408.8**	**4,994.4**	**-2%**	**4%**

NO (Not Occurring)
NE (Not Estimated)
[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.
[b] The low and high estimates for total emissions were calculated separately through simulations and, hence, the low and high emission estimates for the sub-source categories do not sum to total emissions.
Note: Totals may not sum due to independent rounding.

QA/QC and Verification

In order to ensure the quality of the CO_2 emission estimates from fossil fuel combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and methodology used for estimating CO_2 emissions from fossil fuel combustion in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated to determine whether any corrective actions were needed. Minor corrective actions were taken.

One area of QA/QC and verification is to compare the estimates and emission factors used in the Inventory with other sources of CO_2 emissions reporting. Two main areas and sources of data were considered. The first is a comparison with the EPA GHGRP combustion data (subpart C) for stationary combustion sources excluding the electric power sector. This mainly focused on considering carbon factors for natural gas. The second comparison is with the EPA Air Markets Program data for electric power production. This considered carbon factors for coal and natural gas used in electric power production.

The EPA GHGRP collects greenhouse gas emissions data from large emitters including information on fuel combustion. This excludes emissions from mobile sources and smaller residential and commercial sources, those emissions are covered under supplier reporting (subparts MM and NN) and are areas for further research. Fuel combustion CO_2 data reported in 2021 was 2,084.0 MMT CO_2. Of that, 1,581.4 MMT CO_2 was from electricity production. Therefore, the non-electric power production fuel combustion reporting was a fraction of the total covered by the Inventory under fossil fuel combustion. Furthermore, reporters under the GHGRP can use multiple methods of calculating emissions; one method is to use the default emission factors provided in the rule, while another is based on a tier 3 approach using their own defined emission factors. Based on data from reporters on approach used, it was determined that only about 10 percent of natural gas combustion emissions were based on a tier 3 approach. Given the small sample size compared to the overall Inventory calculations for natural gas combustion EPA determined it was not reasonable to consider the GHGRP tier 3 natural gas factors at this time.

EPA collects detailed sulfur dioxide (SO_2), nitrogen oxides (NO_X), and carbon dioxide (CO_2) emissions data and other information from power plants across the country as part of the Acid Rain Program (ARP), the Cross-State Air Pollution Rule (CSAPR), the CSAPR Update, and the Revised CSAPR Update (RCU). The CO_2 data from these Air Market Programs (AMP) can be compared to the electric power sector emissions calculated from the Inventory as shown in Table 3-18 for the three most recent years of data.

Table 3-18: Comparison of Electric Power Sector Emissions (MMT CO_2 Eq. and Percent)

	CO_2 Emissions (MMT CO_2 Eq.)			% Change	
Fuel/Sector	**2019**	**2020**	**2021**	**19-20**	**20-21**
Inventory Electric Power Sector	**1,606.7**	**1,439.6**	**1,540.9**	**-10.4%**	**7.0%**
Coal	973.5	788.2	909.9	-19.0%	15.5%
Natural Gas	616.6	634.8	612.9	3.0%	-3.5%
Petroleum	16.2	16.2	17.7	0.0%	9.6%
AMP Electric Power Sector	**1,605.4**	**1,437.7**	**1,538.6**	**-10.4%**	**7.0%**
Coal	980.9	796.3	917.2	-18.8%	15.2%
Natural Gas	616.4	632.6	612.7	2.6%	-3.2%
Petroleum	8.1	8.8	8.7	7.8%	-0.6%

Note: Totals may not sum due to independent rounding.

In general the emissions and trends from the two sources line up well. There are differences expected based on coverage and scope of each source. The Inventory covers all emissions from the electric power sector as defined above. The EPA AMP data covers emissions from electricity generating units of a certain size so in some respects it could cover more sources (like electric power units at industrial facilities that would be covered under the industrial sector in the Inventory) and not as many sources (since smaller units are excluded). The EPA AMP data also includes heat input for different fuel types. That data can be combined with emissions to calculate implied emission factors.[45] The following Table 3-19 shows the implied emissions factors for coal and natural gas from the EPA AMP data compared to the factors used in the Inventory for the three most recent years of data.

Table 3-19: Comparison of Emissions Factors (MMT Carbon/QBtu)

Fuel Type	2019	2020	2021
EPA AMP			
Coal	25.52	25.52	25.55
Natural Gas	14.43	14.47	14.50
EPA Inventory			
Electric Power Coal	26.08	26.12	26.13
Natural Gas	14.43	14.43	14.43

[45] These emission factors can be converted from MMT Carbon/QBtu to MMT CO_2 Eq./QBtu by multiplying the emission factor by 44/12, the molecular-to-atomic weight ratio of CO_2 to C. This would assume the fraction oxidized to be 100 percent, which is the guidance in IPCC (2006) (see Annex 2.1).

The factors for natural gas line up reasonably well. For coal the EPA emissions factors are roughly 2 percent higher than those calculated from the EPA AMP data. One possible reason for the difference is that the EPA Inventory factors are based on all coal used in electric power production while the factors from the EPA AMP data are based on units where coal is the source of fuel used. There are units that use coal and other fuel sources but emissions for each fuel type could not be calculated. This is an area of further research but given current data available the approach to develop carbon factors as outlined in Annex 2 is still felt to be the most appropriate to represent total fuel combustion in the United States.

The UNFCCC reporting guidelines also require countries to complete a "top-down" reference approach for estimating CO_2 emissions from fossil fuel combustion in addition to their "bottom-up" sectoral methodology. The reference approach (detailed in Annex 4) uses alternative methodologies and different data sources than those contained in this section of the report. The reference approach estimates fossil fuel consumption by adjusting national aggregate fuel production data for imports, exports, and stock changes rather than relying on end-user consumption surveys. The reference approach assumes that once carbon-based fuels are brought into a national economy, they are either saved in some way (e.g., stored in products, kept in fuel stocks, or left unoxidized in ash) or combusted, and therefore the carbon in them is oxidized and released into the atmosphere. In the reference approach, accounting for actual consumption of fuels at the sectoral or sub-national level is not required. One difference between the two approaches is that emissions from carbon that was not stored during non-energy use of fuels are subtracted from the sectoral approach and reported separately (see Section 3.2). These emissions, however, are not subtracted in the reference approach. As a result, the reference approach emission estimates are comparable to those of the sectoral approach, with the exception that the Non-Energy Use (NEU) source category emissions are included in the reference approach (see Annex 4 for more details).

Recalculations Discussion

Several updates to activity data and emission factors lead to recalculations of previous year results. The major updates are as follows:

- EIA (2023a) updated energy consumption statistics across the time series relative to the previous Inventory. This includes an update to transportation sector propane consumption data post 2010.
- EIA (2023a) updated industrial energy sector activity data post 2010 relative to the previous Inventory. This caused the annually variable carbon contents for HGL (energy use) and HGL (non-energy use) to be updated across the time series, because post 2010 data is used to back-cast data for prior years. EIA (2023a) updated petroleum statistics in coordination with its Petroleum Supply Annual 2021. This impacted the HGL category across the time series.
- EPA revised territories data to correct for an error in how LPG data was pulled. The values for LPG were previously referencing the values for Other Petroleum from the EIA's International Energy Statistics (EIA 2023b) and have been corrected to reflect the values for Liquified Petroleum Gas from the same source.
- Natural gas consumption data from EIA's *Monthly Energy Review* (EIA 2023a) Table 10b was updated, which impacted years 2018 through 2020.
- The carbon content for propylene was updated from 65.95 kg CO_2/MMBtu to 67.77 kg CO_2/MMBtu to reflect values used in the EPA Greenhouse Gas Emission Factors Hub.
- Fuel consumption for the U.S. Territories provided by EIA's International Energy Statistics (EIA 2023b) was updated across the time series.
- Updated values of natural gas used for ammonia production across the time series relative to the previous Inventory.
- The collection of data for EIA's Fuel Oil and Kerosene Sales (FOKS) data set was discontinued for 2021 data. Instead, data from EIA's *Monthly Energy Review* (EIA 2023a) was used to allocate distillate fuel consumption for the residential, commercial, and industrial sectors.

- CO_2-equivalent emissions of CH_4 and N_2O have been revised to reflect the 100-year global warming potential (GWP) values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), used in previous Inventories (IPCC 2007). The AR5 GWP values have been applied across the entire time series for consistency. Prior inventories used GWP values of 25 and 298 for CH_4 and N_2O, respectively. These values have been updated to 28 and 265, respectively.

All of the revisions discussed above resulted in the following impacts on emissions over time:

- From 1990 to 2020, petroleum emissions from the residential sector decreased by an average annual amount of 0.09 MMT CO_2 Eq. (less than half a percent). Petroleum emissions from the commercial, industrial, and transportation sectors increased by an average annual amount of 0.05 MMT CO_2 Eq. (less than half a percent), 0.15 MMT CO_2 Eq. (less than half a percent), and 0.07 MMT CO_2 Eq. (less than half a percent), respectively. These changes are due to changes in EIA consumption statistics for petroleum, changes in EIA industrial energy sector activity data, and the change in carbon content for propylene.
- Petroleum emissions from U.S. Territories decreased by an average annual amount of 1.82 MMT CO_2 Eq. (5.49 percent) due to the correction in data pulled for LPG from 1990 to 2020, change in carbon content for propylene, and change in fuel consumption data for U.S. Territories.
- Natural gas emissions across the residential, commercial, transportation, and electric power sectors for years 2018 to 2020 increased by an average annual amount of 0.19 MMT CO_2 Eq. (less than half a percent) due to an update in natural gas consumption for these sectors in EIA's *Monthly Energy Review* (EIA 2023a) Table 10b.
- Natural gas emissions for the industrial sector from 1990 through 2017 decreased by an average annual amount of 1.00 MMT CO_2 Eq. (less than half a percent) due to an update in the correction for natural gas used for ammonia production. Natural gas emissions for the industrial sector from 2018 to 2020 decreased by 0.03 MMT CO_2 Eq. (less than half a percent) due to updates to both ammonia production and MER table 10b.
- Coal emissions from U.S. Territories decreased by an average annual amount of less than 0.01 MMT CO_2 Eq. (less than half a percent) due to the change in fuel consumption data for U.S. Territories.
- Allocating distillate fuel oil consumption using EIA (2023) instead of EIA FOKS resulted in an average annual change of less than 1 Btu (less than half a percent) across the residential, commercial, and industrial sectors.
- Updating GWP values to AR5 values did not impact CO_2 emissions, but CH_4 and N_2O emissions increased 12 percent and decreased 11 percent, respectively. Changes to CH_4 and N_2O emissions from stationary and mobile combustion are discussed in their respective sections below.

Overall, these changes resulted in an average annual decrease of 2.5 MMT CO_2 Eq. (less than 0.05 percent) in CO_2 emissions from fossil fuel combustion for the period 1990 through 2020, relative to the previous Inventory. However, there were bigger absolute changes across the time series as discussed above.

Planned Improvements

To reduce uncertainty of CO_2 from fossil fuel combustion estimates for U.S. Territories, further expert elicitation may be conducted to better quantify the total uncertainty associated with emissions from U.S. Territories. Additionally, although not technically a fossil fuel, since geothermal energy-related CO_2 emissions are included for reporting purposes, further expert elicitation may be conducted to better quantify the total uncertainty associated with CO_2 emissions from geothermal energy use.

The availability of facility-level combustion emissions through EPA's GHGRP will continue to be examined to help better characterize the industrial sector's energy consumption in the United States and further classify total industrial sector fossil fuel combustion emissions by business establishments according to industrial economic activity type. Most methodologies used in EPA's GHGRP are consistent with IPCC methodologies, though for EPA's

GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards, which may differ with the more aggregated data collected for the Inventory to estimate total, national U.S. emissions. In addition, and unlike the reporting requirements for this chapter under the UNFCCC reporting guidelines, some facility-level fuel combustion emissions reported under the GHGRP may also include industrial process emissions.[46] In line with UNFCCC reporting guidelines, fuel combustion emissions are included in this chapter, while process emissions are included in the Industrial Processes and Product Use chapter of this report. In examining data from EPA's GHGRP that would be useful to improve the emission estimates for the CO_2 from fossil fuel combustion category, particular attention will also be made to ensure time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as reported in this Inventory.

Additional analyses will be conducted to align reported facility-level fuel types and IPCC fuel types per the national energy statistics. For example, additional work will look at CO_2 emissions from biomass to ensure they are separated in the facility-level reported data and maintaining consistency with national energy statistics provided by EIA. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will continue to be relied upon.[47]

An ongoing planned improvement is to develop improved estimates of domestic waterborne fuel consumption. The Inventory estimates for residual and distillate fuel used by ships and boats is based in part on data on bunker fuel use from the U.S. Department of Commerce. Domestic fuel consumption is estimated by subtracting fuel sold for international use from the total sold in the United States. It may be possible to more accurately estimate domestic fuel use and emissions by using detailed data on marine ship activity. The feasibility of using domestic marine activity data to improve the estimates will continue to be investigated.

EPA is also evaluating the methods used to adjust for conversion of fuels and exports of CO_2. EPA is exploring the approach used to account for CO_2 transport, injection, and geologic storage, as part of this there may be changes made to accounting for CO_2 exports.

Finally, another ongoing planned improvement is to evaluate data availability to update the carbon and heat content of more fuel types accounted for in this Inventory. This update will impact consumption and emissions across all sectors and will improve consistency with EIA data as carbon and heat contents of fuels will be accounted for as annually variable and therefore improve accuracy across the time series. Some of the fuels considered in this effort include petroleum coke, residual fuel, and woody biomass.

CH_4 and N_2O from Stationary Combustion

Methodology and Time-Series Consistency

Methane and N_2O emissions from stationary combustion were estimated by multiplying fossil fuel and wood consumption data by emission factors (by sector and fuel type for industrial, residential, commercial, and U.S. Territories; and by fuel and technology type for the electric power sector). The electric power sector utilizes a Tier 2 methodology, whereas all other sectors utilize a Tier 1 methodology. The activity data and emission factors used are described in the following subsections.

More detailed information on the methodology for calculating emissions from stationary combustion, including emission factors and activity data, is provided in Annex 3.1.

Industrial, Residential, Commercial, and U.S. Territories

National coal, natural gas, fuel oil, and wood consumption data were grouped by sector: industrial, commercial, residential, and U.S. Territories. For the CH_4 and N_2O emission estimates, consumption data for each fuel were

[46] See https://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf#page=2.

[47] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

obtained from EIA's *Monthly Energy Review* (EIA 2023a). Because the United States does not include territories in its national energy statistics, fuel consumption data for territories were provided separately by EIA's International Energy Statistics (EIA 2023b).[48] Fuel consumption for the industrial sector was adjusted to subtract out mobile source construction and agricultural use, which is reported under mobile sources. Construction and agricultural mobile source fuel use was obtained from EPA (2022) and FHWA (1996 through 2022). Estimates for wood biomass consumption for fuel combustion do not include municipal solid waste, tires, etc., that are reported as biomass by EIA. Non-CO_2 emissions from combustion of the biogenic portion of municipal solid waste and tires is included under waste incineration (Section 3.2). Estimates for natural gas combustion do not include biogas, and therefore non-CO_2 emissions from biogas are not included (see the Planned Improvements section, below). Tier 1 default emission factors for the industrial, commercial, and residential end-use sectors were provided by the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006). U.S. Territories' emission factors were estimated using the U.S. emission factors for the primary sector in which each fuel was combusted.

Electric Power Sector

The electric power sector uses a Tier 2 emission estimation methodology as fuel consumption for the electric power sector by control-technology type was based on EPA's Acid Rain Program Dataset (EPA 2023). Total fuel consumption in the electric power sector from EIA (2023a) was apportioned to each combustion technology type and fuel combination using a ratio of fuel consumption by technology type derived from EPA (2023) data. The combustion technology and fuel use data by facility obtained from EPA (2023) were only available from 1996 to 2020, so the consumption estimates from 1990 to 1995 were estimated by applying the 1996 consumption ratio by combustion technology type from EPA (2023) to the total EIA (2023a) consumption for each year from 1990 to 1995.

Emissions were estimated by multiplying fossil fuel and wood consumption by technology-, fuel-, and country-specific Tier 2 emission factors. The Tier 2 emission factors used are based in part on emission factors published by EPA, and EPA's Compilation of Air Pollutant Emission Factors, AP-42 (EPA 1997) for coal wall-fired boilers, residual fuel oil, diesel oil and wood boilers, natural gas-fired turbines, and combined cycle natural gas units.[49]

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021 as discussed below. As discussed in Annex 5, data are unavailable to include estimates of CH_4 and N_2O emissions from biomass use in Territories, but those emissions are assumed to be insignificant.

Uncertainty

Methane emission estimates from stationary sources exhibit high uncertainty, primarily due to difficulties in calculating emissions from wood combustion (i.e., fireplaces and wood stoves). The estimates of CH_4 and N_2O emissions presented are based on broad indicators of emissions (i.e., fuel use multiplied by an aggregate emission factor for different sectors), rather than specific emission processes (i.e., by combustion technology and type of emission control).

An uncertainty analysis was performed by primary fuel type for each end-use sector, using the IPCC-recommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, with @RISK software.

The uncertainty estimation model for this source category was developed by integrating the CH_4 and N_2O stationary source inventory estimation models with the model for CO_2 from fossil fuel combustion to realistically characterize the interaction (or endogenous correlation) between the variables of these three models. About 55

[48] U.S. Territories data also include combustion from mobile activities because data to allocate territories' energy use were unavailable. For this reason, CH_4 and N_2O emissions from combustion by U.S. Territories are only included in the stationary combustion totals.

[49] Several of the U.S. Tier 2 emission factors were used in IPCC (2006) as Tier 1 emission factors. See Table A-69 in Annex 3.1 for emission factors by technology type and fuel type for the electric power sector.

input variables were simulated for the uncertainty analysis of this source category (about 20 from the CO_2 emissions from fossil fuel combustion inventory estimation model and about 35 from the stationary source inventory models).

In developing the uncertainty estimation model, uniform distribution was assumed for all activity-related input variables and N_2O emission factors, based on the SAIC/EIA (2001) report.[50] For these variables, the uncertainty ranges were assigned to the input variables based on the data reported in SAIC/EIA (2001).[51] However, the CH_4 emission factors differ from those used by EIA. These factors and uncertainty ranges are based on IPCC default uncertainty estimates (IPCC 2006).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-20. Stationary combustion CH_4 emissions in 2021 (including biomass) were estimated to be between 5.9 and 20.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 34 percent below to 127 percent above the 2021 emission estimate of 8.9 MMT CO_2 Eq.[52] Stationary combustion N_2O emissions in 2021 (including biomass) were estimated to be between 16.4 and 33.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 26 percent below to 51 percent above the 2021 emission estimate of 22.1 MMT CO_2 Eq.

Table 3-20: Approach 2 Quantitative Uncertainty Estimates for CH_4 and N_2O Emissions from Energy-Related Stationary Combustion, Including Biomass (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Stationary Combustion	CH_4	8.9	5.9	20.3	-34%	127%
Stationary Combustion	N_2O	22.1	16.4	33.4	-26%	51%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

The uncertainties associated with the emission estimates of CH_4 and N_2O are greater than those associated with estimates of CO_2 from fossil fuel combustion, which mainly rely on the carbon content of the fuel combusted. Uncertainties in both CH_4 and N_2O estimates are due to the fact that emissions are estimated based on emission factors representing only a limited subset of combustion conditions. For the indirect greenhouse gases, uncertainties are partly due to assumptions concerning combustion technology types, age of equipment, emission factors used, and activity data projections.

QA/QC and Verification

In order to ensure the quality of the non-CO_2 emission estimates from stationary combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent

[50] SAIC/EIA (2001) characterizes the underlying probability density function for the input variables as a combination of uniform and normal distributions (the former distribution to represent the bias component and the latter to represent the random component). However, for purposes of the current uncertainty analysis, it was determined that uniform distribution was more appropriate to characterize the probability density function underlying each of these variables.

[51] In the SAIC/EIA (2001) report, the quantitative uncertainty estimates were developed for each of the three major fossil fuels used within each end-use sector; the variations within the sub-fuel types within each end-use sector were not modeled. However, for purposes of assigning uncertainty estimates to the sub-fuel type categories within each end-use sector in the current uncertainty analysis, SAIC/EIA (2001)-reported uncertainty estimates were extrapolated.

[52] The low emission estimates reported in this section have been rounded down to the nearest integer values and the high emission estimates have been rounded up to the nearest integer values.

with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and emission factor sources and methodology used for estimating CH_4, N_2O, and the greenhouse gas precursors from stationary combustion in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated.

Recalculations Discussion

EIA (2023a) updated petroleum statistics in coordination with its Petroleum Supply Annual 2021. This impacted the HGL category across the time series.

Fuel consumption data for U.S. Territories provided by EIA's International Energy Statistics (EIA 2023b) was updated across the time series. Non-CO_2 emissions from U.S Territories decreased by an average annual amount of less than 0.01 MMT CO_2 Eq. (less than half a percent) for coal and 0.01 MMT CO_2 Eq. (5.75 percent) for fuel oil due to the update in fuel consumption data for U.S. Territories.

Wood and natural gas consumption data from EIA's *Monthly Energy Review* (EIA 2023a) Table 10b was updated, which impacted years 2018-2020. Non-CO_2 emissions across the residential, commercial, industrial, and electric power sectors increased by an average annual amount of less than 0.04 MMT CO_2 Eq. (less than half a percent) for wood and decreased by an average annual amount of 0.03 MMT CO_2 Eq. (less than half a percent) for natural gas due to the update in *Monthly Energy Review* Table 10b.

In addition, for the current Inventory, CO_2-equivalent emissions of CH_4 and N_2O from stationary combustion have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), used in previous Inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWP values of 25 and 298 for CH_4 and N_2O, respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was a 12 percent increase and the average annual change in CO_2-equivalent N_2O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the time series changed by an average annual decrease of 2.3 MMT CO_2 Eq. (6.1 percent) relative to emissions results calculated using the prior GWP values. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Several items are being evaluated to improve the CH_4 and N_2O emission estimates from stationary combustion and to reduce uncertainty for U.S. Territories. Efforts will be taken to work with EIA and other agencies to improve the quality of the U.S. Territories data. Because these data are not broken out by stationary and mobile uses, further research will be aimed at trying to allocate consumption appropriately. In addition, the uncertainty of biomass emissions will be further investigated because it was expected that the exclusion of biomass from the estimates would reduce the uncertainty; and in actuality the exclusion of biomass increases the uncertainty. These improvements are not all-inclusive but are part of an ongoing analysis and efforts to continually improve these stationary combustion estimates from U.S. Territories.

Other forms of biomass-based gas consumption include biogas. As an additional planned improvement, EPA will examine EIA and GHGRP data on biogas collected and burned for energy use and determine if CH_4 and N_2O emissions from biogas can be included in future Inventories. EIA (2023a) natural gas data already deducts biogas used in the natural gas supply, so no adjustments are needed to the natural gas fuel consumption data to account for biogas.

CH_4 and N_2O from Mobile Combustion

Methodology and Time-Series Consistency

Estimates of CH_4 and N_2O emissions from mobile combustion were calculated by multiplying emission factors by measures of activity for each fuel and vehicle type (e.g., light-duty gasoline trucks). Activity data included vehicle miles traveled (VMT) for on-road vehicles and fuel consumption for non-road mobile sources. The activity data and emission factors used in the calculations are described in the subsections that follow. A complete discussion of the methodology used to estimate CH_4 and N_2O emissions from mobile combustion and the emission factors used in the calculations is provided in Annex 3.2.

On-Road Vehicles

Estimates of CH_4 and N_2O emissions from gasoline and diesel on-road vehicles are based on VMT and emission factors (in grams of CH_4 and N_2O per mile) by vehicle type, fuel type, model year, and emission control technology. Emission estimates for alternative fuel vehicles (AFVs) are based on VMT and emission factors (in grams of CH_4 and N_2O per mile) by vehicle and fuel type.[53]

CH_4 and N_2O emissions factors by vehicle type and emission tier for newer (starting with model year 2004) on-road gasoline vehicles were calculated by Browning (2019) from annual vehicle certification data compiled by EPA. CH_4 and N_2O emissions factors for older (model year 2003 and earlier) on-road gasoline vehicles were developed by ICF (2004). These earlier emission factors were derived from EPA, California Air Resources Board (CARB) and Environment and Climate Change Canada (ECCC) laboratory test results of different vehicle and control technology types. The EPA, CARB and ECCC tests were designed following the Federal Test Procedure (FTP). The procedure covers three separate driving segments, since vehicles emit varying amounts of greenhouse gases depending on the driving segment. These driving segments are: (1) a transient driving cycle that includes cold start and running emissions, (2) a cycle that represents running emissions only, and (3) a transient driving cycle that includes hot start and running emissions. For each test run, a bag was affixed to the tailpipe of the vehicle and the exhaust was collected; the content of this bag was then analyzed to determine quantities of gases present. The emissions characteristics of driving segment 2 tests were used to define running emissions. Running emissions were subtracted from the total FTP emissions to determine start emissions. These were then recombined to approximate average driving characteristics, based upon the ratio of start to running emissions for each vehicle class from MOBILE6.2, an EPA emission factor model that predicts grams per mile emissions of CO_2, CO, HC, NO_x, and PM from vehicles under various conditions.[54]

Diesel on-road vehicle emission factors were developed by ICF (2006a). CH_4 and N_2O emissions factors for newer (starting with model year 2007) on-road diesel vehicles (those using engine aftertreatment systems) were calculated from annual vehicle certification data compiled by EPA.

CH_4 and N_2O emission factors for AFVs were developed based on the 2021 Greenhouse gases, Regulated Emissions, and Energy use in Transportation (GREET) model (ANL 2022). For light-duty trucks, EPA used travel fractions for LDT1 and LDT2 (MOVES Source Type 31 for LDT1 and MOVES Source Type 32 for LDT2; see Annex 3.2 for information about the MOVES model) to determine light-duty truck emission factors. For medium-duty vehicles, EPA used emission factors for light heavy-duty vocational trucks. For heavy-duty vehicles, EPA used emission factors for long-haul combination trucks. For buses, EPA used emission factors for transit buses. These values represent vehicle operations only (tank-to-wheels); upstream well-to-tank emissions are calculated elsewhere in the Inventory. Biodiesel CH_4 emission factors were corrected from GREET values to be the same as

[53] Alternative fuel and advanced technology vehicles are those that can operate using a motor fuel other than gasoline or diesel. This includes electric or other bi-fuel or dual-fuel vehicles that may be partially powered by gasoline or diesel.

[54] Additional information regarding the MOBILE model can be found at https://www.epa.gov/moves/description-and-history-mobile-highway-vehicle-emission-factor-model.

CH_4 emission factors for diesel vehicles. GREET overestimated biodiesel CH_4 emission factors based upon an incorrect CH_4-to-THC ratio for diesel vehicles with aftertreatment technology.

Annual VMT data for 1990 through 2021 were obtained from the Federal Highway Administration's (FHWA) Highway Performance Monitoring System database as reported in Highway Statistics (FHWA 1996 through 2023). VMT estimates were then allocated to vehicle type using ratios of VMT per vehicle type to total VMT, derived from EPA's MOVES3 model (see Annex 3.2 for information about the MOVES model). This corrects time series inconsistencies in FHWA definitions of vehicle types (Browning 2022a). VMT for alternative fuel vehicles (AFVs) were estimated based on Browning (2022b). The age distributions of the U.S. vehicle fleet were obtained from EPA (2004, 2021b), and the average annual age-specific vehicle mileage accumulation of U.S. vehicles were obtained from EPA (2021b).

Control technology and standards data for on-road vehicles were obtained from EPA's Office of Transportation and Air Quality (EPA 2021c, 2021d, and 1998) and Browning (2005). These technologies and standards are defined in Annex 3.2, and were compiled from EPA (1994a, 1994b, 1998, 1999a) and IPCC (2006) sources.

Non-Road Mobile Sources

The nonroad mobile category for CH_4 and N_2O includes ships and boats, aircraft, locomotives, and other mobile non-road sources (e.g., construction or agricultural equipment). For locomotives, aircraft, ships and non-recreational boats, fuel-based emission factors are applied to data on fuel consumption, following the IPCC Tier 1 approach, The Tier 2 approach for these sources would require separate fuel-based emissions factors by technology, for which data are not currently available. For other non-road sources, EPA uses the Nonroad component of the MOVES model to estimate fuel use. Emission factors by horsepower bin are estimated from EPA engine certification data. Because separate emission factors are applied to specific engine technologies; these non-road sources utilize a Tier 2 approach.

To estimate CH_4 and N_2O emissions from non-road mobile sources, fuel consumption data were employed as a measure of activity and multiplied by fuel-specific emission factors (in grams of N_2O and CH_4 per kilogram of fuel consumed).[55] Activity data were obtained from AAR (2008 through 2022), APTA (2007 through 2022), Rail Inc (2014 through 2022), APTA (2006), BEA (1991 through 2015), Benson (2002 through 2004), DLA Energy (2022), DOC (1991 through 2022), DOE (1993 through 2022), DOT (1991 through 2022), EIA (2002, 2007, 2022), EIA (2022f), EIA (1991 through 2022), EPA (2022b), Esser (2003 through 2004), FAA (2022), FHWA (1996 through 2023),[56] Gaffney (2007), and Whorton (2006 through 2014). Emission factors for non-road modes were taken from IPCC (2006) and Browning (2020a and 2018b).

Uncertainty

A quantitative uncertainty analysis was conducted for the mobile source sector using the IPCC-recommended Approach 2 uncertainty estimation methodology, Monte Carlo Stochastic Simulation technique, using @RISK software. The uncertainty analysis was performed on 2021 estimates of CH_4 and N_2O emissions, incorporating probability distribution functions associated with the major input variables. For the purposes of this analysis, the uncertainty was modeled for the following four major sets of input variables: (1) VMT data, by on-road vehicle and

[55] The consumption of international bunker fuels is not included in these activity data, but emissions related to the consumption of international bunker fuels are estimated separately under the International Bunker Fuels source category.

[56] This Inventory uses FHWA's Agriculture, Construction, and Commercial/Industrial MF-24 fuel volumes along with the MOVES model gasoline volumes to estimate non-road mobile source CH_4 and N_2O emissions for these categories. For agriculture, the MF-24 gasoline volume is used directly because it includes both non-road trucks and equipment. For construction and commercial/industrial category gasoline estimates, the 2014 and older MF-24 volumes represented non-road trucks only; therefore, the MOVES gasoline volumes for construction and commercial/industrial categories are added to the respective categories in the Inventory. Beginning in 2015, this addition is no longer necessary since the FHWA updated its methods for estimating on-road and non-road gasoline consumption. Among the method updates, FHWA now incorporates MOVES equipment gasoline volumes in the construction and commercial/industrial categories.

fuel type, (2) emission factor data, by on-road vehicle, fuel, and control technology type, (3) fuel consumption, data, by non-road vehicle and equipment type, and (4) emission factor data, by non-road vehicle and equipment type.

Uncertainty analyses were not conducted for NO_x, CO, or NMVOC emissions. Emission factors for these gases have been extensively researched because emissions of these gases from motor vehicles are regulated in the United States, and the uncertainty in these emission estimates is believed to be relatively low. For more information, see Section 3.11. However, a much higher level of uncertainty is associated with CH_4 and N_2O emission factors due to limited emission test data, and because, unlike CO_2 emissions, the emission pathways of CH_4 and N_2O are highly complex.

Based on the uncertainty analysis, mobile combustion CH_4 emissions from all mobile sources in 2021 were estimated to be between 2.5 and 3.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 4 percent below to 29 percent above the corresponding 2021 emission estimate of 2.6 MMT CO_2 Eq. Mobile combustion N_2O emissions from mobile sources in 2021 were estimated to be between 15.3 and 19.8 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 8 percent below to 19 percent above the corresponding 2021 emission estimate of 16.7 MMT CO_2 Eq.

Table 3-21: Approach 2 Quantitative Uncertainty Estimates for CH_4 and N_2O Emissions from Mobile Sources (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (Percent)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Mobile Sources	CH_4	2.6	2.5	3.3	-4%	+29%
Mobile Sources	N_2O	16.7	15.3	19.8	-8%	+19%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

This uncertainty analysis is a continuation of a multi-year process for developing quantitative uncertainty estimates for this source category using the IPCC Approach 2 uncertainty estimation methodology. As a result, as new information becomes available, uncertainty characterization of input variables may be improved and revised. For additional information regarding uncertainty in emission estimates for CH_4 and N_2O please refer to the Uncertainty Annex. As discussed in Annex 5, data are unavailable to include estimates of CH_4 and N_2O emissions from any liquid fuel used in pipeline transport or some biomass used in transportation sources, but those emissions are assumed to be insignificant.

QA/QC and Verification

In order to ensure the quality of the emission estimates from mobile combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The specific plan used for mobile combustion was updated prior to collection and analysis of this current year of data. The Tier 2 procedures focused on the emission factor and activity data sources, as well as the methodology used for estimating emissions. These procedures included a qualitative assessment of the emission estimates to determine whether they appear consistent with the most recent activity data and emission factors available. A comparison of historical emissions between the current Inventory and the previous Inventory was also conducted to ensure that the changes in estimates were consistent with the changes in activity data and emission factors.

Recalculations Discussion

In previous inventories, on-highway greenhouse gas emissions were calculated using FHWA fuel consumption and vehicle miles traveled (VMT) data delineated by FHWA vehicle classes. These fuel consumption estimates were then combined with estimates of fuel shares by vehicle type from Oak Ridge National Laboratory's Transportation Energy Data Book (TEDB), to develop an estimate of fuel consumption for each vehicle type in the Inventory (i.e.,

passenger cars, light-duty trucks, buses, medium- and heavy-duty trucks, motorcycles). However, in 2011, FHWA changed its methods for estimating VMT and related data. These methodological changes included how vehicles are classified, moving from a system based on body-type to one that is based on wheelbase. These changes were first incorporated in the 1990 through 2008 Inventory and applied to the time series beginning in 2007. The FHWA methodology update resulted in large changes in VMT and fuel consumption by vehicle class, leading to a shift in emissions among vehicle classes. For example, FHWA replaced the vehicle category "Passenger Cars" with "Light-duty Vehicles-Short Wheelbase" and the "Other 2 axle-4 Tire Vehicles" category was replaced by "Light-duty Vehicles, Long Wheelbase." FHWA changed the definition of light-duty vehicles to less than 10,000 lbs. GVWR instead of 8,500 lbs. GVWR pushed some single-unit heavy-duty trucks to the light-duty class. This change in vehicle classification also moved some smaller trucks and sport utility vehicles from the light truck category to the passenger cars category in this Inventory. These updates resulted in a disconnect in FHWA VMT and fuel consumption data in the 2006 to 2007 timeframe, generating a large drop in the light-duty truck VMT and fuel consumption trend lines between 2006 and 2007, and a corresponding increase in the passenger cars trend lines.

To address this inconsistency in the time series, EPA updated the methodology to divide FHWA VMT data into vehicle classes and fuel type using distributions from EPA's Motor Vehicle Emission Simulator, MOVES. The MOVES model is a nationally recognized model based on vehicle registration, travel activity, and emission rates that are updated with each model release. MOVES3 is the latest version of MOVES and uses forecast growth factors which provide EPA's best estimate of likely future activity based on historical data (see Annex 3.2 for more information about the MOVES model). Thus, dividing FHWA total VMT data into vehicle class and fuel type using MOVES3 ratios provides a more consistent estimate of vehicle activity over the Inventory time series. MOVES3 ratios are also used to reallocate FHWA gasoline and diesel fuel use data (Browning 2022a). For this update, the MOVES3 model was run for calendar years 1990 and 1999 through 2021 for all vehicle types. Calendar years 1991 through 1998 were linearly interpolated from 1990 and 1999 calendar year MOVES3 outputs. Model outputs of VMT and fuel consumption were binned by calendar year, MOVES vehicle type, and fuel type; MOVES vehicle types were then mapped to the vehicle types used in the Inventory. Only outputs of gasoline and diesel fuel consumption from MOVES3 were used; alternative fuel VMT and fuel consumption outputs are ignored because they are calculated for the Inventory under a separate methodology. Total gasoline and diesel fuel consumption values from FHWA were then allocated to Inventory vehicle types using gasoline and diesel fuel consumption ratios by vehicle type from MOVES3. Similarly, VMT by vehicle type and fuel type was calculated by multiplying the total VMT from FHWA by VMT ratios by vehicle and fuel type generated by MOVES3. Overall, because total fuel consumption and VMT values are conserved, the changes in total emissions are small, within 0.1 percent. Observed differences in total emissions are due to changes in CH_4 and N_2O emissions, as the methodology for calculating these non-CO_2 emissions utilizes more detailed activity data and is therefore sensitive to the re-allocation of activity data. While total emissions estimates are not significantly impacted by this methodology update, there are significant changes in the allocation of emissions by vehicle type. The share of emissions allocated to passenger cars now generally decline through the time series while the share of emissions allocated to light-duty trucks increase over time.

In addition, the methodology for estimating emissions from alternative fuel vehicles was revised. In previous Inventories, EPA used Energy Information Administration (EIA) surveys of fleet vehicles used by electricity providers, federal agencies, natural gas providers, propane providers, state agencies and transit agencies to determine fuel use and vehicle counts for most alternative fuel vehicles. However, EIA stopped conducting these surveys in 2017. To address this data void, EPA used various methods to determine vehicle counts. Beginning with the 1990 through 2018 Inventory, electric, plug-in electric, and fuel cell vehicle counts were determined from vehicles sales data published by Wards Intelligence. Beginning with this Inventory, electric and fuel cell heavy-duty bus counts are determined from Zukowski, D. (2022) for calendar years 2018 through 2021. Vehicle counts for other fuels (methanol, ethanol, natural gas, and LPG) for 2018 onward were estimated via regression analysis (Browning 2022b).

In addition, the latest version of Argonne National Laboratory's *Greenhouse Gas, Regulated Emissions, and Energy Use in Transportation Model (GREET2022)* provided updated emission factors for all alternative fuel vehicle classes

(ANL 2022). Updated emission factors from GREET2022 were implemented in this Inventory, across the entire time series.

The updated vehicle counts and emission factors resulted in a 16 percent reduction in CO_2, a 51 percent reduction in CH_4, and a 92 percent reduction in N_2O in calendar year 2020 for alternative fuel vehicles compared with the previous methodology. This resulted in a 21 percent overall reduction in CO_2 Eq. for alternative fuel vehicles compared with the previous methodology.

In addition, for the current Inventory, CO_2-equivalent estimates of CH_4 and N_2O emissions from transportation and mobile combustion have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP values have been applied across the entire time series for consistency.

The GWP of CH_4 increased, leading to an overall increase in CH_4 emissions reported in CO_2 equivalent. The GWP of N_2O decreased, leading to a decrease in emissions from N_2O reported in CO_2 equivalent. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was a 12 percent increase and the average annual change in CO_2-equivalent N_2O emissions was 11 percent decrease for the time series. The net impact from these updates was an average annual 0.1 percent decrease in total CO_2 Eq. emissions for the time series in recent years. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

While the data used for this report represent the most accurate information available, several areas for improvement have been identified.

- Update emission factors for ships and non-recreational boats using residual fuel and distillate fuel. Develop emission factors for locomotives using ultra low sulfur diesel and emission factors for aircraft using jet fuel. The Inventory currently uses IPCC default values for these emission factors.
- Continue to explore potential improvements to estimates of domestic waterborne fuel consumption for future Inventories. The Inventory estimates for residual and distillate fuel used by ships and boats is based in part on data on bunker fuel use from the U.S. Department of Commerce. Domestic fuel consumption is estimated by subtracting fuel sold for international use from the total sold in the United States. Since 2015, all ships travelling within 200 nautical miles of the U.S. coastlines must use distillate fuels thereby overestimating the residual fuel used by U.S. vessels and underestimating distillate fuel use in these ships.

3.2 Carbon Emitted from Non-Energy Uses of Fossil Fuels (CRF Source Category 1A)

In addition to being combusted for energy, fossil fuels are also consumed for non-energy uses (NEU) in the United States. The fuels used for these purposes are diverse, including natural gas, hydrocarbon gas liquids (HGL),[57] asphalt (a viscous liquid mixture of heavy crude oil distillates), petroleum coke (manufactured from heavy oil), and

[57] HGL (formerly referred to as liquefied petroleum gas, or LPG) are hydrocarbons that occur as gases at atmospheric pressure and as liquids under higher pressures. HGLs include paraffins, such as ethane, propane, butanes, isobutane, and natural gasoline (formerly referred to as pentanes plus), and HGLs include olefins, such as ethylene, propylene, butylene and isobutylene.

coal (metallurgical) coke (manufactured from coking coal). The non-energy applications of these fuels are equally diverse, including feedstocks for the manufacture of plastics, rubber, synthetic fibers and other materials; reducing agents for the production of various metals and inorganic products; and products such as lubricants, waxes, and asphalt (IPCC 2006). Emissions from non-energy use of lubricants, paraffin waxes, bitumen/asphalt, and solvents are reported in the Energy sector, as opposed to the Industrial Processes and Product Use (IPPU) sector, to reflect national circumstances in its choice of methodology and to increase transparency of this source category's unique country-specific data sources and methodology (see Box 3-5). In addition, estimates of non-energy use emissions included here do not include emissions already reflected in the IPPU sector, e.g., fuels used as reducing agents. To avoid double counting, the "raw" non-energy fuel consumption data reported by EIA are reduced to account for these emissions already included under IPPU.

Carbon dioxide emissions arise from non-energy uses via several pathways. Emissions may occur during the manufacture of a product, as is the case in producing plastics or rubber from fuel-derived feedstocks. Additionally, emissions may occur during the product's lifetime, such as during solvent use. Overall, throughout the time series and across all uses, about 62 percent of the total C consumed for non-energy purposes was stored in products (e.g., plastics), and not released to the atmosphere; the remaining 38 percent was emitted.

There are several areas in which non-energy uses of fossil fuels are closely related to other parts of this Inventory. For example, some of the non-energy use products release CO_2 at the end of their commercial life when they are combusted after disposal; these emissions are reported separately within the Energy chapter in the Incineration of Waste source category. There are also net exports of petrochemical intermediate products that are not completely accounted for in the EIA data, and the Inventory calculations adjust for the effect of net exports on the mass of C in non-energy applications.

As shown in Table 3-22, fossil fuel emissions in 2021 from the non-energy uses of fossil fuels were 140.2 MMT CO_2 Eq., which constituted approximately 2.8 percent of overall fossil fuel emissions. In 2021, the consumption of fuels for non-energy uses (after the adjustments described above) was 5,902.4 TBtu (see Table 3-23). A portion of the C in the 5,902.4 TBtu of fuels was stored (234.0 MMT CO_2 Eq.), while the remaining portion was emitted (140.2 MMT CO_2 Eq.). Non-energy use emissions increased by 17.6 percent from 2020 to 2021, mainly due to an increase in HGL and industrial coking coal fuel consumption, which contributed 14.0 MMT CO_2 Eq. to the increase in emissions from 2020 to 2021. Although a rise in consumption of some fuels was potentially due to a bounce back in production following the early effects of the COVID-19 pandemic (e.g., naphtha and special naphtha production returned closer to pre-2020 levels), the overall increase in 2021 emissions for select industries exceeds pre-pandemic levels. See Annex 2.3 for more details.

Table 3-22: CO_2 Emissions from Non-Energy Use Fossil Fuel Consumption (MMT CO_2 Eq. and Percent C)

Year	1990	2005	2017	2018	2019	2020	2021
Potential Emissions	305.8	366.9	332.4	352.6	355.9	350.2	374.2
C Stored	193.4	238.0	219.6	223.2	228.2	231.0	234.0
Emissions as a % of Potential	37%	35%	34%	37%	36%	34%	37%
C Emitted	**112.4**	**128.9**	**112.8**	**129.4**	**127.6**	**119.2**	**140.2**

Note: NEU emissions presented in this table differ from the NEU emissions presented in CRF table 1.A(a)s4 as the CRF NEU emissions do not include NEU of lubricants and other petroleum in U.S. Territories. NEU emissions from U.S. Territories are reported under U.S. Territories in the CRF table 1.A(a)s4.

Methodology and Time-Series Consistency

The first step in estimating C stored in products was to determine the aggregate quantity of fossil fuels consumed for non-energy uses. The C content of these feedstock fuels is equivalent to potential emissions, or the product of consumption and the fuel-specific C content values. Both the non-energy fuel consumption and C content data were supplied by the EIA (2023) (see Annex 2.1). Consumption values for industrial coking coal, petroleum coke, other oils, and natural gas in Table 3-23 and Table 3-24 have been adjusted to subtract non-energy uses that are

included in the source categories of the Industrial Processes and Product Use chapter.[58] Consumption of natural gas, HGL, naphthas, other oils, and special naphtha were adjusted to subtract out net exports of these products that are not reflected in the raw data from EIA. Consumption values were also adjusted to subtract net exports of HGL components (e.g., propylene, ethane).

For the remaining non-energy uses, the quantity of C stored was estimated by multiplying the potential emissions by a storage factor.

- For several fuel types—petrochemical feedstocks (including natural gas for non-fertilizer uses, HGL, naphthas, other oils, still gas, special naphtha, and industrial other coal), asphalt and road oil, lubricants, and waxes—U.S. data on C stocks and flows were used to develop C storage factors, calculated as the ratio of (a) the C stored by the fuel's non-energy products to (b) the total C content of the fuel consumed. A lifecycle approach was used in the development of these factors in order to account for losses in the production process and during use. Because losses associated with municipal solid waste management are handled separately in the Energy sector under the Incineration of Waste source category, the storage factors do not account for losses at the disposal end of the life cycle.
- For industrial coking coal and distillate fuel oil, storage factors were taken from Marland and Rotty (1984).
- For the remaining fuel types (petroleum coke, miscellaneous products and other petroleum), IPCC (2006) does not provide guidance on storage factors, and assumptions were made based on the potential fate of C in the respective non-energy use products. Carbon dioxide emissions from carbide production are implicitly accounted for in the storage factor calculation for the non-energy use of petroleum coke.

Table 3-23: Adjusted Consumption of Fossil Fuels for Non-Energy Uses (TBtu)

Year	1990	2005	2017	2018	2019	2020	2021
Industry	**4,317.8**	**5,115.1**	**5,089.8**	**5,448.0**	**5,484.1**	**5,444.8**	**5,780.2**
Industrial Coking Coal	NO	80.4	113.0	124.7	112.8	70.0	124.6
Industrial Other Coal	7.6	11.0	9.5	9.5	9.5	9.5	9.5
Natural Gas to Chemical Plants	282.4	260.9	588.0	676.4	667.6	663.3	667.3
Asphalt & Road Oil	1,170.2	1,323.2	849.2	792.8	843.9	832.3	898.1
HGL[a]	1,218.0	1,610.1	2,193.7	2,506.9	2,550.7	2,658.0	2,819.6
Lubricants	186.3	160.2	124.9	122.0	118.3	111.1	113.9
Natural Gasoline[b]	117.5	95.4	81.7	105.3	155.0	163.7	202.4
Naphtha (<401 °F)	327.0	679.5	413.0	421.2	369.5	329.4	331.1
Other Oil (>401 °F)	663.6	499.5	242.9	219.1	212.1	195.6	196.3
Still Gas	36.7	67.7	163.8	166.9	158.7	145.4	152.8
Petroleum Coke	29.1	104.2	NO	NO	NO	NO	0.0
Special Naphtha	101.1	60.9	95.3	87.0	89.5	80.8	76.1
Distillate Fuel Oil	7.0	16.0	5.8	5.8	5.8	5.8	5.8
Waxes	33.3	31.4	10.2	12.4	10.4	9.2	11.8
Miscellaneous Products	137.8	112.8	198.8	198.0	180.2	170.7	170.8
Transportation	**176.0**	**151.3**	**142.0**	**137.0**	**131.3**	**115.6**	**118.6**
Lubricants	176.0	151.3	142.0	137.0	131.3	115.6	118.6
U.S. Territories	**50.8**	**114.9**	**3.5**	**3.6**	**3.6**	**3.6**	**3.6**
Lubricants	0.7	4.6	1.0	1.0	1.0	1.0	1.0
Other Petroleum (Misc. Prod.)	50.1	110.3	2.4	2.5	2.6	2.6	2.6
Total	**4,544.6**	**5,379.4**	**5,235.3**	**5,588.5**	**5,619.1**	**5,564.0**	**5,902.4**

[58] These source categories include Iron and Steel Production, Lead Production, Zinc Production, Ammonia Manufacture, Carbon Black Manufacture (included in Petrochemical Production), Titanium Dioxide Production, Ferroalloy Production, Silicon Carbide Production, and Aluminum Production.

NO (Not Occurring)

[a] Excludes natural gasoline.

[b] Formerly referred to as "Pentanes Plus." This source has been adjusted and is reported separately from HGL to align with historic data and revised EIA terminology.

Table 3-24: 2021 Adjusted Non-Energy Use Fossil Fuel Consumption, Storage, and Emissions

Sector/Fuel Type	Adjusted Non-Energy Use[a] (TBtu)	Carbon Content Coefficient (MMT C/QBtu)	Potential Carbon (MMT C)	Storage Factor	Carbon Stored (MMT C)	Carbon Emissions (MMT C)	Carbon Emissions (MMT CO_2 Eq.)
Industry	**5,780.2**	**NA**	**99.6**	**NA**	**63.6**	**36.0**	**132.0**
Industrial Coking Coal	124.6	25.60	3.2	0.10	0.3	2.9	10.5
Industrial Other Coal	9.5	26.10	0.2	0.59	0.1	0.1	0.4
Natural Gas to Chemical Plants	667.3	14.47	9.6	0.59	5.7	3.9	14.4
Asphalt & Road Oil	898.1	20.55	18.5	1.00	18.4	0.1	0.3
HGL[b]	2,819.6	16.83	47.4	0.59	28.0	19.4	71.1
Lubricants	113.9	20.20	2.3	0.09	0.2	2.1	7.7
Natural Gasoline[c]	202.4	18.24	3.7	0.59	2.2	1.5	5.5
Naphtha (<401° F)	331.1	18.55	6.1	0.59	3.6	2.5	9.2
Other Oil (>401° F)	196.3	20.17	4.0	0.59	2.3	1.6	5.9
Still Gas	152.8	17.51	2.7	0.59	1.6	1.1	4.0
Petroleum Coke	0.0	27.85	0.0	0.30	0.0	0.0	0.0
Special Naphtha	76.1	19.74	1.5	0.59	0.9	0.6	2.3
Distillate Fuel Oil	5.8	20.22	0.1	0.50	0.1	0.1	0.2
Waxes	11.8	19.80	0.2	0.58	0.1	0.1	0.4
Miscellaneous Products	170.8	0.00	0.0	0.00	0.0	0.0	0.0
Transportation	**118.6**	**NA**	**2.4**	**NA**	**0.2**	**2.2**	**8.0**
Lubricants	118.6	20.20	2.4	0.09	0.2	2.2	8.0
U.S. Territories	**3.6**	**NA**	**0.1**	**NA**	**0.0**	**0.1**	**0.2**
Lubricants	1.0	20.20	0.0	0.09	0.0	0.0	0.1
Other Petroleum (Misc. Prod.)	2.6	20.00	0.1	0.10	0.0	0.0	0.2
Total	**5,902.4**		**102.1**		**63.8**	**38.2**	**140.2**

+ Does not exceed 0.05 TBtu, MMT C, or MMT CO_2 Eq.

NA (Not Applicable)

NO (Not Occurring)

[a] To avoid double counting, net exports have been deducted.

[b] Excludes natural gasoline.

[c] Formerly referred to as "Pentanes Plus." This source has been adjusted and is reported separately from HGL to align with historic data and revised EIA terminology.

Note: Totals may not sum due to independent rounding.

Lastly, emissions were estimated by subtracting the C stored from the potential emissions (see Table 3-22). More detail on the methodology for calculating storage and emissions from each of these sources is provided in Annex 2.3.

Where storage factors were calculated specifically for the United States, data were obtained on (1) products such as asphalt, plastics, synthetic rubber, synthetic fibers, cleansers (soaps and detergents), pesticides, food additives, antifreeze and deicers (glycols), and silicones; and (2) industrial releases including energy recovery (waste gas from chemicals), Toxics Release Inventory (TRI) releases, hazardous waste incineration, and volatile organic compound, solvent, and non-combustion CO emissions. Data were taken from a variety of industry sources, government reports, and expert communications. Sources include EPA reports and databases such as compilations of air

emission factors (EPA 2001), *National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data* (EPA 2022), *Toxics Release Inventory, 1998* (EPA 2000b), *Biennial Reporting System* (EPA 2000a, 2009), *Resource Conservation and Recovery Act Information System* (EPA 2013b, 2015, 2016b, 2018b, 2021), pesticide sales and use estimates (EPA 1998, 1999, 2002, 2004, 2011, 2017), and the Chemical Data Access Tool (EPA 2014b); the EIA Manufacturer's Energy Consumption Survey (MECS) (EIA 1994, 1997, 2001, 2005, 2010, 2013, 2017, 2021); the National Petrochemical & Refiners Association (NPRA 2002); the U.S. Census Bureau (1999, 2004, 2009, 2014, 2021); Bank of Canada (2012, 2013, 2014, 2016, 2017, 2018, 2019, 2020, 2021, 2022); Financial Planning Association (2006); INEGI (2006); the United States International Trade Commission (2022); Gosselin, Smith, and Hodge (1984); EPA's *Municipal Solid Waste (MSW) Facts and Figures* (EPA 2013, 2014a, 2016a, 2018a, 2019); the U.S. Tire Manufacturers Association (USTMA2012, 2013, 2014, 2016, 2018, 2020, 2022); the International Institute of Synthetic Rubber Products (IISRP 2000, 2003); the Fiber Economics Bureau (FEB 2001, 2003, 2005, 2007, 2009, 2010, 2011, 2012, 2013); the Independent Chemical Information Service (ICIS 2008, 2016); the EPA Chemical Data Access Tool (CDAT) (EPA 2014b); the American Chemistry Council (ACC 2003 through 2011, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022a); the *Guide to the Business of Chemistry* (ACC 2022b); and the Chemistry Industry Association of Canada (CIAC 2022). Specific data sources are listed in full detail in Annex 2.3.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021 as discussed below.

Box 3-5: Reporting of Lubricants, Waxes, and Asphalt and Road Oil Product Use in Energy Sector

IPCC (2006) provides methodological guidance to estimate emissions from the first use of fossil fuels as a product for primary purposes other than combustion for energy purposes (including lubricants, paraffin waxes, bitumen / asphalt, and solvents) under the IPPU sector.[59] In this Inventory, C storage and C emissions from product use of lubricants, waxes, and asphalt and road oil are reported under the Energy sector in the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category (CRF Source Category 1A5).[60]

The emissions are reported in the Energy sector, as opposed to the IPPU sector, to reflect national circumstances in its choice of methodology and to increase transparency of this source category's unique country-specific data sources and methodology. Although emissions from these non-energy uses are reported in the Energy chapter the methodologies used to determine emissions are compatible with the *2006 IPCC Guidelines*. The country-specific methodology used for the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category is based on a carbon balance (i.e., C inputs-outputs) calculation of the aggregate amount of fossil fuels used for non-energy uses, including inputs of lubricants, waxes, asphalt and road oil (see Table 3-24).

For those inputs, U.S. country-specific data on C stocks and flows are used to develop carbon storage factors, which are calculated as the ratio of the C stored by the fossil fuel non-energy products to the total C content of the fuel consumed, taking into account losses in the production process and during product use.[61] The country-specific methodology to reflect national circumstances starts with the aggregate amount of fossil fuels used for non-energy uses and applies a C balance calculation, breaking out the C emissions from non-energy use of lubricants, waxes, and asphalt and road oil. The emissions are reported under the Energy chapter to improve transparency, report a more complete carbon balance and to avoid double counting. Due to U.S. national circumstances, reporting these C emissions separately under IPPU would involve making artificial adjustments to allocate both the C inputs and C outputs of the non-energy use C balance. For example, only the emissions from the first use of lubricants and waxes are to be reported under the IPPU sector, emissions from use of lubricants in 2-stroke engines and emissions from secondary use of lubricants and waxes in waste incineration

[59] See for example Volume 3: Industrial Processes and Product Use, and Chapter 5: Non-Energy Products from Fuels and Solvent Use of the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006).

[60] Non-methane volatile organic compound (NMVOC) emissions from solvent use are reported separately in the IPPU sector, following Chapter 5 of the *2006 IPCC Guidelines*.

[61] Data and calculations for lubricants and waxes and asphalt and road oil are in Annex 2.3 – Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

with energy recovery are to be reported under the Energy sector. Reporting these non-energy use emissions from only first use of lubricants and waxes under IPPU would involve making artificial adjustments to the non-energy use C carbon balance and could potentially result in double counting of emissions. These artificial adjustments would also be required for asphalt and road oil and solvents (which are captured as part of petrochemical feedstock emissions) and could also potentially result in double counting of emissions. To avoid presenting an incomplete C balance and a less transparent approach for the Carbon Emitted from Non-Energy Uses of Fossil Fuels source category calculation, the entire calculation of C storage and C emissions is therefore conducted in the Non-Energy Uses of Fossil Fuels category calculation methodology, and both the C storage and C emissions for lubricants, waxes, and asphalt and road oil are reported under the Energy sector.

However, emissions from non-energy uses of fossil fuels as feedstocks or reducing agents (e.g., petrochemical production, aluminum production, titanium dioxide, and zinc production) are reported in the IPPU chapter, unless otherwise noted due to specific national circumstances.

Uncertainty

An uncertainty analysis was conducted to quantify the uncertainty surrounding the estimates of emissions and storage factors from non-energy uses. This analysis, performed using @RISK software and the IPCC-recommended Approach 2 methodology (Monte Carlo Stochastic Simulation technique), provides for the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the inventory estimate. The results presented below provide the 95 percent confidence interval, the range of values within which emissions are likely to fall, for this source category.

As noted above, the non-energy use analysis is based on U.S.-specific storage factors for (1) feedstock materials (natural gas, HGL, natural gasoline, naphthas, other oils, still gas, special naphthas, and other industrial coal), (2) asphalt, (3) lubricants, and (4) waxes. For the remaining fuel types (the "other" category in Table 3-23 and Table 3-24) the storage factors were taken directly from IPCC (2006), where available, and otherwise assumptions were made based on the potential fate of carbon in the respective NEU products. To characterize uncertainty, five separate analyses were conducted, corresponding to each of the five categories. In all cases, statistical analyses or expert judgments of uncertainty were not available directly from the information sources for all the activity variables; thus, uncertainty estimates were determined using assumptions based on source category knowledge.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-25 (emissions) and Table 3-26 (storage factors). Carbon emitted from non-energy uses of fossil fuels in 2021 was estimated to be between 81.3 and 204.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 42 percent below to 46 percent above the 2021 emission estimate of 140.2 MMT CO_2 Eq. The uncertainty in the emission estimates is a function of uncertainty in both the quantity of fuel used for non-energy purposes and the storage factor.

Table 3-25: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Non-Energy Uses of Fossil Fuels (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Feedstocks	CO_2	112.9	58.5	179.9	-48%	+59%
Asphalt	CO_2	0.3	0.1	0.7	-59%	+118%
Lubricants	CO_2	15.7	13.0	18.2	-17%	+16%
Waxes	CO_2	0.4	0.3	0.7	-24%	+84%
Other	CO_2	10.9	2.1	12.7	-81%	+17%
Total	**CO_2**	**140.2**	**81.3**	**204.4**	**-42%**	**+46%**

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Note: Totals may not sum due to independent rounding.

Table 3-26: Approach 2 Quantitative Uncertainty Estimates for Storage Factors of Non-Energy Uses of Fossil Fuels (Percent)

Source	Gas	2021 Storage Factor (%)	Uncertainty Range Relative to Emission Estimate[a] (%)		(%, Relative)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Feedstocks	CO_2	59.1%	46.7%	72.8%	-21%	+23%
Asphalt	CO_2	99.6%	99.1%	99.8%	-0.5%	+0.3%
Lubricants	CO_2	9.2%	4.0%	17.4%	-57%	+90%
Waxes	CO_2	57.8%	47.4%	67.4%	-18%	+17%
Other	CO_2	11.4%	6.6%	82.8%	-42%	+626%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval, as a percentage of the inventory value (also expressed in percent terms).

As shown in Table 3-26, waxes and asphalt contribute least to overall storage factor uncertainty on a percentage basis. Although the feedstocks category—the largest use category in terms of total carbon flows—also appears to have relatively tight confidence limits, this is to some extent an artifact of the way the uncertainty analysis was structured. As discussed in Annex 2.3, the storage factor for feedstocks is based on an analysis of six fates that result in long-term storage (e.g., plastics production), and eleven that result in emissions (e.g., volatile organic compound emissions). Rather than modeling the total uncertainty around all of these fate processes, the current analysis addresses only the storage fates, and assumes that all C that is not stored is emitted. As the production statistics that drive the storage values are relatively well-characterized, this approach yields a result that is probably biased toward understating uncertainty.

As is the case with the other uncertainty analyses discussed throughout this document, the uncertainty results above address only those factors that can be readily quantified. More details on the uncertainty analysis are provided in Annex 2.3.

QA/QC and Verification

In order to ensure the quality of the emission estimates from non-energy uses of fossil fuels, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. This effort included a general analysis, as well as portions of a category specific analysis for non-energy uses involving petrochemical feedstocks and for imports and exports. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and methodology for estimating the fate of C (in terms of storage and emissions) across the various end-uses of fossil C. Emission and storage totals for the different subcategories were compared, and trends across the time series were analyzed to determine whether any corrective actions were needed. Corrective actions were taken to rectify minor errors and to improve the transparency of the calculations, facilitating future QA/QC.

For petrochemical import and export data, special attention was paid to NAICS numbers and titles to verify that none had changed or been removed. Import and export totals were compared with 2020 totals as well as their trends across the time series.

It is important to ensure no double counting of emissions between fuel combustion, non-energy use of fuels and industrial process emissions. For petrochemical feedstock production, our review of the categories suggests this is not a significant issue since the non-energy use industrial release data includes different categories of sources and sectors than those included in the Industrial Processes and Product Use (IPPU) emissions category for petrochemicals. Further data integration is not available at his time because feedstock data from the EIA used to estimate non-energy uses of fuels are aggregated by fuel type, rather than disaggregated by both fuel type and

particular industries. Also, GHGRP-reported data on quantities of fuel consumed as feedstocks by petrochemical producers are unable to be used due to the data failing GHGRP CBI aggregation criteria.

Recalculations Discussion

Several updates to activity data factors lead to recalculations of previous year results. The major updates are as follows:

- ACC (2022b) updated polyester, polyolefin and nylon fiber, ethylene glycol, maleic anhydride, adipic acid, and acetic acid production in 2020, which resulted in a slight decrease in emissions relative to the previous Inventory.
- U.S. International Trade Commission (2022) updated historical import and export data from 1996 to 2020, resulting in fewer net exports relative to the previous Inventory.
- Updates to the petrochemical feedstock production and stocks led to an increase to the annually variable storage factor from 1996 to 2020 for feedstocks, leading to less carbon emitted and a decrease in emissions, most notably from HGL.
- CIAC (2022) revised shipments for years 2017 to 2020, which resulted in a slight increase in emissions from plastics from 2017 to 2020.

Overall, these changes resulted in an average annual decrease of 0.2 MMT CO_2 Eq. (0.2 percent) in carbon emissions from non-energy uses of fossil fuels for the period 1990 through 2020, relative to the previous Inventory.

Planned Improvements

There are several future improvements planned:

- More accurate accounting of C in petrochemical feedstocks. EPA has worked with EIA to determine the cause of input/output discrepancies in the C mass balance contained within the NEU model. In the future, two strategies to reduce or eliminate this discrepancy will continue to be pursued as part of quality control procedures. First, accounting of C in imports and exports will be improved. The import/export adjustment methodology will be examined to ensure that net exports of intermediaries such as ethylene and propylene are fully accounted for. Second, the use of top-down C input calculation in estimating emissions will be reconsidered. Alternative approaches that rely more substantially on the bottom-up C output calculation will be considered instead.
- Improving the uncertainty analysis. Most of the input parameter distributions are based on professional judgment rather than rigorous statistical characterizations of uncertainty.
- Better characterizing flows of fossil C. Additional fates may be researched, including the fossil C load in organic chemical wastewaters, plasticizers, adhesives, films, paints, and coatings. There is also a need to further clarify the treatment of fuel additives and backflows (especially methyl tert-butyl ether, MTBE).
- Reviewing the trends in fossil fuel consumption for non-energy uses. Annual consumption for several fuel types is highly variable across the time series, including industrial coking coal and other petroleum. A better understanding of these trends will be pursued to identify any mischaracterized or misreported fuel consumption for non-energy uses.
- Updating the average C content of solvents was researched, since the entire time series depends on one year's worth of solvent composition data. The data on C emissions from solvents that were readily available do not provide composition data for all categories of solvent emissions and also have conflicting definitions for volatile organic compounds, the source of emissive C in solvents. Additional sources of solvents data will be investigated in order to update the C content assumptions.

- Updating the average C content of cleansers (soaps and detergents) was researched; although production and consumption data for cleansers are published every 5 years by the Census Bureau, the composition (C content) of cleansers has not been recently updated. Recently available composition data sources may facilitate updating the average C content for this category.
- Revising the methodology for consumption, production, and C content of plastics was researched; because of recent changes to the type of data publicly available for plastics, the NEU model for plastics applies data obtained from personal communications. Potential revisions to the plastics methodology to account for the recent changes in published data will be investigated.
- Although U.S.-specific storage factors have been developed for feedstocks, asphalt, lubricants, and waxes, default values from IPCC are still used for two of the non-energy fuel types (industrial coking coal, distillate oil), and broad assumptions are being used for miscellaneous products and other petroleum. Over the long term, there are plans to improve these storage factors by analyzing C fate similar to those described in Annex 2.3 or deferring to more updated default storage factors from IPCC where available.
- Reviewing the storage of carbon black across various sectors in the Inventory; in particular, the carbon black abraded and stored in tires.
- Assess the current method and/or identify new data sources (e.g., EIA) for estimating emissions from ammonia/fertilizer use of natural gas.
- Investigate EIA NEU and MECS data to update, as needed, adjustments made for ammonia production and "natural gas to chemical plants, other uses" and "natural gas to other" non-energy uses, including iron and steel production, in energy uses and IPPU.

3.3 Incineration of Waste (CRF Source Category 1A5)

Combustion is used to manage about 7 to 19 percent of the solid wastes generated in the United States, depending on the source of the estimate and the scope of materials included in the definition of solid waste (EPA 2000; EPA 2020; Goldstein and Madtes 2001; Kaufman et al. 2004; Simmons et al. 2006; van Haaren et al. 2010). In the context of this section, waste includes all municipal solid waste (MSW) as well as scrap tires. In the United States, combustion of MSW tends to occur at waste-to-energy facilities or industrial facilities where useful energy is recovered, and thus emissions from waste combustion are accounted for in the Energy chapter. Similarly, scrap tires are combusted for energy recovery in industrial and utility boilers, pulp and paper mills, and cement kilns. Combustion of waste results in conversion of the organic inputs to CO_2. According to the *2006 IPCC Guidelines*, when the CO_2 emitted is of fossil origin, it is counted as a net anthropogenic emission of CO_2 to the atmosphere. Thus, the emissions from waste combustion are calculated by estimating the quantity of waste combusted and the fraction of the waste that is C derived from fossil sources.

Most of the organic materials in MSW are of biogenic origin (e.g., paper, yard trimmings), and have their net C flows accounted for under the Land Use, Land-Use Change, and Forestry chapter. However, some components of MSW and scrap tires—plastics, synthetic rubber, synthetic fibers, and carbon black—are of fossil origin. Plastics in the U.S. waste stream are primarily in the form of containers, packaging, and durable goods. Rubber is found in durable goods, such as carpets, and in non-durable goods, such as clothing and footwear. Fibers in MSW are predominantly from clothing and home furnishings. As noted above, scrap tires (which contain synthetic rubber and carbon black) are also considered a "non-hazardous" waste and are included in the waste combustion estimate, though waste disposal practices for tires differ from MSW. Estimates on emissions from hazardous waste combustion can be found in Annex 2.3 and are accounted for as part of the C mass balance for non-energy uses of fossil fuels.

Approximately 27.9 million metric tons of MSW were combusted in 2021 (EPA 2021). Carbon dioxide emissions from combustion of waste decreased 3.3 percent since 1990, to an estimated 12.5 MMT CO_2 (12,476 kt) in 2021. Emissions across the time series are shown in Table 3-27 and Table 3-28. Waste combustion is also a source of CH_4 and N_2O emissions (De Soete 1993; IPCC 2006). Methane emissions from the combustion of waste were estimated to be less than 0.05 MMT CO_2 Eq. (less than 0.05kt CH_4) in 2021 and have remained steady since 1990. Nitrous oxide emissions from the combustion of waste were estimated to be 0.4 MMT CO_2 Eq. (1.3 kt N_2O) in 2021 and have decreased by 13 percent since 1990. This decrease is driven by the decrease in total MSW combusted.

Table 3-27: CO_2, CH_4, and N_2O Emissions from the Combustion of Waste (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	12.9	13.3	13.2	13.3	12.9	12.9	12.5
CH_4	+	+	+	+	+	+	+
N_2O	0.4	0.3	0.4	0.4	0.4	0.3	0.4
Total	**13.3**	**13.6**	**13.5**	**13.7**	**13.3**	**13.3**	**12.8**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 3-28: CO_2, CH_4, and N_2O Emissions from the Combustion of Waste (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	12,900	13,254	13,161	13,339	12,948	12,921	12,476
CH_4	+	+	+	+	+	+	+
N_2O	2	1	1	1	1	1	1

+ Does not exceed 0.05 kt.

Methodology and Time-Series Consistency

Municipal Solid Waste Combustion

To determine both CO_2 and non-CO_2 emissions from the combustion of waste, the tonnage of waste combusted and an estimated emissions factor are needed. Emission estimates from the combustion of tires are discussed separately. Data for total waste combusted was derived from *BioCycle* (van Haaren et al. 2010), EPA Facts and Figures Report, Energy Recovery Council (ERC), EPA's Greenhouse Gas Reporting Program (GHGRP), and the U.S. Energy Information Administration (EIA). Multiple sources were used to ensure a complete, quality dataset, as each source encompasses a different timeframe.

EPA determined the MSW tonnages based on data availability and accuracy throughout the time series.

- 1990-2006: MSW combustion tonnages are from Biocycle combustion data. Tire combustion data from the U.S. Tire Manufacturers Association (USTMA) are removed to arrive at MSW combusted without tires
- 2006-2010: MSW combustion tonnages are an average of Biocycle (with USTMA tire data tonnage removed), U.S. EPA Facts and Figures, EIA, and Energy Recovery Council data (with USTMA tire data tonnage removed).
- 2011-2021: MSW combustion tonnages are from EPA's GHGRP data.

Table 3-29 provides the estimated tons of MSW combusted including and excluding tires.

Table 3-29: Municipal Solid Waste Combusted (Short Tons)

Year	Waste Combusted *(excluding tires)*	Waste Combusted *(including tires)*
1990	33,344,839	33,766,239

2005	26,486,414	28,631,054
2017	28,574,258	30,310,598
2018	29,162,364	30,853,949
2019	28,174,311	29,821,141
2020	27,586,271	29,106,686
2021	27,867,446	29,261,446

Sources: BioCycle, EPA Facts and Figures, ERC, GHGRP, EIA, USTMA.

CO_2 Emissions from MSW Excluding Scrap Tires

Fossil CO_2 emission factors were calculated from EPA's GHGRP data for non-biogenic sources. Using GHGRP-reported emissions for CH_4 and N_2O and assumed emission factors, the tonnage of waste combusted, excluding tires, was derived. Methane and N_2O emissions and assumed emission factors were used to estimate the amount of MSW combusted in terms of energy content. The energy content of MSW combusted was then converted into tonnage based on assumed MSW heating value. Two estimates were generated (one for CH_4 and one for N_2O) and the two were averaged together. Dividing fossil CO_2 emissions from GHGRP FLIGHT data for MSW combustors by this estimated tonnage yielded an annual CO_2 emission factor. As this data was only available following 2011, all years prior use an average of the emission factors from 2011 through 2015. See Annex 3.7 for more detail on how MSW C factors were calculated.

Finally, CO_2 emissions were calculated by multiplying the annual tonnage estimates, excluding tires, by the calculated emissions factor. Calculated fossil CO_2 emission factors are shown in Table 3-30**.**

Table 3-30: Calculated Fossil CO_2 Content per Ton Waste Combusted (kg CO_2/Short Ton Combusted)

Year	1990		2005		2017	2018	2019	2020	2021
CO_2 Emission Factors	366		366		360	361	363	377	365

CO_2 Emissions from Scrap Tires

Scrap tires contain several types of synthetic rubber, carbon black, and synthetic fibers. Each type of synthetic rubber has a discrete C content, and carbon black is 100 percent C. For synthetic rubber and carbon black in scrap tires, information was obtained biannually from U.S. Scrap Tire Management Summary for 2005 through 2021 data (USTMA 2022). Information about scrap tire composition was taken from the Rubber Manufacturers' Association internet site (USTMA 2012a). Emissions of CO_2 were calculated based on the amount of scrap tires used for fuel and the synthetic rubber and carbon black content of scrap tires. The mass of combusted material is multiplied by its C content to calculate the total amount of carbon stored. More detail on the methodology for calculating emissions from each of these waste combustion sources is provided in Annex 3.7. Table 3-31 provides CO_2 emissions from combustion of waste tires.

Table 3-31: CO_2 Emissions from Combustion of Tires (MMT CO_2 Eq.)

Year	1990		2005		2017	2018	2019	2020	2021
Synthetic Rubber	0.3		1.6		1.3	1.3	1.2	1.1	1.0
C Black	0.4		2.0		1.6	1.5	1.5	1.4	1.3
Total	**0.7**		**3.6**		**2.9**	**2.8**	**2.7**	**2.5**	**2.3**

Non-CO_2 Emissions

Combustion of waste also results in emissions of CH_4 and N_2O. These emissions were calculated by multiplying the total estimated mass of waste combusted, including tires, by the respective emission factors. The emission factors for CH_4 and N_2O emissions per quantity of MSW combusted are default emission factors for the default continuously-fed stoker unit MSW combustion technology type and were taken from IPCC (2006).

Uncertainty

An Approach 2 Monte Carlo analysis was performed to determine the level of uncertainty surrounding the estimates of CO_2 emissions and N_2O emissions from the incineration of waste (given the very low emissions for CH_4, no uncertainty estimate was derived). IPCC Approach 2 analysis allows the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the Inventory estimate. Statistical analyses or expert judgments of uncertainty were not available directly from the information sources for most variables; thus, uncertainty estimates for these variables were determined using assumptions based on source category knowledge and the known uncertainty estimates for the waste generation variables.

The uncertainties in the waste incineration emission estimates arise from both the assumptions applied to the data and from the quality of the data. Key factors include reported CO_2 emissions; N_2O and CH_4 emissions factors, and tire synthetic rubber and black carbon contents. The highest levels of uncertainty surround the reported emissions from GHGRP; the lowest levels of uncertainty surround variables that were determined by quantitative measurements (e.g., combustion efficiency, C content of C black).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-32. Waste incineration CO_2 emissions in 2021 were estimated to be between 10.4 and 14.9 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 17 percent below to 19 percent above the 2021 emission estimate of 12.5 MMT CO_2 Eq. Also at a 95 percent confidence level, waste incineration N_2O emissions in 2021 were estimated to be between 0.2 and 0.9 MMT CO_2 Eq. This indicates a range of 54 percent below to 163 percent above the 2021 emission estimate of 0.4 MMT CO_2 Eq.

Table 3-32: Approach 2 Quantitative Uncertainty Estimates for CO_2 and N_2O from the Incineration of Waste (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Incineration of Waste	CO_2	12.5	10.4	14.9	-17%	19%
Incineration of Waste	N_2O	0.4	0.2	0.9	-54%	163%

[a] Range of emission estimates predicted by Monte Carlo Simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates from waste combustion, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and specifically focused on the emission factor and activity data sources and methodology used for estimating emissions from combustion of waste. Trends across the time series were analyzed to determine whether any corrective actions were needed. Corrective actions were taken to rectify minor errors in the use of activity data.

Recalculations Discussion

For the current Inventory, CO_2-equivalent emissions of CH_4 and N_2O from waste incineration have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), used in the previous inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWPs of 25 and 298 for CH_4 and N_2O, respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was a 12 percent increase and the average annual change in CO_2-equivalent N_2O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the timeseries changed by an average annual decrease of less than 0.05 MMT CO_2 Eq. (0.3 percent) relative to emissions results calculated using the prior GWPs. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements. All other recalculations described in this section are compared using the prior GWPs.

Recalculations were performed for CO_2 estimates from 1990 through 2010. In previous Inventories, for years prior to 2011, fossil CO_2 content per ton of waste was calculated based on the average of 2011 to the current year of data. For this cycle the calculation was updated to be an average of estimates from 2011 – 2015. Earlier data is assumed to more closely approximate the MSW composition for historic years. As a result of the change in methodology, CO_2 emissions in 1990 decreased by less than 0.05 MMT CO_2 Eq. relative to the previous Inventory and there was an average annual decrease by less than 0.05 MMT CO_2 Eq. from 1990 through 2010.

Recalculations were performed on the estimate of combusted scrap tires in 2020. 2020 estimates for the scrap tire market were previously proxied from the 2019 U.S. Scrap Tire Management Summary (USTMA 2020). The 2021 U.S. Scrap Tire Management Summary was released in October 2022, allowing 2020 estimates to now be calculated by linear interpolation between 2019 and 2021 data. As a result of the change in methodology, CO_2 emissions in 2020 decreased by 0.2 MT CO_2 Eq. relative to the previous Inventory.

Planned Improvements

No planned improvements for waste combustion were identified.

3.4 Coal Mining (CRF Source Category 1B1a)

Three types of coal mining-related activities release CH_4 and CO_2 to the atmosphere: underground mining, surface mining, and post-mining (i.e., coal-handling) activities. While surface coal mines account for the majority of U.S. coal production, underground coal mines contribute the largest share of fugitive CH_4 emissions (see Table 3-34 and Table 3-35) due to the higher CH_4 content of coal in the deeper underground coal seams. In 2021, 174 underground coal mines and 332 surface mines were operating in the United States (EIA 2022). In recent years, the total number of active coal mines in the United States has declined. In 2021, the United States was the fourth largest coal producer in the world (539 MMT), after China (3,685 MMT), India (771 MMT), and Indonesia (545 MMT) (IEA 2022).

Table 3-33: Coal Production (kt)

Year	Underground		Surface		Total	
	Number of Mines	Production	Number of Mines	Production	Number of Mines	Production
1990	1,683	384,244	1,656	546,808	3,339	931,052

2005	586	334,399	789	691,447	1,398	1,025,846
2017	237	247,778	434	454,301	671	702,080
2018	236	249,804	430	435,521	666	685,325
2019	226	242,557	432	397,750	658	640,307
2020	196	177,380	350	307,944	546	485,324
2021	174	200,122	332	323,142	506	523,264

Fugitive CH_4 Emissions

Underground coal mines liberate CH_4 from ventilation systems and from degasification systems. Ventilation systems pump air through the mine workings to dilute noxious gases and ensure worker safety; these systems can exhaust significant amounts of CH_4 to the atmosphere in low concentrations. Degasification systems are wells drilled from the surface or boreholes drilled inside the mine that remove large, often highly concentrated volumes of CH_4 before, during, or after mining. Some mines recover and use CH_4 generated from ventilation and degasification systems, thereby reducing emissions to the atmosphere.

Surface coal mines liberate CH_4 as the overburden is removed and the coal is exposed to the atmosphere. Methane emissions are normally a function of coal rank (a classification related to the percentage of carbon in the coal) and depth. Surface coal mines typically produce lower-rank coals and remove less than 250 feet of overburden, so their level of emissions is much lower than from underground mines.

In addition, CH_4 is released during post-mining activities, as the coal is processed, transported, and stored for use.

Total CH_4 emissions in 2021 were estimated to be 1,595 kt (44.7 MMT CO_2 Eq.), a decline of approximately 59 percent since 1990 (see Table 3-34 and Table 3-35). In 2021, underground mines accounted for approximately 74 percent of total emissions, surface mines accounted for 13 percent, and post-mining activities accounted for 13 percent. In 2021, total CH_4 emissions from coal mining decreased by approximately 3 percent relative to the previous year. Total coal production in 2021 increased by 8 percent compared to 2020. This resulted in an increase of 7 percent in CH_4 emissions from surface mining and post-mining activities in 2021. However, surface mining and post-mining activities have a lower impact on total CH_4 compared to underground mining (74 percent of total emissions in 2021). The number of operating underground mines decreased in 2021 resulting in a slight decrease in overall CH_4 emissions (3 percent), compared to 2020. Additionally, the amount of CH_4 recovered and used in 2021 decreased by less than 0.5 percent compared to 2020 levels.

Table 3-34: CH_4 Emissions from Coal Mining (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	**83.1**	**47.1**	**45.6**	**43.6**	**38.5**	**35.2**	**32.9**
Liberated	90.5	66.9	65.1	64.6	56.3	53.5	51.2
Recovered & Used	(7.4)	(19.8)	(19.5)	(21.0)	(17.8)	(18.3)	(18.3)
Surface Mining	**12.0**	**13.3**	**8.1**	**7.8**	**7.2**	**5.4**	**5.7**
Post-Mining (UG)	**10.3**	**8.6**	**6.0**	**5.9**	**5.8**	**4.3**	**4.8**
Post-Mining (Surface)	**2.6**	**2.9**	**1.8**	**1.7**	**1.5**	**1.2**	**1.2**
Total	**108.1**	**71.8**	**61.4**	**59.1**	**53.0**	**46.2**	**44.7**

Note: Parentheses indicate negative values.

Table 3-35: CH_4 Emissions from Coal Mining (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	**2,968**	**1,682**	**1,627**	**1,557**	**1,376**	**1,257**	**1,176**
Liberated	3,231	2,388	2,324	2,308	2,012	1,912	1,828
Recovered & Used	(263)	(706)	(697)	(751)	(636)	(654)	(652)
Surface Mining	**430**	**475**	**290**	**280**	**255**	**194**	**205**

Post-Mining (UG)	**368**	**306**	**213**	**212**	**206**	**155**	**170**
Post-Mining (Surface)	**93**	**103**	**63**	**61**	**55**	**42**	**44**
Total	**3,860**	**2,566**	**2,192**	**2,110**	**1,893**	**1,648**	**1,595**

Note: Parentheses indicate negative values.

Methodology and Time-Series Consistency

EPA uses an IPCC Tier 3 method for estimating CH_4 emissions from underground coal mining and an IPCC Tier 2 method for estimating CH_4 emissions from surface mining and post-mining activities (for coal production from both underground mines and surface mines). The methodology for estimating CH_4 emissions from coal mining consists of two steps:

- Estimate CH_4 emissions from underground mines. These emissions have two sources: ventilation systems and degasification systems. They are estimated using mine-specific data, then summed to determine total CH_4 liberated. The CH_4 recovered and used is then subtracted from this total, resulting in an estimate of net emissions to the atmosphere.
- Estimate CH_4 emissions from surface mines and post-mining activities. Unlike the methodology for underground mines, which uses mine-specific data, the methodology for estimating emissions from surface mines and post-mining activities consists of multiplying basin-specific coal production by basin-specific gas content and an emission factor.

Step 1: Estimate CH_4 Liberated and CH_4 Emitted from Underground Mines

Underground mines generate CH_4 from ventilation systems and degasification systems. Some mines recover and use the liberated CH_4, thereby reducing emissions to the atmosphere. Total CH_4 emitted from underground mines equals the CH_4 liberated from ventilation systems, plus the CH_4 liberated from degasification systems, minus the CH_4 recovered and used.

Step 1.1: Estimate CH_4 Liberated from Ventilation Systems

To estimate CH_4 liberated from ventilation systems, EPA uses data collected through its Greenhouse Gas Reporting Program (GHGRP)[62] (Subpart FF, "Underground Coal Mines"), data provided by the U.S. Mine Safety and Health Administration (MSHA) (MSHA 2022), and occasionally data collected from other sources on a site-specific level (e.g., state gas production databases). Since 2011, the nation's "gassiest" underground coal mines—those that liberate more than 36,500,000 actual cubic feet of CH_4 per year (about 17,525 MT CO_2 Eq.)—have been required to report to EPA's GHGRP (EPA 2022).[63] Mines that report to EPA's GHGRP must report quarterly measurements of CH_4 emissions from ventilation systems; they have the option of recording and reporting their own measurements, or using the measurements taken by MSHA as part of that agency's quarterly safety inspections of all mines in the United States with detectable CH_4 concentrations.[64]

Since 2013, ventilation CH_4 emission estimates have been calculated based on both quarterly GHGRP data submitted by underground mines and on quarterly measurement data obtained directly from MSHA. Because not all mines report under EPA's GHGRP, the emissions of the mines that do not report must be calculated using MSHA

[62] In implementing improvements and integrating data from EPA's GHGRP, EPA followed the latest guidance from the IPCC on the use of facility-level data in national inventories (IPCC 2011).

[63] Underground coal mines report to EPA under Subpart FF of the GHGRP (40 CFR Part 98). In 2021, 60 underground coal mines reported to the program.

[64] MSHA records coal mine CH_4 readings with concentrations of greater than 50 ppm (parts per million) CH_4. Readings below this threshold are considered non-detectable.

data. The MSHA data also serves as a quality assurance tool for validating GHGRP data. For GHGRP data, reported quarterly ventilation methane emissions (metric tons) are summed for each mine to develop mine-specific annual ventilation emissions. For MSHA data, the average daily CH_4 emission rate for each mine is determined using the CH_4 total for all data measurement events conducted during the calendar year and total duration of all data measurement events (in days). The calculated average daily CH_4 emission rate is then multiplied by 365 days to estimate annual ventilation CH_4 emissions for the MSHA dataset.

Step 1.2: Estimate CH_4 Liberated from Degasification Systems

Particularly gassy underground mines also use degasification systems (e.g., wells or boreholes) to remove CH_4 before, during, or after mining. This CH_4 can then be collected for use or vented to the atmosphere. Twenty mines used degasification systems in 2021 and all of these mines reported the CH_4 removed through these systems to EPA's GHGRP under Subpart FF (EPA 2022). Based on the weekly measurements reported to EPA's GHGRP, degasification data summaries for each mine are added to estimate the CH_4 liberated from degasification systems. Twelve of the 20 mines with degasification systems had operational CH_4 recovery and use projects, including two mines with two recovery and use projects each (see step 1.3 below).[65]

Degasification data reported to EPA's GHGRP by underground coal mines is the primary source of data used to develop estimates of CH_4 liberated from degasification systems. Data reported to EPA's GHGRP were used exclusively to estimate CH_4 liberated from degasification systems at 15 of the 20 mines that used degasification systems in 2021. Data from state gas well production databases were used to supplement GHGRP degasification data for the remaining five mines (DMME 2022; GSA 2022; WVGES 2022).

For pre-mining wells, cumulative degasification volumes that occur prior to the well being mined through are attributed to the mine in the inventory year in which the well is mined through.[66] EPA's GHGRP does not require gas production from virgin coal seams (coalbed methane) to be reported by coal mines under Subpart FF.[67] Most pre-mining wells drilled from the surface are considered coalbed methane wells prior to mine-through and associated CH_4 emissions are reported under another subpart of the GHGRP (Subpart W, "Petroleum and Natural Gas Systems"). As a result, GHGRP data must be supplemented to estimate cumulative degasification volumes that occurred prior to well mine-through. There were four mines with degasification systems that include pre-mining wells that were mined through in 2021. For all of these mines, GHGRP data were supplemented with historical data from state gas well production databases (DMME 2022; ERG 2022; GSA 2022; WVGES 2022), as well as with mine-specific information regarding the locations and dates on which the pre-mining wells were mined through (JWR 2010; El Paso 2009; ERG 2022).

Step 1.3: Estimate CH_4 Recovered from Ventilation and Degasification Systems, and Utilized or Destroyed (Emissions Avoided)

Twelve mines had a total of fourteen CH_4 recovery and use projects in place in 2021, including two mines that each have two recovery and use projects. Thirteen of these projects involved degasification systems with one mine having a ventilation air methane abatement project (VAM). Ten of these mines sold the recovered CH_4 to a pipeline, including one that also used CH_4 to fuel a thermal coal dryer. One mine destroyed recovered CH_4 using flares. One mine destroyed the recovered CH_4 (VAM) using regenerative thermal oxidation (RTO) without energy recovery and using enclosed flares.

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[65] Several of the mines venting CH_4 from degasification systems use a small portion of the gas to fuel gob well blowers in remote locations where electricity is not available. However, this CH_4 use is not considered to be a formal recovery and use project.

[66] A well is "mined through" when coal mining development or the working face intersects the borehole or well.

[67] This applies for pre-drainage in years prior to the well being mined through. Beginning with the year the well is mined through, the annual volume of CH_4 liberated from a pre-drainage well is reported under Subpart FF of EPA's GHGRP.

The CH_4 recovered and used (or destroyed) at the twelve mines described above are estimated using the following methods:

- EPA's GHGRP data was exclusively used to estimate the CH_4 recovered and used from six of the 12 mines that deployed degasification systems in 2021. Based on weekly measurements, the GHGRP degasification destruction data summaries for each mine are added together to estimate the CH_4 recovered and used from degasification systems.
- State sales data were used to supplement GHGRP data to estimate CH_4 recovered and used from five mines that deployed degasification systems in 2021 (DMME 2022, ERG 2022, GSA 2022, and WVGES 2022). Four of these mines intersected pre-mining wells in 2021. Supplemental information is used for these mines because estimating CH_4 recovery and use from pre-mining wells requires additional data not reported under Subpart FF of EPA's GHGRP (see discussion in step 1.2 above) to account for the emissions avoided prior to the well being mined through. The supplemental data is obtained from state gas production databases as well as mine-specific information on the location and timing of mined-through pre-mining wells.
- For the single mine that employed VAM for CH_4 recovery and use, the estimates of CH_4 recovered and used were obtained from the mine's offset verification statement (OVS) submitted to the California Air Resources Board (CARB) (McElroy OVS 2022). This mine also reported CH_4 reductions from flaring. GHGRP data were used to estimate CH_4 recovered and flared in 2021.

Step 2: Estimate CH_4 Emitted from Surface Mines and Post-Mining Activities

Mine-specific data are not available for estimating CH_4 emissions from surface coal mines or for post-mining activities. For surface mines, basin-specific coal production obtained from the Energy Information Administration's *Annual Coal Report* (EIA 2022) is multiplied by basin-specific CH_4 contents (EPA 1996, 2005) and a 150 percent emission factor (to account for CH_4 from over- and under-burden) to estimate CH_4 emissions (King 1994; Saghafi 2013). For post-mining activities, basin-specific coal production is multiplied by basin-specific CH_4 contents and a mid-range 32.5 percent emission factor for CH_4 desorption during coal transportation and storage (Creedy 1993). Basin-specific in situ gas content data were compiled from AAPG (1984) and USBM (1986).

Fugitive CO_2 Emissions

Methane and CO_2 are naturally occurring in coal seams and are collectively referred to as coal seam gas. These gases remain trapped in the coal seam until coal is mined (i.e., coal seam is exposed and fractured during mining operations). Fugitive CO_2 emissions occur during underground coal mining, surface coal mining, and post-mining activities. Methods and data to estimate fugitive CO_2 emissions from underground and surface coal mining are presented in the sections below. Fugitive CO_2 emissions from post-mining activities were not estimated due to the lack of an IPCC method and unavailability of data.

Total fugitive CO_2 emissions in 2021 were estimated to be 2,456 kt (2.5 MMT CO_2 Eq.), a decline of approximately 47 percent since 1990. In 2021, underground mines accounted for approximately 89 percent of total fugitive CO_2 emissions. In 2021, total fugitive CO_2 emissions from coal mining increased by approximately 12 percent relative to the previous year. This increase was due to an increase in annual coal production.

Table 3-36: CO_2 Emissions from Coal Mining (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	**4.2**	**3.6**	**2.8**	**2.8**	**2.7**	**1.9**	**2.2**
Liberated	4.2	3.6	2.7	2.7	2.6	1.9	2.2
Recovered & Used	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Flaring	NO	NO	0.1	0.1	0.1	+	+
Surface Mining	**0.4**	**0.6**	**0.4**	**0.4**	**0.3**	**0.2**	**0.3**

Total	**4.6**	**4.2**	**3.2**	**3.1**	**3.0**	**2.2**	**2.5**

+ Does not exceed 0.05 MMT CO_2 Eq.
NO (Not Occurring)
Note: Parentheses indicate negative values.

Table 3-37: CO_2 Emissions from Coal Mining (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Underground (UG) Mining	**4,164**	**3,610**	**2,785**	**2,789**	**2,670**	**1,948**	**2,194**
Liberated	4,171	3,630	2,690	2,712	2,633	1,926	2,173
Recovered & Used	(8)	(20)	(19)	(21)	(18)	(18)	(18)
Flaring	NO	NO	114	97	55	41	40
Surface Mining	**443**	**560**	**368**	**353**	**322**	**249**	**262**
Total	**4,606**	**4,170**	**3,153**	**3,141**	**2,992**	**2,198**	**2,456**

NO (Not Occurring)
Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

EPA uses an IPCC Tier 1 method for estimating fugitive CO_2 emissions from underground coal mining and surface mining (IPCC 2019). IPCC methods and data to estimate fugitive CO_2 emissions from post-mining activities (for both underground and surface coal mining) are currently not available.

Step 1: Underground Mining

EPA used the following overarching IPCC equation to estimate fugitive CO_2 emissions from underground coal mines (IPCC 2019):

Equation 3-1: Estimating Fugitive CO_2 Emissions from Underground Mines

$$Total\ CO_2\ from\ Underground\ Mines = CO_2\ from\ underground\ mining - Amount\ of\ CO_2\ in\ gas\ recovered + CO_2\ from\ methane\ flaring$$

Step 1.1: Estimate Fugitive CO_2 Emissions from Underground Mining

EPA estimated fugitive CO_2 emissions from underground mining using the IPCC Tier 1 emission factor (5.9 m^3/metric ton) and annual coal production from underground mines (EIA 2022). The underground mining default emission factor accounts for all the fugitive CO_2 likely to be emitted from underground coal mining. Therefore, the amount of CO_2 from coal seam gas recovered and utilized for energy is subtracted from underground mining estimates in Step 2, below. Under IPCC methods, the CO_2 emissions from gas recovered and utilized for energy use (e.g., injected into a natural gas pipeline) are reported under other sectors of the Inventory (e.g., stationary combustion of fossil fuel or oil and natural gas systems) and not under the coal mining sector.

Step 1.2: Estimate Amount of CO_2 In Coal Seam Gas Recovered for Energy Purposes

EPA estimated fugitive CO_2 emissions from coal seam gas recovered and utilized for energy purposes by using the IPCC Tier 1 default emission factor (19.57 metric tons CO_2/million cubic meters of coal bed methane (CBM) produced) and quantity of coal seam gas recovered and utilized. Data on annual quantity of coal seam gas recovered and utilized are available from GHGRP and state sales data (GHGRP 2022; DMME 2022; ERG 2022; GSA 2022; WVGES 2022). The quantity of coal seam gas recovered and destroyed without energy recovery (e.g., VAM projects) is deducted from the total coal seam gas recovered quantity (McElroy OVS 2022).

Step 1.3: Estimate Fugitive CO_2 Emissions from Flaring

The IPCC method includes combustion CO_2 emissions from gas recovered for non-energy uses (i.e., flaring, or catalytic oxidation) under fugitive CO_2 emission estimates for underground coal mining. In effect, these emissions, though occurring through stationary combustion, are categorized as fugitive emissions in the Inventory. EPA estimated CO_2 emissions from methane flaring using the following equation:

Equation 3-2: Estimating CO_2 Emissions from Drained Methane Flared or Catalytically Oxidized

$$CO_2\ from\ flaring = 0.98 \times Volume\ of\ methane\ flared \times Conversion\ Factor \times Stoichiometric\ Mass\ Factor$$

Currently there are three mines that report catalytic oxidation of recovered methane through flaring without energy use. Annual data for 2021 were obtained from one mine's offset verification statement (OVS) submitted to the California Air Resources Board (CARB) and the GHGRP for the remaining two mines (McElroy OVS 2022; GHGRP 2022).

Step 2: Surface Mining

EPA estimated fugitive CO_2 emissions from surface mining using the IPCC Tier 1 emission factor (0.44 m^3/metric ton) and annual coal production from surface mines (EIA 2022).

Uncertainty

A quantitative uncertainty analysis was conducted for the coal mining source category using the IPCC-recommended Approach 2 uncertainty estimation methodology. Because emission estimates of CH_4 from underground ventilation systems were based on actual measurement data from EPA's GHGRP or from MSHA, uncertainty is relatively low. A degree of imprecision was introduced because the ventilation air measurements used were not continuous but rather quarterly instantaneous readings that were used to determine the average annual emission rates. Additionally, the measurement equipment used can be expected to have resulted in an average of 10 percent overestimation of annual CH_4 emissions (Mutmansky & Wang 2000). Equipment measurement uncertainty is applied to GHGRP data.

Estimates of CH_4 liberated and recovered by degasification systems are relatively certain for utilized CH_4 because of the availability of EPA's GHGRP data and state gas sales information. Many of the liberation and recovery estimates use data on wells within 100 feet of a mined area. However, uncertainty exists concerning the radius of influence of each well. The number of wells counted, and thus the liberated CH_4 and avoided emissions, may vary if the drainage area is found to be larger or smaller than estimated.

EPA's GHGRP requires weekly CH_4 monitoring of mines that report degasification systems, and continuous CH_4 monitoring is required for CH_4 utilized on- or off-site. Since 2012, GHGRP data have been used to estimate CH_4 emissions from vented degasification wells, reducing the uncertainty associated with prior MSHA estimates used for this sub-source. Beginning in 2013, GHGRP data were also used for determining CH_4 recovery and use at mines without publicly available gas usage or sales records, which has reduced the uncertainty from previous estimation methods that were based on information from coal industry contacts.

Surface mining and post-mining emissions are associated with considerably more uncertainty than underground mines, because of the difficulty in developing accurate emission factors from field measurements. However, since underground coal mining, as a general matter, results in significantly larger CH_4 emissions due to production of higher-rank coal and greater depth, and estimated emissions from underground mining constitute the majority of estimated total coal mining CH_4 emissions, the uncertainty associated with underground emissions is the primary factor that determines overall uncertainty.

The major sources of uncertainty for estimates of fugitive CO_2 emissions are the Tier 1 IPCC default emission factors used for underground mining (-50 percent to +100 percent) and surface mining (-67 percent to +200 percent) (IPCC 2019). Additional sources of uncertainty for fugitive CO_2 emission estimates include EIA's annual coal production data and data used for gas recovery projects, such as GHGRP data, state gas sales data, and VAM estimates for the single mine that operates an active VAM project. Uncertainty ranges for these additional data sources are already available, as these are the same data sources used for CH_4 emission estimates.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-38. Coal mining CH_4 emissions in 2021 were estimated to be between 40.1 and 54.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 10.2 percent below to 21.5 percent above the 2021 emission estimate of 44.7 MMT CO_2 Eq. Coal mining fugitive CO_2 emissions in 2021 were estimated to be between 0.8 and 4.3 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 67.6 percent below to 75.8 percent above the 2021 emission estimate of 2.5 MMT CO_2 Eq.

Table 3-38: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Coal Mining (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Coal Mining	CH_4	44.7	40.1	54.3	-10%	+22%
Coal Mining	CO_2	2.5	0.8	4.3	-68%	+76%

[a] Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates for coal mining, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and reported emissions data used for estimating fugitive emissions from coal mining. Trends across the time series were analyzed to determine whether any corrective actions were needed.

Emission estimates for coal mining rely in large part on data reported by coal mines to EPA's GHGRP. EPA verifies annual facility-level reports through a multi-step process to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. All reports submitted to EPA are evaluated by electronic validation and verification checks. If potential errors are identified, EPA will notify the reporter, who can resolve the issue either by providing an acceptable response describing why the flagged issue is not an error or by correcting the flagged issue and resubmitting their annual report. Additional QA/QC and verification procedures occur for each GHGRP subpart. No QA/QC issues or errors were identified in the 2021 Subpart FF data.

Recalculations Discussion

State gas sales production values were updated for five mines, as part of normal updates. This update impacted CH_4 emissions for 1998 to 2020. As a result of this update, CH_4 emissions from degasification systems and CH_4 emissions avoided increased across the time-series. Degasification CH_4 emissions increased slightly by an average of 0.4 percent and CH_4 emissions avoided increased by an average of 1.6 percent over the 1998 to 2020 time series, compared to the previous Inventory.

Fugitive CO_2 emissions from flaring were recalculated for 2014 through 2020 as a result of adding two flaring projects to the Inventory, as part of normal updates. One of the flaring projects was operational from 2014 onwards and the other one started in 2020. As a result of this update, flaring CO_2 emissions for 2014 to 2020 increased by an average of 230 percent, compared to the previous Inventory, with 2020 emissions increasing by

277 percent. However, as flaring CO_2 emissions only contribute 2 percent of total fugitive CO_2 emissions, this update resulted in a slight increase of overall fugitive CO_2 emissions for 2014 to 2020 by an average of 2 percent, compared to the previous Inventory.

In addition to the above-mentioned updates, for the current Inventory, estimates of CO_2-equivalent CH_4 emissions from coal mining have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

The net impact from the updates listed above was an average annual 12 percent increase in CH_4 emissions and an average annual 0.4 percent increase in CO_2 emissions for the time series.

Planned Improvements

EPA is assessing planned improvements for future reports, but at this time has no specific planned improvements for estimating CH_4 and CO_2 emissions from underground and surface mining and CH_4 emissions from post-mining.

3.5 Abandoned Underground Coal Mines (CRF Source Category 1B1a)

Underground coal mines contribute the largest share of coal mine methane (CMM) emissions, with active underground mines the leading source of underground emissions. However, mines also continue to release CH_4 after closure. As mines mature and coal seams are mined through, mines are closed and abandoned. Many are sealed and some flood through intrusion of groundwater or surface water into the void. Shafts or portals are generally filled with gravel and capped with a concrete seal, while vent pipes and boreholes are plugged in a manner similar to oil and gas wells. Some abandoned mines are vented to the atmosphere to prevent the buildup of CH_4 that may find its way to surface structures through overburden fractures. As work stops within the mines, CH_4 liberation decreases but it does not stop completely. Following an initial decline, abandoned mines can liberate CH_4 at a near-steady rate over an extended period of time, or if flooded, produce gas for only a few years. The gas can migrate to the surface through the conduits described above, particularly if they have not been sealed adequately. In addition, diffuse emissions can occur when CH_4 migrates to the surface through cracks and fissures in the strata overlying the coal mine. The following factors influence abandoned mine emissions:

- Time since abandonment;
- Gas content and adsorption characteristics of coal;
- CH_4 flow capacity of the mine;
- Mine flooding;
- Presence of vent holes; and
- Mine seals.

Annual gross abandoned mine CH_4 emissions ranged from 8.1 to 12.1 MMT CO_2 Eq. from 1990 to 2021, varying, in general, by less than 1 percent to approximately 19 percent from year to year. Fluctuations were due mainly to the number of mines closed during a given year as well as the magnitude of the emissions from those mines when active. Gross abandoned mine emissions peaked in 1996 (12.1 MMT CO_2 Eq.) due to the large number of gassy

mine[68] closures from 1994 to 1996 (72 gassy mines closed during the three-year period). In spite of this rapid rise, abandoned mine emissions have been generally on the decline since 1996. Since 2002, there have been fewer than twelve gassy mine closures each year. In 2021 there were two gassy mine closures. Gross abandoned mine emissions decreased slightly from 9.4 MMT CO_2 Eq. (335 kt CH_4) in 2020 to 9.2 (330 kt CH_4) MMT CO_2 Eq. in 2021 (see Table 3-39 and Table 3-40). Gross emissions are reduced by CH_4 recovered and used at 47 mines, resulting in net emissions in 2021 of 6.4 MMT CO_2 Eq. (228 kt CH_4).

Table 3-39: CH_4 Emissions from Abandoned Coal Mines (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Underground Mines	8.1	9.3	10.3	9.9	9.6	9.4	9.2
Recovered & Used	NO	(2.0)	(3.1)	(3.0)	(2.9)	(2.9)	(2.9)
Total	**8.1**	**7.4**	**7.2**	**6.9**	**6.6**	**6.5**	**6.4**

NO (Not Occurring)
Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 3-40: CH_4 Emissions from Abandoned Coal Mines (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Underground Mines	288	334	367	355	341	335	330
Recovered & Used	NO	(70)	(109)	(107)	(104)	(103)	(103)
Total	**288**	**264**	**257**	**247**	**237**	**232**	**228**

NO (Not Occurring)
Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Estimating CH_4 emissions from an abandoned coal mine requires predicting the emissions of a mine from the time of abandonment through the inventory year of interest. The flow of CH_4 from the coal to the mine void is primarily dependent on the mine's emissions when active and the extent to which the mine is flooded or sealed. The CH_4 emission rate before abandonment reflects the gas content of the coal, the rate of coal mining, and the flow capacity of the mine in much the same way as the initial rate of a water-free conventional gas well reflects the gas content of the producing formation and the flow capacity of the well. A well or a mine that produces gas from a coal seam and the surrounding strata will produce less gas through time as the reservoir of gas is depleted. Depletion of a reservoir will follow a predictable pattern depending on the interplay of a variety of natural physical conditions imposed on the reservoir. The depletion of a reservoir is commonly modeled by mathematical equations and mapped as a type curve. Type curves, which are referred to as decline curves, have been developed for abandoned coal mines. Existing data on abandoned mine emissions through time, although sparse, appear to fit the hyperbolic type of decline curve used in forecasting production from natural gas wells.

To estimate CH_4 emissions over time for a given abandoned mine, it is necessary to apply a decline function, initiated upon abandonment, to that mine. In the analysis, mines were grouped by coal basin with the assumption that they will generally have the same initial pressures, permeability, and isotherm. As CH_4 leaves the system, the reservoir pressure (Pr) declines as described by the isotherm's characteristics. The emission rate declines because the mine pressure (Pw) is essentially constant at atmospheric pressure for a vented mine, and the productivity index (PI), which is expressed as the flow rate per unit of pressure change, is essentially constant at the pressures of interest (atmospheric to 30 psia). The CH_4 flow rate is determined by the laws of gas flow through porous media, such as Darcy's Law. A rate-time equation can be generated that can be used to predict future emissions. This decline through time is hyperbolic in nature and can be empirically expressed as:

[68] A mine is considered a "gassy" mine if it emits more than 100 thousand cubic feet of CH_4 per day (100 Mcfd).

Equation 3-3: Decline Function to Estimate Venting Abandoned Mine Methane Emissions

$$q = q_i \left(1 + bD_i t\right)^{\left(-\frac{1}{b}\right)}$$

where,

q = Gas flow rate at time t in million cubic feet per day (mmcfd)
q_i = Initial gas flow rate at time zero (t_o), mmcfd
b = The hyperbolic exponent, dimensionless
D_i = Initial decline rate, 1/year
t = Elapsed time from t_o (years)

This equation is applied to mines of various initial emission rates that have similar initial pressures, permeability, and adsorption isotherms (EPA 2004).

The decline curves created to model the gas emission rate of coal mines must account for factors that decrease the rate of emissions after mining activities cease, such as sealing and flooding. Based on field measurement data, it was assumed that most U.S. mines prone to flooding will become completely flooded within eight years and therefore will no longer have any measurable CH_4 emissions. Based on this assumption, an average decline rate for flooded mines was established by fitting a decline curve to emissions from field measurements. An exponential equation was developed from emissions data measured at eight abandoned mines known to be filling with water located in two of the five basins. Using a least squares, curve-fitting algorithm, emissions data were matched to the exponential equation shown below. For this analysis of flooded abandoned mines, there was not enough data to establish basin-specific equations, as was done with the vented, non-flooding mines (EPA 2004). This decline through time can be empirically expressed as:

Equation 3-4: Decline Function to Estimate Flooded Abandoned Mine Methane Emissions

$$q = q_i e^{(-Dt)}$$

where,

q = Gas flow rate at time t in mmcfd
q_i = Initial gas flow rate at time zero (t_o), mmcfd
D = Decline rate, 1/year
t = Elapsed time from t_o (years)

Seals have an inhibiting effect on the rate of flow of CH_4 into the atmosphere compared to the flow rate that would exist if the mine had an open vent. The total volume emitted will be the same, but emissions will occur over a longer period of time. The methodology, therefore, treats the emissions prediction from a sealed mine similarly to the emissions prediction from a vented mine, but uses a lower initial rate depending on the degree of sealing. A computational fluid dynamics simulator was used with the conceptual abandoned mine model to predict the decline curve for inhibited flow. The percent sealed is defined as 100 × (1 – [initial emissions from sealed mine / emission rate at abandonment prior to sealing]). Significant differences are seen between 50 percent, 80 percent, and 95 percent closure. These decline curves were therefore used as the high, middle, and low values for emissions from sealed mines (EPA 2004).

For active coal mines, those mines producing over 100 thousand cubic feet per day (Mcfd) of CH_4 account for about 98 percent of all CH_4 emissions. This same relationship is assumed for abandoned mines. It was determined that the 530 abandoned mines closed since 1972 produced CH_4 emissions greater than 100 Mcfd when active. Further, the status of 306 of the 530 mines (or 58 percent) is known to be either: 1) vented to the atmosphere; 2) sealed to some degree (either earthen or concrete seals); or 3) flooded (enough to inhibit CH_4 flow to the atmosphere). The remaining 42 percent of the mines whose status is unknown were placed in one of these three categories by applying a probability distribution analysis based on the known status of other mines located in the same coal basin (EPA 2004). Table 3-41 presents the count of mines by post-abandonment state, based on EPA's probability distribution analysis.

Table 3-41: Number of Gassy Abandoned Mines Present in U.S. Basins in 2021, Grouped by Class According to Post-Abandonment State

Basin	Sealed	Vented	Flooded	Total Known	Unknown	Total Mines
Central Appl.	43	25	50	118	144	262
Illinois	35	3	14	52	31	83
Northern Appl.	48	23	15	86	39	125
Warrior Basin	0	0	16	16	0	16
Western Basins	28	4	2	34	10	44
Total	**154**	**55**	**97**	**306**	**224**	**530**

Inputs to the decline equation require the average CH_4 emission rate prior to abandonment and the date of abandonment. Generally, these data are available for mines abandoned after 1971; however, such data are largely unknown for mines closed before 1972. Information that is readily available, such as coal production by state and county, is helpful but does not provide enough data to directly employ the methodology used to calculate emissions from mines abandoned before 1972. It is assumed that pre-1972 mines are governed by the same physical, geologic, and hydrologic constraints that apply to post-1971 mines; thus, their emissions may be characterized by the same decline curves.

During the 1970s, 78 percent of CH_4 emissions from coal mining came from seventeen counties in seven states. Mine closure dates were obtained for two states, Colorado and Illinois, for the hundred-year period extending from 1900 through 1999. The data were used to establish a frequency of mine closure histogram (by decade) and applied to the other five states with gassy mine closures. As a result, basin-specific decline curve equations were applied to the 145 gassy coal mines estimated to have closed between 1920 and 1971 in the United States, representing 78 percent of the emissions. State-specific, initial emission rates were used based on average coal mine CH_4 emission rates during the 1970s (EPA 2004).

Abandoned mine emission estimates are based on all closed mines known to have active mine CH_4 ventilation emission rates greater than 100 Mcfd at the time of abandonment. For example, for 1990 the analysis included 145 mines closed before 1972 and 258 mines closed between 1972 and 1990. Initial emission rates based on MSHA reports, time of abandonment, and basin-specific decline curves influenced by a number of factors were used to calculate annual emissions for each mine in the database (MSHA 2022). Coal mine degasification data are not available for years prior to 1990, thus the initial emission rates used reflect only ventilation emissions for pre-1990 closures. Methane degasification amounts were added to the quantity of CH_4 vented to determine the total CH_4 liberation rate for all mines that closed between 1992 and 2021. Since the sample of gassy mines described above is assumed to account for 78 percent of the pre-1972 and 98 percent of the post-1971 abandoned mine emissions, the modeled results were multiplied by 1.22 and 1.02, respectively, to account for all U.S. abandoned mine emissions.

From 1993 through 2021, emission totals were downwardly adjusted to reflect CH_4 emissions avoided from abandoned mines with CH_4 recovery and use or destruction systems. Currently, there are 48 abandoned mines with recovery projects, including 11 projects at mines abandoned before 1972 (pre-1972 mines) (EPA 2004, CMOP 2022). Because CH_4 recovered by these projects is expected to decline with the age of the mine, CH_4 recovery is assumed to be the total estimated CH_4 liberated based on the mine's decline function except for three recovery projects where additional data are available (COGIS 2018, MSHA 2022).[69]

The Inventory totals were not adjusted for abandoned mine CH_4 emissions avoided from 1990 through 1992 due to unavailability of data. Avoided CH_4 emissions from pre-1972 abandoned mines are estimated by multiplying the total estimated emissions from these mines in each decade by the fraction of mines with recovery projects in that

[69] Data from a state oil and gas database (COGIS) is used for one project and the mine status information from MSHA for two mines (sealed and flooded) indicate zero recovery emissions for these projects.

decade. For recovery projects at pre-1972 abandoned mines, four projects are at mines abandoned in the 1920s, three in the 1930s, two in the 1950s, and two in the 1960s (EPA 2004).

Starting with the current (i.e., 1990 through 2021) Inventory, in addition to reviewing Coalbed Methane Outreach Program data (CMOP 2022), the recovery project list was checked against the International Coal Mine Methane Database (GMI 2016). Of the 24 operational recovery projects for U.S. abandoned coal mines currently available in the GMI dataset, 18 are already included in the AMM model. The remaining six projects in the GMI dataset are for mines that are not yet abandoned according to MSHA records (MSHA 2022). Therefore, no new recovery projects were added from this database for the 1990 through 2021 Inventory.

Uncertainty

A quantitative uncertainty analysis was conducted for the abandoned coal mine source category using the IPCC-recommended Approach 2 uncertainty estimation methodology. The uncertainty analysis provides for the specification of probability density functions for key variables within a computational structure that mirrors the calculation of the Inventory estimate. The results provide the range within which, with 95 percent certainty, emissions from this source category are likely to fall.

As discussed above, the parameters for which values must be estimated for each mine to predict its decline curve are: 1) the coal's adsorption isotherm; 2) CH_4 flow capacity as expressed by permeability; and 3) pressure at abandonment. Because these parameters are not available for each mine, a methodological approach to estimating emissions was used that generates a probability distribution of potential outcomes based on the most likely value and the probable range of values for each parameter. The range of values is not meant to capture the extreme values, but rather values that represent the highest and lowest quartile of the cumulative probability density function of each parameter. Once the low, mid, and high values are selected, they are applied to a probability density function.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 3-42. Annual abandoned coal mine CH_4 emissions in 2021 were estimated to be between 5.0 and 7.7 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 22 percent below to 21 percent above the 2021 emission estimate of 6.4 MMT CO_2 Eq. One of the reasons for the relatively narrow range is that mine-specific data is available for use in the methodology for mines closed in 1972 and later years. Emissions from mines closed prior to 1972 have the largest degree of uncertainty because no mine-specific CH_4 liberation rates at the time of abandonment exist.

Table 3-42: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Abandoned Underground Coal Mines (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Abandoned Underground Coal Mines	CH_4	6.4	5.0	7.7	-22%	+21%

[a] Range of emission estimates predicted by Monte Carlo Simulation for a 95 percent confidence interval.

QA/QC and Verification

In order to ensure the quality of the emission estimates for abandoned coal mines, general (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and reported emissions data used for estimating emissions from abandoned coal mines. Trends across the time series were analyzed to determine whether any corrective actions were needed.

Recalculations Discussion

For the current Inventory, estimates of CO_2-equivalent CH_4 emissions from abandoned coal mines have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

3.6 Petroleum Systems (CRF Source Category 1B2a)

This IPCC category (1B2a) is for fugitive emissions from petroleum systems, which per IPCC guidelines include emissions from leaks, venting, and flaring. Methane emissions from petroleum systems are primarily associated with onshore and offshore crude oil exploration, production, transportation, and refining operations. During these activities, CH_4 is released to the atmosphere as emissions from leaks, venting (including emissions from operational upsets), and flaring. Carbon dioxide emissions from petroleum systems are primarily associated with onshore and offshore crude oil production and refining operations. Note, CO_2 emissions in petroleum systems exclude all combustion emissions (e.g., engine combustion) except for flaring CO_2 emissions. All combustion CO_2 emissions (except for flaring) are accounted for in the fossil fuel combustion chapter (see Section 3.1). Emissions of N_2O from petroleum systems are primarily associated with flaring. Total greenhouse gas emissions (CH_4, CO_2, and N_2O) from petroleum systems in 2021 were 74.9 MMT CO_2 Eq., an increase of 23 percent from 1990, primarily due to increases in CO_2 emissions. Total emissions increased by 10 percent from 2010 levels and have decreased by 10 percent since 2020. Total CO_2 emissions from petroleum systems in 2021 were 24.67 MMT CO_2 (24,669 kt CO_2), 2.6 times higher than in 1990. Total CO_2 emissions in 2021 were 1.8 times higher than in 2010 and 15 percent lower than in 2020. Total CH_4 emissions from petroleum systems in 2021 were 50.2 MMT CO_2 Eq. (1,791 kt CH_4), a decrease of 2 percent from 1990. Since 2010, total CH_4 emissions decreased by 8 percent; and since 2020, CH_4 emissions decreased by 8 percent. Total N_2O emissions from petroleum systems in 2021 were 0.022 MMT CO_2 Eq. (0.082 kt N_2O), 1.7 times higher than in 1990, 1.2 times higher than in 2010, and 34 percent lower than in 2020. Since 1990, U.S. oil production has increased by 46 percent. In 2021, U.S. oil production was 146 percent higher than in 2010 and 1 percent lower than in 2020.

Each year, some estimates in the Inventory are recalculated with improved methods and/or data. These improvements are implemented consistently across the entire Inventory's time series (i.e., 1990 to 2021) to ensure that the trend is representative of changes in emissions levels. Recalculations in petroleum systems in this year's Inventory include:

- Updates to oil and gas production volumes using the most recent data from the United States Energy Information Administration (EIA)
- Recalculations due to Greenhouse Gas Reporting Program (GHGRP) submission revisions
- Recalculations due to methodological updates to four onshore production segment sources - pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks.
- Recalculations due to updating the global warming potential (GWP) for CH_4 and N_2O to use AR5 values.

The Recalculations Discussion section below provides more details on the updated methods.

Exploration. Exploration includes well drilling, testing, and completion. Exploration accounts for less than 0.5 percent of total CH_4 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The predominant sources of CH_4 emissions from exploration are hydraulically fractured oil well completions. Other sources include well testing, well drilling, and well completions without hydraulic fracturing. Since 1990, exploration CH_4 emissions have decreased 96 percent, and while the number of hydraulically fractured wells completed increased 64 percent, there were decreases in the fraction of such completions without reduced emissions completions (RECs) or flaring. Emissions of CH_4 from exploration were highest in 2012, over 60 times higher than in 2021; and lowest in 2021. Emissions of CH_4 from exploration decreased 52 percent from 2020 to 2021, due to a decrease in emissions from hydraulically fractured oil well completions without RECs, as well as due to hydraulically fractured oil well completions with RECs and venting. Exploration accounts for 2 percent of total CO_2 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. Emissions of CO_2 from exploration in 2021 were 28 percent higher than in 1990, and decreased by 44 percent from 2020, largely due to a decrease in the number of hydraulically fractured oil well completions without RECS or flaring (by 36 percent from 2020). Emissions of CO_2 from exploration were highest in 2014, over 8 times higher than in 2021. Exploration accounts for 1 percent of total N_2O emissions from petroleum systems in 2021. Emissions of N_2O from exploration in 2021 are 35 percent higher than in 1990, and 39 percent lower than in 2020, due to the above-mentioned changes in hydraulically fractured oil well completions with flaring.

Production. Production accounts for 98 percent of total CH_4 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The predominant sources of emissions from production field operations are pneumatic controllers, offshore oil platforms, equipment leaks, chemical injection pumps, gas engines, produced water, and associated gas flaring. In 2021, these seven sources together accounted for 94 percent of the CH_4 emissions from production. Since 1990, CH_4 emissions from production have increased by 6 percent primarily due to increases in emissions from pneumatic devices. Overall, production segment CH_4 emissions decreased by 8 percent from 2020 levels due primarily to lower pneumatic controller emissions. The number of high- and intermittent-bleed pneumatic controllers decreased from 2020 to 2021 whereas, the number of low-bleed pneumatic controllers increased from 2020 to 2021. Production emissions account for 81 percent of the total CO_2 emissions (including leaks, vents, and flaring) from petroleum systems in 2021. The principal sources of CO_2 emissions are associated gas flaring, miscellaneous production flaring, and oil tanks with flares. In 2021, these three sources together accounted for 97 percent of the CO_2 emissions from production. In 2021, CO_2 emissions from production were 3.4 times higher than in 1990, due to increases in flaring emissions from associated gas flaring, miscellaneous production flaring, and tanks. Overall, in 2021, production segment CO_2 emissions decreased by 17 percent from 2020 levels primarily due to decreases in associated gas flaring and miscellaneous production flaring in the Permian and Williston Basins. Production emissions accounted for 48 percent of the total N_2O emissions from petroleum systems in 2021. The principal sources of N_2O emissions are associated gas flaring, oil tanks with flares, miscellaneous production flaring, and offshore flaring. In 2021, N_2O emissions from production were 115 percent higher than in 1990 and were 51 percent lower than in 2020.

Crude Oil Transportation. Emissions from crude oil transportation account for a very small percentage of the total emissions (including leaks, vents, and flaring) from petroleum systems. Crude oil transportation activities account for 0.4 percent of total CH_4 emissions from petroleum systems. Emissions from tanks, marine loading, and truck loading operations account for 78 percent of CH_4 emissions from crude oil transportation. Since 1990, CH_4 emissions from transportation have increased by 21 percent. In 2021, CH_4 emissions from transportation decreased by 3 percent from 2020 levels. Crude oil transportation activities account for less than 0.01 percent of total CO_2 emissions from petroleum systems. Emissions from tanks, marine loading, and truck loading operations account for 78 percent of CO_2 emissions from crude oil transportation.

Crude Oil Refining. Crude oil refining processes and systems account for 2 percent of total fugitive (including leaks, vents, and flaring) CH_4 emissions from petroleum systems. This low share is because most of the CH_4 in crude oil is removed or escapes before the crude oil is delivered to the refineries. There is a negligible amount of CH_4 in all refined products. Within refineries, flaring accounts for 52 percent of the CH_4 emissions, while delayed cokers, uncontrolled blowdowns, and equipment leaks account for 16, 13 and 9 percent, respectively. Fugitive CH_4 emissions from refining of crude oil have increased by 12 percent since 1990, and decreased 5 percent from 2020; however, like the transportation subcategory, this increase has had little effect on the overall emissions of CH_4

from petroleum systems. Crude oil refining processes and systems account for 17 percent of total fugitive (including leaks, vents, and flaring) CO_2 emissions from petroleum systems. Of the total fugitive CO_2 emissions from refining, almost all (about 99 percent) of it comes from flaring.[70] Since 1990, refinery fugitive CO_2 emissions increased by 28 percent and have decreased by less than 1 percent from the 2020 levels, due to a decrease in flaring. Flaring occurring at crude oil refining processes and systems accounts for 51 percent of total fugitive N_2O emissions from petroleum systems. In 2021, refinery fugitive N_2O emissions increased by 37 percent since 1990, and decreased by less than 1 percent from 2020 levels.

Table 3-43: Total Greenhouse Gas Emissions (CO_2, CH_4, and N_2O) from Petroleum Systems (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	4.7	6.3	2.3	3.8	2.9	1.2	0.6
Production	52.0	50.1	79.3	88.2	97.6	77.1	68.9
Transportation	0.2	0.1	0.2	0.2	0.3	0.2	0.2
Crude Refining	4.0	4.6	4.5	4.6	6.0	5.1	5.1
Total	**60.8**	**61.2**	**86.4**	**96.8**	**106.8**	**83.6**	**74.9**

Table 3-44: CH_4 Emissions from Petroleum Systems (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	**4.3**	**5.9**	**0.5**	**0.6**	**0.5**	**0.3**	**0.2**
Production	**46.1**	**44.0**	**60.3**	**59.0**	**58.2**	**53.0**	**48.9**
Pneumatic Controllers	21.3	23.3	38.1	35.3	24.8	31.7	28.4
Offshore Production	9.9	7.2	5.7	5.5	5.5	5.3	5.5
Equipment Leaks	2.3	2.9	3.3	3.7	3.9	3.2	3.3
Gas Engines	2.3	2.0	2.5	2.6	2.6	2.5	2.5
Produced Water	2.6	1.7	2.4	2.6	2.7	2.5	2.5
Chemical Injection Pumps	1.3	3.0	3.4	3.9	10.8	3.3	3.2
Assoc Gas Flaring	0.5	0.4	1.1	1.9	2.3	1.2	0.8
Other Sources	5.9	3.5	3.7	3.6	5.5	3.5	2.8
Crude Oil Transportation	**0.2**	**0.1**	**0.2**	**0.2**	**0.3**	**0.2**	**0.2**
Refining	**0.7**	**0.8**	**0.9**	**0.8**	**1.0**	**0.9**	**0.8**
Total	**51.3**	**50.9**	**61.9**	**60.6**	**59.9**	**54.5**	**50.2**

Table 3-45: CH_4 Emissions from Petroleum Systems (kt CH_4)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	**154**	**211**	**17**	**20**	**16**	**12**	**6**
Production	**1,646**	**1,573**	**2,152**	**2,107**	**2,078**	**1,894**	**1,748**
Pneumatic Controllers	760	833	1,362	1,260	886	1,131	1,015
Offshore Production	353	259	205	197	196	188	195
Equipment Leaks	82	102	120	132	138	115	117
Gas Engines	82	71	89	92	94	89	89
Produced Water	91	62	84	93	98	89	89
Chemical Injection Pumps	47	105	121	139	387	116	116
Assoc Gas Flaring	20	14	38	66	82	43	28
Other Sources	211	125	133	128	197	124	99
Crude Oil Transportation	**7**	**5**	**8**	**8**	**9**	**8**	**8**

[70] Petroleum Systems includes fugitive emissions (leaks, venting, and flaring). In many industries, including petroleum refineries, the largest source of onsite CO_2 emissions is often fossil fuel combustion, which is covered in Section 3.1 of this chapter.

Refining	**26**	**30**	**33**	**30**	**36**	**31**	**30**
Total	**1,833**	**1,819**	**2,209**	**2,165**	**2,138**	**1,945**	**1,791**

Table 3-46: CO_2 Emissions from Petroleum Systems (MMT CO_2)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	0.4	0.4	1.9	3.2	2.4	0.8	0.5
Production	5.9	6.1	19.0	29.2	39.4	24.0	20.0
Transportation	+	+	+	+	+	+	+
Crude Refining	3.3	3.7	3.6	3.7	5.0	4.2	4.2
Total	**9.5**	**10.2**	**24.5**	**36.1**	**46.9**	**29.1**	**24.7**

+ Does not exceed 0.05 MMT CO_2 Eq.

Table 3-47: CO_2 Emissions from Petroleum Systems (kt CO_2)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	364	395	1,853	3,208	2,434	838	467
Production	5,869	6,097	19,025	29,187	39,429	24,000	19,985
Transportation	0.9	0.7	1.1	1.2	1.3	1.2	1.1
Crude Refining	3,284	3,728	3,582	3,706	5,009	4,242	4,216
Total	**9,519**	**10,221**	**24,462**	**36,102**	**46,874**	**29,081**	**24,669**

Table 3-48: N_2O Emissions from Petroleum Systems (Metric Tons CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	161	174	722	1,338	894	361	219
Production	4,907	5,465	13,450	25,638	26,522	21,665	10,539
Transportation	NE	NE	NE	NE	NE	NE	NE
Crude Refining	8,096	9,189	9,286	9,351	13,127	11,149	11,088
Total	**13,164**	**14,827**	**23,458**	**36,327**	**40,542**	**33,175**	**21,846**

NE (Not Estimated)

Table 3-49: N_2O Emissions from Petroleum Systems (Metric Tons N_2O)

Activity	1990	2005	2017	2018	2019	2020	2021
Exploration	0.6	0.7	2.7	5.0	3.4	1.4	0.8
Production	18.5	20.6	50.8	96.7	100.1	81.8	39.8
Transportation	NE	NE	NE	NE	NE	NE	NE
Crude Refining	30.5	34.7	35.0	35.3	49.5	42.1	41.8
Total	**49.7**	**56.0**	**88.5**	**137.1**	**153.0**	**125.2**	**82.4**

NE (Not Estimated)

Methodology and Time-Series Consistency

See Annex 3.5 for the full time series of emissions data, activity data, emission factors, and additional information on methods and data sources.

Petroleum systems includes emission estimates for activities occurring in petroleum systems from the oil wellhead through crude oil refining, including activities for crude oil exploration, production field operations, crude oil

transportation activities, and refining operations. Generally, emissions are estimated for each activity by multiplying emission factors (e.g., emission rate per equipment or per activity) by corresponding activity data (e.g., equipment count or frequency of activity). Certain sources within petroleum refineries are developed using an IPCC Tier 3 approach (i.e., all refineries in the nation report facility-level emissions data to the GHGRP, which are included directly in the national emissions estimates here). Other estimates are developed with a Tier 2 approach. Tier 1 approaches are not used.

EPA received stakeholder feedback on updates in the Inventory through EPA's stakeholder process on oil and gas in the Inventory. Stakeholder feedback is noted below in Recalculations Discussion and Planned Improvements. More information on the stakeholder process can be found online.[71]

Emission Factors. Key references for emission factors include *Methane Emissions from the Natural Gas Industry by the Gas Research Institute and EPA* (GRI/EPA 1996), *Estimates of Methane Emissions from the U.S. Oil Industry* (EPA 1999), *Compilation of Air Pollutant Emission Factors, AP-42* (EPA 1997)*, Global Emissions of Methane from Petroleum Sources* (API 1992), consensus of industry peer review panels, Bureau of Ocean Energy Management (BOEM) reports, *Nonpoint Oil and Gas Emission Estimation Tool* (EPA 2017), and analysis of GHGRP data (EPA 2022).

Emission factors for hydraulically fractured (HF) oil well completions and workovers (in four control categories) were developed using EPA's GHGRP data; year-specific data were used to calculate emission factors from 2016-forward and the year 2016 emission factors were applied to all prior years in the time series. The emission factors for well testing and associated gas venting and flaring were developed using year-specific GHGRP data for years 2015 forward; earlier years in the time series use 2015 emission factors. For miscellaneous production flaring, year-specific emission factors were developed for years 2015 forward from GHGRP data, an emission factor of 0 (assumption of no flaring) was assumed for 1990 through 1992, and linear interpolation was applied to develop emission factors for 1993 through 2014. For more information, please see memoranda available online.[72] For offshore oil production, emission factors were calculated using BOEM data for offshore facilities in federal waters of the Gulf of Mexico (and these data were also applied to facilities located in state waters of the Gulf of Mexico) and GHGRP data for offshore facilities off the coasts of California and Alaska. For many other sources, emission factors were held constant for the period 1990 through 2021, and trends in emissions reflect changes in activity levels. Emission factors from EPA 1999 are used for all other production and transportation activities.

For associated gas venting and flaring and miscellaneous production flaring, emission factors were developed on a production basis (i.e., emissions per unit oil produced). Additionally, for these two sources, basin-specific activity and emission factors were developed for each basin that in any year from 2011 forward contributed at least 10 percent of total source emissions (on a CO_2 Eq. basis) in the GHGRP. For associated gas venting and flaring, basin-specific factors were developed for four basins: Williston, Permian, Gulf Coast, and Anadarko. For miscellaneous production flaring, basin-specific factors were developed for three basins: Williston, Permian, and Gulf Coast. For each source, data from all other basins were combined, and activity and emission factors were developed for the other basins as a single group.

For pneumatic controllers and tanks, basin-specific emission factors were calculated for all the basins reporting to the GHGRP. These emission factors were calculated for all the years with applicable GHGRP data (i.e., 2011 - 2021 or 2015 - 2021). For the remaining basins (i.e., basins not reporting to the GHGRP), subpart W average emission factors were used. For more information, please see memoranda available online.[3]

For the exploration and production segments, in general, CO_2 emissions for each source were estimated with GHGRP data or by multiplying CO_2 content factors by the corresponding CH_4 data, as the CO_2 content of gas relates to its CH_4 content. Sources with CO_2 emission estimates calculated using GHGRP data include HF completions and workovers, associated gas venting and flaring, tanks, well testing, pneumatic controllers, chemical injection pumps, miscellaneous production flaring, and certain offshore production facilities (those located off the coasts of

[71] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

[72] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

California and Alaska). For these sources, CO_2 was calculated using the same methods as used for CH_4. Carbon dioxide emission factors for offshore oil production in the Gulf of Mexico were derived using data from BOEM, following the same methods as used for CH_4 estimates. For other sources, the production field operations emission factors for CO_2 are generally estimated by multiplying the CH_4 emission factors by a conversion factor, which is the ratio of CO_2 content and CH_4 content in produced associated gas.

For the exploration and production segments, N_2O emissions were estimated for flaring sources using GHGRP or BOEM OGOR-B data and the same method used for CO_2. Sources with N_2O emissions in the exploration segment include well testing and HF completions with flaring. Sources with N_2O emissions in the production segment include associated gas flaring, tank flaring, miscellaneous production flaring, HF workovers with flaring, and flaring from offshore production sources.

For crude oil transportation, emission factors for CH_4 were largely developed using data from EPA (1997), API (1992), and EPA (1999). Emission factors for CO_2 were estimated by multiplying the CH_4 emission factors by a conversion factor, which is the ratio of CO_2 content and CH_4 content in whole crude post-separator.

For petroleum refining activities, year-specific emissions from 2010 forward were directly obtained from EPA's GHGRP. All U.S. refineries have been required to report CH_4, CO_2, and N_2O emissions for all major activities starting with emissions that occurred in 2010. The reported total CH_4, CO_2, and N_2O emissions for each activity was used for the emissions in each year from 2010 forward. To estimate emissions for 1990 to 2009, the 2010 to 2013 emissions data from GHGRP along with the refinery feed data for 2010 to 2013 were used to derive CH_4 and CO_2 emission factors (i.e., sum of activity emissions/sum of refinery feed) and 2010 to 2017 data were used to derive N_2O emission factors; these emission factors were then applied to the annual refinery feed in years 1990 to 2009. GHGRP delayed coker CH_4 emissions for 2010 through 2017 were increased using the ratio of certain reported emissions for 2018 to 2017, to account for a more accurate GHGRP calculation methodology that was implemented starting in reporting year 2018.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.5.

Activity Data. References for activity data include Enverus data (Enverus 2021), Energy Information Administration (EIA) reports, *Methane Emissions from the Natural Gas Industry by the Gas Research Institute and EPA* (EPA/GRI 1996), *Estimates of Methane Emissions from the U.S. Oil Industry* (EPA 1999), consensus of industry peer review panels, BOEM reports, the Oil & Gas Journal, the Interstate Oil and Gas Compact Commission, the United States Army Corps of Engineers, and analysis of GHGRP data (EPA 2022). Enverus data for 2021 were not available; this version of the Inventory uses 2020 data as proxy for 2021.

For pneumatic controllers, equipment leaks, chemical injection pumps, and tanks, basin-specific activity factors were calculated for all the basins reporting to the GHGRP. These factors were calculated for all the years with applicable GHGRP data (i.e., 2011 through 2021 or 2015 through 2021). For the remaining basins (i.e., basins not reporting to the GHGRP), GHGRP average activity factors were used. For more information, please see memoranda available online.[73]

For many sources, complete activity data were not available for all years of the time series. In such cases, one of three approaches was employed to estimate values, consistent with IPCC good practice. Where appropriate, the activity data were calculated from related statistics using ratios developed based on EPA/GRI (1996) and/or GHGRP data. In some cases, activity data are developed by interpolating between recent data points (such as from GHGRP) and earlier data points, such as from EPA/GRI (1996). Lastly, in limited instances the previous year's data were used if current year data were not yet available.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.5. The United States reports data to the UNFCCC using this Inventory report along with Common Reporting Format (CRF) tables. This note is provided for those reviewing the CRF tables: The notation key "IE" is used for CO_2 and CH_4 emissions from venting and flaring in CRF table 1.B.2. Disaggregating flaring and venting estimates across the

[73] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

Inventory would involve the application of assumptions and could result in inconsistent reporting and, potentially, decreased transparency. Data availability varies across segments within oil and gas activities systems, and emission factor data available for activities that include flaring can include emissions from multiple sources (flaring, venting and leaks).

As noted above, EPA's GHGRP data, available starting in 2010 for refineries and in 2011 for other sources, have improved estimates of emissions from petroleum systems. Many of the previously available datasets were collected in the 1990s. To develop a consistent time series for sources with new data, EPA reviewed available information on factors that may have resulted in changes over the time series (e.g., regulations, voluntary actions) and requested stakeholder feedback on trends as well. For most sources, EPA developed annual data for 1993 through 2009 or 2014 by interpolating activity data or emission factors or both between 1992 (when GRI/EPA data are available) and 2010 or 2015 data points. Information on time-series consistency for sources updated in this year's Inventory can be found in the Recalculations Discussion below, with additional detail provided in supporting memos (relevant memos are cited in the Recalculations Discussion). For information on other sources, please see the Methodology Discussion above and Annex 3.5.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

EPA conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique) to characterize uncertainty for petroleum systems. For more information on the approach, please see the memoranda *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Natural Gas and Petroleum Systems Uncertainty Estimates* and *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Update for Natural Gas and Petroleum Systems CO_2 Uncertainty Estimates*.[74]

EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around CH_4 and CO_2 emissions from petroleum systems for the current Inventory. For the CH_4 uncertainty analysis, EPA focused on the five highest methane-emitting sources for the year 2021, which together emitted 75 percent of methane from petroleum systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. For the CO_2 uncertainty analysis, EPA focused on the three highest-emitting sources for the year 2021 which together emitted 78 percent of CO_2 from petroleum systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." As a result, the understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve. The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification. To estimate uncertainty for N_2O, EPA applied the uncertainty bounds calculated for CO_2. EPA will seek to refine this estimate in future Inventories.

The results presented below provide the 95 percent confidence bound within which actual emissions from this source category are likely to fall for the year 2021, using the recommended IPCC methodology. The results of the Approach 2 uncertainty analysis are summarized in Table 3-50. Petroleum systems CH_4 emissions in 2021 were estimated to be between 44.5 and 57.0 MMT CO_2 Eq., while CO_2 emissions were estimated to be between 21.3 and 29.2 MMT CO_2 Eq. at a 95 percent confidence level. Petroleum systems N_2O emissions in 2021 were estimated to be between 0.019 and 0.026 MMT CO_2 Eq. at a 95 percent confidence level. The basin-specific updates to activity factors and emissions factors discussed elsewhere impacted the uncertainty results when compared to the

[74] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

uncertainty analysis in the previous Inventory. The second highest emitting methane source in 2021, pneumatic controllers, included an updated approach to estimate emissions that analyzed basin-level data. EPA modeled uncertainty at the basin level as well for this source. The increased granularity in modelling led to an overall decrease in the uncertainty bounds.

Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series. For example, years where many emission sources are calculated with interpolated data would likely have higher uncertainty than years with predominantly year-specific data. In addition, the emission sources that contribute the most to CH_4 and CO_2 emissions are different over the time series, particularly when comparing recent years to early years in the time series. For example, associated gas venting emissions were higher and flaring emissions were lower in early years of the time series, compared to recent years. Technologies also changed over the time series (e.g., reduced emissions completions were not used early in the time series).

Table 3-50: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Petroleum Systems (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)[b]	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Petroleum Systems	CH_4	50.2	44.5	57.0	-10%	+15%
Petroleum Systems	CO_2	24.7	21.3	29.2	-13%	+19%
Petroleum Systems	N_2O	0.022	0.019	0.026	-13%	+19%

[a] Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for the year 2021 CH_4 and CO_2 emissions.

[b] All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in table.

QA/QC and Verification Discussion

The petroleum systems emission estimates in the Inventory are continually being reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the emission calculations. EPA performs a thorough review of information associated with new studies, GHGRP data, regulations, public webcasts, and the Natural Gas STAR Program to assess whether the assumptions in the Inventory are consistent with current industry practices. EPA has a multi-step data verification process for GHGRP data, including automatic checks during data-entry, statistical analyses on completed reports, and staff review of the reported data. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred.[75]

As in previous years, EPA conducted early engagement and communication with stakeholders on updates prior to public review of the current Inventory. EPA held stakeholder webinars on greenhouse gas data for oil and gas in September and November of 2022. EPA released memos detailing updates under consideration and requesting stakeholder feedback. Stakeholder feedback received through these processes is discussed in the Recalculations Discussion and Planned Improvements sections below.

In recent years, several studies have measured emissions at the source level and at the national or regional level and calculated emission estimates that may differ from the Inventory. There are a variety of potential uses of data from new studies, including replacing a previous estimate or factor, verifying or QA of an existing estimate or

[75] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

factor, and identifying areas for updates. In general, there are two major types of studies related to oil and gas greenhouse gas data: studies that focus on measurement or quantification of emissions from specific activities, processes, and equipment, and studies that use tools such as inverse modeling to estimate the level of overall emissions needed to account for measured atmospheric concentrations of greenhouse gases at various scales. The first type of study can lead to direct improvements to or verification of Inventory estimates. In the past few years, EPA has reviewed, and in many cases, incorporated data from these data sources. The second type of study can provide general indications on potential over- and under-estimates.

A key challenge in using these types of studies to assess Inventory results is having a relevant basis for comparison (e.g., the two data sets should have comparable time frames and geographic coverage, and the independent study should assess data from the Inventory and not another data set, such as the Emissions Database for Global Atmospheric Research, or "EDGAR"). In an effort to improve the ability to compare the national-level Inventory with measurement results that may be at other spatial and temporal scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1 degree x 0.1 degree spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization.[76] The gridded methane inventory is designed to be consistent with the U.S. EPA's *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014* estimates for the year 2012, which presents national totals.[77] An updated version of the gridded inventory is being developed and will improve efforts to compare results of the inventory with atmospheric studies.

As discussed above, refinery emissions are quantified by using the total emissions reported to GHGRP for the refinery emission categories included in Petroleum Systems. Subpart Y has provisions that refineries are not required to report under Subpart Y if their emissions fall below certain thresholds. Each year, a review is conducted to determine whether an adjustment is needed to the Inventory emissions to include emissions from refineries that stopped reporting to the GHGRP. Based on the review of the most recent GHGRP data, EPA identified 4 refineries that reported in the past, but have stopped reporting to GHGRP. One of these refineries last reported to GHGRP in 2012 and the remaining 3 refineries last reported in 2020. EPA used the last reported emissions for these refineries as proxy to gap fill annual emissions for 2013 through 2021 for these refineries, as applicable.

Recalculations Discussion

EPA received information and data related to the emission estimates through GHGRP reporting and stakeholder feedback on updates under consideration. In October 2022 and February 2023, EPA released draft memoranda that discussed changes under consideration and requested stakeholder feedback on those changes.[78] Feedback received is discussed in the Planned Improvements section below. Memoranda cited in the Recalculations Discussion below are: Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data (*Disaggregation* memo) and Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data for the Production Segment (*Production Disaggregation* memo).

In this Inventory, an update that incorporates additional basin-level data from GHGRP subpart W was implemented for several emission sources in the onshore production segment. The update seeks to improve the ability of EPA's gridded and state inventories to reflect variation due to differences in formation types, technologies and practices, regulations, or voluntary initiatives, and not only the differences in key activity levels that are reflected in the current gridded and state inventories. This would allow EPA to use the gridded inventory for improved comparisons of the national Inventory with various atmospheric observation studies (since regions will better reflect the local differences in emissions rates as reported to GHGRP) and would allow the state-level inventory to

[76] See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

[77] See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-1990-2014.

[78] Stakeholder materials including draft memoranda for the current (i.e., 1990 to 2021) Inventory are available at https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

reflect differences in state-level programs, formation type mixes, and varying technologies and practices. For many sources, an approach that develops estimates using geographically disaggregated data may not be possible or preferable to a national level approach based on the currently available data. For some emission sources in the Inventory, emission factor data come from research studies and are applied at the national level. For example, many of the emission factors used to quantify emissions in the Inventory for the gathering and boosting, transmission and storage, distribution, and post-meter segments are from research studies and do not have a level of detail or total population comparable to GHGRP. For petroleum refineries, because there is no reporting threshold for GHGRP Subpart Y, facility-level data are generally available for all refineries in the United States, and these site-specific data are already used to develop the gridded and state-level greenhouse gas estimates. Even in cases where geographically disaggregated data are available, such an approach may not always be preferable. In cases with limited variation between areas, such an approach would have limited impact on emissions estimates regionally or nationally. In cases with limited data in certain areas, disaggregated approaches might substantially increase the uncertainty of estimates and basin-specific calculations would not be an improvement over use of a national average. EPA continues to seek stakeholder feedback on the draft approach in this Inventory.

EPA evaluated relevant information available and made several updates to the Inventory, including for pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. General information for these source specific recalculations are presented below and details (including the basin-specific emissions estimates) are available in the *Disaggregation* memo and *Production Disaggregation* memo.

In addition to the updates to production segment sources mentioned above, for certain sources, CH_4 and/or CO_2 emissions changed by greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. The emissions changes were mostly due to GHGRP data submission revisions. These sources are discussed below and include associated gas flaring, miscellaneous production flaring, offshore production, and refinery flaring.

In addition, for the current Inventory, CO_2-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an increase in the calculated CO_2-equivalent emissions of CH_4, while the GWP of N_2O has decreased from 298 to 265, leading to a decrease in the calculated CO_2-equivalent emissions of N_2O. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

The combined impact of revisions to 2020 petroleum systems CH_4 emission estimates on a CO_2-equivalent basis, compared to the previous Inventory, is an increase from 40.2 to 54.5 MMT CO_2 Eq. (14.2 MMT CO_2 Eq., or 35 percent), or an increase from 1,609 kt CH_4 to 1,945 kt CH_4 or 21 percent. The recalculations resulted in higher CH_4 emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 11.0 MMT CO_2 Eq., or 25 percent, or by 204 kt CH_4 or 12 percent.

The combined impact of revisions to 2020 petroleum systems CO_2 emission estimates, compared to the previous Inventory, is a decrease from 30.2 to 29.1 MMT CO_2 (1.1 MMT CO_2, or 4 percent). The recalculations resulted in lower emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 1.2 MMT CO_2 Eq., or 9 percent.

The combined impact of revisions to 2020 petroleum systems N_2O emission estimates on a CO_2-equivalent basis, compared to the previous Inventory, is a decrease of 0.004 MMT CO_2, Eq. or 12 percent, (or a decrease of less than 1 percent comparing on a kt N_2O basis). The recalculations resulted in an average decrease in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 0.002 MMT CO_2 Eq., or 11 percent, (or a decrease of less than 1 percent comparing on a kt N_2O basis).

In Table 3-51 and Table 3-52 below are categories in Petroleum Systems with updated methodologies or with recalculations resulting in a change of greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. For more information, please see the discussion below.

For certain sources, CH_4 emissions for 2020 changed by greater than 0.05 MMT CO_2 Eq., compared to the previous Inventory due to the use of the updated GWP value (AR5). These sources are not discussed below and include associated gas venting and flaring, produced water, gas engines, heaters, and refineries.

Table 3-51: Recalculations of CO_2 in Petroleum Systems (MMT CO_2)

Segment/Source	*Previous Estimate Year 2020, 2022 Inventory*	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	***0.9***	**0.8**	**0.5**
Production	***25.0***	**24.0**	**20.0**
Tanks	*6.5*	5.3	5.4
Pneumatic Controllers	*0.1*	0.1	0.1
Equipment Leaks	*+*	+	+
Chemical Injection Pumps	*+*	+	+
Associated Gas Flaring	*13.0*	13.3	9.6
Miscellaneous Production Flaring	*4.6*	4.7	4.2
Transportation	***+***	**+**	**+**
Refining	***4.3***	**4.2**	**4.2**
Flares	4.3	4.2	4.2
Petroleum Systems Total	***30.2***	**29.1**	**24.7**

+ Does not exceed 0.05 MMT CO_2.

Table 3-52: Recalculations of CH_4 in Petroleum Systems (MMT CO_2 Eq.)

Segment/Source	*Previous Estimate Year 2020, 2022 Inventory*	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	***0.3***	**0.3**	**0.2**
Production	***38.9***	**53.0**	**48.9**
Tanks	*0.7*	0.8	0.6
Pneumatic Controllers	*21.3*	31.7	28.4
Equipment Leaks	*2.4*	3.2	3.3
Chemical Injection Pumps	*1.9*	3.3	3.2
Miscellaneous Production Flaring	*0.4*	0.6	0.5
Offshore Production	*4.8*	5.3	5.5
Transportation	***0.2***	**0.2**	**0.2**
Refining	***0.8***	**0.9**	**0.8**
Petroleum Systems Total	***40.2***	**54.5**	**50.2**

Exploration

Recalculations for the exploration segment have resulted in lower calculated CH_4 and CO_2 emissions over the time series (less than 0.1 percent), compared to the previous Inventory.

Production

Pneumatic Controllers (Methodological Update)

EPA updated the calculation methodology for pneumatic controllers to use basin-specific activity factors and emission factors calculated from subpart W data for each type of controller (i.e., high, intermittent, and low bleed). Previously, national average activity and emission factors calculated using subpart W data were applied to estimate pneumatic controller emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH_4 emission factors for all basins that reported subpart W data. The factors were year-specific for RY2011 through RY2021. EPA retained the previous Inventory's activity factor assumptions for 1990 through 1993 and applied linear interpolation between the 1993 and 2011 activity factors at the basin-level. Year 2011 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors.

The estimation methodology for CO_2 emissions was not updated to use the basin-specific approach for this version of the Inventory. CO_2 emissions were estimated by applying a CO_2 to CH_4 ratio to the estimated CH_4 emissions.

As a result of this methodological update, CH_4 emissions estimates are an average of 22 percent higher across the time-series and 32 percent higher in 2020, compared to the previous Inventory. The most significant changes are in recent years, 2013 through 2020, due specifically to changes in intermittent bleed controller emissions estimates. Certain basins (e.g., Anadarko Basin, Appalachian, Appalachian Basin (Eastern Overthrust), Bend Arch, Fort Worth Syncline, Gulf Coast, and Sedgwick) have higher activity factors (mainly the average number of controllers per well) and/or emission factors for intermittent bleed pneumatic controllers, compared to the national average. Some of these basins also exhibit large changes in emissions over these recent years.

Table 3-53: Pneumatic Controllers National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
High Bleed Controllers	708,800	493,011	89,472	73,438	73,278	87,884	48,202
Low Bleed Controllers	51,170	63,773	20,104	31,779	50,456	36,752	46,360
Intermittent Bleed Controllers	0	276,145	1,252,028	1,155,041	762,647	1,006,263	920,518
Total Emissions	**759,970**	**832,929**	**1,361,605**	**1,260,259**	**886,382**	**1,130,899**	**1,015,080**
Previous Estimate	*736,447*	*708,680*	*835,129*	*727,365*	*732,092*	*853,562*	*NA*

NA (Not Applicable)

Equipment Leaks (Methodological Update)

EPA updated the calculation methodology for onshore production equipment leaks to use basin-specific equipment-level activity factors (e.g., separators/well) from GHGRP data. Previously, national average equipment activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific equipment-level activity factors for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA retained the previous Inventory's activity factors for 1990 through 1993 and used linear interpolation between the 1993 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors using all subpart W data. This methodological update applies only for activity factors. The previous Inventory's CH_4 emission factors for onshore production segment equipment leaks (by equipment type) were retained and used to develop CH_4 estimates.

This update resulted in CH_4 emissions an average of 18 percent higher across the time-series compared with the previous Inventory and a 21 percent higher estimate for 2020, compared to the previous Inventory. The emissions increase is due to certain basins having higher activity factors compared to the national average activity factors (e.g., Anadarko, Appalachian, Appalachian Basin (Eastern Overthrust), and Gulf Coast).

Table 3-54: Production Equipment Leaks National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Oil Wellheads	56,524	51,563	60,557	59,195	60,877	58,632	60,029
Separators	10,970	17,514	30,021	42,001	38,510	29,356	27,107
Heater/Treaters	11,119	20,741	16,245	17,492	22,706	18,734	21,307
Headers	3,323	12,434	12,754	13,217	15,595	8,075	8,444
Total Emissions	**81,936**	**102,251**	**119,577**	**131,904**	**137,688**	**114,797**	**116,887**
Previous Estimate	*81,874*	*86,248*	*100,450*	*99,287*	*98,459*	*94,921*	*NA*

NA (Not Applicable)

Chemical injection Pumps (Methodological Update)

EPA updated the calculation methodology for chemical injection pumps to use basin-specific activity factors from GHGRP data. Previously, a national average activity factor developed using RY2014 GHGRP data was used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factor for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factor for 1990 through 1993 and used linear interpolation between the 1993 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied the national average unweighted activity factor from all subpart W data. This methodological update applies only to activity factors. The previous Inventory's CH_4 emission factor for chemical injection pumps was retained and used to develop CH_4 estimates.

This update resulted in calculated CH_4 emissions an average of 63 percent higher across the time-series compared with the previous Inventory and 52 percent higher in 2020, compared to the previous Inventory. The emissions increase is due to certain basins having a higher activity factor compared to the national average activity factor (e.g., Anadarko Basin, Appalachian, Appalachian Basin (Eastern Overthrust), Bend Arch, Fort Worth Syncline, Green River, and Gulf Coast).

Table 3-55: Chemical Injection Pumps National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Chemical Injection Pumps	**47,401**	**105,458**	**121,469**	**138,866**	**387,416**	**116,080**	**115,678**
Previous Estimate	*46,758*	*67,685*	*80,728*	*79,793*	*79,128*	*76,284*	*NA*

NA (Not Applicable)

Storage Tanks (Methodological Update)

EPA updated the calculation methodology for production segment storage tanks to use basin-specific activity factors and emission factors, calculated from Subpart W data for each storage tank category. Previously, national annual average activity and emission factors calculated using subpart W data were applied to estimate storage tank emissions. In this update, EPA developed national emission estimates by summing calculated basin-level total emission estimates, using basin-level data emission and activity factors developed from Subpart W. The *Production Disaggregation* memo presents additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH_4 and CO_2 emission factors for all basins that reported subpart W data. The factors were year-specific for reporting year (RY) 2015 through RY2021. EPA also retained the previous

Inventory's activity factor assumptions (i.e., all oil tanks were uncontrolled in 1990) and used linear interpolation between the 1990 and 2015 activity factors at the basin-level. Year 2015 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors (unweighted average of all Subpart W reported data).

This update resulted in oil tank CH_4 emission estimates that are on average 16 percent lower across the time series than in the previous Inventory. The CH_4 estimates for 2020 are 2 percent lower than in the previous Inventory. Oil tank CO_2 emissions are on average 55 percent lower across the time series than in the previous Inventory and 2020 emissions estimates are 20 percent lower than in the previous Inventory. The CH_4 emissions estimate decrease occurs mainly from 1990 through 2005, where there is an average decrease in calculated emissions of 39 percent, compared to the previous inventory. Oil tank CO_2 emissions have a similarly large decrease in that time frame.

The Arctic Coastal Plains Province Basin has a large impact on these earlier time series year emissions, when this basin accounts for a large percentage of total liquids production, but very little of the production in that basin is stored in tanks. Oil tank CO_2 emissions decreased in recent years of the time series due to certain basins with higher production (e.g., Denver Basin, Gulf Coast, Permian) having lower activity factors and emission factors than the national average.

Table 3-56: Storage Tanks National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	0	993	5,142	6,330	4,226	3,715	3,108
Large Tanks w/VRU	0	721	9,334	2,410	2,320	1,026	513
Large Tanks w/o Control	105,668	40,150	42,112	42,679	26,491	21,294	12,290
Small Tanks w/Flares	0	15	45	16	23	29	68
Small Tanks w/o Flares	7,438	3,448	2,991	3,326	2,755	2,709	3,598
Malfunctioning Separator Dump Valves	2,397	1,472	4,247	785	428	338	320
Total Emissions	**115,503**	**46,799**	**63,871**	**55,546**	**36,243**	**29,112**	**19,896**
Previous Estimate	*218,419*	*60,186*	*61,098*	*57,412*	*35,266*	*29,613*	*NA*

NA (Not Applicable)

Table 3-57: Storage Tanks National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	0	716	3,771	5,348	5,974	5,212	5,381
Large Tanks w/VRU	0	3	4	4	6	2	1
Large Tanks w/o Control	24	8	5	4	5	6	5
Small Tanks w/Flares	0	3	11	7	9	10	9
Small Tanks w/o Flares	12	5	4	5	4	4	5
Malfunctioning Separator Dump Valves	12	13	32	30	26	20	37
Total Emissions	**47**	**748**	**3,828**	**5,398**	**6,024**	**5,255**	**5,439**
Previous Estimate	*115*	*2,505*	*4,313*	*6,189*	*6,682*	*6,537*	*NA*

NA (Not Applicable)

Associated Gas Flaring (Recalculation with Updated Data)

Associated gas flaring CO_2 emission estimates are on average of 0.1 percent higher across the time series compared with the previous Inventory and in 2020 are 2 percent higher than in the previous Inventory. The emission changes were due to GHGRP data submission revisions.

Table 3-58: Associated Gas Flaring National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	225	124	749	645	712	801	410
360 - Anadarko Basin	102	63	62	79	18	10	8
395 - Williston Basin	969	1,243	6,954	10,698	15,334	8,257	6,772
430 - Permian Basin	2,844	1,971	3,141	6,700	7,333	3,605	1,942
"Other" Basins	944	507	384	633	1,006	619	486
Total Emissions	**5,084**	**3,908**	**11,291**	**18,756**	**24,403**	**13,293**	**9,619**
220 - Gulf Coast Basin (LA, TX)	*225*	*124*	*749*	*651*	*713*	*798*	*NA*
360 - Anadarko Basin	*102*	*63*	*62*	*79*	*18*	*10*	*NA*
395 - Williston Basin	*969*	*1,243*	*6,909*	*11,140*	*14,762*	*8,052*	*NA*
430 - Permian Basin	*2,844*	*1,971*	*3,141*	*6,711*	*7,227*	*3,558*	*NA*
"Other" Basins	*944*	*507*	*384*	*624*	*990*	*624*	*NA*
Previous Estimate	*5,084*	*3,908*	*11,245*	*19,206*	*23,710*	*13,041*	*NA*

NA (Not Applicable)

Miscellaneous Production Flaring

Miscellaneous production flaring CO_2 emission estimates are on average 0.3 percent higher across the time series than in the previous Inventory and in 2020 are 2 percent higher than in the previous Inventory. The emission estimate changes were due to GHGRP data submission revisions.

Table 3-59: Miscellaneous Production Flaring National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	0	105	509	584	616	651	787
395 - Williston Basin	0	72	537	1,701	2,643	852	882
430 - Permian Basin	0	209	1,465	1,406	4,320	2,798	2,216
"Other" Basins	0	400	551	615	646	378	270
Total Emissions	**0**	**786**	**3,063**	**4,307**	**8,225**	**4,679**	**4,154**
Previous Estimate	*0*	*786*	*3,031*	*4,166*	*7,989*	*4,589*	*NA*

NA (Not Applicable)

Miscellaneous production flaring CH_4 emission estimates are on average 2 percent higher across the time series compared with the previous inventory and in 2020 are 31 percent higher than calculated in the previous Inventory. The emission changes were due to GHGRP data submission revisions.

Table 3-60: Miscellaneous Production Flaring National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
220 - Gulf Coast Basin (LA, TX)	0	440	2,119	1,978	2,506	2,452	2,989
395 - Williston Basin	0	179	1,618	3,031	3,503	1,670	1,396
430 - Permian Basin	0	1,097	5,389	5,296	21,296	16,712	11,305
"Other" Basins	0	1,291	1,904	1,819	1,731	1,249	961
Total Emissions	**0**	**3,008**	**11,030**	**12,124**	**29,037**	**22,082**	**16,650**
Previous Estimate	*0*	*3,008*	*10,928*	*11,669*	*22,994*	*16,807*	*NA*

NA (Not Applicable)

Offshore Production (Recalculation with Updated Data)

Offshore production CH_4 emission estimates are on average less than 0.05 percent lower across the time series than in the previous Inventory. The 2020 value is 3 percent lower than in the previous Inventory. The emission changes were due to updated offshore complex counts.

Table 3-61: Offshore Production National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
GOM Federal Waters	302,936	219,285	187,433	183,236	181,488	173,336	179,891
GOM State Waters	5,657	665	96	60	71	60	59
Pacific Waters	22,609	17,659	5,052	3,794	3,370	4,262	4,554
Alaska State Waters	21,936	21,191	12,163	9,834	10,711	10,366	10,664
Total Emissions	**353,138**	**258,801**	**204,745**	**196,924**	**195,640**	**188,024**	**195,168**
Previous Estimate	*353,138*	*258,801*	*203,917*	*196,349*	*195,626*	*192,943*	*NA*

NA (Not Applicable)

Transportation

Recalculations for the transportation segment have resulted in calculated CH_4 and CO_2 emissions over the time series from this segment that are lower (by less than 0.2 percent) than in the previous Inventory.

Refining

Recalculations due to resubmitted GHGRP data in the refining segment have resulted in average calculated CH_4 emissions over the time series 3 percent lower than in the previous Inventory, and 2020 CH_4 emissions 0.9 lower than in the previous Inventory.

Refining CO_2 emission estimates are on average 0.3 percent lower across the time series than in the previous Inventory and 2 percent lower in 2020 than in the previous Inventory. This change is due to GHGRP resubmissions and was largely due to a change in reported flaring CO_2 emissions.

Table 3-62: Refining National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Flares	3,134	3,557	3,509	3,643	4,961	4,208	4,183
Total Refining	**3,284**	**3,728**	**3,582**	**3,706**	**5,009**	**4,242**	**4,216**
Previous Estimate	*3,284*	*3,728*	*3,725*	*3,820*	*5,080*	*4,326*	*NA*

NA (Not Applicable)

Planned Improvements

Planned Improvements for 2024 Inventory

The calculations for Petroleum Systems exploration and production segment emissions do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: oil well counts, wells drilled, wells completed, and production. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Basin-level approaches for pneumatic controllers, equipment leaks, and chemical injection pumps were applied to calculate CH_4 emissions. Feedback EPA received on this update include support for continued use of GHGRP data, and that EPA should consider application of the approach to only basins with 50 percent coverage or more.

For the next Inventory, EPA plans to apply consistent methods for both CO_2 and CH_4 emissions calculations. EPA will also consider including additional emission sources in geographically disaggregated calculations. Additional information on the update and specific requests for stakeholder feedback can be found in the *Disaggregation* memo and *Production Disaggregation* memos.

Upcoming Data, and Additional Data that Could Inform the Inventory

EPA will assess new data received by the Greenhouse Gas Reporting Program, the Methane Challenge Program and other relevant programs on an ongoing basis, which may be used to confirm or improve existing estimates and assumptions.

EPA continues to track studies that contain data that may be used to update the Inventory. EPA will also continue to assess studies that include and compare both top-down and bottom-up estimates, and which could lead to improved understanding of unassigned high emitters (e.g., identification of emission sources and information on frequency of high emitters) as recommended in previous stakeholder comments.

Box 3-6: Carbon Dioxide Transport, Injection, and Geological Storage

Carbon dioxide is produced, captured, transported, and used for Enhanced Oil Recovery (EOR) as well as commercial and non-EOR industrial applications, or is stored geologically. This CO_2 is produced from both naturally-occurring CO_2 reservoirs and from industrial sources such as natural gas processing plants and ammonia plants. In the Inventory, emissions of CO_2 from naturally-occurring CO_2 reservoirs are estimated based on the specific application.

In the Inventory, CO_2 that is used in non-EOR industrial and commercial applications (e.g., food processing, chemical production) is assumed to be emitted to the atmosphere during its industrial use. These emissions are discussed in the Carbon Dioxide Consumption section, 4.15.

For EOR CO_2, as noted in the *2006 IPCC Guidelines*, "At the Tier 1 or 2 methodology levels [EOR CO_2 is] indistinguishable from fugitive greenhouse gas emissions by the associated oil and gas activities." In the U.S. estimates for oil and gas fugitive emissions, the Tier 2 emission factors for CO_2 include CO_2 that was originally injected and is emitted along with other gas from leak, venting, and flaring pathways, as measurement data used to develop those factors would not be able to distinguish between CO_2 from EOR and CO_2 occurring in the produced natural gas. Therefore, EOR CO_2 emitted through those pathways is included in CO_2 estimates in 1B2.

IPCC includes methodological guidance to estimate emissions from the capture, transport, injection, and geological storage of CO_2. The methodology is based on the principle that the carbon capture and storage system should be handled in a complete and consistent manner across the entire Energy sector. The approach accounts for CO_2 captured at natural and industrial sites as well as emissions from capture, transport, and use. For storage specifically, a Tier 3 methodology is outlined for estimating and reporting emissions based on site-specific evaluations. However, IPCC (IPCC 2006) notes that if a national regulatory process exists, emissions information available through that process may support development of CO_2 emission estimates for geologic storage.

In the United States, facilities that produce CO_2 for various end-use applications (including capture facilities such as acid gas removal plants and ammonia plants), importers of CO_2, exporters of CO_2, facilities that conduct geologic sequestration of CO_2, and facilities that inject CO_2 underground, are required to report greenhouse gas data annually to EPA through its GHGRP. Facilities reporting geologic sequestration of CO_2 to the GHGRP develop and implement an EPA-approved site-specific monitoring, reporting and verification plan, and report the amount of CO_2 sequestered using a mass balance approach.

GHGRP data relevant for this Inventory estimate consists of national-level annual quantities of CO_2 captured and extracted for EOR applications for 2010 to 2021 and data reported for geologic sequestration from 2016 to 2021.

The amount of CO_2 captured and extracted from natural and industrial sites for EOR applications in 2021 is

35,090 kt (35.1 MMT CO_2 Eq.) (see 6). The quantity of CO_2 captured and extracted is noted here for information purposes only; CO_2 captured and extracted from industrial and commercial processes is generally assumed to be emitted and included in emissions totals from those processes.

Table 3-63: Quantity of CO_2 Captured and Extracted for EOR Operations (kt CO_2)

Stage	2017	2018	2019	2020	2021
Quantity of CO_2 Captured and Extracted for EOR Operations	49,600	48,400	52,100	35,210	35,090

Several facilities are reporting under GHGRP Subpart RR (Geologic Sequestration of Carbon Dioxide). See Table 3-64 for the number of facilities reporting under Subpart RR, the reported CO_2 sequestered in subsurface geologic formations in each year, and of the quantity of CO_2 emitted from equipment leaks in each year. The quantity of CO_2 sequestered and emitted is noted here for information purposes only; EPA is considering updates to its approach in the Inventory for this source for future Inventories.

Table 3-64: Geologic Sequestration Information Reported Under GHGRP Subpart RR

Stage	2017	2018	2019	2020	2021
Number of Reporting Facilities	3	5	5	6	9
Reported Annual CO_2 Sequestered (kt)	5,958	7,662	8,332	6,802	6,947
Reported Annual CO_2 Emissions from Equipment Leaks (kt)	10	11	16	13	37

3.7 Natural Gas Systems (CRF Source Category 1B2b)

The U.S. natural gas system encompasses hundreds of thousands of wells, hundreds of processing facilities, and over a million miles of transmission and distribution pipelines. This IPCC category (1B2b) is for fugitive emissions from natural gas systems, which per IPCC guidelines include emissions from leaks, venting, and flaring. Total greenhouse gas emissions (CH_4, CO_2, and N_2O) from natural gas systems in 2021 were 217.5 MMT CO_2 Eq., a decrease of 12 percent from 1990 and a decrease of 2 percent from 2020, both primarily due to decreases in CH_4 emissions. From 2010, emissions decreased by 3 percent, primarily due to decreases in CH_4 emissions. National total dry gas production in the United States increased by 94 percent from 1990 to 2021, increased by 3 percent from 2020 to 2021, and increased by 62 percent from 2010 to 2021. Of the overall greenhouse gas emissions (217.5 MMT CO_2 Eq.), 83 percent are CH_4 emissions (181.4 MMT CO_2 Eq.), 17 percent are CO_2 emissions (36.2 MMT), and less than 0.01 percent are N_2O emissions (0.01 MMT CO_2 Eq.).

Overall, natural gas systems emitted 181.4 MMT CO_2 Eq. (6,478 kt CH_4) of CH_4 in 2021, a 16 percent decrease compared to 1990 emissions, and 2 percent decrease compared to 2020 emissions (see Table 3-66 and Table 3-67). For non-combustion CO_2, a total of 36.2 MMT CO_2 Eq. (36,161 kt) was emitted in 2021, a 12 percent increase compared to 1990 emissions, and a 1 percent increase compared to 2020 levels. The 2021 N_2O emissions were

estimated to be 0.01 MMT CO_2 Eq. (0.03 kt N_2O), a 73 percent increase compared to 1990 emissions, and a 12 percent decrease compared to 2020 levels.

The 1990 to 2021 emissions trend is not consistent across segments or gases. Overall, the 1990 to 2021 decrease in CH_4 emissions is due primarily to the decrease in emissions from the following segments: distribution (70 percent decrease), transmission and storage (30 percent decrease), processing (40 percent decrease), and exploration (94 percent decrease). Over the same time period, the production segment saw increased CH_4 emissions of 45 percent (with onshore production emissions increasing 27 percent, offshore production emissions decreasing 86 percent, and gathering and boosting [G&B] emissions increasing 110 percent), and post-meter emissions increasing by 60 percent. The 1990 to 2021 increase in CO_2 emissions is primarily due to an increase in CO_2 emissions in the production segment, where emissions from flaring have increased over time.

Methane and CO_2 emissions from natural gas systems include those resulting from normal operations, routine maintenance, and system upsets. Emissions from normal operations include natural gas engine and turbine uncombusted exhaust, flaring, and leak emissions from system components. Routine maintenance emissions originate from pipelines, equipment, and wells during repair and maintenance activities. Pressure surge relief systems and accidents can lead to system upset emissions. Emissions of N_2O from flaring activities are included in the Inventory, with most of the emissions occurring in the processing and production segments. Note, CO_2 emissions exclude all combustion emissions (e.g., engine combustion) except for flaring CO_2 emissions. All combustion CO_2 emissions (except for flaring) are accounted for in Section 3.1 CO_2 from Fossil Fuel Combustion.

Each year, some estimates in the Inventory are recalculated with improved methods and/or data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is representative of changes in emissions. Recalculations in natural gas systems in this year's Inventory include:

- Methodological updates to five onshore production segment sources - pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading
- Recalculations due to Greenhouse Gas Reporting Program (GHGRP) submission revisions
- Recalculations due to updating the global warming potential (GWP) for CH_4 and N_2O to use AR5 values.

The Recalculations Discussion section below provides more details on the updated methods.

Below is a characterization of the six emission subcategories of natural gas systems: exploration, production (including gathering and boosting), processing, transmission and storage, distribution, and post-meter. Each of the segments is described and the different factors affecting CH_4, CO_2, and N_2O emissions are discussed.

Exploration. Exploration includes well drilling, testing, and completion. Emissions from exploration accounted for less than 0.2 percent of CH_4 emissions and of CO_2 emissions from natural gas systems in 2021. Well completions accounted for approximately 88 percent of CH_4 emissions from the exploration segment in 2021, with the rest resulting from well testing and drilling. Well completion flaring emissions account for most of the CO_2 emissions. Methane emissions from exploration decreased by 94 percent from 1990 to 2021, with the largest decreases coming from hydraulically fractured gas well completions without reduced emissions completions (RECs). Methane emissions decreased 17 percent from 2020 to 2021 due to decreases in emissions from non-hydraulically fractured well completions with venting. Methane emissions were highest from 2005 to 2008. Carbon dioxide emissions from exploration decreased by 94 percent from 1990 to 2021 primarily due to decreases in hydraulically fractured gas well completions. Carbon dioxide emissions from exploration decreased by 83 percent from 2020 to 2021 due to decreases in emissions from hydraulically fractured gas well completions with flaring. Carbon dioxide emissions were highest from 2006 to 2008. Nitrous oxide emissions decreased 98 percent from 1990 to 2021 and decreased 86 percent from 2020 to 2021.

Production (including gathering and boosting). In the production segment, wells are used to withdraw raw gas from underground formations. Emissions arise from the wells themselves, and from well-site equipment and activities such as pneumatic controllers, tanks and separators, and liquids unloading. Gathering and boosting emission sources are included within the production sector. The gathering and boosting sources include gathering and boosting stations (with multiple emission sources on site) and gathering pipelines. The gathering and boosting

stations receive natural gas from production sites and transfer it, via gathering pipelines, to transmission pipelines or processing facilities (custody transfer points are typically used to segregate sources between each segment). Boosting processes include compression, dehydration, and transport of gas to a processing facility or pipeline. Emissions from production (including gathering and boosting) accounted for 52 percent of CH_4 emissions and 25 percent of CO_2 emissions from natural gas systems in 2021. Emissions from gathering and boosting and pneumatic controllers in onshore production accounted for most of the production segment CH_4 emissions in 2021. Within gathering and boosting, the largest sources of CH_4 are compressor exhaust slip, compressor venting and leaks, and tanks. Flaring emissions account for most of the CO_2 emissions from production, with the highest emissions coming from flare stacks at gathering stations, miscellaneous onshore production flaring, and tank flaring. Methane emissions from production increased by 45 percent from 1990 to 2021, due primarily to increases in emissions from pneumatic controllers (due to an increase in the number of controllers, particularly in the number of intermittent bleed controllers) and increases in emissions from compressor exhaust slip in gathering and boosting. Methane emissions decreased 3 percent from 2020 to 2021 due to decreases in emissions from pneumatic controllers and liquids unloading. Carbon dioxide emissions from production increased by approximately a factor of 2.7 from 1990 to 2021 due to increases in emissions at flare stacks in gathering and boosting and miscellaneous onshore production flaring and increased 3 percent from 2020 to 2021 due primarily to increases in emissions from tanks and acid gas removal units at gathering and boosting stations. Nitrous oxide emissions decreased by 24 percent from 1990 to 2021 and decreased 12 percent from 2020 to 2021. The decrease in N_2O emissions from 1990 to 2021 and from 2020 to 2021 is primarily due to decreases in emissions from flaring at gathering and boosting stations.

Processing. In the processing segment, natural gas liquids and various other constituents from the raw gas are removed, resulting in "pipeline quality" gas, which is injected into the transmission system. Methane emissions from compressors, including compressor seals, are the primary emission source from this stage. Most of the CO_2 emissions come from acid gas removal (AGR) units, which are designed to remove CO_2 from natural gas. Processing plants accounted for 8 percent of CH_4 emissions and 72 percent of CO_2 emissions from natural gas systems. Methane emissions from processing decreased by 40 percent from 1990 to 2021 as emissions from compressors (leaks and venting) and equipment leaks decreased; and increased 3 percent from 2020 to 2021 due to increased emissions from gas engines. Carbon dioxide emissions from processing decreased by 8 percent from 1990 to 2021, due to a decrease in AGR emissions, and increased 3 percent from 2020 to 2021 due to increased emissions from AGR. Nitrous oxide emissions decreased 1 percent from 2020 to 2021.

Transmission and Storage. Natural gas transmission involves high pressure, large diameter pipelines that transport gas long distances from field production and processing areas to distribution systems or large volume customers such as power plants or chemical plants. Compressor station facilities are used to move the gas throughout the U.S. transmission system. Leak CH_4 emissions from these compressor stations and venting from pneumatic controllers account for most of the emissions from this stage. Uncombusted compressor engine exhaust and pipeline venting are also sources of CH_4 emissions from transmission. Natural gas is also injected and stored in underground formations, or liquefied and stored in above ground tanks, during periods of low demand (e.g., summer), and withdrawn, processed, and distributed during periods of high demand (e.g., winter). Leak and venting emissions from compressors are the primary contributors to CH_4 emissions from storage. Emissions from liquefied natural gas (LNG) stations and terminals are also calculated under the transmission and storage segment. Methane emissions from the transmission and storage segment accounted for approximately 25 percent of emissions from natural gas systems, while CO_2 emissions from transmission and storage accounted for 2 percent of the CO_2 emissions from natural gas systems. CH_4 emissions from this source decreased by 30 percent from 1990 to 2021 due to reduced pneumatic device and compressor station emissions (including emissions from compressors and leaks) and decreased 2 percent from 2020 to 2021 due to decreased emissions from pipeline venting transmission compressors. CO_2 emissions from transmission and storage were 4.9 times higher in 2021 than in 1990, due to increased emissions from LNG export terminals, and decreased by 57 percent from 2020 to 2021, also due to LNG export terminals and flaring (both transmission and storage). The quantity of LNG exported from the United States increased by a factor of 68 from 1990 to 2021, and by 49 percent from 2020 to 2021. LNG emissions are about 1 percent of CH_4 and 81 percent of CO_2 emissions from transmission and storage in year 2021. Nitrous oxide emissions from transmission and storage increased by 85 percent from 1990 to 2021 and decreased 56 percent from 2020 to 2021.

Distribution. Distribution pipelines take the high-pressure gas from the transmission system at "city gate" stations, reduce the pressure and distribute the gas through primarily underground mains and service lines to individual end users. There were 1,337,012 miles of distribution mains in 2021, an increase of 392,855 miles since 1990 (PHMSA 2021). Distribution system emissions, which accounted for 8 percent of CH_4 emissions from natural gas systems and less than 1 percent of CO_2 emissions, result mainly from leak emissions from pipelines and stations. An increased use of plastic piping, which has lower emissions than other pipe materials, has reduced both CH_4 and CO_2 emissions from this stage, as have station upgrades at metering and regulating (M&R) stations. Distribution system CH_4 emissions in 2021 were 70 percent lower than 1990 levels and 1 percent lower than 2020 emissions. Distribution system CO_2 emissions in 2021 were 70 percent lower than 1990 levels and 1 percent lower than 2020 emissions. Annual CO_2 emissions from this segment are less than 0.1 MMT CO_2 Eq. across the time series.

Post-Meter. Post-meter includes leak emissions from residential and commercial appliances, industrial facilities and power plants, and natural gas fueled vehicles. Leak emissions from residential appliances and industrial facilities and power plants account for the majority of post-meter CH_4 emissions. Methane emissions from the post-meter segment accounted for approximately 7 percent of emissions from natural gas systems in 2021. Post-meter CH_4 emissions increased by 60 percent from 1990 to 2021 and increased by less than 1 percent from 2020 to 2021, due to increases in the number of residential houses using natural gas and increased natural gas consumption at industrial facilities and power plants. CO_2 emissions from post-meter account for less than 0.01 percent of total CO_2 emissions from natural gas systems.

Total greenhouse gas emissions from the six subcategories within natural gas systems are shown in MMT CO_2 Eq. in Table 3-65. Total CH_4 emissions for these same segments of natural gas systems are shown in MMT CO_2 Eq. (Table 3-66) and kt (Table 3-67). Most emission estimates are calculated using a net emission approach. However, a few sources are still calculated with a potential emission approach. Reductions data are applied to those sources. In 2021, 2.6 MMT CO_2 Eq. CH_4 is subtracted from production segment emissions, 4.3 MMT CO_2 Eq. CH_4 is subtracted from the transmission and storage segment, and 0.1 MMT CO_2 Eq. CH_4 is subtracted from the distribution segment to calculate net emissions. More disaggregated information on potential emissions, net emissions, and reductions data is available in Annex 3.6, Methodology for Estimating CH_4 and CO_2 Emissions from Natural Gas Systems.

Table 3-65: Total Greenhouse Gas Emissions (CH_4, CO_2, and N_2O) from Natural Gas Systems (MMT CO_2 Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	3.6	11.5	1.8	3.0	2.3	0.3	0.2
Production	68.1	102.4	111.5	116.2	115.5	106.2	103.2
Processing	52.2	31.8	35.8	36.3	40.4	39.3	40.4
Transmission and Storage	64.2	44.4	41.4	43.6	45.6	47.5	45.4
Distribution	51.0	28.5	15.7	15.6	15.5	15.5	15.3
Post-Meter	8.1	9.6	11.9	12.5	12.8	13.0	13.0
Total	**247.3**	**228.3**	**218.1**	**227.1**	**232.2**	**221.8**	**217.5**

Note: Totals may not sum due to independent rounding.

Table 3-66: CH_4 Emissions from Natural Gas Systems (MMT CO_2 Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	3.3	10.0	1.4	2.6	2.1	0.2	0.2
Production	64.7	97.9	103.5	107.0	104.7	97.3	94.1
Onshore Production	39.3	69.0	59.9	62.9	59.4	53.8	50.0
Gathering and Boosting	20.7	26.8	42.9	43.3	44.6	42.6	43.4
Offshore Production	4.8	2.0	0.7	0.8	0.7	0.9	0.7
Processing	23.9	13.0	12.9	13.5	14.2	13.9	14.3
Transmission and Storage	64.1	44.2	40.9	43.1	44.3	45.5	44.5

Distribution	50.9	28.5	15.7	15.6	15.5	15.5	15.3
Post-Meter	8.1	9.6	11.9	12.5	12.8	13.0	13.0
Total	**215.1**	**203.3**	**186.2**	**194.3**	**193.6**	**185.3**	**181.4**

Note: Totals may not sum due to independent rounding.

Table 3-67: CH_4 Emissions from Natural Gas Systems (kt)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	119	358	49	94	75	9	7
Production	2,311	3,495	3,697	3,823	3,739	3,475	3,360
Onshore Production	1,403	2,464	2,139	2,246	2,122	1,923	1,787
Gathering and Boosting	739	958	1,533	1,547	1,591	1,520	1,548
Offshore Production	170	73	26	30	25	32	24
Processing	853	463	460	483	506	495	510
Transmission and Storage	2,288	1,580	1,460	1,538	1,583	1,625	1,590
Distribution	1,819	1,018	561	557	554	553	548
Post-Meter	290	344	424	445	457	463	463
Total	**7,680**	**7,260**	**6,652**	**6,939**	**6,914**	**6,619**	**6,478**

Note: Totals may not sum due to independent rounding.

Table 3-68: CO_2 Emissions from Natural Gas Systems (MMT)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	0.3	1.4	0.4	0.3	0.2	0.1	+
Production	3.3	4.6	8.0	9.1	10.9	8.9	9.1
Processing	28.3	18.8	22.9	22.8	26.2	25.4	26.1
Transmission and Storage	0.2	0.2	0.5	0.5	1.2	2.1	0.9
Distribution	0.1	+	+	+	+	+	+
Post-Meter	+	+	+	+	+	+	+
Total	**32.2**	**25.0**	**31.9**	**32.8**	**38.6**	**36.5**	**36.2**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 3-69: CO_2 Emissions from Natural Gas Systems (kt)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	297	1,434	444	336	220	96	17
Production	3,337	4,556	7,967	9,147	10,857	8,878	9,141
Processing	28,338	18,836	22,935	22,766	26,225	25,419	26,096
Transmission and Storage	180	176	499	547	1,242	2,051	890
Distribution	54	30	17	17	16	16	16
Post-Meter	1	1	2	2	2	2	2
Total	**32,207**	**25,033**	**31,864**	**32,815**	**38,563**	**36,463**	**36,161**

NE (Not Estimated)

Note: Totals may not sum due to independent rounding.

Table 3-70: N_2O Emissions from Natural Gas Systems (Metric Tons CO_2 Eq.)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	355	1,090	217	156	103	45	6
Production	3,840	5,153	3,730	4,061	4,774	3,310	2,779
Processing	NO	2,977	2,643	2,998	5,081	4,349	4,300
Transmission and Storage	228	274	411	208	560	953	422
Distribution	NO	NO	NO	NO	NO	NO	NO
Post-Meter	NO	NO	NO	NO	NO	NO	NO
Total	**4,424**	**9,495**	**7,001**	**7,424**	**10,518**	**8,658**	**7,649**

NO (Not Occurring)

Note: Totals may not sum due to independent rounding.

Table 3-71: N_2O Emissions from Natural Gas Systems (Metric Tons N_2O)

Segment	1990	2005	2017	2018	2019	2020	2021
Exploration	1.3	4.1	0.8	0.6	0.4	0.2	0.0
Production	14.5	19.4	14.1	15.3	18.0	12.5	10.5
Processing	NO	11.2	10.0	11.3	19.2	16.4	16.2
Transmission and Storage	0.9	1.0	1.6	0.8	2.1	3.6	1.6
Distribution	NO	NO	NO	NO	NO	NO	NO
Post-Meter	NO	NO	NO	NO	NO	NO	NO
Total	**16.7**	**35.8**	**26.4**	**28.0**	**39.7**	**32.7**	**28.9**

NO (Not Occurring)
Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

See Annex 3.6 for the full time series of emissions data, activity data, and emission factors, and additional information on methods and data sources—for example, the specific years of reporting data from EPA's GHGRP that are used to develop certain factors.

This section provides a general overview of the methodology for natural gas system emission estimates in the Inventory, which involves the calculation of CH_4, CO_2, and N_2O emissions for over 100 emissions sources (i.e., equipment types or processes), and then the summation of emissions for each natural gas segment.

The approach for calculating emissions for natural gas systems generally involves the application of emission factors to activity data. For most sources, the approach uses technology-specific emission factors or emission factors that vary over time and take into account changes to technologies and practices, which are used to calculate net emissions directly. For others, the approach uses what are considered "potential methane factors" and emission reduction data to calculate net emissions. The estimates are developed with an IPCC Tier 2 approach. Tier 1 approaches are not used.

Emission Factors. Key references for emission factors for CH_4 and CO_2 emissions from the U.S. natural gas industry include a 1996 study published by the Gas Research Institute (GRI) and EPA (GRI/EPA 1996), EPA's GHGRP (EPA 2022), and others.

The 1996 GRI/EPA study developed over 80 CH_4 emission factors to characterize emissions from the various components within the operating segments of the U.S. natural gas system. The GRI/EPA study was based on a combination of process engineering studies, collection of activity data, and measurements at representative natural gas facilities conducted in the early 1990s. Year-specific natural gas CH_4 compositions are calculated using U.S. Department of Energy's Energy Information Administration (EIA) annual gross production data for National Energy Modeling System (NEMS) oil and gas supply module regions in conjunction with data from the Gas Technology Institute (GTI, formerly GRI) Unconventional Natural Gas and Gas Composition Databases (GTI 2001). These year-specific CH_4 compositions are applied to emission factors, which therefore may vary from year to year due to slight changes in the CH_4 composition of natural gas for each NEMS region.

GHGRP Subpart W data were used to develop CH_4, CO_2, and N_2O emission factors for many sources in the Inventory. In the exploration and production segments, GHGRP data were used to develop emission factors used for all years of the time series for well testing, gas well completions and workovers with and without hydraulic fracturing, pneumatic controllers and chemical injection pumps, condensate tanks, liquids unloading, miscellaneous flaring, gathering and boosting pipelines, and certain sources at gathering and boosting stations. In the processing segment, for recent years of the times series, GHGRP data were used to develop emission factors for leaks, compressors, flares, dehydrators, and blowdowns/venting. In the transmission and storage segment, GHGRP data were used to develop factors for all years of the time series for LNG stations and terminals and transmission pipeline blowdowns, and for pneumatic controllers for recent years of the times series.

Other data sources used for CH_4 emission factors include Zimmerle et al. (2015) for transmission and storage station leaks and compressors, GTI (2009 and 2019) for commercial and industrial meters, Lamb et al. (2015) for recent years for distribution pipelines and meter/regulator stations, Zimmerle et al. (2019) for gathering and boosting stations, Bureau of Ocean Energy Management (BOEM) reports, and Fischer et al. (2019) and IPCC (2019) for post-meter emissions.

For CO_2 emissions from sources in the exploration, production and processing segments that use emission factors not directly calculated from GHGRP data, data from the 1996 GRI/EPA study and a 2001 GTI publication were used to adapt the CH_4 emission factors into related CO_2 emission factors. For sources in the transmission and storage segment that use emission factors not directly calculated from GHGRP data, and for sources in the distribution segment, data from the 1996 GRI/EPA study and a 1993 GTI publication were used to adapt the CH_4 emission factors into non-combustion related CO_2 emission factors. CO_2 emissions from post-meter sources (commercial, industrial and vehicles) were estimated using default emission factors from IPCC (2019). Carbon dioxide emissions from post-meter residential sources are included in fossil fuel combustion data.

Flaring N_2O emissions were estimated for flaring sources using GHGRP data.

See Annex 3.6 for more detailed information on the methodology and data used to calculate CH_4, CO_2, and N_2O emissions from natural gas systems.

Activity Data. Activity data were taken from various published data sets, as detailed in Annex 3.6. Key activity data sources include data sets developed and maintained by EPA's GHGRP (EPA 2022); Enverus (Enverus 2021); BOEM; Federal Energy Regulatory Commission (FERC); EIA; the Natural Gas STAR and Methane Challenge Programs annual data; Oil and Gas Journal; and PHMSA. Enverus data for 2021 were not available; this version of the Inventory uses 2020 data as proxy for 2021.

For a few sources, recent direct activity data are not available. For these sources, either 2020 data were used as a proxy for 2021 data, or a set of industry activity data drivers was developed and used to calculate activity data over the time series. Drivers include statistics on gas production, number of wells, system throughput, miles of various kinds of pipe, and other statistics that characterize the changes in the U.S. natural gas system infrastructure and operations. More information on activity data and drivers is available in Annex 3.6.

A complete list of references for emission factors and activity data by emission source is provided in Annex 3.6.

Calculating Net Emissions. For most sources, net emissions are calculated directly by applying emission factors to activity data. Emission factors used in net emission approaches reflect technology-specific information, and take into account regulatory and voluntary reductions. However, for production, transmission and storage, and distribution, some sources are calculated using potential emission factors, and CH_4 that is not emitted is deducted from the total CH_4 potential estimates. To take into account use of such technologies and practices that result in lower emissions but are not reflected in "potential" emission factors, data are collected on both regulatory and voluntary reductions. Regulatory actions addressed using this method include EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations for dehydrator vents. Voluntary reductions included in the Inventory are those reported to Natural Gas STAR and Methane Challenge for certain sources. Natural Gas STAR and Methane Challenge reductions were reassessed for this Inventory, see the Recalculations Discussion for more information.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2020. GHGRP data available (starting in 2011) and other recent data sources have improved estimates of emissions from natural gas systems. To develop a consistent time series, for sources with new data, EPA reviewed available information on factors that may have resulted in changes over the time series (e.g., regulations, voluntary actions) and requested stakeholder feedback on trends as well. For most sources, EPA developed annual data for 1993 through 2010 by interpolating activity data or emission factors or both between 1992 and 2011 data points. Information on time-series consistency for sources updated in this year's Inventory can be found in the Recalculations Discussion below, with additional detail provided in supporting memos (relevant memos are cited in the Recalculations Discussion). For detailed documentation of methodologies, please see Annex 3.5.

Through EPA's stakeholder process on oil and gas in the Inventory, EPA received stakeholder feedback on updates under consideration for the Inventory. Stakeholder feedback is noted below in Recalculations Discussion and Planned Improvements.

The United States reports data to the UNFCCC using this Inventory report along with Common Reporting Format (CRF) tables. This note is provided for those reviewing the CRF tables: The notation key "IE" is used for CO_2 and CH_4 emissions from venting and flaring in CRF table 1.B.2. Disaggregating flaring and venting estimates across the Inventory would involve the application of assumptions and could result in inconsistent reporting and, potentially, decreased transparency. Data availability varies across segments within oil and gas activities systems, and emission factor data available for activities that include flaring can include emissions from multiple sources (flaring, venting and leaks).

Uncertainty

EPA has conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo Simulation technique) to characterize the uncertainty for natural gas systems. For more information on the approach, please see the memoranda *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Natural Gas and Petroleum Systems Uncertainty Estimates* and *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2019: Update for Natural Gas and Petroleum Systems CO_2 Uncertainty Estimates.*[79]

EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around CH_4 and CO_2 emissions from natural gas systems for the current Inventory. For the CH_4 uncertainty analysis, EPA focused on the 17 highest-emitting sources for the year 2021, which together emitted 75 percent of methane from natural gas systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. For the CO_2 uncertainty analysis, EPA focused on the three highest-emitting sources for the year 2021, which together emitted 79 percent of CO_2 from natural gas systems in 2021, and extrapolated the estimated uncertainty for the remaining sources. To estimate uncertainty for N_2O, EPA applied the uncertainty bounds calculated for CO_2. EPA will seek to refine this estimate in future Inventories. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification. The understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve.

The results presented below provide the 95 percent confidence bound within which actual emissions from this source category are likely to fall for the year 2021, using the IPCC methodology. The results of the Approach 2 uncertainty analysis are summarized in Table 3-72. Natural gas systems CH_4 emissions in 2021 were estimated to be between 151.1 and 211.7 MMT CO_2 Eq. at a 95 percent confidence level. Natural gas systems CO_2 emissions in 2021 were estimated to be between 30.7 and 40.7 MMT CO_2 Eq. at a 95 percent confidence level. Natural gas systems N_2O emissions in 2021 were estimated to be between 0.0067 and 0.0088 MMT CO_2 Eq. at a 95 percent confidence level. The basin-specific updates to activity factors and emissions factors discussed elsewhere impacted the uncertainty results when compared to the uncertainty analysis in the previous Inventory. The second highest emitting methane source in 2021, pneumatic controllers, included an updated approach to estimate emissions that analyzed basin-level data. EPA modeled uncertainty at the basin level as well for this source. The increased granularity in modelling led to an overall decrease in the uncertainty bounds.

Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series. For example, years where many emission sources are calculated with interpolated data would

[79] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

likely have higher uncertainty than years with predominantly year-specific data. In addition, the emission sources that contribute the most to CH_4 and CO_2 emissions are different over the time series, particularly when comparing recent years to early years in the time series. For example, venting emissions were higher and flaring emissions were lower in early years of the time series, compared to recent years. Technologies also changed over the time series (e.g., liquids unloading with plunger lifts and reduced emissions completions were not used early in the time series and cast iron distribution mains were more prevalent than plastic mains in early years). Transmission and gas processing compressor leak and vent emissions were also higher in the early years of the time series.

Table 3-72: Approach 2 Quantitative Uncertainty Estimates for CH_4 and Non-combustion CO_2 Emissions from Natural Gas Systems (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)[b]	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound[b]	Upper Bound[b]	Lower Bound[b]	Upper Bound[b]
Natural Gas Systems	CH_4	181.4	151.1	211.7	-17%	+17%
Natural Gas Systems	CO_2	36.2	30.7	40.7	-13%	+15%
Natural Gas Systems	N_2O	+	+	+	-13%	+15%

+ Less than 0.05 MMT CO_2 Eq.

[a] Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for the year 2021 CH_4 and CO_2 emissions.

[b] All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in Table 3-66 and Table 3-67.

QA/QC and Verification Discussion

The natural gas systems emission estimates in the Inventory are continually being reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the model calculations. EPA performs a thorough review of information associated with new studies, GHGRP data, regulations, public webcasts, and the Natural Gas STAR Program to assess whether the assumptions in the Inventory are consistent with current industry practices. The EPA has a multi-step data verification process for GHGRP data, including automatic checks during data-entry, statistical analyses on completed reports, and staff review of the reported data. Based on the results of the verification process, the EPA follows up with facilities to resolve mistakes that may have occurred.[80]

As in previous years, EPA conducted early engagement and communication with stakeholders on updates prior to public review of the current Inventory. EPA held stakeholder webinars in September and November of 2022. EPA released memos detailing updates under consideration and requesting stakeholder feedback.

In recent years, several studies have measured emissions at the source level and at the national or regional level and calculated emission estimates that may differ from the Inventory. There are a variety of potential uses of data from new studies, including replacing a previous estimate or factor, verifying or QA of an existing estimate or factor, and identifying areas for updates. In general, there are two major types of studies related to oil and gas greenhouse gas data: studies that focus on measurement or quantification of emissions from specific activities, processes and equipment, and studies that use tools such as inverse modeling to estimate the level of overall emissions needed to account for measured atmospheric concentrations of greenhouse gases at various scales. The first type of study can lead to direct improvements to or verification of Inventory estimates. In the past few years, EPA has reviewed and, in many cases, incorporated data from these data sources. The second type of study can

[80] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

provide general indications of potential over- and under-estimates. In addition, in recent years information from top-down studies has been directly incorporated to quantify emissions from well blowouts.

A key challenge in using these types of studies to assess Inventory results is having a relevant basis for comparison (e.g., the two data sets should have comparable time frames and geographic coverage, and the independent study should assess data from the Inventory and not another data set, such as the Emissions Database for Global Atmospheric Research, or "EDGAR"). In an effort to improve the ability to compare the national-level Inventory with measurement results that may be at other spatial or temporal scales, a team at Harvard University along with EPA and other coauthors developed a gridded inventory of U.S. anthropogenic methane emissions with 0.1 degree x 0.1 degree spatial resolution, monthly temporal resolution, and detailed scale-dependent error characterization.[81] The gridded methane inventory is designed to be consistent with the U.S. EPA's *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2014* estimates for the year 2012, which presents national totals.[82] An updated version of the gridded inventory is being developed and will improve efforts to compare results of the Inventory with atmospheric studies.

Recalculations Discussion

EPA received information and data related to the emission estimates through GHGRP reporting and stakeholder feedback on updates under consideration. In October 2022 and February 2023, EPA released draft memoranda that discussed changes under consideration and requested stakeholder feedback on those changes.[83] Feedback received is discussed in the Planned Improvements section below. Memoranda cited in the Recalculations Discussion below are: Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data (*Disaggregation* memo) and Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2021: Updates Under Consideration for Incorporating Additional Geographically Disaggregated Data for the Production Segment (*Production Disaggregation* memo).

In this Inventory, an update that incorporates additional basin-level data from GHGRP subpart W was implemented for several emission sources in the onshore production segment. The update seeks to improve the ability of EPA's gridded and state inventories to reflect variation due to differences in formation types, technologies and practices, regulations, or voluntary initiatives, and not only the differences in key activity levels that are reflected in the current gridded and state inventories. This would allow EPA to use the gridded inventory for improved comparisons of the national Inventory with various atmospheric observation studies (since regions will better reflect the local differences in emissions rates as reported to GHGRP) and would allow the state-level inventory to reflect differences in state-level programs, formation type mixes, and varying technologies and practices. For many sources, an approach that develops estimates using geographically disaggregated data may not be possible or preferable to a national level approach based on the currently available data. For some emission sources in the Inventory, emission factor data come from research studies and are applied at the national level. For example, many of the emission factors used to quantify emissions in the Inventory for the gathering and boosting, transmission and storage, distribution, and post-meter segments are from research studies and do not have a level of detail or total population comparable to GHGRP. Even in cases where geographically disaggregated data are available, such an approach may not always be preferable. In cases with limited variation between areas, such an approach would have limited impact on emissions estimates regionally or nationally. In cases with limited data in certain areas, disaggregated approaches might substantially increase the uncertainty of estimates and basin-specific calculations would not be an improvement over use of a national average. EPA continues to seek stakeholder feedback on the draft approach in this Inventory.

[81] See https://www.epa.gov/ghgemissions/gridded-2012-methane-emissions.

[82] See https://www.epa.gov/ghgemissions/us-greenhouse-gas-inventory-report-1990-2014.

[83] Stakeholder materials including draft memoranda for the current (i.e., 1990 to 2021) Inventory are available at https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

EPA evaluated relevant information available and made several updates to the Inventory, including for pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. General information for these source specific recalculations are presented below and details are available in the *Disaggregation* memo and *Production Disaggregation* memo, including additional considerations for the updates.

In addition to the production segment sources mentioned above, for certain sources, CH_4 and/or CO_2 emissions changed by greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2020 to the current (recalculated) estimate for 2020. The emissions changes were mostly due to GHGRP data submission revisions. These sources are discussed below and include miscellaneous production flaring, offshore production, distribution pipelines, and post-meter emissions.

In addition, for the current Inventory, CO_2-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an increase in the calculated CO_2-equivalent emissions of CH_4, while the GWP of N_2O has decreased from 298 to 265, leading to a decrease in the calculated CO_2-equivalent emissions of N_2O. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

The combined impact of revisions to 2020 natural gas systems CH_4 emissions, compared to the previous Inventory, is an increase from 164.9 to 185.3 MMT CO_2 Eq. (20.4 MMT CO_2 Eq., or 12 percent), or an increase from 6,596 kt CH_4 to 6,619 kt CH_4, or less than 1 percent. The recalculations resulted in an average increase in the annual CH_4 emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 24.0 MMT CO_2 Eq., or 13.5 percent, or 89 kt CH_4, or 1 percent.

The combined impact of revisions to 2020 natural gas systems CO_2 emissions, compared to the previous Inventory, is an increase from 35.4 MMT to 36.5 MMT, or 3.1 percent. The recalculations resulted in an average increase in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 0.2 MMT CO_2 Eq., or 0.7 percent.

The combined impact of revisions to 2020 natural gas systems N_2O emissions, compared to the previous Inventory, is a decrease from 10.2 kt CO_2 Eq. to 8.7 kt CO_2 Eq., or 15 percent, (or a decrease of 4 percent comparing on a basis of kt N_2O).The recalculations resulted in an average decrease in emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 11 percent (or a decrease of less than 1 percent comparing on a basis of kt N_2O).

In Table 3-73 and Table 3-74 below are categories in Natural Gas Systems with recalculations resulting in a change of greater than 0.05 MMT CO_2 Eq., comparing the previous estimate for 2019 to the current (recalculated) estimate for 2019. No changes made to N_2O estimates resulted in a change greater than 0.05 MMT CO_2 Eq. For more information, please see the Recalculations Discussion below.

For certain sources, the change in GWP for CH_4 alone (i.e., not the results of other recalculations) resulted in calculated CH_4 CO_2-equivalent emissions for 2020 changing by greater than 0.05 MMT CO_2 Eq., compared to the previous Inventory. These sources are not discussed below. The production segment sources impacted by the GWP update are: wellhead leaks, produced water, dehydrator kimray pumps, gas engine exhaust, G&B compressors, G&B pneumatic controllers, G&B pneumatic pumps, G&B combustion slip, G&B yard piping, and G&B pipeline leaks. The natural gas processing sources impacted by the GWP update are: reciprocating compressors, gas engine exhaust, and blowdowns. The transmission and storage sources impacted by the GWP update are: compressor station leaks, reciprocating compressors, centrifugal compressors, M&R, gas engine exhaust, pneumatic controllers, pipeline venting, and compressor station venting. The distribution sources impacted by the GWP update are distribution main and service leaks, customer meters, and mishaps.

Table 3-73: Recalculations of CO_2 in Natural Gas Systems (MMT CO_2)

Segment and Emission Sources with Changes of Greater than 0.05 MMT CO_2 due to Recalculations	*Previous Estimate Year 2020, 2022 Inventory*	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	***0.1***	**0.1**	**+**
Production	***7.7***	**8.9**	**9.1**
Misc. Onshore Production Flaring	*1.1*	1.3	1.0
Large Tanks with Flares	*0.6*	0.9	0.9
Liquids Unloading	*+*	+	+
G&B Station Sources	*5.8*	6.5	7.1
Processing	***25.5***	**25.4**	**26.1**
Flares	*7.9*	8.1	7.4
Transmission and Storage	***2.0***	**2.1**	**0.9**
Distribution	***+***	**+**	**+**
Post-Meter	***+***	**+**	**+**
Total	***35.4***	**36.5**	**36.2**

+ Does not exceed 0.05 MMT CO_2.

Table 3-74: Recalculations of CH_4 in Natural Gas Systems (MMT CO_2 Eq.)

Segment and Emission Sources with Changes of Greater than 0.05 MMT CO_2 due to Recalculations	*Previous Estimate Year 2020, 2022 Inventory*	Current Estimate Year 2020, 2023 Inventory	Current Estimate Year 2021, 2023 Inventory
Exploration	***0.2***	**0.2**	**0.2**
Production	***86.4***	**97.3**	**94.1**
Well pad Equipment Leaks	*6.6*	10.3	9.6
Chemical Injection Pumps	*2.8*	2.4	2.1
Pneumatic Controllers	*23.8*	22.8	21.3
Tanks	*0.4*	1.5	1.2
Liquids Unloading	*3.2*	4.5	3.4
G&B Station Sources	*34.1*	38.7	39.8
Processing	***12.4***	**13.9**	**14.3**
Transmission and Storage	***40.6***	**45.5**	**44.5**
Distribution	***13.9***	**15.5**	**15.3**
Pipeline Mains – Unprotected Steel	*1.0*	1.1	1.0
Post-Meter	***11.5***	**13.0**	**13.0**
Total	***164.9***	**185.3**	**181.4**

Exploration

There were no methodological updates to the exploration segment, and recalculations due to updated data resulted in average decreases in calculated CH_4 and CO_2 emissions over the time series of less than 1 percent.

Production

Pneumatic Controllers (Methodological Update)

EPA updated the calculation methodology for pneumatic controllers to use basin-specific activity factors and emission factors calculated from subpart W data for each type of controller (i.e., high, intermittent, and low bleed). Previously, national average activity and emission factors calculated using subpart W data were applied to estimate pneumatic controller emissions. In this methodological update, EPA summed basin-level emissions

together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH_4 emission factors were calculated for all basins that reported subpart W data. The factors were year-specific for RY2011 through RY2021. EPA retained the previous Inventory's activity factor assumptions for 1990 through 1992 and applied linear interpolation between the 1992 and 2011 activity factors at the basin-level. Year 2011 emission factors were applied to all prior years for each basin. For basins without subpart W data available, EPA applied national average activity and emission factors.

The estimation methodology for CO_2 emissions was not updated to use the basin-specific approach for this version of the Inventory. CO_2 emissions were estimated by applying a CO_2 to CH_4 ratio to the estimated CH_4 emissions. EPA will calculate pneumatic controller CO_2 emissions in the same manner as CH_4 emissions for the next version of this Inventory (i.e., 2024 Inventory).

As a result of this methodological update, CH_4 emissions estimates are on average 4 percent higher across the time-series than in the previous Inventory. The estimate for 2020 is 14 percent lower than in the previous Inventory. Pneumatic controller CH_4 emissions were higher for all years between 1990 through 2011 by an average of 8 percent and CH_4 emissions were lower for 2011 through 2020 by an average of 6 percent, compared to the previous inventory. Emissions were lower in recent years due to some basins having slightly lower activity factors and/or emission factors for intermittent bleed pneumatic controllers, compared to the national average. Emissions were higher in early years of the time series due to basins having higher emission factors than the national average. Multiple basins impact the emissions changes for pneumatic controllers at gas wells.

Table 3-75: Pneumatic Controllers National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Low Bleed Controllers	0	22,745	32,360	33,805	31,475	27,364	25,609
High Bleed Controllers	350,535	483,375	108,533	87,071	53,233	42,332	42,828
Intermittent Bleed Controllers	230,504	569,592	873,015	835,249	874,372	744,622	692,097
Total Emissions	**581,039**	**1,075,712**	**1,013,908**	**956,125**	**959,080**	**814,318**	**760,534**
Previous Estimate	*510,354*	*1,041,503*	*1,104,896*	*1,072,874*	*1,024,678*	*950,718*	*NA*

NA (Not Applicable)

Storage Tanks (Methodological Update)

EPA updated the calculation methodology for production segment storage tanks to use basin-specific activity factors and emission factors calculated from Subpart W data for each storage tank category. Previously, national annual average activity and emission factors calculated using Subpart W data were applied to estimate storage tank emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The calculation methodology was updated to estimate CH_4 and CO_2 emissions using basin-level data from subpart W. The *Production Disaggregation* memo presents additional information and considerations for this update.

EPA calculated basin-specific activity factors and CH_4 and CO_2 emission factors for all basins that reported subpart W data. The factors were year-specific for reporting year (RY) 2015 through RY2021. EPA also retained the previous Inventory's activity factor assumptions for 1990 and used linear interpolation between the 1990 and 2015 activity factors at the basin-level. Year 2015 emission factors were applied to all prior years for each basin. For basins without Subpart W data available, EPA applied national average activity and emission factors.

This update resulted in CH_4 emission estimates an average of 276 percent higher across the time series compared with the previous Inventory. The estimate for 2020 is 210 percent higher than in the previous Inventory. Storage tank CO_2 emissions are an average of 43 percent higher across the time series compared to the previous Inventory. The 2020 emission estimate is 50 percent higher than in the previous Inventory.

The basin-level approach's emissions increased because certain basins with high liquids production and storage tank throughput had higher emission factors and/or activity factors than the national average. The time-series is also impacted as the basin-level approach reflects changing levels of liquids production, and hence storage tank

throughput, for basins across the time-series; basins with more production and storage tank throughput in the early 90s also corresponded to basins with higher emission factors and/or activity factors than the national average. For CH_4, this is particularly noticeable for basins with small tanks without flares (e.g., Arkoma Basin, Bend Arch, Central Western Overthrust, East Texas, Piceance) and for CO_2 emissions this is noticeable for basins using large tanks with flares (e.g., Anadarko Basin, Appalachian, Chautauqua Platform, Denver, Gulf Coast, Permian, South Oklahoma Folded Belt).

Table 3-76: Storage Tanks National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	505	336	1,016	1,273	789	600	606
Large Tanks w/VRU	0	27	205	143	905	525	371
Large Tanks w/o Control	16,161	6,867	6,622	15,416	2,446	4,284	4,916
Small Tanks w/Flares	0	51	249	237	208	201	168
Small Tanks w/o Flares	89,757	31,176	40,152	43,448	63,168	47,749	37,959
Malfunctioning Separator Dump Valves	7	4	648	40	80	254	197
Total Emissions	**106,429**	**38,461**	**48,892**	**60,556**	**67,595**	**53,613**	**44,217**
Previous Estimate	*16,421*	*11,331*	*21,493*	*24,435*	*21,194*	*17,294*	*NA*

NA (Not Applicable)

Table 3-77: Storage Tanks National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Large Tanks w/Flares	579	422	1,804	1,356	840	795	825
Large Tanks w/VRU	0	2	0	0	1	1	1
Large Tanks w/o Control	2	1	1	37	1	1	1
Small Tanks w/Flares	0	13	72	87	82	41	28
Small Tanks w/o Flares	47	18	23	26	33	24	18
Malfunctioning Separator Dump Valves	0	0	2	0	0	1	0
Total Emissions	**628**	**456**	**1,902**	**1,507**	**956**	**862**	**873**
Previous Estimate	*298*	*380*	*1,131*	*844*	*634*	*574*	*NA*

NA (Not Applicable)

Equipment Leaks (Methodological Update)

EPA updated the calculation methodology for onshore production equipment leaks to use basin-specific equipment-level activity factors (e.g., separators per well) from GHGRP data. Previously, national average equipment activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific equipment-level activity factors for all basins that reported Subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factors for 1990 through 1992 and used linear interpolation between the 1992 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors. This methodological update applies only for activity factors. The previous Inventory's CH_4 emission factors for onshore production segment equipment leaks (by equipment type) were retained and used to develop CH_4 estimates. Since the CH_4 emission factors were not updated, EPA also retained the Gas STAR reductions that are applicable to equipment leaks.

The calculation methodology for CO_2 emissions was not updated for this version of the Inventory. The previous Inventory's methodology was retained to develop CO_2 estimates. EPA will calculate equipment leak CO_2 emissions in the same manner as CH_4 emissions for the next versions of this Inventory (i.e., 2024 Inventory).

This update resulted in CH_4 emission estimates an average of 8 percent higher across the time series compared to the previous Inventory. The 2020 emission estimate is 39 percent higher than in the previous Inventory. The early years of the time series are minimally impacted by the update, with average CH_4 emissions 1 percent lower for years 1990 through 2002, compared to the previous Inventory. Methane emissions are an average of 14 percent higher for 2002 through 2020, compared to the previous Inventory. These recent years of the time series relied on the basin-specific activity factors and certain basins had higher activity factors compared to the national average factors (e.g., Anadarko Basin, Arkla, Fort Worth Syncline, Gulf Coast, Powder River, San Juan, Strawn).

Table 3-78: Production Equipment Leaks National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Heaters	12,116	20,307	20,068	80,312	16,421	19,223	17,694
Separators	40,746	92,060	129,978	124,339	128,675	132,409	112,425
Dehydrators	12,722	12,796	4,485	5,552	3,739	3,133	4,128
Meters/Piping	42,205	72,148	78,403	81,139	85,625	154,544	135,476
Compressors	29,858	64,877	73,000	72,026	64,471	60,157	73,963
Gas STAR Reductions for Leaks	26	22,908	2,748	71	133	133	133
Total Emissions	**137,647**	**239,280**	**303,187**	**363,296**	**298,797**	**369,333**	**343,553**
Previous Estimate	*138,844*	*220,489*	*273,028*	*274,664*	*270,662*	*265,657*	*NA*

NA (Not Applicable)

Chemical Injection Pumps (Methodological Update)

EPA updated the calculation methodology for chemical injection pumps to use basin-specific activity factors from GHGRP data. Previously, national average activity factors developed using RY2014 GHGRP data were used in the Inventory for all years. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors for all basins that reported subpart W data. The factors were year-specific for RY2015 through RY2021. EPA also retained the previous Inventory's activity factors for 1990 through 1992 and applied linear interpolation between the 1992 and 2015 activity factors at the basin-level. For basins without subpart W data available, EPA applied national average activity factors. This methodological update applies only to activity factors. The previous Inventory's CH_4 emission factor for chemical injection pumps was retained and used to develop CH_4 estimates.

The estimation methodology for CO_2 emissions was not updated for this version of the Inventory. The previous Inventory's methodology was retained to develop CO_2 estimates. EPA will calculate chemical injection pump CO_2 emissions in the same manner as CH_4 emissions for the next version of this Inventory (i.e., 2024 Inventory).

This update resulted in CH_4 emission estimates an average of 86 percent higher across the time-series. The 2020 emission estimate is 24 percent lower than in the previous Inventory. The emissions increase across the time-series is predominantly due to the Bend Arch, which has a very high RY2015 activity factor (chemical injection pumps per well), which then impacts prior years because it's used in the linear interpolation back to the 1992 activity factor.

Table 3-79: Chemical Injection Pumps National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Chemical Injection Pumps	25,345	183,832	113,726	120,984	108,546	84,002	76,315
Previous Estimate	*27,158*	*84,573*	*116,107*	*115,140*	*113,538*	*110,785*	*NA*

NA (Not Applicable)

Liquids Unloading (Methodological Update)

EPA updated the calculation methodology for liquids unloading to use basin-specific activity factors and emission factors calculated from subpart W data for each type of liquids unloading (i.e., with and without plunger lifts). Previously, national average activity and emission factors calculated using Subpart W data were applied to estimate liquids unloading emissions. In this methodological update, EPA summed basin-level emissions together to develop national emissions. The *Disaggregation* memo and *Production Disaggregation* memo present additional information and considerations for this update.

EPA calculated basin-specific activity factors, and CH_4 and CO_2 emission factors for all basins that reported subpart W data. The factors were also year-specific for RY2011 through RY2021. EPA also revised the previous Inventory's activity factor and emission factor assumptions for 1990 through 1992. Previously, Year 2011 emission factors were applied to all prior years of the time series and activity factors were derived by linear interpolation between Year 2011 data and API/ANGA data (collected in 2011) for 1990. In the current Inventory, EPA used activity and emission factors developed using GRI data for 1990 through 1992 (GRI/EPA 1996). The 1996 GRI study did not include CO_2 data for liquids unloading. EPA used RY2011 CO_2 emission factors for the earlier years in the time series (i.e., 1990 through 2010). The same activity and emission factors derived from the GRI data were used for all basins for 1990 through 1992. For the remaining time series years (i.e., 1993-2010), EPA applied linear interpolation between the 1992 and 2011 factors at the basin-level. For basins without subpart W data available, EPA applied national average activity and emission factors.

This update resulted in CH_4 and CO_2 emission estimates an average of 15 percent lower across the time series than in the previous Inventory. In the earlier years of the time series (i.e., 1990 through 2006), CH_4 emissions are lower than in the previous Inventory by an average of 43 percent. CO_2 emissions over the same time period are lower than in the previous Inventory by an average of 38 percent. For the time series years with reported GHGRP data (i.e., 2011 through 2020), CH_4 emissions increased by an average of 21 percent, compared to the previous Inventory. Similarly, CO_2 emissions also increased by an average of 17 percent during 2011 through 2020. The basin-level approach's emissions were higher than the previous Inventory's because certain basins with high gas well counts (e.g., Appalachian and Anadarko basins) had higher emission factors than the national average.

Table 3-80: Liquids Unloading National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Liquids Unloading With Plunger Lifts	0	144,856	68,633	99,159	85,536	60,280	39,456
Liquids Unloading Without Plunger Lifts	76,815	214,070	116,012	166,014	124,428	98,687	80,690
Total Emissions	**76,815**	**358,925**	**184,645**	**265,173**	**209,964**	**158,968**	**120,145**
Previous Estimate	*373,528*	*379,184*	*155,178*	*207,603*	*175,156*	*129,831*	*NA*

NA (Not Applicable)

Table 3-81: Liquids Unloading National CO_2 Emissions (Metric Tons CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Liquids Unloading With Plunger Lifts	0	11,926	3,376	4,212	2,864	2,606	1,967
Liquids Unloading Without Plunger Lifts	44,810	40,806	5,390	7,227	7,270	3,562	3,733
Total Emissions	**44,810**	**52,733**	**8,767**	**11,439**	**10,134**	**6,168**	**5,700**
Previous Estimate	*83,155*	*67,087*	*7,487*	*9,181*	*8,284*	*5,491*	*NA*

NA (Not Applicable)

Miscellaneous Production Flaring (Recalculation with Updated Data)

Miscellaneous production flaring CO_2 emissions estimates are on average 0.2 percent higher across the 1990 to 2020 time series compared with the previous Inventory and the 2020 estimate is 23 percent higher, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-82: Miscellaneous Production Flaring National Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Miscellaneous Flaring-Gulf Coast Basin	NO	166	209	137	398	250	267
Miscellaneous Flaring-Williston Basin	NO	+	10	6	3	4	4
Miscellaneous Flaring-Permian Basin	NO	260	622	707	889	831	483
Miscellaneous Flaring-Other Basins	NO	117	306	476	305	213	236
Total Emissions	**NO**	**543**	**1,148**	**1,326**	**1,595**	**1,298**	**991**
Previous Estimate	*NO*	*543*	*1,145*	*1,344*	*1,904*	*1,060*	*NA*

+ Does not exceed 0.5 kt.
NO (Not Occurring)
NA (Not Applicable)

Gathering and Boosting – Tanks (Recalculation with Updated Data)

Methane emission estimates for gathering and boosting tanks are on average 0.1 percent lower across the 1990 to 2020 time series than in the previous Inventory. The 2020 estimate is 2 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-83: Tanks National Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Tanks	129,829	165,236	255,244	249,489	295,914	239,623	276,748
Previous Estimate	*129,829*	*165,236*	*255,244*	*249,489*	*300,169*	*244,257*	*NA*

NA (Not Applicable)

Gathering and Boosting – Station Blowdowns

Methane emissions estimates for gathering and boosting station blowdowns are on average 0.7 percent lower across the 1990 to 2020 time series than in the previous Inventory. The 2020 estimate is 10 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-84: Station Blowdowns National Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Station Blowdowns	20,517	26,113	63,852	78,548	38,412	40,468	42,231
Previous Estimate	*20,517*	*26,113*	*63,852*	*78,548*	*43,865*	*44,881*	*NA*

NA (Not Applicable)

Gathering and Boosting – Dehydrator Vents (Large Units)

Methane emissions for dehydrator vents at large units are on average of 4 percent higher across the 1990 to 2020 time series compared with the previous Inventory. The 2020 estimate is 115 percent higher compared to the previous Inventory. The dehydrator vents at large units CO_2 emissions estimate increased by an average of 10 percent across the time series and by 292 percent in 2020, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-85: Dehydrator Vents National Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Dehydrator Vents	35,716	45,457	61,754	56,543	56,405	52,323	59,207
Previous Estimate	*35,716*	*45,457*	*61,386*	*56,381*	*55,967*	*24,345*	*NA*

NA (Not Applicable)

Table 3-86: Dehydrator Vents National Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Dehydrator Vents	371	472	771	820	1,039	1,048	995
Previous Estimate	*371*	*472*	*772*	*820*	*907*	*267*	*NA*

NA (Not Applicable)

Gathering and Boosting – Flare Stacks (R*ecalculation with Updated Data)*

The flare stacks CO_2 emissions estimate are an average of 0.3 percent lower across the time series compared with the previous Inventory. The 2020 estimate is 4 percent lower, compared to the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-87: Production Storage Tanks National Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Flare Stacks	1,355	1,725	2,256	3,696	4,777	2,822	2,631
Previous Estimate	*1,355*	*1,725*	*2,256*	*3,695*	*5,028*	*2,926*	*NA*

NA (Not Applicable)

Processing

Flares (Recalculation with Updated Data)

Processing segment flare CO_2 emission estimates are on average of less than 1 percent higher across the 1993 to 2020 time series than in the previous Inventory. The estimate for 2020 is 3 percent higher than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-88: Processing Segment Flares National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Flares	NO	3,517	5,587	5,945	9,859	8,120	7,381
Previous Estimate	*NO*	*3,517*	*5,590*	*6,176*	*9,837*	*7,879*	*NA*

NA (Not Applicable)
NO (Not Occurring)

AGR Vents (Recalculation with Updated Data)

AGR vents CO_2 emission estimates are on average lower than the previous Inventory by less than 1 percent across the 1990 to 2020 time series. Emission estimates for 2020 are 2 percent lower than in the previous Inventory. These changes were due to GHGRP submission revisions.

Table 3-89: AGR Vents National CO_2 Emissions (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
AGR Vents	28,282	15,281	17,313	16,788	16,325	17,258	18,658
Previous Estimate	*28,282*	*15,281*	*17,364*	*16,792*	*16,505*	*17,559*	*NA*

NA (Not Applicable)
NO (Not Occurring)

Transmission and Storage

There were no methodological updates to the transmission and storage segment, and recalculations resulted in an average increase in calculated CH_4 emissions over the time series of 0.2 percent. CO_2 emissions will be updated for the Final Inventory; see Planned Improvements.

Distribution

*Ma*ins – Unprotected *Steel (Recalculation with Updated Data)*

Methane emissions estimates for unprotected steel distribution mains are on average 0.6 percent lower across the 1990 to 2020 time series compared to the previous Inventory and 6 percent lower in 2020, compared to the previous Inventory. The emission changes were due to updated PHMSA pipeline mileage data.

Table 3-90: Mains – Unprotected Steel National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Mains – Unprotected Steel	231,201	91,262	44,574	42,581	40,732	39.261	37,488
Previous Estimate	*231,201*	*91,262*	*47,236*	*45,213*	*43,369*	*41,554*	*NA*

NA (Not Applicable)

Post-Meter

Post-Meter (Recalculation with Updated Data)

Post-Meter CH_4 emissions estimates are higher by an average of 0.1 percent across the 1990 to 2020 time series compared with the previous Inventory, and 1 percent higher in 2020, compared to the previous Inventory. The emission changes were due to changes in residential and industrial natural gas consumption data.

Table 3-91: Post-Meter National CH_4 Emissions (Metric Tons CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Post-Meter	289,951	344,464	424,492	445,323	456,679	462,751	463,072
Previous Estimate	*289,951*	*344,464*	*424,492*	*445,220*	*456,551*	*459,072*	*NA*

NA (Not Applicable)

Planned Improvements

Planned Improvements for 2024 Inventory

The calculations for Natural Gas Systems exploration and production segment emissions do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: oil well counts, wells drilled, wells completed, and production. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Basin-level approaches for pneumatic controllers, equipment leaks, and chemical injection pumps were applied to calculate CH_4 emissions. Feedback EPA received on this update include support for continued use of GHGRP data, that EPA should consider application of the approach to only basins with 50 percent coverage or more, and that liquids unloading is a source that may be particularly well-suited to a basin-level approach.

For the next Inventory, EPA plans to apply consistent methods for both CO_2 and CH_4 emissions calculations. EPA will also consider including additional emission sources in geographically disaggregated calculations.

Additional information on the update and specific requests for stakeholder feedback can be found in the *Disaggregation* memo and *Production Disaggregation* memos.

EPA also received feedback on its estimate for post-meter emissions. The feedback urged EPA to remove the estimate for residential post-meter emissions. EPA will continue to track studies with relevance to residential post-meter emissions for potential improvements to the Inventory for this source.

Upcoming Data, and Additional Data that Could Inform the Inventory

EPA will assess new data received by EPA's Greenhouse Gas Reporting Program, Methane Challenge Program on an ongoing basis, which may be used to validate or improve existing estimates and assumptions.

EPA continues to track studies that contain data that may be used to update the Inventory. EPA will also continue to assess studies that include and compare both top-down and bottom-up emission estimates, which could lead to improved understanding of unassigned high emitters (e.g., identification of emission sources and information on frequency of high emitters) as recommended in previous stakeholder comments.

3.8 Abandoned Oil and Gas Wells (CRF Source Categories 1B2a and 1B2b)

The term "abandoned wells", as used in the Inventory, encompasses various types of oil and gas wells, including orphaned wells and other non-producing wells:

- Wells with no recent production, and not plugged. Common terms (such as those used in state databases) might include: inactive, temporarily abandoned, shut-in, dormant, and idle.
- Wells with no recent production and no responsible operator. Common terms might include: orphaned, deserted, long-term idle, and abandoned.
- Wells that have been plugged to prevent migration of gas or fluids.

The U.S. population of abandoned oil and gas wells (including orphaned wells and other non-producing wells) is around 3.7 million (with around 2.9 million abandoned oil wells and 0.8 million abandoned gas wells). The methods to calculate emissions from abandoned wells involve calculating the total populations of plugged and unplugged abandoned oil and gas wells in the United States and the application of emission factors. An estimate of the number of orphaned wells within this population is not developed as part of the methodology. Wells that are plugged have much lower average emissions than wells that are unplugged (less than 1 kg CH_4 per well per year, versus over 100 kg CH_4 per well per year). Around 42 percent of the abandoned well population in the United States is plugged. This fraction has increased over the Inventory time series (from around 22 percent in 1990) as more wells fall under regulations and programs requiring or promoting plugging of abandoned wells.

Abandoned oil wells. Abandoned oil wells emitted 231 kt CH_4 and 5 kt CO_2 in 2021. Emissions of both gases increased by 3 percent from 1990, while the total population of abandoned oil wells increased 37 percent.

Abandoned gas wells. Abandoned gas wells emitted 63 kt CH_4 and 3 kt CO_2 in 2021. Emissions of both gases increased by 25 percent from 1990, while the total population of abandoned gas wells increased 75 percent.

Table 3-92: CH_4 Emissions from Abandoned Oil and Gas Wells (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	6.3	6.5	6.5	6.5	6.5	6.5	6.5
Abandoned Gas Wells	1.4	1.6	1.8	1.8	1.8	1.8	1.8
Total	**7.7**	**8.1**	**8.3**	**8.3**	**8.3**	**8.2**	**8.2**

Table 3-93: CH_4 Emissions from Abandoned Oil and Gas Wells (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	223	232	232	232	233	231	231
Abandoned Gas Wells	51	57	63	63	64	63	63
Total	**274**	**289**	**295**	**296**	**297**	**295**	**295**

Table 3-94: CO_2 Emissions from Abandoned Oil and Gas Wells (MMT CO_2)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	+	+	+	+	+	+	+
Abandoned Gas Wells	+	+	+	+	+	+	+
Total	**+**	**+**	**+**	**+**	**+**	**+**	**+**

+ Does not exceed 0.05 MMT CO_2 Eq.

Table 3-95: CO_2 Emissions from Abandoned Oil and Gas Wells (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Abandoned Oil Wells	5	5	5	5	5	5	5
Abandoned Gas Wells	2	2	3	3	3	3	3
Total	**7**	**7**	**7**	**7**	**8**	**7**	**7**

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

EPA uses a Tier 2 method from IPCC (2019) to quantify emissions from abandoned oil and gas wells. EPA's approach is based on the number of plugged and unplugged abandoned wells in the Appalachian region and in the rest of the U.S., and emission factors for plugged and unplugged abandoned wells in Appalachia and the rest of the U.S. Methods for abandoned wells are unavailable in IPCC (2006). The details of this approach and of the data sources used are described in the memorandum *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Abandoned Wells in Natural Gas and Petroleum Systems (2018 Abandoned Wells Memo).*

EPA developed abandoned well CH_4 emission factors using data from Kang et al. (2016) and Townsend-Small et al. (2016). Plugged and unplugged abandoned well CH_4 emission factors were developed at the national-level (using emission data from Townsend-Small et al.) and for the Appalachia region (using emission data from measurements in Pennsylvania and Ohio conducted by Kang et al. and Townsend-Small et al., respectively). The Appalachia region emissions factors were applied to abandoned wells in states in the Appalachian basin region, and the national-level emission factors were applied to abandoned wells in all other states. EPA developed abandoned well CO_2 emission factors using the CH_4 emission factors and an assumed ratio of CO_2-to-CH_4 gas content, similar to the approach used to calculate CO_2 emissions for many sources in Petroleum Systems and Natural Gas Systems. For abandoned oil wells, EPA used the Petroleum Systems default production segment associated gas ratio of 0.020 MT CO_2/MT CH_4, which was derived through API TankCalc modeling runs. For abandoned gas wells, EPA used the Natural Gas Systems default production segment CH_4 and CO_2 gas content values (GRI/EPA 1996, GTI 2001) to develop a ratio of 0.044 MT CO_2/MT CH_4. The same respective emission factors are applied for each year of the time series.

EPA developed state-level annual counts of abandoned wells for 1990 through 2020 by summing together an annual estimate of abandoned wells in the Enverus data set (Enverus 2021), and an estimate of total abandoned wells not included the Enverus dataset (see *2018 Abandoned Wells Memo* for additional information on how the value was calculated) for each state. References reviewed to develop the number of abandoned wells not included in the Enverus dataset include historical records collected by state agencies and by USGS.

The total abandoned well population was then split into plugged and unplugged wells by applying an assumption that all abandoned wells were unplugged in 1950 and using Enverus data to calculate the fraction of plugged abandoned wells in 2020 in that data set, which was then applied to the total population of abandoned wells for

2020 and 2021. Linear interpolation was applied between the 1950 value and 2020 value to calculate the plugged fraction for intermediate years. See the memorandum *Inventory of U.S. Greenhouse Gas Emissions and Sinks 1990-2016: Abandoned Wells in Natural Gas and Petroleum Systems (2018 Abandoned Wells Memo)* for details.[84] State-level plugged and unplugged fractions were developed for the time-series using state-level Enverus data for 2020 and linear interpolation between 1950 and 2020 plugged and unplugged fractions. Abandoned wells in all states were assumed to be unplugged in 1950.

Abandoned Oil Wells

Table 3-96: Abandoned Oil Wells Activity Data, CH_4 and CO_2 Emissions (kt)

Source	1990	2005	2017	2018	2019	2020	2021
Plugged abandoned oil wells	474,432	799,331	1,105,366	1,139,476	1,175,867	1,192,907	1,192,907
Unplugged abandoned oil wells	1,664,717	1,749,329	1,749,813	1,751,999	1,756,573	1,739,533	1,739,533
Total Abandoned Oil Wells	2,139,149	2,548,660	2,855,179	2,891,475	2,932,440	2,932,440	2,932,440
Abandoned oil wells in Appalachia	23%	21%	19%	19%	19%	19%	19%
Abandoned oil wells outside of Appalachia	77%	79%	81%	81%	81%	81%	81%
CH_4 from plugged abandoned oil wells (kt)	0.20	0.30	0.39	0.40	0.41	0.42	0.42
CH_4 from unplugged abandoned oil wells(kt)	223.1	231.3	231.5	231.8	232.5	230.7	230.7
Total CH_4 from Abandoned oil wells (kt)	**223.3**	**231.6**	**231.9**	**232.2**	**232.9**	**231.1**	**231.1**
Total CO_2 from Abandoned oil wells (kt)	**4.5**	**4.7**	**4.7**	**4.7**	**4.7**	**4.7**	**4.7**

Abandoned Gas Wells

Table 3-97: Abandoned Gas Wells Activity Data, CH_4 and CO_2 Emissions (kt)

Source	1990	2005	2017	2018	2019	2020	2021
Plugged abandoned gas wells	107,292	206,413	332,743	342,495	353,746	358,871	358,871
Unplugged abandoned gas wells	349,041	397,844	440,367	442,014	444,532	439,407	439,407
Total Abandoned Gas Wells	456,333	604,257	773,110	784,509	798,278	798,278	798,278
Abandoned gas wells in Appalachia	29%	26%	24%	24%	25%	25%	25%
Abandoned gas wells outside of Appalachia	71%	74%	76%	76%	75%	75%	75%
CH_4 from plugged abandoned gas wells (kt)	0.07	0.12	0.17	0.18	0.19	0.19	0.19
CH_4 from unplugged abandoned gas wells (kt)	50.9	56.8	62.8	63.2	63.8	63.2	63.2
Total CH_4 from Abandoned gas wells (kt)	**50.9**	**56.9**	**63.0**	**63.4**	**64.0**	**63.4**	**63.4**
Total CO_2 from Abandoned gas wells (kt)	**2.2**	**2.5**	**2.8**	**2.8**	**2.8**	**2.8**	**2.8**

[84] See https://www.epa.gov/ghgemissions/natural-gas-and-petroleum-systems.

Uncertainty

To characterize uncertainty surrounding estimates of abandoned well emissions, EPA conducted a quantitative uncertainty analysis using the IPCC Approach 2 methodology (Monte Carlo simulation technique). See the *2018 Abandoned Wells Memo* for details of the uncertainty analysis methods. EPA used Microsoft Excel's @RISK add-in tool to estimate the 95 percent confidence bound around total methane emissions from abandoned oil and gas wells in year 2021, then applied the calculated bounds to both CH_4 and CO_2 emissions estimates for each population. The @RISK add-in provides for the specification of probability density functions (PDFs) for key variables within a computational structure that mirrors the calculation of the inventory estimate. EPA used measurement data from the Kang et al. (2016) and Townsend-Small et al. (2016) studies to characterize the CH_4 emission factor PDFs. For activity data inputs (e.g., total count of abandoned wells, split between plugged and unplugged), EPA assigned default uncertainty bounds of ± 10 percent based on expert judgment.

The IPCC guidance notes that in using this method, "some uncertainties that are not addressed by statistical means may exist, including those arising from omissions or double counting, or other conceptual errors, or from incomplete understanding of the processes that may lead to inaccuracies in estimates developed from models." As a result, the understanding of the uncertainty of emission estimates for this category evolves and improves as the underlying methodologies and datasets improve. The uncertainty bounds reported below only reflect those uncertainties that EPA has been able to quantify and do not incorporate considerations such as modeling uncertainty, data representativeness, measurement errors, misreporting or misclassification.

The results presented below in Table 3-98 provide the 95 percent confidence bound within which actual emissions from abandoned oil and gas wells are likely to fall for the year 2021, using the recommended IPCC methodology. Abandoned oil well CH_4 emissions in 2021 were estimated to be between 1.1 and 19.7 MMT CO_2 Eq., while abandoned gas well CH_4 emissions were estimated to be between 0.3 and 5.4 MMT CO_2 Eq. at a 95 percent confidence level. Uncertainty bounds for other years of the time series have not been calculated, but uncertainty is expected to vary over the time series.

Table 3-98: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Petroleum and Natural Gas Systems (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)[b]	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Abandoned Oil Wells	CH_4	6.5	1.1	19.7	-83%	+204%
Abandoned Gas Wells	CH_4	1.8	0.3	5.4	-83%	+204%
Abandoned Oil Wells	CO_2	0.005	0.001	0.014	-83%	+204%
Abandoned Gas Wells	CO_2	0.003	0.0005	0.008	-83%	+204%

[a] Range of emission estimates estimated by applying the 95 percent confidence intervals obtained from the Monte Carlo Simulation analysis conducted for total abandoned oil and gas well CH_4 emissions in year 2021.

[b] All reported values are rounded after calculation. As a result, lower and upper bounds may not be duplicable from other rounded values as shown in table.

QA/QC and Verification Discussion

The emission estimates in the Inventory are continually reviewed and assessed to determine whether emission factors and activity factors accurately reflect current industry practices. A QA/QC analysis was performed for data gathering and input, documentation, and calculation. QA/QC checks are consistently conducted to minimize human error in the model calculations. EPA performs a thorough review of information associated with new studies to assess whether the assumptions in the Inventory are consistent with industry practices and whether new data is available that could be considered for updates to the estimates. As in previous years, EPA conducted

early engagement and communication with stakeholders on updates prior to public review. EPA held stakeholder webinars on greenhouse gas data for oil and gas in September and November of 2022.

Recalculations Discussion

EPA updated the Inventory methodology to estimate abandoned well emissions at the state-level as an intermediate step to calculating national emissions. Previously, well counts were developed for the Appalachian region and for all other regions as a total, and plugged and unplugged fractions were developed at the national-level. In the current Inventory, EPA used abandoned well counts and plugged and unplugged fractions at the state-level to estimate emissions. The incorporation of disaggregated, state-level data will improve future versions of both the gridded and state-level greenhouse gas inventories as geographic differences in plugging rates can now be reflected. This will allow EPA to use the gridded greenhouse gas inventory for improved comparisons with atmospheric observation studies, because regions will reflect local differences. In addition, this update will improve the ability of the state-level Inventory to reflect impacts of state-level programs.

The emission factors from the previous Inventory were retained and used to estimate state-level emissions, with Appalachia-specific factors applied to states in Appalachia. The state-level emissions were then summed up to the national level. As an outcome of these revisions, total calculated abandoned well CH_4 emissions across the time series are an average of 6 percent higher than in the previous Inventory. The calculated value for 2020 is 7 percent higher than in the previous Inventory.

The main cause of increased emission estimate across the time series is the application of state-specific fractions of plugged wells, which resulted in a larger fraction of unplugged wells in Appalachia (which has a higher unplugged well emission factor than other regions) than in the previous inventory, which applied a national average plugging fraction to the entire U.S. abandoned well population.

In the previous Inventory, abandoned dry wells were proportionally allocated between abandoned oil and gas wells at the national level. In the current Inventory, dry wells are proportionally allocated to abandoned oil and gas wells at the state level. The total counts of abandoned wells changed by 0.02 percent (decrease), compared with the previous inventory. The counts of abandoned oil wells are about 1.6 percent lower across the time series compared to the previous Inventory and gas wells are about 7 percent higher.

In addition, for the current Inventory, CO_2-equivalent emissions totals have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an overall increase in the calculated CO_2-equivalent emissions of CH_4.

Compared to the previous Inventory which applied 100-year GWP values from AR4, in the current Inventory (including other recalculations noted above), CO_2-equivalent CH_4 emissions increased by 16 percent on average over the time series. Emissions on a kt CH_4 basis increased by an average of 7 percent across the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

The calculations for Abandoned Oil and Gas Wells do not incorporate updated activity data for the following data inputs, due to a data base subscription lapse: abandoned well counts, and fractions of plugged and unplugged abandoned wells. Year 2020 values for activity data are used in place of year 2021. Next year's inventory will include the latest data. It is not expected that use of the latest data will result in large recalculations.

Stakeholder feedback received include comments on the total number of abandoned wells, assumptions regarding dry wells, and emission factors.

EPA will continue to assess new data and stakeholder feedback on considerations (such as potential use of emission factor data from regions not included in the measurement studies on which current emission factors are

based) to improve the abandoned well count estimates and emission factors. In future Inventories, EPA will assess data that become available from Department of Interior and Department of Energy orphan well plugging programs.

3.9 International Bunker Fuels (CRF Source Category 1: Memo Items)

Emissions resulting from the combustion of fuels used for international transport activities, termed international bunker fuels under the UNFCCC, are not included in national emission totals, but are reported separately based upon location of fuel sales. The decision to report emissions from international bunker fuels separately, instead of allocating them to a particular country, was made by the Intergovernmental Negotiating Committee in establishing the Framework Convention on Climate Change.[85] These decisions are reflected in the IPCC methodological guidance, including IPCC (2006), in which countries are requested to report emissions from ships or aircraft that depart from their ports with fuel purchased within national boundaries and are engaged in international transport separately from national totals (IPCC 2006).[86]

Two transport modes are addressed under the IPCC definition of international bunker fuels: aviation and marine.[87] Greenhouse gases emitted from the combustion of international bunker fuels, like other fossil fuels, include CO_2, CH_4 and N_2O for marine transport modes, and CO_2 and N_2O for aviation transport modes. Emissions from ground transport activities—by road vehicles and trains—even when crossing international borders are allocated to the country where the fuel was loaded into the vehicle and, therefore, are not counted as bunker fuel emissions.

The *2006 IPCC Guidelines* distinguish between three different modes of air traffic: civil aviation, military aviation, and general aviation. Civil aviation comprises aircraft used for the commercial transport of passengers and freight, military aviation comprises aircraft under the control of national armed forces, and general aviation applies to recreational and small corporate aircraft. The *2006 IPCC Guidelines* further define international bunker fuel use from civil aviation as the fuel combusted for civil (e.g., commercial) aviation purposes by aircraft arriving or departing on international flight segments. However, as mentioned above, and in keeping with the *2006 IPCC Guidelines*, only the fuel purchased in the United States and used by aircraft taking-off (i.e., departing) from the United States are reported here. The standard fuel used for civil and military aviation is kerosene-type jet fuel, while the typical fuel used for general aviation is aviation gasoline.[88]

Emissions of CO_2 from aircraft are essentially a function of fuel consumption. Nitrous oxide emissions also depend upon engine characteristics, flight conditions, and flight phase (i.e., take-off, climb, cruise, decent, and landing). Recent data suggest that little or no CH_4 is emitted by modern engines (Anderson et al. 2011), and as a result, CH_4 emissions from this category are reported as zero. In jet engines, N_2O is primarily produced by the oxidation of atmospheric nitrogen, and the majority of emissions occur during the cruise phase.

International marine bunkers comprise emissions from fuels burned by ocean-going ships of all flags that are engaged in international transport. Ocean-going ships are generally classified as cargo and passenger carrying,

[85] See report of the Intergovernmental Negotiating Committee for a Framework Convention on Climate Change on the work of its ninth session, held at Geneva from 7 to 18 February 1994 (A/AC.237/55, annex I, para. 1c).

[86] Note that the definition of international bunker fuels used by the UNFCCC differs from that used by the International Civil Aviation Organization.

[87] Most emission related international aviation and marine regulations are under the rubric of the International Civil Aviation Organization (ICAO) or the International Maritime Organization (IMO), which develop international codes, recommendations, and conventions, such as the International Convention of the Prevention of Pollution from Ships (MARPOL).

[88] Naphtha-type jet fuel was used in the past by the military in turbojet and turboprop aircraft engines.

military (i.e., U.S. Navy), fishing, and miscellaneous support ships (e.g., tugboats). For the purpose of estimating greenhouse gas emissions, international bunker fuels are solely related to cargo and passenger carrying vessels, which is the largest of the four categories, and military vessels. Two main types of fuels are used on sea-going vessels: distillate diesel fuel and residual fuel oil. Carbon dioxide is the primary greenhouse gas emitted from marine shipping.

Overall, aggregate greenhouse gas emissions in 2021 from the combustion of international bunker fuels from both aviation and marine activities were 80.9 MMT CO_2 Eq., or 22.7 percent below emissions in 1990 (see Table 3-99 and Table 3-100). Emissions from international flights and international shipping voyages departing from the United States have increased by 33.0 percent and decreased by 55.1 percent, respectively, since 1990. The majority of these emissions were in the form of CO_2; however, small amounts of CH_4 (from marine transport modes) and N_2O were also emitted.

Table 3-99: CO_2, CH_4, and N_2O Emissions from International Bunker Fuels (MMT CO_2 Eq.)

Gas/Mode	1990	2005	2017	2018	2019	2020	2021
CO_2	**103.6**	**113.3**	**120.2**	**124.3**	**113.6**	**69.6**	**80.2**
Aviation	38.2	60.2	77.8	83.0	78.3	39.8	50.8
Commercial	*30.0*	*55.6*	*74.5*	*79.8*	*75.1*	*36.7*	*47.6*
Military	*8.2*	*4.6*	*3.3*	*3.2*	*3.2*	*3.1*	*3.2*
Marine	65.4	53.1	42.4	41.3	35.4	29.9	29.4
CH_4	**0.2**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Aviation	NO	NO	NO	NO	NO	NO	NO
Marine	0.2	0.1	0.1	0.1	0.1	0.1	0.1
N_2O	**0.8**	**0.9**	**0.9**	**1.0**	**0.9**	**0.5**	**0.6**
Aviation	0.3	0.5	0.7	0.7	0.7	0.3	0.4
Marine	0.4	0.4	0.3	0.3	0.2	0.2	0.2
Total	**104.6**	**114.3**	**121.2**	**125.3**	**114.6**	**70.3**	**80.9**

NO (Not Occurring)

Notes: Totals may not sum due to independent rounding. Includes aircraft cruise altitude emissions.

Table 3-100: CO_2, CH_4, and N_2O Emissions from International Bunker Fuels (kt)

Gas/Mode	1990	2005	2017	2018	2019	2020	2021
CO_2	**103,634**	**113,328**	**120,192**	**124,279**	**113,632**	**69,638**	**80,180**
Aviation	38,205	60,221	77,764	82,953	78,280	39,781	50,812
Marine	65,429	53,107	42,428	41,325	35,351	29,857	29,369
CH_4	**7**	**5**	**4**	**4**	**4**	**3**	**3**
Aviation	NO	NO	NO	NO	NO	NO	NO
Marine	7	5	4	4	4	3	3
N_2O	**3**	**3**	**4**	**4**	**3**	**2**	**2**
Aviation	1	2	2	3	2	1	2
Marine	2	1	1	1	1	1	1

NO (Not Occurring)

Notes: Totals may not sum due to independent rounding. Includes aircraft cruise altitude emissions.

Methodology and Time-Series Consistency

Emissions of CO_2 were for the most part estimated by applying C content and fraction oxidized factors to fuel consumption activity data. This approach is analogous to that described under Section 3.1 – CO_2 from Fossil Fuel Combustion. Carbon content and fraction oxidized factors for jet fuel (except for commercial aviation as per below), distillate fuel oil, and residual fuel oil are the same as used for CO_2 from Fossil Fuel Combustion and are presented in Annex 2.1, Annex 2.2, and Annex 3.8 of this Inventory. Density conversions were taken from ASTM (1989) and USAF (1998). Heat content for distillate fuel oil and residual fuel oil were taken from EIA (2023) and USAF (1998), and heat content for jet fuel was taken from EIA (2023). See below for details on how emission estimates for commercial aviation were determined.

A complete description of the methodology and a listing of the various factors employed can be found in Annex 2.1. See Annex 3.8 for a specific discussion on the methodology used for estimating emissions from international bunker fuel use by the U.S. military.

Emission estimates for CH_4 and N_2O were calculated by multiplying emission factors by measures of fuel consumption by fuel type and mode. Emission factors used in the calculations of CH_4 and N_2O emissions were obtained from the *Revised 1996 IPCC Guidelines* (IPCC/UNEP/OECD/IEA 1997), which is also referenced in the *2006 IPCC Guidelines* (IPCC 2006). For aircraft emissions, the following value, in units of grams of pollutant per kilogram of fuel consumed (g/kg), was employed: 0.1 for N_2O (IPCC 2006). For marine vessels consuming either distillate diesel or residual fuel oil the following values (g/MJ), were employed: 0.315 for CH_4 and 0.08 for N_2O. Activity data for aviation included solely jet fuel consumption statistics, while the marine mode included both distillate diesel and residual fuel oil.

Activity data on domestic and international aircraft fuel consumption were developed by the U.S. Federal Aviation Administration (FAA) using radar-informed data from the FAA Enhanced Traffic Management System (ETMS) for 1990 and 2000 through 2021 as modeled with the Aviation Environmental Design Tool (AEDT). This bottom-up approach is built from modeling dynamic aircraft performance for each flight occurring within an individual calendar year. The analysis incorporates data on the aircraft type, date, flight identifier, departure time, arrival time, departure airport, arrival airport, ground delay at each airport, and real-world flight trajectories. To generate results for a given flight within AEDT, the radar-informed aircraft data is correlated with engine and aircraft performance data to calculate fuel burn and exhaust emissions. Information on exhaust emissions for in-production aircraft engines comes from the International Civil Aviation Organization (ICAO) Aircraft Engine Emissions Databank (EDB). This bottom-up approach is in accordance with the Tier 3B method from the *2006 IPCC Guidelines* (IPCC 2006).

International aviation CO_2 estimates for 1990 and 2000 through 2021 were obtained directly from FAA's AEDT model (FAA 2023). The radar-informed method that was used to estimate CO_2 emissions for commercial aircraft for 1990 and 2000 through 2021 was not possible for 1991 through 1999 because the radar dataset was not available for years prior to 2000. FAA developed Official Airline Guide (OAG) schedule-informed inventories modeled with AEDT and great circle trajectories for 1990, 2000, and 2010. Because fuel consumption and CO_2 emission estimates for years 1991 through 1999 are unavailable, consumption estimates for these years were calculated using fuel consumption estimates from the Bureau of Transportation Statistics (DOT 1991 through 2013), adjusted based on 2000 through 2005 data. See Annex 3.3 for more information on the methodology for estimating emissions from commercial aircraft jet fuel consumption.

Data on U.S. Department of Defense (DoD) aviation bunker fuels and total jet fuel consumed by the U.S. military was supplied by the Office of the Under Secretary of Defense (Installations and Environment), DoD. Estimates of the percentage of each Service's total operations that were international operations were developed by DoD. Military aviation bunkers included international operations, operations conducted from naval vessels at sea, and operations conducted from U.S. installations principally over international water in direct support of military operations at sea. Military aviation bunker fuel emissions were estimated using military fuel and operations data synthesized from unpublished data from DoD's Defense Logistics Agency Energy (DLA Energy 2022). Together, the data allow the quantity of fuel used in military international operations to be estimated. Densities for each jet fuel type were obtained from a report from the U.S. Air Force (USAF 1998). Final jet fuel consumption estimates are presented in Table 3-101. See Annex 3.8 for additional discussion of military data.

Table 3-101: Aviation Jet Fuel Consumption for International Transport (Million Gallons)

Nationality	1990	2005	2017	2018	2019	2020	2021
U.S. and Foreign Carriers	3,155	5,858	7,844	8,178	7,911	3,859	5,015
U.S. Military	862	462	326	315	318	308	321
Total	**4,017**	**6,321**	**8,171**	**8,493**	**8,229**	**4,167**	**5,336**

Note: Totals may not sum due to independent rounding.

In order to quantify the civilian international component of marine bunker fuels, activity data on distillate diesel and residual fuel oil consumption by cargo or passenger carrying marine vessels departing from U.S. ports were collected for individual shipping agents on a monthly basis by the U.S. Customs and Border Protection. This information was then reported in unpublished data collected by the Foreign Trade Division of the U.S. Department of Commerce's Bureau of the Census (DOC 1991 through 2022) for 1990 through 2001, 2007 through 2021, and the Department of Homeland Security's Bunker Report for 2003 through 2006 (DHS 2008). Fuel consumption data for 2002 was interpolated due to inconsistencies in reported fuel consumption data. Activity data on distillate diesel consumption by military vessels departing from U.S. ports were provided by DLA Energy (2022). The total amount of fuel provided to naval vessels was reduced by 21 percent to account for fuel used while the vessels were not-underway (i.e., in port). Data on the percentage of steaming hours underway versus not underway were provided by the U.S. Navy. These fuel consumption estimates are presented in Table 3-102.

Table 3-102: Marine Fuel Consumption for International Transport (Million Gallons)

Fuel Type	1990	2005	2017	2018	2019	2020	2021
Residual Fuel Oil	4,781	3,881	2,975	2,790	2,246	1,964	1,953
Distillate Diesel Fuel & Other	617	444	568	684	702	461	437
U.S. Military Naval Fuels	522	471	307	285	281	296	285
Total	**5,920**	**4,796**	**3,850**	**3,759**	**3,229**	**2,721**	**2,674**

Note: Totals may not sum due to independent rounding.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Emission estimates related to the consumption of international bunker fuels are subject to the same uncertainties as those from domestic aviation and marine mobile combustion emissions; however, additional uncertainties result from the difficulty in collecting accurate fuel consumption activity data for international transport activities separate from domestic transport activities.[89] For example, smaller aircraft on shorter routes often carry sufficient fuel to complete several flight segments without refueling in order to minimize time spent at the airport gate or take advantage of lower fuel prices at particular airports. This practice, called tankering, when done on international flights, complicates the use of fuel sales data for estimating bunker fuel emissions. Tankering is less common with the type of large, long-range aircraft that make many international flights from the United States, however. Similar practices occur in the marine shipping industry where fuel costs represent a significant portion of overall operating costs and fuel prices vary from port to port, leading to some tankering from ports with low fuel costs.

Uncertainties exist with regard to the total fuel used by military aircraft and ships. Total aircraft and ship fuel use estimates were developed from DoD records, which document fuel sold to the DoD Components (e.g., Army, Department of Navy and Air Force) from the Defense Logistics Agency Energy. These data may not include fuel used in aircraft and ships as a result of a Service procuring fuel from, selling fuel to, trading fuel with, or giving fuel to other ships, aircraft, governments, or other entities.

Additionally, there are uncertainties in historical aircraft operations and training activity data. Estimates for the quantity of fuel actually used in Navy and Air Force flying activities reported as bunker fuel emissions had to be estimated based on a combination of available data and expert judgment. Estimates of marine bunker fuel emissions were based on Navy vessel steaming hour data, which reports fuel used while underway and fuel used while not underway. This approach does not capture some voyages that would be classified as domestic for a commercial vessel. Conversely, emissions from fuel used while not underway preceding an international voyage are reported as domestic rather than international as would be done for a commercial vessel. There is uncertainty

[89] See uncertainty discussions under section 3.1 CO_2 from Fossil Fuel Combustion.

associated with ground fuel estimates for 1997 through 2021, including estimates for the quantity of jet fuel allocated to ground transportation. Small fuel quantities may have been used in vehicles or equipment other than that which was assumed for each fuel type.

There are also uncertainties in fuel end-uses by fuel type, emissions factors, fuel densities, diesel fuel sulfur content, aircraft and vessel engine characteristics and fuel efficiencies, and the methodology used to back-calculate the data set to 1990 using the original set from 1995. The data were adjusted for trends in fuel use based on a closely correlating, but not matching, data set. All assumptions used to develop the estimate were based on process knowledge, DoD data, and expert judgments. The magnitude of the potential errors related to the various uncertainties has not been calculated but is believed to be small. The uncertainties associated with future military bunker fuel emission estimates could be reduced through revalidation of assumptions based on data regarding current equipment and operational tempo, however, it is doubtful data with more fidelity exist at this time.

Although aggregate fuel consumption data have been used to estimate emissions from aviation, the recommended method for estimating emissions of gases other than CO_2 in the *2006 IPCC Guidelines* (IPCC 2006) is to use data by specific aircraft type, number of individual flights and, ideally, movement data to better differentiate between domestic and international aviation and to facilitate estimating the effects of changes in technologies. The IPCC also recommends that cruise altitude emissions be estimated separately using fuel consumption data, while landing and take-off (LTO) cycle data be used to estimate near-ground level emissions of gases other than CO_2.[90]

There is also concern regarding the reliability of the existing DOC (1991 through 2022) data on marine vessel fuel consumption reported at U.S. customs stations due to the significant degree of inter-annual variation.

QA/QC and Verification

In order to ensure the quality of the emission estimates from international bunker fuels, General (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The Tier 2 procedures that were implemented involved checks specifically focusing on the activity data and emission factor sources and methodology used for estimating CO_2, CH_4, and N_2O emissions from international bunker fuels in the United States. Emission totals for the different sectors and fuels were compared and trends were investigated. No corrective actions were necessary.

Recalculations Discussion

For the current Inventory, CO_2-equivalent emissions of CH_4 and N_2O from international bunker fuels have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4), which was used in the previous inventories (IPCC 2007). The AR5 GWPs have been applied across the entire time series for consistency. Prior inventories used GWPs of 25 and 298 for CH_4 and N_2O, respectively. These values have been updated to 28 and 265, respectively. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent CH_4 emissions was a 12 percent increase and the average annual change in CO_2-equivalent N_2O emissions was an 11 percent decrease for the time series. As a result of the change in methodology, total emissions across the time series changed by an average annual decrease of 0.1 MMT CO_2 Eq. (less than half a percent) relative to emissions results calculated using the prior GWPs. Further

[90] U.S. aviation emission estimates for CO, NO_x, and NMVOCs are reported by EPA's National Emission Inventory (NEI) Air Pollutant Emission Trends website, and reported under the Mobile Combustion section. It should be noted that these estimates are based solely upon LTO cycles and consequently only capture near ground-level emissions, which are more relevant for air quality evaluations. These estimates also include both domestic and international flights. Therefore, estimates reported under the Mobile Combustion section overestimate IPCC-defined domestic CO, NO_x, and NMVOC emissions by including landing and take-off (LTO) cycles by aircraft on international flights, but underestimate because they do not include emissions from aircraft on domestic flight segments at cruising altitudes.

discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA will evaluate data availability to update the sources for densities, energy contents, and emission factors applied to estimate emissions from aviation and marine fuels. Many are from sources from the late 1990s, such as IPCC/UNEP/OECD/IEA (1997). Potential sources with more recent data include the International Maritime Organization (IMO) greenhouse gas emission inventory, International Air Transport Association (IATA)/ICAO greenhouse gas reporting system (CORSIA), and the EPA Greenhouse Gas Reporting Program (GHGRP) Technical Support Document for Petroleum Products. Specifically, EPA will evaluate data availability to support updating the heat contents and carbon contents of jet fuel with input from EIA.

A longer-term effort is underway to consider the feasibility of including data from a broader range of domestic and international sources for bunker fuels. Potential sources include the IMO greenhouse gas emission inventory, data from the U.S. Coast Guard on vehicle operation currently used in criteria pollutant modeling, data from the International Energy Agency (IEA), relevant updated FAA models to improve aviation bunker fuel estimates, and researching newly available marine bunker data.

3.10 Biomass and Biofuels Consumption (CRF Source Category 1A)

The combustion of biomass—such as wood, charcoal, the biogenic portions of MSW, and wood waste and biofuels such as ethanol, biogas, and biodiesel—generates CO_2 in addition to CH_4 and N_2O already covered in this chapter. In line with the reporting requirements for inventories submitted under the UNFCCC, CO_2 emissions from biomass and biofuel combustion have been estimated separately from fossil fuel CO_2 emissions and are not directly included in the energy sector contributions to U.S. totals. In accordance with IPCC methodological guidelines, any such emissions are calculated by accounting for net carbon fluxes from changes in biogenic C reservoirs in wooded or crop lands. For a more complete description of this methodological approach, see the Land Use, Land-Use Change, and Forestry chapter (Chapter 6), which accounts for the contribution of any resulting CO_2 emissions to U.S. totals within the Land Use, Land-Use Change, and Forestry sector's approach.

Therefore, CO_2 emissions from biomass and biofuel consumption are not included specifically in summing energy sector totals. However, they are presented here for informational purposes and to provide detail on biomass and biofuels consumption.

In 2021, total CO_2 emissions from the burning of woody biomass in the industrial, residential, commercial, and electric power sectors were approximately 204.8 MMT CO_2 Eq. (204,848 kt) (see Table 3-103 and Table 3-104). As the largest consumer of woody biomass, the industrial sector was responsible for 62.6 percent of the CO_2 emissions from this source. The residential sector was the second largest emitter, constituting 23.3 percent of the total, while the electric power and commercial sectors accounted for the remainder.

Table 3-103: CO_2 Emissions from Wood Consumption by End-Use Sector (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	135.3	136.3	135.4	134.4	132.1	127.3	128.2
Residential	59.8	44.3	44.3	54.1	56.3	45.5	47.8
Commercial	6.8	7.2	8.6	8.7	8.7	8.6	8.5
Electric Power	13.3	19.1	23.6	22.8	20.7	19.1	20.3
Total	**215.2**	**206.9**	**212.0**	**220.0**	**217.7**	**200.4**	**204.8**

Table 3-104: CO_2 Emissions from Wood Consumption by End-Use Sector (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	135,348	136,269	135,386	134,417	132,069	127,301	128,209
Residential	59,808	44,340	44,298	54,124	56,253	45,452	47,823
Commercial	6,779	7,218	8,634	8,669	8,693	8,554	8,528
Electric Power	13,252	19,074	23,647	22,795	20,677	19,115	20,288
Total	**215,186**	**206,901**	**211,965**	**220,005**	**217,692**	**200,421**	**204,848**

Note: Totals may not sum due to independent rounding.

Carbon dioxide emissions from combustion of the biogenic components of MSW by the electric power sector were an estimated 15.3 MMT CO_2 (15,329 kt) in 2021. Emissions across the time series are shown in Table 3-105 and Table 3-106. As discussed in Section 3.3, MSW is combusted to produce electricity and the CO_2 emissions from the fossil portion of the MSW (e.g., plastics, textiles, etc.) are included in the energy sector FFC estimates. The MSW also includes biogenic components (e.g., food waste, yard trimmings, natural fibers) and the CO_2 emissions associated with that biogenic portion is included here.

Table 3-105: CO_2 Emissions from Biogenic Components of MSW (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Electric Power	18.5	14.7	16.1	16.1	15.7	15.6	15.3

Table 3-106: CO_2 Emissions from Biogenic Components of MSW (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Electric Power	18,534	14,722	16,130	16,115	15,709	15,614	15,329

The transportation sector is responsible for most of the fuel ethanol consumption in the United States. Ethanol used for fuel is currently produced primarily from corn grown in the Midwest, but it can be produced from a variety of biomass feedstocks. Most ethanol for transportation use is blended with gasoline to create a 90 percent gasoline, 10 percent by volume ethanol blend known as E-10 or gasohol.

In 2021, the United States transportation sector consumed an estimated 1,101.7 trillion Btu of ethanol (95 percent of total), and as a result, produced approximately 75.4 MMT CO_2 Eq. (75,417 kt) (see Table 3-107 and Table 3-108) of CO_2 emissions. Smaller quantities of ethanol were also used in the industrial and commercial sectors. Ethanol fuel production and consumption has grown significantly since 1990 due to the favorable economics of blending ethanol into gasoline and federal policies that have encouraged use of renewable fuels.

Table 3-107: CO_2 Emissions from Ethanol Consumption (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation[a]	4.1	21.6	77.7	78.6	78.7	68.1	75.4
Industrial	0.1	1.2	1.9	1.4	1.6	1.6	1.5
Commercial	0.1	0.2	2.5	1.9	2.2	2.2	2.1
Total	**4.2**	**22.9**	**82.1**	**81.9**	**82.6**	**71.8**	**79.1**

[a] See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.
Note: Totals may not sum due to independent rounding.

Table 3-108: CO_2 Emissions from Ethanol Consumption (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation[a]	4,059	21,616	77,671	78,603	78,739	68,085	75,417
Industrial	105	1,176	1,868	1,404	1,610	1,582	1,509
Commercial	63	151	2,550	1,910	2,229	2,182	2,139
Total	**4,227**	**22,943**	**82,088**	**81,917**	**82,578**	**71,848**	**79,064**

[a] See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.
Note: Totals may not sum due to independent rounding.

The transportation sector is assumed to be responsible for all of the biodiesel consumption in the United States (EIA 2023a). Biodiesel is currently produced primarily from soybean oil, but it can be produced from a variety of biomass feedstocks including waste oils, fats, and greases. Biodiesel for transportation use appears in low-level blends (less than 5 percent) with diesel fuel, high-level blends (between 6 and 20 percent) with diesel fuel, and 100 percent biodiesel (EIA 2023b).

In 2021, the United States consumed an estimated 218.2 trillion Btu of biodiesel, and as a result, produced approximately 16.1 MMT CO_2 Eq. (16,112 kt) (see Table 3-109 and Table 3-110) of CO_2 emissions. Biodiesel production and consumption has grown significantly since 2001 due to the favorable economics of blending biodiesel into diesel and federal policies that have encouraged use of renewable fuels (EIA 2023b). There was no measured biodiesel consumption prior to 2001 EIA (2023a).

Table 3-109: CO_2 Emissions from Biodiesel Consumption (MMT CO_2 Eq.)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation[a]	NO	0.9	18.7	17.9	17.1	17.7	16.1

NO (Not Occurring)
[a] See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.

Table 3-110: CO_2 Emissions from Biodiesel Consumption (kt)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation[a]	NO	856	18,705	17,936	17,080	17,678	16,112

NO (Not Occurring)
[a] See Annex 3.2, Table A-76 for additional information on transportation consumption of these fuels.

Methodology and Time-Series Consistency

Woody biomass emissions were estimated by applying two gross heat contents from EIA (Lindstrom 2006) to U.S. consumption data (EIA 2023a) (see Table 3-112), provided in energy units for the industrial, residential, commercial, and electric power sectors. One heat content (16.95 MMBtu/MT wood and wood waste) was applied to the industrial sector's consumption, while the other heat content (15.43 MMBtu/MT wood and wood waste) was applied to the consumption data for the other sectors. An EIA emission factor of 0.434 MT C/MT wood (Lindstrom 2006) was then applied to the resulting quantities of woody biomass to obtain CO_2 emission estimates. The woody biomass is assumed to contain black liquor and other wood wastes, have a moisture content of 12 percent, and undergo complete combustion to be converted into CO_2.

Data for total waste incinerated, excluding tires, from 1990 to 2021 was derived following the methodology described in Section 3.3. Biogenic CO_2 emissions associated with MSW combustion were obtained from EPA's GHGRP FLIGHT data for MSW combustion sources (EPA 2022). Dividing biogenic CO_2 emissions from GHGRP FLIGHT data for MSW combustors by estimated MSW tonnage combusted yielded an annual biogenic CO_2 emission factor. This approach follows the same approach used to develop the fossil CO_2 emissions from MSW combustion as discussed in Section 3.3. As this data was only available following 2011, all years prior use an average of the emission factors from 2011 through 2015.

Biogenic CO_2 emissions from MSW combustion were calculated by multiplying the annual tonnage estimates, excluding tires, by the calculated emissions factor. Calculated biogenic CO_2 emission factors are shown in Table 3-111.

Table 3-111: Calculated Biogenic CO_2 Content per Ton Waste (kg CO_2/Short Ton Combusted)

	1990	2005	2017	2018	2019	2020	2021
CO_2 Emission Factors	556	556	564	553	558	566	550

The amount of ethanol allocated across the transportation, industrial, and commercial sectors was based on the sector allocations of ethanol-blended motor gasoline. The sector allocations of ethanol-blended motor gasoline were determined using a bottom-up analysis conducted by EPA, as described in the Methodology section of Fossil Fuel Combustion. Total U.S. ethanol consumption from EIA (2023a) was allocated to individual sectors using the same sector allocations as ethanol-blended motor gasoline. The emissions from ethanol consumption were calculated by applying an emission factor of 18.67 MMT C/Qbtu (EPA 2010) to adjusted ethanol consumption estimates (see Table 3-113). The emissions from biodiesel consumption were calculated by applying an emission factor of 20.1 MMT C/Qbtu (EPA 2010) to U.S. biodiesel consumption estimates that were provided in energy units (EIA 2023a) (see Table 3-114).[91]

Table 3-112: Woody Biomass Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Industrial	1,441.9	1,451.7	1,442.3	1,432.0	1,407.0	1,356.2	1,365.9
Residential	580.0	430.0	429.6	524.9	545.5	440.8	463.8
Commercial	65.7	70.0	83.7	84.1	84.3	83.0	82.7
Electric Power	128.5	185.0	229.3	221.1	200.5	185.4	196.7
Total	**2,216.2**	**2,136.7**	**2,185.0**	**2,262.0**	**2,237.3**	**2,065.3**	**2,109.1**

Note: Totals may not sum due to independent rounding.

Table 3-113: Ethanol Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	59.3	315.8	1,134.6	1,148.2	1,150.2	994.6	1,101.7
Industrial	1.5	17.2	27.3	20.5	23.5	23.1	22.0
Commercial	0.9	2.2	37.2	27.9	32.6	31.9	31.2
Total	**61.7**	**335.1**	**1,199.1**	**1,196.6**	**1,206.3**	**1,049.5**	**1,155.0**

Note: Totals may not sum due to independent rounding.

Table 3-114: Biodiesel Consumption by Sector (Trillion Btu)

End-Use Sector	1990	2005	2017	2018	2019	2020	2021
Transportation	NO	11.6	253.3	242.9	231.3	239.4	218.2

NO (Not Occurring)

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

It is assumed that the combustion efficiency for biomass is 100 percent, which is believed to be an overestimate of the efficiency of biomass combustion processes in the United States. Decreasing the combustion efficiency would decrease emission estimates for CO_2. Additionally, the heat content applied to the consumption of woody biomass in the residential, commercial, and electric power sectors is unlikely to be a completely accurate representation of the heat content for all the different types of woody biomass consumed within these sectors. Emission estimates from ethanol and biodiesel production are more certain than estimates from woody biomass consumption due to better activity data collection methods and uniform combustion techniques.

[91] CO_2 emissions from biodiesel do not include emissions associated with the C in the fuel that is from the methanol used in the process. Emissions from methanol use and combustion are assumed to be accounted for under Non-Energy Use of Fuels. See Annex 2.3 – Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

Recalculations Discussion

The CO_2 emissions associated with the biogenic components of MSW were added to this year's report. The emissions were calculated based on the same approach used to develop fossil CO_2 emissions from the fossil components of MSW as described in Section 3.3.

Planned Improvements

Future research will investigate the availability of data on woody biomass heat contents and carbon emission factors to see if there are newer, improved data sources available for these factors.

Currently, emission estimates from biomass and biomass-based fuels included in this Inventory are limited to woody biomass, biogenic components of MSW, ethanol, and biodiesel. Additional forms of biomass-based fuel consumption include biogas, and other renewable diesel fuels. EPA will investigate additional forms of biomass-based fuel consumption, research the availability of relevant emissions factors, and integrate these into the Inventory as feasible. EPA will examine EIA data on biogas and other renewable diesel fuels to see if these fuel types can be included in future Inventories. EIA (2023a) natural gas data already deducts biogas used in the natural gas supply, so no adjustments are needed to the natural gas fuel consumption data to account for biogas. Distillate fuel statistics are adjusted in this Inventory to remove other renewable diesel fuels as well as biodiesel. Additionally, options for including "Other Renewable Fuels," as defined by EIA, will be evaluated.

The availability of facility-level combustion emissions through EPA's GHGRP will be examined to help better characterize the industrial sector's energy consumption in the United States and further classify woody biomass consumption by business establishments according to industrial economic activity type. Most methodologies used in EPA's GHGRP are consistent with IPCC, although for EPA's GHGRP, facilities collect detailed information specific to their operations according to detailed measurement standards, which may differ with the more aggregated data collected for the Inventory to estimate total, national U.S. emissions. In addition, and unlike the reporting requirements for this chapter under the UNFCCC reporting guidelines, some facility-level fuel combustion emissions reported under EPA's GHGRP may also include industrial process emissions.[92]

In line with UNFCCC reporting guidelines, fuel combustion emissions are included in this chapter, while process emissions are included in the Industrial Processes and Product Use chapter of this report. In examining data from EPA's GHGRP that would be useful to improve the emission estimates for the CO_2 from biomass combustion category, particular attention will also be made to ensure time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as reported in this Inventory. Additionally, analyses will focus on aligning reported facility-level fuel types and IPCC fuel types per the national energy statistics, ensuring CO_2 emissions from biomass are separated in the facility-level reported data, and maintaining consistency with national energy statistics provided by EIA. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[93]

3.11 Energy Sources of Precursor Greenhouse Gases

[92] See https://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf#page=2.

[93] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

In addition to the main greenhouse gases addressed above, energy-related activities are also sources of greenhouse gas precursors. The reporting requirements of the UNFCCC[94] request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO_2). These gases are not direct greenhouse gases, but indirectly impact Earth's radiative balance by altering the concentrations of greenhouse gases (e.g., tropospheric ozone) and atmospheric aerosol (e.g., particulate sulfate). Total emissions of NO_x, CO, NMVOCs, and SO_2 from energy-related activities from 1990 to 2021 are reported in Table 3-115.

Table 3-115: NO_x, CO, NMVOC, and SO_2 Emissions from Energy-Related Activities (kt)

Gas/ Activity	1990	2005	2017	2018	2019	2020	2021
NO_x	**21,966**	**18,196**	**7,165**	**6,812**	**6,503**	**5,630**	**5,684**
Fossil Fuel Combustion	21,678	18,188	7,157	6,804	6,496	5,624	5,678
Transportation[a]	*12,132*	*12,628*	*4,848*	*4,486*	*4,322*	*3,618*	*3,616*
Industrial	*2,476*	*1,487*	*795*	*820*	*800*	*751*	*750*
Electric Power Sector	*6,045*	*3,440*	*1,048*	*1,025*	*898*	*762*	*819*
Commercial	*451*	*288*	*185*	*186*	*187*	*193*	*192*
Residential	*575*	*346*	*281*	*288*	*290*	*300*	*300*
Petroleum and Natural Gas Systems	288	8	8	7	7	7	6
International Bunker Fuels	1,953	1,699	1,475	1,456	1,280	977	1,008
CO	**124,685**	**63,891**	**30,530**	**30,237**	**29,854**	**27,897**	**28,773**
Fossil Fuel Combustion	124,353	63,686	30,345	30,050	29,660	27,703	28,587
Transportation[a]	*119,478*	*59,540*	*26,776*	*26,024*	*25,621*	*23,546*	*24,430*
Residential	*3,620*	*2,393*	*2,272*	*2,751*	*2,860*	*2,968*	*2,968*
Industrial	*705*	*977*	*615*	*620*	*600*	*670*	*670*
Electric Power Sector	*329*	*582*	*533*	*505*	*428*	*362*	*362*
Commercial	*220*	*195*	*149*	*151*	*151*	*157*	*157*
Petroleum and Natural Gas Systems	332	205	185	186	194	194	185
International Bunker Fuels	102	131	153	158	150	83	101
NMVOCs	**12,377**	**8,169**	**5,055**	**5,094**	**5,031**	**4,866**	**4,943**
Fossil Fuel Combustion	11,793	6,079	2,702	2,632	2,593	2,391	2,469
Transportationa	*10,932*	*5,608*	*2,267*	*2,127*	*2,072*	*1,846*	*1,923*
Residential	*693*	*322*	*315*	*382*	*397*	*431*	*431*
Commercial	*9*	*18*	*13*	*14*	*14*	*14*	*14*
Industrial	*117*	*87*	*77*	*80*	*81*	*74*	*74*
Electric Power Sector	*43*	*44*	*29*	*30*	*29*	*26*	*26*
Petroleum and Natural Gas Systems	584	2,090	2,353	2,462	2,438	2,475	2,475
International Bunker Fuels	57	54	50	50	45	32	34
SO_2	**22,100**	**13,530**	**1,968**	**1,880**	**1,555**	**1,331**	**1,489**
Fossil Fuel Combustion	21,482	13,235	1,863	1,770	1,447	1,138	1,296
Electric Power Sector	*14,432*	*9,436*	*1,254*	*1,189*	*921*	*758*	*911*
Industrial	*2,886*	*1,378*	*271*	*259*	*234*	*172*	*173*
Transportationa	*793*	*724*	*46*	*45*	*40*	*23*	*27*
Commercial	*485*	*318*	*21*	*18*	*19*	*13*	*13*
Residential	*2,886*	*1,378*	*271*	*259*	*234*	*172*	*173*
Petroleum and Natural Gas Systems	618	295	105	110	108	193	193
International Bunker Fuels	*NA*	*NA*	*NA*	*NA*	*NA*	*NA*	*NA*

NA (Not Applicable)

[a] The scope of the NEI for aircraft related precursor emissions included under the transportation is different from UNFCCC reporting scope. The NEI precursor estimate methodology does not exclude emissions that could be considered international bunkers given local impacts from these emissions. The precursor estimates are based on modeled using FAA- and state-supplied landing and take-off data for all aircraft types (including ground support equipment and auxiliary engines) used for public, private, and military purposes.

Note: Totals may not sum due to independent rounding.

[94] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2021 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 3-117, NEI reported emissions of CO, NO_x, NMVOCs, and SO_2 were recategorized from NEI Emissions Inventory System (EIS) sectors to source categories more closely aligned with UNFCCC reporting sectors based on discussions between the EPA GHG Inventory and NEI staff (see crosswalk documented in Annex 6.3).[95] EIS sectors mapped to the energy sector categories in this report include: fuel combustion for electric utilities, industrial, and other; petroleum and related industries; highway vehicles; off-highway; and other mobile sources (e.g., commercial marine vessels and rail). As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), NEI emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD and on EPA's Air Pollutant Emission Trends website (EPA 2023a; EPA 2023b). No quantitative estimates of uncertainty were calculated for this source category.

[95] The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO, NO_x, SO_2, and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

4. Industrial Processes and Product Use

The Industrial Processes and Product Use (IPPU) chapter includes greenhouse gas emissions occurring from industrial processes and from the use of greenhouse gases in products. The industrial processes and product use categories included in this chapter are presented in Figure 4-1 and Figure 4-2. Greenhouse gas emissions from industrial processes can occur in two different ways. First, they may be generated and emitted as the byproducts of various non-energy-related industrial activities. Second, they may be emitted due to their use in manufacturing processes or by end-consumers. Combustion-related energy use emissions from industry are reported in Chapter 3, Energy.

In the case of byproduct emissions, the emissions are generated by an industrial process itself and are not directly a result of energy consumed during the process. For example, raw materials can be chemically or physically transformed from one state to another. This transformation can result in the release of greenhouse gases such as carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated greenhouse gases (e.g., HFC-23). The greenhouse gas byproduct generating processes included in this chapter include iron and steel production and metallurgical coke production, cement production, petrochemical production, ammonia production, lime production, other process uses of carbonates (e.g., flux stone, flue gas desulfurization, and soda ash consumption not associated with glass manufacturing), nitric acid production, adipic acid production, urea consumption for non-agricultural purposes, aluminum production, HCFC-22 production, glass production, soda ash production, ferroalloy production, titanium dioxide production, caprolactam production, zinc production, phosphoric acid production, lead production, and silicon carbide production and consumption.

Greenhouse gases that are used in manufacturing processes or by end-consumers include man-made compounds such as hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). The present contribution of HFCs, PFCs, SF_6, and NF_3 gases to the radiative forcing effect of all anthropogenic greenhouse gases is small; however, because of their extremely long lifetimes, many of them will continue to persist in the atmosphere long after they were first released. In addition, many of these gases have high global warming potentials; SF_6 is the most potent greenhouse gas the Intergovernmental Panel on Climate Change (IPCC) has evaluated. Use of HFCs is growing rapidly since they are the primary substitutes for ozone depleting substances (ODS), which are being phased-out under the Montreal Protocol on Substances that Deplete the Ozone Layer. Hydrofluorocarbons, PFCs, SF_6, and NF_3 are employed and emitted by a number of other industrial sources in the United States, such as electronics industry, electric power transmission and distribution, aluminum production, and magnesium metal production and processing. Carbon dioxide is also consumed and emitted through various end-use applications. In addition, nitrous oxide is used in and emitted by the electronics industry and anesthetic and aerosol applications.

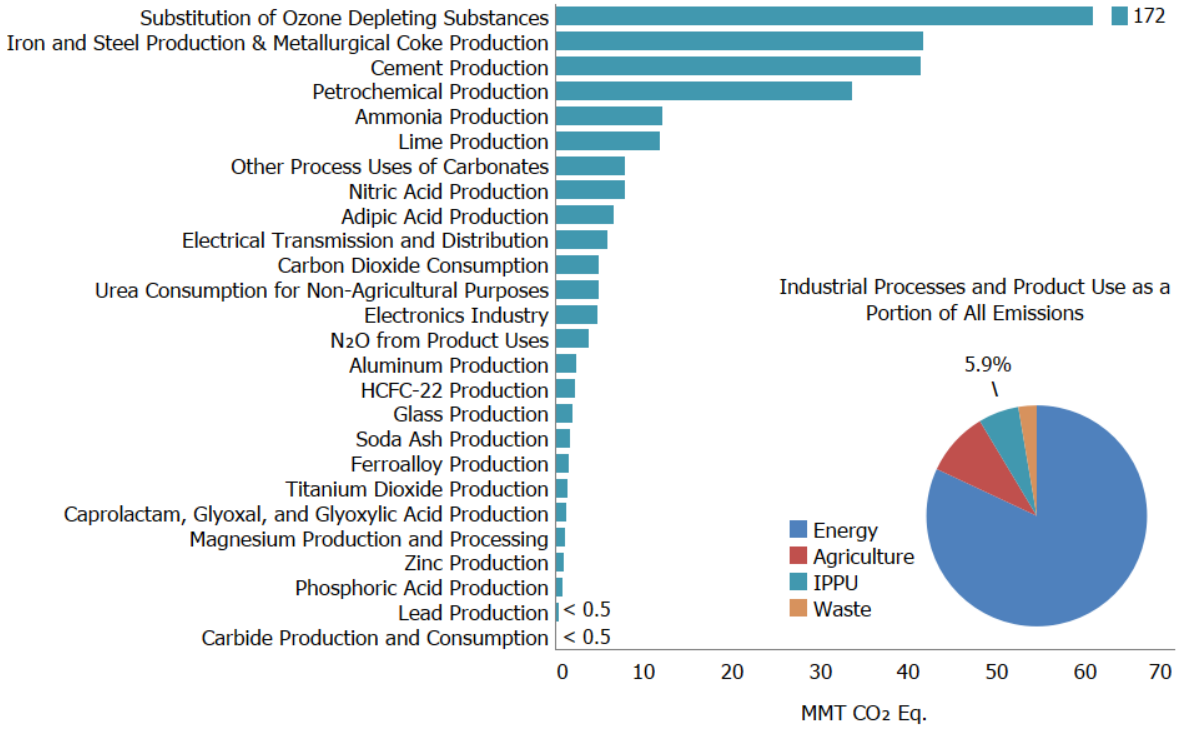
In 2021, IPPU generated emissions of 376.4 million metric tons of CO_2 equivalent (MMT CO_2 Eq.), or 5.9 percent of total U.S. greenhouse gas emissions.[1] Carbon dioxide emissions from all industrial processes were 168.9 MMT CO_2

[1] Emissions reported in the IPPU chapter include those from all 50 states, including Hawaii and Alaska, as well as from U.S. Territories.

Eq. (168,913 kt CO_2) in 2021, or 3.4 percent of total U.S. CO_2 emissions. Methane emissions from industrial processes resulted in emissions of approximately 0.4 MMT CO_2 Eq. (16 kt CH_4) in 2021, which was 0.1 percent of U.S. CH_4 emissions. Nitrous oxide emissions from IPPU were 19.7 MMT CO_2 Eq. (74 kt N_2O) in 2021, or 5.0 percent of total U.S. N_2O emissions. In 2021 combined emissions of HFCs, PFCs, SF_6, and NF_3 totaled 187.3 MMT CO_2 Eq. Total emissions from IPPU in 2021 were 12.2 percent more than 1990 emissions. Total emissions from IPPU remained relatively constant between 2020 and 2021, increasing by 3.6 percent due to offsetting trends within the sector. More information on emissions of greenhouse gas precursors emissions that also result from IPPU are presented in Section 4.27 of this chapter.

The largest source of IPPU-related emissions is the Substitution of Ozone Depleting Substances, which accounted for 45.8 percent of sector emissions in 2021. These emissions have increased by 73.5 percent since 2005, and 3.8 percent between 2020 and 2021. Iron and Steel Production and Metallurgical Coke Production was the second largest source of IPPU emissions in 2021, accounting for 11.1 percent of IPPU emissions in 2021. Cement Production was the third largest source of IPPU emissions, accounting for 11.0 percent of the sector total in 2021.

Figure 4-1: 2021 Industrial Processes and Product Use Sector Greenhouse Gas Sources



The increase in overall IPPU emissions since 1990 reflects a range of emission trends among the emission sources, as shown in Figure 4-2. Emissions resulting from most types of metal production have declined significantly since 1990, largely due to production shifting to other countries, but also due to transitions to less-emissive methods of production (in the case of iron and steel) and to improved practices (in the case of PFC emissions from aluminum production). Carbon dioxide and CH_4 emissions from some chemical production sources (e.g., petrochemical production, urea consumption for non-agricultural purposes) have increased since 1990, while emissions from other chemical production sources (e.g., ammonia production, phosphoric acid production) have decreased. Emissions from mineral sources have either increased (e.g., cement production) or not changed significantly (e.g., lime production) since 1990 and largely follow economic cycles. Hydrofluorocarbon emissions from the substitution of ODS have increased drastically since 1990 and are the largest source of IPPU emissions (45.8 percent in 2021), while the emissions of HFCs, PFCs, SF_6, and NF_3 from other sources have generally declined. Nitrous oxide emissions from the production of nitric acid have decreased. Some emission sources (e.g., adipic

acid) exhibit varied interannual trends. Trends are explained further within each emission source category throughout the chapter.

Figure 4-2: Trends in Industrial Processes and Product Use Sector Greenhouse Gas Sources

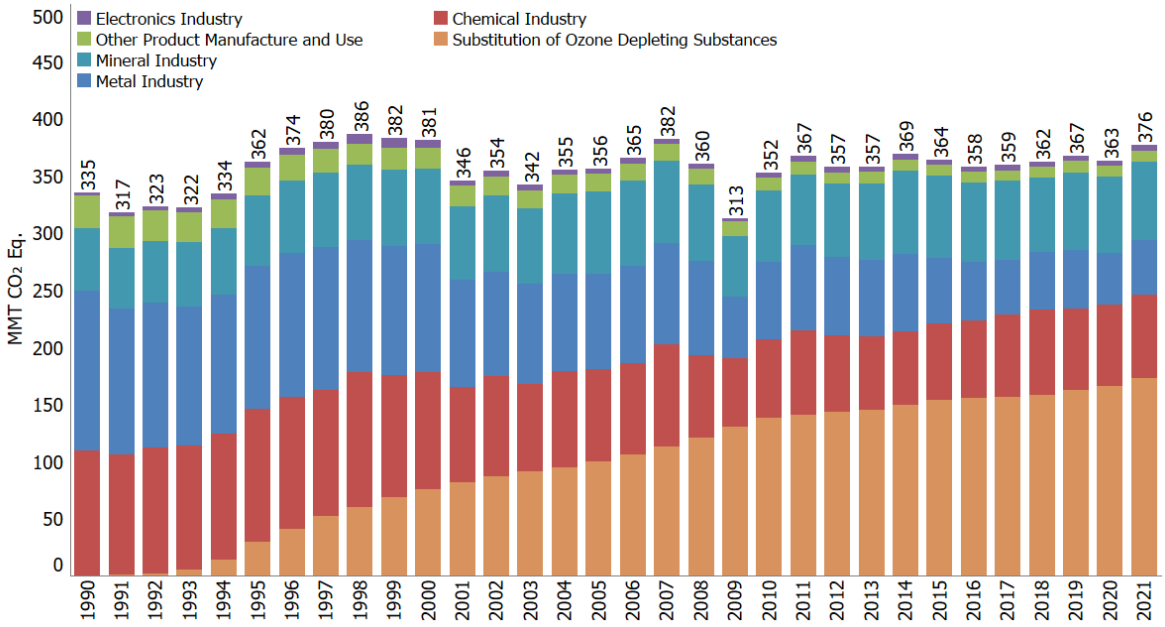


Table 4-1 summarizes emissions for the IPPU chapter in MMT CO_2 Eq. using IPCC *Fifth Assessment Report* (AR5) GWP values, following the requirements of the current United Nations Framework Convention on Climate Change (UNFCCC) reporting guidelines for national inventories (IPCC 2007).[2] Unweighted gas emissions in kt are also provided in Table 4-2. The source descriptions that follow in the chapter are presented in the order as reported to the UNFCCC in the Common Reporting Format (CRF) tables, corresponding generally to: mineral industry, chemical industry, metal industry, and emissions from the uses of HFCs, PFCs, SF_6, and NF_3.

Each year, some emission and sink estimates in the IPPU sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Key updates to this year's inventory include revisions to the Ammonia Production methodology to use GHGRP activity data for 2010 through 2021; Glass Production methodology to use additional GHGRP activity data for the years 2010 through 2020; updates to emission estimates from Urea Consumption for Non-Agricultural Purposes driven by revisions to quantities of urea applied, urea imports, and urea exports; and revisions to method for electrical equipment for estimating historical emissions for non-Partners based on the comparison with atmospheric data. Together, these methodological and data updates increased IPPU sector greenhouse gas emissions an average of 2.4 MMT CO_2 Eq. (1 percent) across the time series. In addition, estimates of CO_2-equivalent emissions totals of CH_4, N_2O, HFCs, PFCs, SF_6 and NF_3 have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). In total, the methodological and historic data improvements in addition to the change to AR5 GWP values, the IPPU sector emissions decreased 11.3 MMT CO_2 Eq. (3.1 percent) across the time series. For

[2] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

more information on specific methodological updates, please see the Recalculations Discussion section for each category in this chapter.

Table 4-1: Emissions from Industrial Processes and Product Use (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**214.0**	**195.4**	**166.2**	**165.9**	**170.0**	**161.8**	**168.9**
Iron and Steel Production & Metallurgical Coke Production	104.7	70.1	40.8	42.9	43.1	37.7	41.7
Iron and Steel Production	*99.1*	*66.2*	*38.8*	*41.6*	*40.1*	*35.4*	*38.4*
Metallurgical Coke Production	*5.6*	*3.9*	*2.0*	*1.3*	*3.0*	*2.3*	*3.2*
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3
Petrochemical Production	21.6	27.4	28.9	29.3	30.7	29.8	33.2
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9
Other Process Uses of Carbonates	6.2	7.5	9.9	7.4	8.4	8.4	8.0
Carbon Dioxide Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0
Urea Consumption for Non-Agricultural Purposes	3.8	3.7	5.2	6.1	6.2	5.8	5.0
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7
Ferroalloy Production	2.2	1.4	2.0	2.1	1.6	1.4	1.6
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5
Titanium Dioxide Production	1.2	1.8	1.7	1.5	1.5	1.2	1.5
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4
Carbide Production and Consumption	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Substitution of Ozone Depleting Substances[a]	+	+	+	+	+	+	+
Magnesium Production and Processing	0.1	+	+	+	+	+	+
CH_4	**0.3**	**0.1**	**0.3**	**0.4**	**0.4**	**0.4**	**0.4**
Petrochemical Production	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	+	+	+	+	+	+	+
Iron and Steel Production	+	+	+	+	+	+	+
Metallurgical Coke Production	NO	NO	NO	NO	NO	NO	NO
N_2O	**29.6**	**22.2**	**20.2**	**23.1**	**18.7**	**20.8**	**19.7**
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6
N_2O from Product Uses	3.8	3.8	3.8	3.8	3.8	3.8	3.8
Caprolactam, Glyoxal, and Glyoxylic Acid Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2
Electronics Industry	+	0.1	0.2	0.2	0.2	0.3	0.3
HFCs	**39.0**	**116.4**	**160.8**	**160.9**	**165.4**	**168.2**	**175.1**
Substitution of Ozone Depleting Substances[a]	0.3	99.4	156.1	157.7	161.9	166.1	172.4
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2
Electronics Industry	0.2	0.2	0.3	0.3	0.3	0.3	0.4

Magnesium Production and Processing	NO	NO	0.1	0.1	0.1	0.1	+
PFCs	**21.8**	**6.1**	**3.8**	**4.3**	**4.0**	**3.9**	**3.5**
Electronics Industry	2.5	3.0	2.7	2.8	2.5	2.4	2.6
Aluminum Production	19.3	3.1	1.0	1.4	1.4	1.4	0.9
Substitution of Ozone Depleting Substances	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO	+	+	0.0	+	+	+
SF_6	**30.5**	**15.5**	**7.2**	**7.1**	**7.8**	**7.5**	**8.0**
Electrical Transmission and Distribution	24.7	11.8	5.5	5.2	6.1	5.9	6.0
Magnesium Production and Processing	5.4	2.9	1.0	1.1	0.9	0.9	1.1
Electronics Industry	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF_3	**+**	**0.4**	**0.5**	**0.5**	**0.5**	**0.6**	**0.6**
Electronics Industry	+	0.4	0.5	0.5	0.5	0.6	0.6
Total[b]	**335.4**	**356.1**	**359.1**	**362.2**	**366.8**	**363.2**	**376.4**

+ Does not exceed 0.05 MMT CO_2 Eq.

NO (Not Occurring)

[a] Small amounts of PFC emissions also result from this source.

[b] Total does not include other fluorinated gases, such as HFEs and PFPEs, which are reported separately in Section 4.23.

Note: Totals may not sum due to independent rounding. Emissions of F-HTFs that are not HFCs, PFCs or SF_6 are not included in inventory totals and are included for informational purposes only in Section 4.23. Emissions presented for informational purposes include HFEs, PFPMIEs, perfluoroalkylmorpholines, and perfluorotrialkylamines.

Table 4-2: Emissions from Industrial Processes and Product Use (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**214,010**	**195,416**	**166,228**	**165,924**	**169,976**	**161,807**	**168,913**
Iron and Steel Production & Metallurgical Coke Production	104,737	70,076	40,810	42,858	43,090	37,712	41,656
Iron and Steel Production	*99,129*	*66,156*	*38,832*	*41,576*	*40,084*	*35,387*	*38,432*
Metallurgical Coke Production	*5,608*	*3,921*	*1,978*	*1,282*	*3,006*	*2,325*	*3,224*
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312
Petrochemical Production	21,611	27,383	28,890	29,314	30,702	29,780	33,170
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207
Lime Production	11,700	14,552	12,882	13,106	12,112	11,299	11,870
Other Process Uses of Carbonates	6,233	7,459	9,869	7,351	8,422	8,399	7,951
Carbon Dioxide Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990
Urea Consumption for Non-Agricultural Purposes	3,784	3,653	5,161	6,111	6,154	5,814	4,989
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714
Ferroalloy Production	2,152	1,392	1,975	2,063	1,598	1,377	1,567
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541
Titanium Dioxide Production	1,195	1,755	1,688	1,541	1,474	1,193	1,474
Zinc Production	632	1,030	900	999	1,026	977	969
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909
Lead Production	516	553	513	527	531	464	446
Carbide Production and Consumption	243	213	181	184	175	154	172

Substitution of Ozone Depleting Substances[a]	+	1	3	3	3	4	4
Magnesium Production and Processing	128	3	3	2	2	3	3
CH_4	**11**	**4**	**11**	**13**	**15**	**13**	**16**
Petrochemical Production	9	3	10	12	13	12	15
Ferroalloy Production	1	+	1	1	+	+	+
Carbide Production and Consumption	1	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	1	1	+	+	+	+	+
Iron and Steel Production	*1*	*1*	*+*	*+*	*+*	*+*	*+*
Metallurgical Coke Production	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*	*NO*
N_2O	**112**	**84**	**76**	**87**	**71**	**79**	**74**
Nitric Acid Production	41	38	31	32	34	31	30
Adipic Acid Production	51	24	25	35	18	28	25
N_2O from Product Uses	14	14	14	14	14	14	14
Caprolactam, Glyoxal, and Glyoxylic Acid Production	6	7	5	5	5	4	5
Electronics Industry	+	+	1	1	1	1	1
HFCs	**M**	**M**	**M**	**M**	**M**	**M**	**M**
Substitution of Ozone Depleting Substances[a]	M	M	M	M	M	M	M
HCFC-22 Production	3	1	+	+	+	+	+
Electronics Industry	0	0	+	+	+	+	+
Magnesium Production and Processing	+	+	+	+	+	+	+
PFCs	**M**	**M**	**M**	**M**	**M**	**M**	**M**
Electronics Industry	+	+	+	+	+	+	+
Aluminum Production	M	M	M	M	M	M	M
Substitution of Ozone Depleting Substances	NO	+	+	+	+	+	+
Electrical Transmission and Distribution	NO	+	+	0	+	+	+
SF_6	**1**	**1**	**+**	**+**	**+**	**+**	**+**
Electrical Transmission and Distribution	1	1	+	+	+	+	+
Magnesium Production and Processing	+	+	+	+	+	+	+
Electronics Industry	+	+	+	+	+	+	+
NF_3	**+**	**+**	**+**	**+**	**+**	**+**	**+**
Electronics Industry	+	+	+	+	+	+	+

+ Does not exceed 0.5 kt.
M (Mixture of gases)
NO (Not Occurring)
[a] Small amounts of PFC emissions also result from this source.
Note: Totals by gas may not sum due to independent rounding.

This chapter presents emission estimates calculated in accordance with the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (*2006 IPCC Guidelines*) and its refinements. For additional detail on IPPU sources that are not included in this Inventory report, please review Annex 5, Assessment of the Sources and Sinks of Greenhouse Gas Emissions Not Included. These sources are not included due to various national circumstances, such as emissions from a source may not currently occur in the United States, data are not currently available for those emission sources (e.g., ceramics, non-metallurgical magnesium production, glyoxal and glyoxylic acid

production, CH_4 from direct reduced iron production), emissions are included elsewhere within the Inventory report, or data suggest that emissions are not significant (e.g., other various fluorinated gas emissions from other product uses). In terms of geographic scope, emissions reported in the IPPU chapter include those from all 50 states, including Hawaii and Alaska, as well as from District of Columbia and U.S. Territories to the extent to which industries are occurring. While most IPPU sources do not occur in U.S. Territories (e.g., electronics manufacturing does not occur in U.S. Territories), they are estimated and accounted for where they are known to occur (e.g., cement production, lime production, and electrical transmission and distribution). EPA will review this on an ongoing basis to ensure emission sources are included across all geographic areas if they occur. Information on planned improvements for specific IPPU source categories can be found in the Planned Improvements section of the individual source category.

In addition, as mentioned in the Energy chapter of this report (Box 3-5), fossil fuels consumed for non-energy uses for primary purposes other than combustion for energy (including lubricants, paraffin waxes, bitumen asphalt, and solvents) are reported in the Energy chapter. According to the *2006 IPCC Guidelines*, these non-energy uses of fossil fuels are to be reported under the IPPU, rather than the Energy sector; however, due to national circumstances regarding the allocation of energy statistics and carbon balance data, the United States reports these non-energy uses in the Energy chapter of this Inventory. Although emissions from these non-energy uses are reported in the Energy chapter, the methodologies used to determine emissions are compatible with the *2006 IPCC Guidelines* and are well documented and scientifically based. The methodologies used are described in Section 3.2, Carbon Emitted from Non-Energy Uses of Fossil Fuels and Annex 2.3, Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels. The emissions are reported under the Energy chapter to improve transparency, report a more complete carbon balance, and avoid double counting. For example, only the emissions from the first use of lubricants and waxes are to be reported under the IPPU sector, and emissions from use of lubricants in 2-stroke engines and emissions from secondary use of lubricants and waxes in waste incineration with energy recovery are to be reported under the Energy sector. Reporting non-energy use emissions from only first use of lubricants and waxes under IPPU would involve making artificial adjustments to the non-energy use carbon balance and could potentially result in double counting of emissions. These artificial adjustments would also be required for asphalt and road oil and solvents (which are captured as part of petrochemical feedstock emissions) and could also potentially result in double counting of emissions. For more information, see the Methodology discussion in Section 3.1, CO_2 from Fossil Fuel Combustion, Section 3.2, Carbon Emitted from Non-Energy Uses of Fossil Fuels and Annex 2.3, Methodology for Estimating Carbon Emitted from Non-Energy Uses of Fossil Fuels.

Finally, as stated in the Energy chapter, portions of the fuel consumption data for seven fuel categories—coking coal, distillate fuel, industrial other coal, petroleum coke, natural gas, residual fuel oil, and other oil—are reallocated to the IPPU chapter, as they are consumed during non-energy related industrial process activity. Emissions from uses of fossil fuels as feedstocks or reducing agents (e.g., petrochemical production, aluminum production, titanium dioxide, zinc production) are reported in the IPPU chapter, unless otherwise noted due to specific national circumstances. This approach is compatible with the *2006 IPCC Guidelines* and is well documented and scientifically based. The emissions from these feedstocks and reducing agents are reported under the IPPU chapter to improve transparency and to avoid double counting of emissions under both the Energy and IPPU sectors. More information on the methodology to adjust for these emissions within the Energy chapter is described in the Methodology section of CO_2 from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion. Additional information is listed within each IPPU emission source in which this approach applies.

Box 4-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)* and its supplements and

refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the IPPU chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from industrial processes and from the use of greenhouse gases in products.

QA/QC and Verification Procedures

For IPPU sources, a detailed QA/QC plan was developed and implemented for specific categories. This plan is consistent with the U.S. Inventory QA/QC plan outlined in Annex 8 but tailored to include specific procedures recommended for these sources. The IPPU QA/QC Plan does not replace the Inventory QA/QC Plan, but rather provides more context for the IPPU sector. The IPPU QA/QC Plan provides the completed QA/QC forms for each inventory reports, as well as, for certain source categories (e.g., key categories), more detailed documentation of quality control checks and recalculations due to methodological changes.

Two types of checks were performed using this plan: (1) general (Tier 1) procedures consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines* that focus on annual procedures and checks to be used when gathering, maintaining, handling, documenting, checking, and archiving the data, supporting documents, and files; and (2) source category-specific (Tier 2) procedures that focus on checks and comparisons of the emission factors, activity data, and methodologies used for estimating emissions from the relevant industrial process and product use sources. Examples of these procedures include: checks to ensure that activity data and emission estimates are consistent with historical trends to identify significant changes; that, where possible, consistent and reputable data sources are used and specified across sources; that interpolation or extrapolation techniques are consistent across sources; and that common datasets, units, and conversion factors are used where applicable. The IPPU QA/QC plan also checked for transcription errors in data inputs required for emission calculations, including activity data and emission factors; and confirmed that estimates were calculated and reported for all applicable and able portions of the source categories for all years.

For sources that use data from EPA's Greenhouse Gas Reporting Program (GHGRP), EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.[3] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. See Box 4-2 below for more information on use of GHGRP data in this chapter.

General QA/QC procedures (Tier 1) and calculation-related QC (category-specific, Tier 2) have been performed for all IPPU sources. Consistent with the *2006 IPCC Guidelines*, additional category-specific QC procedures were performed for more significant emission categories (such as the comparison of reported consumption with modeled consumption using EPA's Greenhouse Gas Reporting Program (GHGRP) data within Substitution of Ozone Depleting Substances) or sources where significant methodological and data updates have taken place. The QA/QC implementation did not reveal any significant inaccuracies, and all errors identified were documented and

[3] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

corrected. Application of these procedures, specifically category-specific QC procedures and updates/improvements as a result of QA processes (expert, public, and UNFCCC technical expert reviews), are described further within respective source categories, in the Recalculations Discussion and Planned Improvement sections.

For most IPPU categories, activity data are obtained via aggregation of facility-level data from EPA's GHGRP (see Box 4-2 below and Annex 9), national commodity surveys conducted by U.S. Geological Survey (USGS) National Minerals Information Center, U.S. Department of Energy (DOE), U.S. Census Bureau, and industry associations such as Air-Conditioning, Heating, and Refrigeration Institute (AHRI), American Chemistry Council (ACC), and American Iron and Steel Institute (AISI) (specified within each source category). The emission factors used include those derived from the EPA's GHGRP and application of IPCC default factors. Descriptions of uncertainties and assumptions for activity data and emission factors are included within the uncertainty discussion sections for each IPPU source category.

Box 4-2: Industrial Process and Product Use Data from EPA's Greenhouse Gas Reporting Program

EPA collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject CO_2 underground for sequestration or other reasons and requires reporting by sources or suppliers in 41 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases.

In general, the threshold for reporting is 25,000 metric tons or more of CO_2 Eq. per year, but reporting is required for all facilities in some industries. Calendar year 2010 was the first year for which data were collected for facilities subject to 40 CFR Part 98, though some source categories first collected data for calendar year 2011. For more information, see Annex 9, Use of EPA Greenhouse Gas Reporting Program in Inventory.

EPA uses annual GHGRP data in a number of categories to improve the national estimates presented in this Inventory, consistent with IPCC guidelines (e.g., minerals, chemicals, product uses). Methodologies used in EPA's GHGRP are consistent with IPCC guidelines, including higher tier methods; however, it should be noted that the coverage and definitions for source categories (e.g., allocation of energy and IPPU emissions) in EPA's GHGRP may differ from those used in this Inventory in meeting the UNFCCC reporting guidelines (IPCC 2011) and is an important consideration when incorporating GHGRP data in the Inventory. In line with the UNFCCC reporting guidelines, the Inventory is a comprehensive accounting of all emissions from source categories identified in the *2006 IPCC Guidelines*. EPA has paid particular attention to ensuring both completeness and time-series consistency for major recalculations that have occurred from the incorporation of GHGRP data into these categories, consistent with *2006 IPCC Guidelines* and *IPCC Technical Bulletin on Use of Facility-Specific Data in National GHG Inventories.*[4]

For certain source categories in this Inventory (e.g., nitric acid production, lime production, cement production, petrochemical production, carbon dioxide consumption, ammonia production, and urea consumption for non-agricultural purposes), EPA has integrated data values that have been calculated by aggregating GHGRP data that are considered confidential business information (CBI) at the facility level. EPA, with industry engagement, has put forth criteria to confirm that a given data aggregation shields underlying CBI from public disclosure. EPA is only publishing data values that meet these aggregation criteria.[5] Specific uses of aggregated facility-level data are described in the respective methodological sections (e.g., including other sources using GHGRP data that is not aggregated CBI, such as aluminum, electronics industry, electrical transmission and distribution,

[4] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

[5] U.S. EPA Greenhouse Gas Reporting Program. Developments on Publication of Aggregated Greenhouse Gas Data, November 25, 2014. See http://www.epa.gov/ghgreporting/confidential-business-information-ghg-reporting.

HCFC-22 production, and magnesium production and processing). For other source categories in this chapter, as indicated in the respective planned improvements sections,[6] EPA is continuing to analyze how facility-level GHGRP data may be used to improve the national estimates presented in this Inventory, giving particular consideration to ensuring time-series consistency and completeness.

Additionally, EPA's GHGRP has and will continue to enhance QA/QC procedures and assessment of uncertainties within the IPPU categories (see those categories for specific QA/QC details regarding the use of GHGRP data).

4.1 Cement Production (CRF Source Category 2A1)

Cement production is an energy- and raw material-intensive process that results in the generation of carbon dioxide (CO_2) both from the energy consumed in making the clinker precursor to cement and from the chemical process to make the clinker. Emissions from fuels consumed for energy purposes during the production of cement are accounted for in the Energy chapter.

During the clinker production process, the key reaction occurs when calcium carbonate ($CaCO_3$), in the form of limestone or similar rocks or in the form of cement kiln dust (CKD), is heated in a cement kiln at a temperature range of about 700 to 1,000 degrees Celsius (1,300 to 1,800 degrees Fahrenheit) to form lime (i.e., calcium oxide, or CaO) and CO_2 in a process known as calcination or calcining. The quantity of CO_2 emitted during clinker production is directly proportional to the lime content of the clinker. During calcination, each mole of $CaCO_3$ heated in the clinker kiln forms one mole of CaO and one mole of CO_2. The CO_2 is vented to the atmosphere as part of the kiln exhaust:

$$CaCO_3 + heat \rightarrow CaO + CO_2$$

Next, over a temperature range of 1000 to 1450 degrees Celsius, the CaO combines with alumina, iron oxide and silica that are also present in the clinker raw material mix to form hydraulically reactive compounds within white-hot semifused (sintered) nodules of clinker. These "sintering" reactions are highly exothermic and produce few CO_2 process emissions. The clinker is then rapidly cooled to maintain quality and then very finely ground with a small amount of gypsum and potentially other materials (e.g., ground granulated blast furnace slag, etc.) to make portland and similar cements.

Masonry cement consists of plasticizers (e.g., ground limestone, lime, etc.) and portland cement, and the amount of portland cement used accounts for approximately 3 percent of total clinker production (USGS 2022a). No additional emissions are associated with the production of masonry cement. Carbon dioxide emissions that result from the production of lime used to produce portland and masonry cement are included in Section 4.2 Lime Production (CRF Source Category 2A2).

Carbon dioxide emitted from the chemical process of cement production is the second largest source of industrial CO_2 emissions in the United States. Cement is produced in 34 states and Puerto Rico. Texas, Missouri, California, and Florida were the leading cement-producing states in 2021 and accounted for almost 44 percent of total U.S. production (USGS 2022b). In 2021, shipments of cement were estimated to have slightly increased from 2020, and net imports increased by about 20 percent compared to 2020 (USGS 2022b). Clinker production in 2021 increased by 1.5 percent, compared to 2020 (EPA 2022; USGS 2022b). In 2021, U.S. clinker production totaled 79,400 kilotons

[6] Ammonia Production, Glass Production, Lead Production, and Other Fluorinated Gas Production.

(EPA 2022). The resulting CO_2 emissions were estimated to be 41.3 MMT CO_2 Eq. (41,312 kt) (see Table 4-3 and Table 4-4). The total construction value and cement shipments increased during the first nine months of 2021 compared to the same time period in 2020. This increase was attributed to economic recovery from the COVID-19 pandemic. Despite the slight increases, growth was constrained by increased costs, labor shortages, logistical issues, and supply chain disruptions (USGS 2022b).

Table 4-3: CO_2 Emissions from Cement Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Cement Production	33.5	46.2	40.3	39.0	40.9	40.7	41.3

Table 4-4: CO_2 Emissions from Cement Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Cement Production	33,484	46,194	40,324	38,971	40,896	40,688	41,312

Greenhouse gas emissions from cement production, which are primarily driven by production levels, increased every year from 1991 through 2006 but decreased in the following years until 2009. Since 1990, emissions have increased by 23 percent. Emissions from cement production were at their lowest levels in 2009 (2009 emissions are approximately 28 percent lower than 2008 emissions and 12 percent lower than 1990) due to the economic recession and the associated decrease in demand for construction materials. Since 2009, emissions have increased by nearly 40 percent due to increasing demand for cement. Cement continues to be a critical component of the construction industry; therefore, the availability of public and private construction funding, as well as overall economic conditions, have considerable impact on the level of cement production.

Methodology and Time-Series Consistency

Carbon dioxide emissions from cement production were estimated using the Tier 2 methodology from the *2006 IPCC Guidelines* as this is a key category. The Tier 2 methodology was used because detailed and complete data (including weights and composition) for carbonate(s) consumed in clinker production are not available,[7] and thus a rigorous Tier 3 approach is impractical. Tier 2 specifies the use of aggregated plant or national clinker production data and an emission factor, which is the product of the average lime mass fraction for clinker of 65 percent and a constant reflecting the mass of CO_2 released per unit of lime. The U.S. Geological Survey (USGS) mineral commodity expert for cement has confirmed that this is a reasonable assumption for the United States (Van Oss 2013a). This calculation yields an emission factor of 0.510 tons of CO_2 per ton of clinker produced, which was determined as follows:

Equation 4-1: *2006 IPCC Guidelines* Tier 1 Emission Factor for Clinker (precursor to Equation 2.4)

$$\mathrm{EF_{clinker}} = 0.650\ \mathrm{CaO} \times \left[\left(44.01 \frac{\mathrm{g}}{\mathrm{mole}} \mathrm{CO_2}\right) \div \left(56.08 \frac{\mathrm{g}}{\mathrm{mole}} \mathrm{CaO}\right)\right] = 0.510\ \frac{\mathrm{tons\ CO_2}}{\mathrm{ton\ clinker}}$$

During clinker production, some of the raw materials, partially reacted raw materials, and clinker enters the kiln line's exhaust system as non-calcinated, partially calcinated, or fully calcinated cement kiln dust (CKD). To the degree that the CKD contains carbonate raw materials which are then calcined, there are associated CO_2 emissions. At some plants, essentially all CKD is directly returned to the kiln, becoming part of the raw material feed, or is likewise returned to the kiln after first being removed from the exhaust. In either case, the returned CKD becomes

[7] As discussed further under "Planned Improvements," most cement-producing facilities that report their emissions to the GHGRP use CEMS to monitor combined process and fuel combustion emissions for kilns, making it difficult to quantify the process emissions on a facility-specific basis. In 2021, the percentage of facilities not using CEMS was 4 percent.

a raw material, thus forming clinker, and the associated CO_2 emissions are a component of those calculated for the clinker overall. At some plants, however, the CKD cannot be returned to the kiln because it is chemically unsuitable as a raw material or chemical issues limit the amount of CKD that can be so reused. Any clinker that cannot be returned to the kiln is either used for other (non-clinker) purposes or is landfilled. The CO_2 emissions attributable to the non-returned calcinated portion of the CKD are not accounted for by the clinker emission factor and thus a CKD correction factor should be applied to account for those emissions. The USGS reports the amount of CKD used to produce clinker, but no information is currently available on the total amount of CKD produced annually.[8] Because data are not currently available to derive a country-specific CKD correction factor, a default correction factor of 1.02 (2 percent) was used to account for CKD CO_2 emissions, as recommended by the IPCC (IPCC 2006).[9] Total cement production emissions were calculated by adding the emissions from clinker production and the emissions assigned to CKD.

Small amounts of impurities (i.e., not calcium carbonate) may exist in the raw limestone used to produce clinker. The proportion of these impurities is generally minimal, although a small amount (1 to 2 percent) of magnesium oxide (MgO) may be desirable as a flux. Per the IPCC Tier 2 methodology, a correction for MgO is not used, since the amount of MgO from carbonate is likely very small and the assumption of a 100 percent carbonate source of CaO already yields an overestimation of emissions (IPCC 2006).

The 1990 through 2012 activity data for clinker production were obtained from USGS (Van Oss 2013a, Van Oss 2013b). Clinker production data for 2013 were also obtained from USGS (USGS 2014). USGS compiled the data (to the nearest ton) through questionnaires sent to domestic clinker and cement manufacturing plants, including facilities in Puerto Rico. Clinker production values in the current Inventory report utilize GHGRP data for the years 2014 through 2021 (EPA 2022). Clinker production data are summarized in Table 4-5. Details on how this GHGRP data compares to USGS reported data can be found in the section on QA/QC and Verification.

Table 4-5: Clinker Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Clinker	64,355	88,783	77,500	74,900	78,600	78,200	79,400

Notes: Clinker production from 1990 through 2021 includes Puerto Rico (relevant U.S. Territories).

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021. The methodology for cement production spliced activity data from two different sources: USGS for 1990 through 2013 and GHGRP starting in 2014. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

The uncertainties contained in these estimates are primarily due to uncertainties in the lime content of clinker and in the percentage of CKD recycled inside the cement kiln. Uncertainty is also associated with the assumption that all calcium-containing raw materials are $CaCO_3$, when a small percentage likely consists of other carbonate and non-carbonate raw materials. The lime content of clinker varies from 60 to 67 percent; 65 percent is used as a representative value (Van Oss 2013a). This contributes to the uncertainty surrounding the emission factor for

[8] The USGS *Minerals Yearbook: Cement* notes that CKD values used for clinker production are likely underreported.

[9] As stated on p. 2.12 of the *2006 IPCC Guidelines*, Vol. 3, Chapter 2: "…As data on the amount of CKD produced may be scarce (except possibly for plant-level reporting), estimating emissions from lost CKD based on a default value can be considered good practice. The amount of CO_2 from lost CKD can vary but range typically from about 1.5 percent (additional CO_2 relative to that calculated for clinker) for a modern plant to about 20 percent for a plant losing a lot of highly calcinated CKD (van Oss 2005). In the absence of data, the default CKD correction factor (CF_{ckd}) is 1.02 (i.e., add 2 percent to the CO_2 calculated for clinker). If no calcined CKD is believed to be lost to the system, the CKD correction factor will be 1.00 (van Oss 2005)…"

clinker which has an uncertainty range of ±3 percent with uniform densities (Van Oss 2013b). The amount of CO_2 from CKD loss can range from 1.5 to 8 percent depending upon plant specifications, and uncertainty was estimated at ±5 percent with uniform densities (Van Oss 2013b). Additionally, some amount of CO_2 is reabsorbed when the cement is used for construction. As cement reacts with water, alkaline substances such as calcium hydroxide are formed. During this curing process, these compounds may react with CO_2 in the atmosphere to create calcium carbonate. This reaction only occurs in roughly the outer 0.2 inches of the total thickness. Because the amount of CO_2 reabsorbed is thought to be minimal, it was not estimated. EPA assigned default uncertainty bounds of ±3 percent for clinker production, based on expert judgment (Van Oss 2013b).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-6. Based on the uncertainties associated with total U.S. clinker production, the CO_2 emission factor for clinker production, and the emission factor for additional CO_2 emissions from CKD, 2021 CO_2 emissions from cement production were estimated to be between 39.5 and 43.1 MMT CO_2 Eq. at the 95 percent confidence level. This confidence level indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 41.3 MMT CO_2 Eq.

Table 4-6: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Cement Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate [a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Cement Production	CO_2	41.3	39.5	43.1	-4%	+4%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

EPA relied upon the latest guidance from the IPCC on the use of facility-level data in national inventories and applied a category-specific QC process to compare activity data from EPA's GHGRP with existing data from USGS surveys. This was to ensure time-series consistency of the emission estimates presented in the Inventory. Total U.S. clinker production is assumed to have low uncertainty because facilities routinely measure this for economic reasons and because both USGS and GHGRP take multiple steps to ensure that reported totals are accurate. EPA verifies annual facility-level GHGRP reports through a multi-step process that is tailored to the reporting industry (e.g., combination of electronic checks including range checks, statistical checks, algorithm checks, year-to-year comparison checks, along with manual reviews involving outside data checks) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred.[10] Facilities are also required to monitor and maintain records of monthly clinker production per section 98.84 of the GHGRP regulation (40 CFR 98.84).

EPA's GHGRP requires all facilities producing Portland cement to report greenhouse gas emissions, including CO_2 process emissions from each kiln, CO_2 combustion emissions from each kiln, CH_4 and N_2O combustion emissions

[10] See GHGRP Verification Fact Sheet https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

from each kiln, and CO_2, CH_4, and N_2O emissions from each stationary combustion unit other than kilns (40 CFR Part 98 Subpart H). Source-specific quality control measures for the Cement Production category are included in section 98.84, Monitoring and QA/QC Requirements.

As mentioned above, EPA compares GHGRP clinker production data to the USGS clinker production data. For the year 2014 and 2020, USGS and GHGRP clinker production data showed a difference of approximately 1 percent. In 2018 the difference was approximately 3 percent. In 2015, 2016, 2017, 2019, and 2021, that difference was less than 1 percent between the two sets of activity data. This difference resulted in a difference in emissions compared to USGS data of about 0.1 MMT CO_2 Eq. in 2015, 2016, 2017, 2019, and 2021. The information collected by the USGS National Minerals Information Center surveys continue to be an important data source.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Planned Improvements

EPA is continuing to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates for the Cement Production source category. Most cement production facilities reporting under EPA's GHGRP use Continuous Emission Monitoring Systems (CEMS) to monitor and report CO_2 emissions, thus reporting combined process and combustion emissions from kilns. In implementing further improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon, in addition to category-specific QC methods recommended by the *2006 IPCC Guidelines*.[11] EPA's long-term improvement plan includes continued assessment of the feasibility of using additional GHGRP information beyond aggregation of reported facility-level clinker data, in particular disaggregating the combined process and combustion emissions reported using CEMS, to separately present national process and combustion emissions streams consistent with IPCC and UNFCCC guidelines. This long-term planned analysis is still in development and has not been applied for this current Inventory.

EPA continues to review methods and data used to estimate CO_2 emissions from cement production in order to account for organic material in the raw material and to discuss the carbonation that occurs across the duration of the cement product. Work includes identifying data and studies on the average carbon content for organic materials in kiln feed in the United States and on CO_2 reabsorption rates via carbonation for various cement products. This information is not reported by facilities subject to GHGRP reporting. This is a long-term improvement.

4.2 Lime Production (CRF Source Category 2A2)

Lime is an important manufactured product with many industrial, chemical, and environmental applications. Lime production involves three main processes: stone preparation, calcination, and hydration. Carbon dioxide (CO_2) is generated during the calcination stage, when limestone—consisting of calcium carbonate ($CaCO_3$) and/or

[11] See IPCC Technical Bulletin on Use of Facility-Specific Data in National Greenhouse Gas Inventories http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

magnesium carbonate ($MgCO_3$)—is roasted at high temperatures in a kiln to produce calcium oxide (CaO) and CO_2. The CO_2 is given off as a gas and is normally emitted to the atmosphere.

$$CaCO_3 \rightarrow CaO + CO_2$$

Some facilities, however, recover CO_2 generated during the production process for use in sugar refining and precipitated calcium carbonate (PCC) production.[12] PCC is used as a filler or coating in the paper, food, and plastic industries and is derived from reacting hydrated high-calcium quicklime with CO_2, a production process that does not result in net emissions of CO_2 to the atmosphere. Emissions from fuels consumed for energy purposes during the production of lime are included in the Energy chapter.

For U.S. operations, the term "lime" actually refers to a variety of chemical compounds. These include CaO, or high-calcium quicklime; calcium hydroxide ($Ca(OH)_2$), or hydrated lime; dolomitic quicklime ([CaO•MgO]); and dolomitic hydrate ([$Ca(OH)_2$•MgO] or [$Ca(OH)_2$•$Mg(OH)_2$]).

The current lime market is approximately distributed across six end-use categories, as follows: metallurgical uses, 35 percent; environmental uses, 29 percent; chemical and industrial uses, 21 percent; construction uses, 10 percent; miscellaneous uses, 3 percent; and refractory dolomite, 1 percent (USGS 2021c). The major uses are in steel making, chemical and industrial applications (such as the manufacture of fertilizer, glass, paper and pulp, and precipitated calcium carbonate, and in sugar refining), flue gas desulfurization (FGD) systems at coal-fired electric power plants, construction, and water treatment, as well as uses in mining, pulp and paper and precipitated calcium carbonate manufacturing (USGS 2022a). Lime is also used as a CO_2 scrubber, and there has been experimentation on the use of lime to capture CO_2 from electric power plants. Both lime (CaO) and limestone ($CaCO_3$) can be used as a sorbent for FGD systems. Emissions from limestone consumption for FGD systems are reported under Section 4.4 Other Process Uses of Carbonate Production (CRF Source Category 2A4).

Emissions from lime production have fluctuated over the time series depending on lime end-use markets – primarily the steel making industry and FGD systems for utility and industrial plants – and also energy costs. One significant change to lime end-use since 1990 has been the increase in demand for lime for FGD at coal-fired electric power plants, which can be attributed to compliance with sulfur dioxide (SO_2) emission regulations of the Clean Air Act Amendments of 1990. Phase I went into effect on January 1, 1995, followed by Phase II on January 1, 2000. To supply lime for the FGD market, the lime industry installed more than 1.8 million tons per year of new capacity by the end of 1995 (USGS 1996). The need for air pollution controls continued to drive the FGD lime market, which had doubled between 1990 and 2019 (USGS 1991 and 2020d).

The U.S. lime industry temporarily shut down some individual gas-fired kilns and, in some case, entire lime plants during 2000 and 2001, due to significant increases in the price of natural gas. Lime production continued to decrease in 2001 and 2002, a result of lower demand from the steel making industry, lime's largest end-use market, when domestic steel producers were affected by low priced imports and slowing demand (USGS 2002).

Emissions from lime production increased and then peaked in 2006 at approximately 30.3 percent above 1990 levels, due to strong demand from the steel and construction markets (road and highway construction projects), before dropping to its lowest level in 2009 at approximately 2.5 percent below 1990 emissions, driven by the economic recession and downturn in major markets including construction, mining, and steel (USGS 2007, 2008, 2010). In 2010, the lime industry began to recover as the steel, FGD, and construction markets also recovered (USGS 2011 and 2012a). Fluctuation in lime production since 2015 has been driven largely by demand from the steel making industry (USGS 2018b, 2019, 2020b, 2021c). In 2020, a decline in lime production was a result of plants temporarily closing as a result of the global COVID-19 pandemic (USGS 2022a).

Lime production in the United States—including Puerto Rico—was reported to be 16,774 kilotons in 2021, an increase of about 5.7 percent compared to 2020 levels (USGS 2022b). Compared to 1990, lime production

[12] The amount of CO_2 captured for sugar refining and PCC production is reported within the CRF tables under CRF Source Category 2H3 "Other", but within this report, they are included in this chapter.

increased by about 5.9 percent. At year-end 2021, 73 primary lime plants were operating in the United States, including Puerto Rico according to the USGS MCS (USGS 2022a).[13] Principal lime producing states were, in alphabetical order, Alabama, Kentucky, Missouri, Ohio, and Texas (USGS 2022a).

U.S. lime production resulted in estimated net CO_2 emissions of 11.9 MMT CO_2 Eq. (11,870 kt) (see Table 4-7 and Table 4-8). Carbon dioxide emissions from lime production increased by about 5.1 percent compared to 2020 levels. Compared to 1990, CO_2 emissions have increased by about 1.5 percent. The trends in CO_2 emissions from lime production are directly proportional to trends in production, which are described above.

Table 4-7: CO_2 Emissions from Lime Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Lime Production	11.7	14.6	12.9	13.1	12.1	11.3	11.9

Table 4-8: Gross, Recovered, and Net CO_2 Emissions from Lime Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Gross	11,959	15,074	13,283	13,609	12,676	11,875	12,586
Recovered[a]	259	522	401	503	564	576	716
Net Emissions	**11,700**	**14,552**	**12,882**	**13,106**	**12,112**	**11,299**	**11,870**

Note: Totals may not sum due to independent rounding.

[a] For sugar refining and PCC production.

Methodology and Time-Series Consistency

To calculate emissions, the amounts of high-calcium and dolomitic lime produced were multiplied by their respective emission factors, consistent with Tier 2 methodology from the *2006 IPCC Guidelines*. The emission factor is the product of the stoichiometric ratio between CO_2 and CaO, and the average CaO and MgO content for lime. The CaO and MgO content for lime is assumed to be 95 percent for both high-calcium and dolomitic lime (IPCC 2006). The emission factors were calculated as follows:

Equation 4-2: *2006 IPCC Guidelines* Tier 2 Emission Factor for Lime Production, High-Calcium Lime (Equation 2.9)

$$\mathrm{EF}_{\text{High-Calcium Lime}} = \left[\left(44.01\,\frac{\text{g}}{\text{mole}}\,\mathrm{CO_2}\right) \div \left(56.08\,\frac{\text{g}}{\text{mole}}\,\mathrm{CaO}\right)\right] \times \left(0.9500\,\frac{\mathrm{CaO}}{\text{lime}}\right) = 0.7455\ \frac{\text{g CO}_2}{\text{g lime}}$$

Equation 4-3: *2006 IPCC Guidelines* Tier 2 Emission Factor for Lime Production, Dolomitic Lime (Equation 2.9)

$$\mathrm{EF}_{\text{Dolomitic Lime}} = \left[\left(88.02\,\frac{\text{g}}{\text{mole}}\,\mathrm{CO_2}\right) \div \left(96.39\,\frac{\text{g}}{\text{mole}}\,\mathrm{CaO \bullet MgO}\right)\right] \times \left(0.9500\ \frac{\mathrm{CaO \bullet MgO}}{\text{lime}}\right) = 0.8675\ \frac{\text{g CO}_2}{\text{g lime}}$$

Production was adjusted to remove the mass of chemically combined water found in hydrated lime, determined according to the molecular weight ratios of H_2O to $(Ca(OH)_2$ and $[Ca(OH)_2 \bullet Mg(OH)_2])$ (IPCC 2006). These factors set the chemically combined water content to 27 percent for high-calcium hydrated lime, and 30 percent for dolomitic hydrated lime.

The *2006 IPCC Guidelines* (Tier 2 method) also recommends accounting for emissions from lime kiln dust (LKD) through application of a correction factor. LKD is a byproduct of the lime manufacturing process typically not

[13] In 2021, 68 operating primary lime facilities in the United States reported to the EPA Greenhouse Gas Reporting Program.

recycled back to kilns. LKD is a very fine-grained material and is especially useful for applications requiring very small particle size. Most common LKD applications include soil reclamation and agriculture. Emissions from the application of lime for agricultural purposes are reported in the Agriculture chapter under 5.5 Liming (CRF Source Category 3G). Currently, data on annual LKD production is not readily available to develop a country-specific correction factor. Lime emission estimates were multiplied by a factor of 1.02 to account for emissions from LKD (IPCC 2006). See the Planned Improvements section associated with efforts to improve uncertainty analysis and emission estimates associated with LKD.

Lime emission estimates were further adjusted to account for the amount of CO_2 captured for use in on-site processes. All the domestic lime facilities are required to report these data to EPA under its GHGRP. The total national-level annual amount of CO_2 captured for on-site process use was obtained from EPA's GHGRP (EPA 2022) based on reported facility-level data for years 2010 through 2021. The amount of CO_2 captured/recovered for non-marketed on-site process use is deducted from the total gross emissions (i.e., from lime production and LKD). The net lime emissions are presented in Table 4-7 and Table 4-8. GHGRP data on CO_2 removals (i.e., CO_2 captured/recovered) was available only for 2010 through 2021. Since GHGRP data are not available for 1990 through 2009, IPCC "splicing" techniques were used as per the *2006 IPCC Guidelines* on time-series consistency (IPCC 2006, Volume 1, Chapter 5).

Lime production data (i.e., lime sold and non-marketed lime used by the producer) by type (i.e., high-calcium and dolomitic quicklime, high-calcium and dolomitic hydrated lime, and dead-burned dolomite) for 1990 through 2021 (see Table 4-9) were obtained from U.S. Geological Survey (USGS) Minerals Yearbook (USGS 1992 through 2022b) and are compiled by USGS to the nearest ton. Dead-burned dolomite data are additionally rounded by USGS to no more than one significant digit to avoid disclosing company proprietary data. Production data for the individual quicklime (i.e., high-calcium and dolomitic) and hydrated lime (i.e., high-calcium and dolomitic) types were not provided prior to 1997. These were calculated based on total quicklime and hydrated lime production data from 1990 through 1996 and the three-year average ratio of the individual lime types from 1997 to 1999. Natural hydraulic lime, which is produced from CaO and hydraulic calcium silicates, is not manufactured in the United States (USGS 2018a). Total lime production was adjusted to account for the water content of hydrated lime by converting hydrate to oxide equivalent based on recommendations from the IPCC and using the water content values for high-calcium hydrated lime and dolomitic hydrated lime mentioned above, and is presented in Table 4-10 (IPCC 2006). The CaO and CaO•MgO contents of lime, both 95 percent, were obtained from the IPCC (IPCC 2006).

Table 4-9: High-Calcium- and Dolomitic-Quicklime, High-Calcium- and Dolomitic-Hydrated, and Dead-Burned-Dolomite Lime Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
High-Calcium Quicklime	11,166	14,100	12,200	12,400	11,300	10,700	11,200
Dolomitic Quicklime	2,234	2,990	2,650	2,810	2,700	2,390	2,700
High-Calcium Hydrated	1,781	2,220	2,360	2,430	2,430	2,320	2,430
Dolomitic Hydrated	319	474	276	265	267	252	244
Dead-Burned Dolomite	342	200	200	200	200	200	200

Table 4-10: Adjusted Lime Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
High-Calcium	12,466	15,721	13,923	14,174	13,074	12,394	12,974
Dolomitic	2,800	3,522	3,043	3,196	3,087	2,766	3,071

Note: Minus water content of hydrated lime.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The uncertainties contained in these estimates can be attributed to slight differences in the chemical composition of lime products and CO_2 recovery rates for on-site process use over the time series. Although the methodology accounts for various formulations of lime, it does not account for the trace impurities found in lime, such as iron oxide, alumina, and silica. Due to differences in the limestone used as a raw material, a rigid specification of lime material is impossible. As a result, few plants produce lime with exactly the same properties.

In addition, a portion of the CO_2 emitted during lime production will actually be reabsorbed when the lime is consumed, especially at captive lime production facilities. As noted above, lime has many different chemical, industrial, environmental, and construction applications. In many processes, CO_2 reacts with the lime to create calcium carbonate (e.g., water softening). Carbon dioxide reabsorption rates vary, however, depending on the application. For example, 100 percent of the lime used to produce precipitated calcium carbonate reacts with CO_2, whereas most of the lime used in steel making reacts with impurities such as silica, sulfur, and aluminum compounds. Quantifying the amount of CO_2 that is reabsorbed would require a detailed accounting of lime use in the United States and additional information about the associated processes where both the lime and byproduct CO_2 are "reused." Research conducted thus far has not yielded the necessary information to quantify CO_2 reabsorption rates.[14] Some additional information on the amount of CO_2 consumed on site at lime facilities, however, has been obtained from EPA's GHGRP.

In some cases, lime is generated from calcium carbonate byproducts at pulp mills and water treatment plants.[15] The lime generated by these processes is included in the USGS data for commercial lime consumption. In the pulping industry, mostly using the Kraft (sulfate) pulping process, lime is consumed in order to causticize a process liquor (green liquor) composed of sodium carbonate and sodium sulfide. The green liquor results from the dilution of the smelt created by combustion of the black liquor where biogenic carbon (C) is present from the wood. Kraft mills recover the calcium carbonate "mud" after the causticizing operation and calcine it back into lime—thereby generating CO_2—for reuse in the pulping process. Although this re-generation of lime could be considered a lime manufacturing process, the CO_2 emitted during this process is mostly biogenic in origin and therefore is not included in the industrial processes totals (Miner and Upton 2002). In accordance with IPCC methodological guidelines, any such emissions are calculated by accounting for net C fluxes from changes in biogenic C reservoirs in wooded or crop lands (see the Land Use, Land-Use Change, and Forestry chapter).

In the case of water treatment plants, lime is used in the softening process. Some large water treatment plants may recover their waste calcium carbonate and calcine it into quicklime for reuse in the softening process. Further research is necessary to determine the degree to which lime recycling is practiced by water treatment plants in the United States.

Another uncertainty is the assumption that calcination emissions for LKD are around 2 percent. EPA assigned uncertainty ranges of ±2 percent for the LKD correction factor based on expert judgment (RTI 2023). The National Lime Association (NLA) has commented that the estimates of emissions from LKD in the United States could be closer to 6 percent. They also note that additional emissions (approximately 2 percent) may also be generated through production of other byproducts/wastes (off-spec lime that is not recycled, scrubber sludge) at lime plants (Seeger 2013). Publicly available data on LKD generation rates, total quantities not used in cement production, and types of other byproducts/wastes produced at lime facilities are limited. NLA compiled and shared historical

[14] Representatives of the National Lime Association estimate that CO_2 reabsorption that occurs from the use of lime may offset as much as a quarter of the CO_2 emissions from calcination (Males 2003).

[15] Some carbide producers may also regenerate lime from their calcium hydroxide byproducts, which does not result in emissions of CO_2. In making calcium carbide, quicklime is mixed with coke and heated in electric furnaces. The regeneration of lime in this process is done using a waste calcium hydroxide (hydrated lime) [$CaC_2 + 2H_2O \rightarrow C_2H_2 + Ca(OH)_2$], not calcium carbonate [$CaCO_3$]. Thus, the calcium hydroxide is heated in the kiln to simply expel the water [$Ca(OH)_2 + \text{heat} \rightarrow CaO + H_2O$], and no CO_2 is released.

emissions information and quantities for some waste products reported by member facilities associated with generation of total calcined byproducts and LKD, as well as methodology and calculation worksheets that member facilities complete when reporting. There is uncertainty regarding the availability of data across the time series needed to generate a representative country-specific LKD factor. Uncertainty of the activity data is also a function of the reliability and completeness of voluntarily reported plant-level production data. EPA assigned uncertainty ranges of ±1 percent for lime production, based on expert judgment (USGS 2012b). Further research, including discussion with NLA and data is needed to improve understanding of additional calcination emissions to consider revising the current assumptions that are based on the *2006 IPCC Guidelines*. More information can be found in the Planned Improvements section below.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-11. Lime CO_2 emissions for 2021 were estimated to be between 11.6 and 12.1 MMT CO_2 Eq. at the 95 percent confidence level. This confidence level indicates a range of approximately 2 percent below and 2 percent above the emission estimate of 11.9 MMT CO_2 Eq.

Table 4-11: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Lime Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Lime Production	CO_2	11.9	11.6	12.1	-2%	+2%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as noted in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods associated with reporting on CO_2 captured for onsite use applicable to lime manufacturing facilities can be found under Subpart S (Lime Manufacturing) of the GHGRP regulation (40 CFR Part 98).[16] EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2022).[17] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

[16] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

[17] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Planned Improvements

EPA plans to review GHGRP emissions and activity data reported to EPA under Subpart S of the GHGRP regulation (40 CFR Part 98), and aggregated activity data on lime production by type in particular. In addition, initial review of data has identified that several facilities use CEMS to report emissions. Under Subpart S, if a facility is using a CEMS, they are required to report combined combustion emissions and process emissions. EPA continues to review how best to incorporate GHGRP and notes that particular attention will be made to also ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required because the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[18]

Future improvements involve improving and/or confirming the representativeness of current assumptions associated with emissions from production of LKD and other byproducts/wastes as discussed in the Uncertainty section, per comments from the NLA provided during a prior Public Review comment period for a previous Inventory (i.e., 1990 through 2018) . EPA met with NLA in summer of 2020 for clarification on data needs and available data and to discuss planned research into GHGRP data. Previously, EPA met with NLA in spring of 2015 to outline specific information required to apply IPCC methods to develop a country-specific correction factor to more accurately estimate emissions from production of LKD. In 2016, NLA compiled and shared historical emissions information reported by member facilities on an annual basis under voluntary reporting initiatives from 2002 through 2011 associated with generation of total calcined byproducts and LKD. Reporting of LKD was only differentiated for the years 2010 and 2011. This emissions information was reported on a voluntary basis consistent with NLA's facility-level reporting protocol, which was also provided to EPA. To reflect information provided by NLA, EPA updated the qualitative description of uncertainty. At the time of this Inventory, this planned improvement is in process and has not been incorporated into this current Inventory report.

4.3 Glass Production (CRF Source Category 2A3)

Glass production is an energy and raw-material intensive process that results in the generation of carbon dioxide (CO_2) from both the energy consumed in making glass and the glass production process itself. Emissions from fuels consumed for energy purposes during the production of glass are included in the Energy sector.

Glass production employs a variety of raw materials in a glass-batch. These include formers, fluxes, stabilizers, and sometimes colorants. The major raw materials (i.e., fluxes and stabilizers) that emit process-related CO_2 emissions during the glass melting process are limestone, dolomite, and soda ash. The main former in all types of glass is silica (SiO_2). Other major formers in glass include feldspar and boric acid (i.e., borax). Fluxes are added to lower the temperature at which the batch melts. Most commonly used flux materials are soda ash (sodium carbonate, Na_2CO_3) and potash (potassium carbonate, K_2O). Stabilizers make glass more chemically stable and keep the finished glass from dissolving and/or falling apart. Commonly used stabilizing agents in glass production are limestone ($CaCO_3$), dolomite ($CaCO_3MgCO_3$), alumina (Al_2O_3), magnesia (MgO), barium carbonate ($BaCO_3$), strontium carbonate ($SrCO_3$), lithium carbonate (Li_2CO_3), and zirconia (ZrO_2) (DOE 2002). Glass makers also use a

[18] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

certain amount of recycled scrap glass (cullet), which comes from in-house return of glassware broken in the production process or other glass spillage or retention, such as recycling or from cullet broker services.

The raw materials (primarily soda ash, limestone, and dolomite) release CO_2 emissions in a complex high-temperature chemical reaction during the glass melting process. This process is not directly comparable to the calcination process used in lime manufacturing, cement manufacturing, and process uses of carbonates (i.e., limestone/dolomite use) but has the same net effect in terms of generating process CO_2 emissions (IPCC 2006).

The U.S. glass industry can be divided into four main categories: containers, flat (window) glass, fiber glass, and specialty glass. The majority of commercial glass produced is container and flat glass (EPA 2009). The United States is one of the major global exporters of glass. Domestically, demand comes mainly from the construction, auto, bottling, and container industries. There are more than 1,700 facilities that manufacture glass in the United States, with the largest companies being Corning, Guardian Industries, Owens-Illinois, and PPG Industries.[19]

The glass container sector is one of the leading soda ash consuming sectors in the United States. In 2021, glass production accounted for 48 percent of total domestic soda ash consumption (USGS 2022). Emissions from soda ash production are reported in 4.12 Soda Ash Production (CRF Source Category 2B7).

In 2021, 2,280 kilotons of soda ash, 1,397 kilotons of limestone, 893 kilotons of dolomite, and 2 kilotons of other carbonates were consumed for glass production (USGS 2022; EPA 2022). Use of soda ash, limestone, dolomite, and other carbonates in glass production resulted in aggregate CO_2 emissions of 2.0 MMT CO_2 Eq. (1,969 kt), which are summarized in Table 4-12 and Table 4-13. Overall, emissions have decreased by 13 percent compared to 1990. Emissions increased by 6 percent compared to 2020 levels.

Emissions from glass production have remained relatively consistent over the time series with some fluctuations since 1990. In general, these fluctuations were related to the behavior of the export market and the U.S. economy. Specifically, the extended downturn in residential and commercial construction and automotive industries between 2008 and 2010 resulted in reduced consumption of glass products, causing a drop in global demand for limestone/dolomite and soda ash and resulting in lower emissions. Some commercial food and beverage package manufacturers are shifting from glass containers towards lighter and more cost-effective polyethylene terephthalate (PET) based containers, putting downward pressure on domestic consumption of soda ash (USGS 1995 through 2015b). Glass production in 2021 was steady, changing by no more than 5 percent over the course of the year (Federal Reserve 2022).

Table 4-12: CO_2 Emissions from Glass Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Glass Production	1.9	2.4	2.0	2.0	1.9	1.9	2.0

Table 4-13: CO_2 Emissions from Glass Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Glass Production	1,928	2,402	1,984	1,989	1,940	1,858	1,969

Methodology and Time-Series Consistency

Carbon dioxide emissions were calculated based on the *2006 IPCC Guidelines* Tier 3 method by multiplying the quantity of input carbonates (limestone, dolomite, soda ash, and other carbonates) by the carbonate-based emission factor (in metric tons CO_2/metric ton carbonate) and the average carbonate-based mineral mass fraction.

[19] Excerpt from Glass & Glass Product Manufacturing Industry Profile, First Research. Available online at: http://www.firstresearch.com/Industry-Research/Glass-and-Glass-Product-Manufacturing.html.

2010 through 2021

For this Inventory, the methodology for estimating CO_2 emissions from glass production for years 2010 through 2021 has added new activity data reported to the U.S. EPA Greenhouse Gas Reporting Program (GHGRP) on the quantities of a group of other carbonates (i.e., barium carbonate, potassium carbonate, lithium carbonate, and strontium carbonate) used for glass production (EPA 2022). The methodology continues to use the quantities of limestone and dolomite used for glass production obtained from GHGRP (EPA 2022). USGS data on the quantity of soda ash used for glass production continues to be used because it was obtained directly from the soda ash producers and includes use by smaller artisanal glass operations, which are excluded in the GHGRP data.

GHGRP collects data from glass production facilities with greenhouse gas emissions greater than 25,000 metric tons CO_2 Eq. The reporting threshold is used to exclude artisanal glass operations that are expected to have much lower greenhouse gas emissions than the threshold. These smaller facilities have not been accounted for yet for this portion of the time series for limestone, dolomite, or other carbonates due to limited data. Facilities report the total quantity of each type of carbonate used in glass production each year to GHGRP, with data collection starting in 2010 (EPA 2022).

Using the total quantities of each carbonate, EPA calculated the metric tons of emissions resulting from glass production by multiplying the quantity of input carbonates (i.e., limestone, dolomite, soda ash, and other carbonates) by carbonate-based emission factors in metric tons CO_2/metric ton carbonate (limestone, 0.43971; dolomite, 0.47732; soda ash, 0.41492; and other carbonates, 0.262), and by the average carbonate-based mineral mass fraction for each year. IPCC default values were used for limestone, dolomite, and soda ash emission factors, and the emission factor for other carbonates is based on expert judgment (Icenhour 2022). The average carbonate-based mineral mass fractions from the GHGRP, averaged across 2010 through 2014, indicate that soda ash contained 98.7 percent sodium carbonate (Na_2CO_3). This averaged value is used to estimate emissions for 1990 through 2009, described below. The previous methodology assumed that soda ash contained 100 percent sodium carbonate (Na_2CO_3). The years 2010 to 2014 were used to determine the average carbonate-based mineral mass fractions because that period was deemed to better represent historic glass production from 1990 to 2009.

1990 through 2009

Data from GHGRP on the quantity of limestone, dolomite, and other carbonates used in glass production are not available for 1990 through 2009. Additionally, USGS does not collect data on the quantity of other carbonates used for glass production.

To address time-series consistency, total emissions from 1990 to 2009 were calculated using the Federal Reserve Industrial Production Index for glass production in the United States as a surrogate for the total quantity of carbonates used in glass production. The production index measures real output expressed as a percentage of real output in a base year, which is currently 2017 (Federal Reserve 2021). Since January 1971, the Federal Reserve has released the monthly glass production index for NAICS code 3272 (Glass and Glass Product Manufacturing) as part of release G.17, "Industrial Production and Capacity Utilization" (Federal Reserve 2022). The monthly index values for each year were averaged to calculate an average annual glass production index value. Total annual process emissions were calculated by taking a ratio of the average annual glass production index for each year to the average annual glass production index for base year 2017, and multiplying by the calculated 2017 emissions (process-related) based on GHGRP data.

Emissions from limestone, dolomite, and other carbonate consumption were disaggregated from total annual emissions, using the average percent contribution of each to annual emissions from these three carbonates for 2010 through 2014 based on GHGRP data: 64.5 percent limestone, 35.5 percent dolomite, and 0.1 percent other carbonates.

The methodology for estimating CO_2 emissions from the use of soda ash for glass production and data sources for the amount of soda ash used in glass production are consistent with the methodology used for 2010 through 2021. Because data on the average mineral mass fraction for soda ash is only available starting in 2010, the values for 2010 through 2014 are averaged, as described above, and used to calculate emissions for 1990 to 2009.

Data on soda ash used for glass production for 1990 through 2021 were obtained from the U.S. Bureau of Mines (1991 and 1993a), the USGS *Minerals Yearbook: Soda Ash* (USGS 1995 through 2015b), and USGS *Mineral Industry Surveys for Soda Ash* (USGS 2017 through 2021). Data on limestone, dolomite, and other carbonates used for glass production and on average carbonate-based mineral mass fraction for 2010 through 2021 were obtained from GHGRP (EPA 2022). The quantities of limestone, dolomite, and other carbonates were calculated for 1990 through 2009 using the Federal Reserve Industrial Production Index (Federal Reserve 2022).

The amount of limestone, dolomite, soda ash, and other carbonates used in glass production each year and the annual average Federal Reserve production indices for glass production are shown in Table 4-14.

Table 4-14: Limestone, Dolomite, Soda Ash, and Other Carbonates Used in Glass Production (kt) and Average Annual Production Index for Glass and Glass Product Manufacturing

Activity	1990	2005	2017	2018	2019	2020	2021
Limestone	1,409	1,690	1,488	1,442	1,370	1,334	1,397
Dolomite	714	857	806	871	883	824	893
Soda Ash	3,177	3,050	2,360	2,280	2,220	2,130	2,280
Other Carbonates	2	3	2	2	2	2	2
Total	**5,302**	**5,599**	**4,656**	**4,596**	**4,475**	**4,289**	**4,572**
Production Index[a]	94.3	113.1	100	102.5	99.8	93.2	93.7

[a] Average Annual Production Index uses 2017 as the base year.
Note: Totals may not sum due to independent rounding.

As discussed above, methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare USGS and GHGRP data sets for 2010 through 2021. To address the inconsistencies, adjustments were made as described above.

Uncertainty

The methodology in this Inventory report uses GHGRP data for the average mass fraction of each mineral used in glass production. These minerals are limestone, dolomite, soda ash, and other carbonates (barium carbonate ($BaCO_3$), potassium carbonate (K_2CO_3), lithium carbonate (Li_2CO_3), and strontium carbonate ($SrCO_3$)). The mass fractions are reported directly by the glass manufacturers, for each year from 2010 to2021.

The methodology uses the quantities of limestone, dolomite, and other carbonates used in glass manufacturing which is reported directly by the glass manufacturers for years 2010 through 2021 and the amount of soda ash used in glass manufacturing which is reported by soda ash producers for the full time series. EPA assigned an uncertainty range of ±5 percent for all carbonate quantities and the Federal Reserve Industrial Production Index for glass production, and using this suggested uncertainty provided in Section 2.4.2.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of ±2 percent for the carbonate emission factors, ±2 percent for the mineral mass fractions, and ±1 percent for the calcination fraction, and using this suggested uncertainty provided in Section 2.4.2.1 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-15. In 2021, glass production CO_2 emissions were estimated to be between 1.9 and 2.0 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 3 percent below and 3 percent above the emission estimate of 2.0 MMT CO_2 Eq.

Table 4-15: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Glass Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate[a]

		(MMT CO_2 Eq.)	(MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Glass Production	CO_2	2.0	1.9	2.0	-3%	+3%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[20] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

For the current Inventory, refinements to the methodology were implemented, using more complete activity data from GHGRP for 2010 through 2021 and the industrial production index for glass and glass product manufacturing from the Federal Reserve for 1990 through 2009 to address time-series consistency. These refinements are described under the Methodology and Time-Series Consistency section. The revised values for 1990 through 2020 resulted in decreased emissions estimates prior to 2018 and slight increases for 2019 and 2020. Across the time series, emissions decreased by an average of 1.0 percent compared to the previous Inventory. Annual emission changes during the time series ranged from a 0.1 percent increase in 2019 and 2020 (1 kt CO_2) to a 1.4 percent decrease in 1999 (27 kt CO_2).

Planned Improvements

EPA plans to evaluate updates to uncertainty levels for the activity data and mineral mass fraction values from EPA's GHGRP. This is a near-term planned improvement.

Some glass producing facilities in the United States do not report to EPA's GHGRP because they fall below the reporting threshold for this industry. EPA will continue ongoing research on the availability of data to better assess the completeness of emission estimates from glass production and how to refine the methodology to ensure complete national coverage of this category. When reporting began in 2010, EPA received data from more facilities that were above the reporting threshold than expected, and total emissions were higher than expected for all glass production facilities in the United States (EPA 2009). Research will include reassessing previous assessments of GHGRP industry coverage using the reporting threshold of 25,000 metric tons CO_2 Eq. This is a medium-term planned improvement.

[20] GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

4.4 Other Process Uses of Carbonates (CRF Source Category 2A4)

Limestone ($CaCO_3$), dolomite ($CaCO_3MgCO_3$),[21] and other carbonates such as soda ash, magnesite, and siderite are basic materials used by a wide variety of industries, including construction, agriculture, chemical, metallurgy, glass production, and environmental pollution control. This section addresses only limestone, dolomite, and soda ash use. For industrial applications, carbonates such as limestone and dolomite are heated sufficiently enough to calcine the material and generate CO_2 as a byproduct.

$$CaCO_3 \rightarrow CaO + CO_2$$

$$MgCO_3 \rightarrow MgO + CO_2$$

Examples of such applications include limestone used as a flux or purifier in metallurgical furnaces, as a sorbent in flue gas desulfurization (FGD) systems for utility and industrial plants, and as a raw material for the production of glass, lime, and cement. Emissions from limestone and dolomite used in the production of cement, lime, glass, and iron and steel are excluded from the Other Process Uses of Carbonates category and reported under their respective source categories (e.g., Section 4.3, Glass Production). Emissions from soda ash production are reported under Section 4.12, Soda Ash Production (CRF Source Category 2B7). Emissions from soda ash consumption associated with glass manufacturing are reported under Section 4.3, Glass Production (CRF Source Category 2A3). Emissions from the use of limestone and dolomite in liming of agricultural soils are included in the Agriculture chapter under Section 5.5, Liming (CRF Source Category 3G). Emissions from fuels consumed for energy purposes during these processes are accounted for in the Energy chapter under Section 3.1, Fossil Fuel Combustion (CRF Source Category 1A). Both lime (CaO) and limestone ($CaCO_3$) can be used as a sorbent for FGD systems. Emissions from lime consumption for FGD systems and from sugar refining are reported under Section 4.3 Lime Production (CRF Source Category 2A2). Emissions from the use of dolomite in primary magnesium metal production are reported under Section 4.20, Magnesium Production and Processing (CRF Source Category 2C4).

Limestone and dolomite are widely distributed throughout the world in deposits of varying sizes and degrees of purity. Large deposits of limestone occur in nearly every state in the United States, and significant quantities are extracted for industrial applications. In 2018, the leading limestone producing states were Texas, Florida, Ohio, Missouri, and Pennsylvania, which contributed 46 percent of the total U.S. output (USGS 2022a). Dolomite deposits are found in the United States, Canada, Mexico, Europe, Africa, and Brazil. In the United States, the leading dolomite producing states are Pennsylvania, New York, and Utah which currently contribute more than a third of the total U.S. output (USGS 2022a). Internationally, two types of soda ash are produced: natural and synthetic. In 2019, 93 percent of the global soda ash production came from China, the United States, Russia, Germany, India, Turkey, Poland, and France. The United States only produces natural soda ash and only in two states: Wyoming and California (USGS 2021c).

In 2021, 12,789 kilotons (kt) of limestone, 2,826 kt of dolomite, and 2,360 kt of soda ash were consumed for these emissive applications, which excludes consumption for the production of cement, lime, glass, and iron and steel (Willett 2022, USGS 2022b). Usage of limestone, dolomite and soda ash resulted in aggregate CO_2 emissions of 8.0 MMT CO_2 Eq. (7,951 kt) (see Table 4-16 and Table 4-17). The 2021 emissions decreased 5 percent compared to 2020, primarily as a result of decreased limestone consumption attributed to flux stone. Growth in the public and private construction markets contributed to an increase in consumption of crushed stone in 2021. Overall emissions have increased 29 percent from 1990 through 2021.

[21] Limestone and dolomite are collectively referred to as limestone by the industry, and intermediate varieties are seldom distinguished.

Table 4-16: CO_2 Emissions from Other Process Uses of Carbonates (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Flux Stone	2.6	2.6	2.4	2.8	2.9	3.4	2.8
FGD	1.4	3.0	5.6	2.2	3.2	3.0	3.1
Soda Ash Consumption[a]	1.4	1.3	1.1	1.1	1.0	1.0	1.0
Other Miscellaneous Uses[b]	0.8	0.5	0.8	1.3	1.2	1.0	1.0
Total	**6.2**	**7.5**	**9.9**	**7.4**	**8.4**	**8.4**	**8.0**

[a] Soda ash consumption not associated with glass manufacturing.
[b] "Other miscellaneous uses" include chemical stone, mine dusting or acid water treatment, and acid neutralization.
Note: Totals may not sum due to independent rounding.

Table 4-17: CO_2 Emissions from Other Process Uses of Carbonates (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Flux Stone	2,592	2,649	2,441	2,795	2,936	3,450	2,799
FGD	1,432	2,973	5,598	2,229	3,202	2,997	3,135
Soda Ash Consumption[a]	1,390	1,305	1,058	1,069	1,036	958	979
Other Miscellaneous Uses[b]	819	533	771	1,259	1,248	994	1,038
Total	**6,233**	**7,459**	**9,869**	**7,351**	**8,422**	**8,399**	**7,951**

[a] Soda ash consumption not associated with glass manufacturing.
[b] "Other miscellaneous uses" include chemical stone, mine dusting or acid water treatment, and acid neutralization.
Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Carbon dioxide emissions from limestone and dolomite consumption were calculated based on the *2006 IPCC Guidelines* Tier 2 method by multiplying the quantity of limestone or dolomite consumed by the emission factor for limestone or dolomite calcination, respectively: 0.43971 metric ton CO_2/metric ton carbonate for limestone and 0.47732 metric ton CO_2/metric ton carbonate for dolomite.[22] This methodology was used for flux stone, flue gas desulfurization systems, chemical stone, mine dusting or acid water treatment, and acid neutralization. Flux stone used during the production of iron and steel was deducted from the Other Process Uses of Carbonates source category estimate and attributed to the Iron and Steel Production source category estimate. Similarly, limestone and dolomite consumption for glass manufacturing, cement, and lime manufacturing are excluded from this category and attributed to their respective categories.

Consumption data for 1990 through 2021 of limestone and dolomite used for flux stone, flue gas desulfurization systems, chemical stone, mine dusting or acid water treatment, and acid neutralization (see Table 4-18) were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook: Crushed Stone Annual Report* (1995a through 2022), preliminary data for 2021 from USGS Crushed Stone Commodity Expert (Willett 2022), American Iron and Steel Institute limestone and dolomite consumption data (AISI 2018 through 2021), and the U.S. Bureau of Mines (1991 and 1993a), which are reported to the nearest ton. In addition, the estimated values for limestone and dolomite consumption for flux stone used during the production of iron and steel were adjusted using emissions data from the EPA's Greenhouse Gas Reporting Program (GHGRP) subpart Q for the iron and steel sector to account for the impacts of the COVID-19 pandemic in 2020 and 2021. Iron and steel GHGRP process emissions data increased by approximately 12 percent from 2020 to 2021 (EPA 2022). This adjustment method is consistent with the method used in Section 4.17 Iron and Steel Production (CRF Source Category 2C1) and Metallurgical Coke Production.

[22] *2006 IPCC Guidelines*, Volume 3: Chapter 2, Table 2.1.

During 1990 and 1992, the USGS did not conduct a detailed survey of limestone and dolomite consumption by end-use; therefore, data on consumption by end use for 1990 was estimated by applying the 1991 ratios of total limestone and dolomite consumption by end use to total 1990 limestone and dolomite consumption values. Similarly, the 1992 consumption figures were approximated by applying an average of the 1991 and 1993 ratios of total limestone and dolomite use by end uses to the 1992 total values.

In 1991, the U.S. Bureau of Mines, now known as the USGS, began compiling production and end use information through surveys of crushed stone manufacturers. Manufacturers provided different levels of detail in survey responses, so information was divided into three categories: (1) production by end-use, as reported by manufacturers (i.e., "specified" production); (2) production reported by manufacturers without end-uses specified (i.e., "unspecified-reported" production); and (3) estimated additional production by manufacturers who did not respond to the survey (i.e., "unspecified-estimated" production). Additionally, each year the USGS withholds data on certain limestone and dolomite end-uses due to confidentiality agreements regarding company proprietary data. For the purposes of this analysis, emissive end-uses that contained withheld data were estimated using one of the following techniques: (1) the value for all the withheld data points for limestone or dolomite use was distributed evenly to all withheld end-uses; (2) the average percent of total limestone or dolomite for the withheld end-use in the preceding and succeeding years; or (3) the average fraction of total limestone or dolomite for the end-use over the entire time period.

A large quantity of crushed stone was reported to the USGS under the category "unspecified uses." A portion of this consumption is believed to be limestone or dolomite used for emissive end uses. The quantity listed for "unspecified uses" was, therefore, allocated to all other reported end-uses according to each end-use's fraction of total consumption in that year.[23]

Table 4-18: Limestone and Dolomite Consumption (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Flux Stone	5,842	5,745	5,447	6,242	6,551	7,592	6,124
Limestone	*5,237*	*2,492*	*4,216*	*4,891*	*5,088*	*4,631*	*3,299*
Dolomite	*605*	*3,254*	*1,230*	*1,351*	*1,463*	*2,961*	*2,826*
FGD	3,258	6,761	12,732	5,068	7,282	6,817	7,129
Other Miscellaneous Uses	1,835	1,212	1,754	2,862	2,834	2,260	2,361
Total	**10,935**	**13,719**	**19,932**	**14,172**	**16,667**	**16,669**	**15,615**

Note: Totals may not sum due to independent rounding.

Carbon dioxide emissions from soda ash consumption were calculated based on the *2006 IPCC Guidelines* Tier 1 method. Excluding glass manufacturing which is reported under Section 4.3 Glass Production (CRF Source Category 2A3), most soda ash is consumed in chemical production, with minor amounts used in soap production, pulp and paper, flue gas desulfurization, and water treatment. As soda ash is consumed for these purposes, CO_2 is usually emitted. In these applications, it is assumed that one mole of carbon is released for every mole of soda ash used. Thus, approximately 0.113 metric tons of carbon (or 0.415 metric tons of CO_2) are released for every metric ton of soda ash consumed. The activity data for soda ash consumption for 1990 to 2021 (see Table 4-19) were obtained from the U.S. Geological Survey (USGS) Minerals Yearbook for Soda Ash (1994 through 2015b) and USGS Mineral Industry Surveys for Soda Ash (USGS 2017a, 2018, 2019, 2020b, 2021d, 2022b). Soda ash consumption data were collected by the USGS from voluntary surveys of the U.S. soda ash industry.

Table 4-19: Soda Ash Consumption Not Associated with Glass Manufacturing (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Soda Ash[a]	3,351	3,144	2,550	2,576	2,497	2,310	2,360

[23] This approach was recommended by USGS, the data collection agency.

[a] Soda ash consumption is sales reported by producers which exclude imports. Historically, imported soda ash is less than 1 percent of the total U.S. consumption (Kostick 2012).

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The uncertainty levels presented in this section account for uncertainty associated with activity data. Data on limestone and dolomite consumption are collected by USGS through voluntary national surveys. USGS contacts the mines (i.e., producers of various types of crushed stone) for annual sales data. Data on other carbonate consumption are not readily available. The producers report the annual quantity sold to various end-users and industry types. USGS estimates the historical response rate for the crushed stone survey to be approximately 70 percent, and the rest is estimated by USGS. Large fluctuations in reported consumption exist, reflecting year-to-year changes in the number of survey responders. The uncertainty resulting from a shifting survey population is exacerbated by the gaps in the time series of reports. The accuracy of distribution by end use is also uncertain because this value is reported by the producer/mines and not the end user. Additionally, there is significant inherent uncertainty associated with estimating withheld data points for specific end uses of limestone and dolomite. Lastly, much of the limestone consumed in the United States is reported as "other unspecified uses;" therefore, it is difficult to accurately allocate this unspecified quantity to the correct end-uses. EPA contacted the USGS National Minerals Information Center Crushed Stone commodity expert to assess the current uncertainty ranges associated with the limestone and dolomite consumption data compiled and published by USGS. During this discussion, the expert confirmed that EPA's range of uncertainty was still reasonable (Willett 2017). EPA assigned an uncertainty range of ±10 percent for limestone and dolomite consumption, based on expert judgement (Willett 2017). EPA assigned an uncertainty range of ±5 percent for soda ash consumption, and using this suggested uncertainty provided in Volume 3, Chapter 2, Section 2.4.2.2 of the *2006 IPPC Guidelines* is appropriate based on expert judgment (RTI 2023).

Uncertainty in the estimates also arises in part due to variations in the chemical composition of limestone. In addition to calcium carbonate, limestone may contain smaller amounts of magnesia, silica, and sulfur, among other minerals. The exact specifications for limestone or dolomite used as flux stone vary with the pyrometallurgical process and the kind of ore processed. EPA assigned an uncertainty range of ±3 percent for the CO_2 emission factors for limestone and dolomite consumption, and using this suggested uncertainty provided in Volume 3, Chapter 2, Section 2.5.2.1 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of ±2 percent for the CO_2 emission factor for soda ash consumption, and using this suggested uncertainty provided in Volume 3, Chapter 2, Section 2.4.2.1 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

For emissions from soda ash consumption, the primary source of uncertainty results from the fact that these emissions are dependent upon the type of processing employed by each end-use. Specific emission factors for each end-use are not available, so a Tier 1 default emission factor is used for all end-uses. Therefore, there is uncertainty surrounding the emission factors from the consumption of soda ash. Additional uncertainty comes from the reported consumption and allocation of consumption within sectors that is collected on a quarterly basis by the USGS. Efforts have been made to categorize company sales within the correct end-use sector. EPA assigned an uncertainty range of ±2 percent for the CO_2 emission factor for soda ash consumption. The uncertainty range is derived from the default ranges for soda ash consumption for glass production in Volume 3, Chapter 2, Section 2.4.2.1 of the *2006 IPCC Guidelines* which is representative of soda ash consumption not associated with glass production, based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-20. Carbon dioxide emissions from other process uses of carbonates in 2021 were estimated to be between 7.1 and 9.2 MMT CO_2 Eq.

at the 95 percent confidence level. This indicates a range of approximately 11 percent below and 14 percent above the emission estimate of 8.0 MMT CO_2 Eq.

Table 4-20: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Other Process Uses of Carbonates (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Other Process Uses of Carbonates	CO_2	8.0	7.1	9.2	-11%	+14%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

For the current Inventory, updated USGS data on limestone and dolomite consumption was available for 2019 and 2020, resulting in updated emissions estimates for those years. Compared to the previous Inventory, emissions for 2019 decreased by 14.7 percent (1,449 kt CO_2 Eq.) and emissions for 2020 decreased by 18.8 percent (1,843 kt CO_2 Eq.).

Planned Improvements

In response to comments received during previous Inventory reports from the UNFCCC, EPA has inquired to the availability of ceramics and non-metallurgical magnesia data. EPA is assessing potential activity data from USGS that spans the full time series for ceramics production. Data on non-metallurgical magnesia is not currently reported by survey respondents to USGS, and EPA continues to conduct outreach with other entities. This improvement remains ongoing, and EPA plans to continue to update this Planned Improvements section in future reports as more information becomes available.

EPA also plans to review the uncertainty ranges assigned to activity data. This planned improvement is currently planned as a medium-term improvement.

4.5 Ammonia Production (CRF Source Category 2B1)

Emissions of carbon dioxide (CO_2) occur during the production of synthetic ammonia (NH_3), primarily through the use of natural gas, petroleum coke, or naphtha as a feedstock. The natural gas-, naphtha-, and petroleum coke-based processes produce CO_2 and hydrogen (H_2), the latter of which is used in the production of ammonia. The brine electrolysis process for production of ammonia does not lead to process-based CO_2 emissions. Due to

national circumstances, emissions from fuels consumed for energy purposes during the production of ammonia are accounted for in the Energy chapter. More information on this approach can be found in the Methodology section below.

Ammonia production requires a source of nitrogen (N) and hydrogen (H). Nitrogen is obtained from air through liquid air distillation or an oxidative process where air is burnt and the residual nitrogen is recovered. In the United States, the majority of ammonia is produced using a natural gas feedstock as the hydrogen source. One synthetic ammonia production plant located in Kansas is producing ammonia from petroleum coke feedstock. In some U.S. plants, some of the CO_2 produced by the process is captured and used to produce urea rather than being emitted to the atmosphere. In 2021, 16 companies operated 35 ammonia producing facilities in 16 states. Approximately 60 percent of domestic ammonia production capacity is concentrated in Louisiana, Oklahoma, and Texas (USGS 2022).

Synthetic ammonia production from natural gas feedstock consists of five principal process steps. The primary reforming step converts methane (CH_4) to CO_2, carbon monoxide (CO), and hydrogen (H_2) in the presence of a catalyst. Only 30 to 40 percent of the CH_4 feedstock to the primary reformer is converted to CO and CO_2 in this step of the process. The secondary reforming step converts the remaining CH_4 feedstock to CO and CO_2. In the shift conversion step, the CO in the process gas from the secondary reforming step (representing approximately 15 percent of the process gas) is converted to CO_2 in the presence of a catalyst, water, and air. Carbon dioxide is removed from the process gas by the shift conversion process, and the H_2 is combined with the nitrogen (N_2) gas in the process gas during the ammonia synthesis step to produce ammonia. The CO_2 is included in a waste gas stream with other process impurities and is absorbed by a scrubber solution. In regenerating the scrubber solution, CO_2 is released from the solution.

The conversion process for conventional steam reforming of CH_4, including the primary and secondary reforming and the shift conversion processes, is approximately as follows:

$$0.88CH_4 + 1.26Air + 1.24H_2O \rightarrow 0.88CO_2 + N_2 + 3H_2$$

$$N_2 + 3H_2 \rightarrow 2NH_3$$

To produce synthetic ammonia from petroleum coke, the petroleum coke is gasified and converted to CO_2 and H_2. These gases are separated, and the H_2 is used as a feedstock to the ammonia production process, where it is reacted with N_2 to form ammonia.

Not all of the CO_2 produced during the production of ammonia is emitted directly to the atmosphere. Some of the ammonia and some of the CO_2 produced by the synthetic ammonia process are used as raw materials in the production of urea [$CO(NH_2)_2$], which has a variety of agricultural and industrial applications.

The chemical reaction that produces urea is:

$$2NH_3 + CO_2 \rightarrow NH_2COONH_4 \rightarrow CO(NH_2)_2 + H_2O$$

Only the CO_2 emitted directly to the atmosphere from the synthetic ammonia production process is accounted for in determining emissions from ammonia production. The CO_2 that is captured during the ammonia production process and used to produce urea does not contribute to the CO_2 emission estimates for ammonia production presented in this section. Instead, CO_2 emissions resulting from the consumption of urea are attributed to the urea consumption or urea application source category (under the assumption that the carbon stored in the urea during its manufacture is released into the environment during its consumption or application). Emissions of CO_2 resulting from agricultural applications of urea are accounted for in Section 5.6 Urea Fertilization (CRF Source Category 3H) of the Agriculture chapter. Emissions of CO_2 resulting from non-agricultural applications of urea (e.g., use as a feedstock in chemical production processes) are accounted for in Section 4.6 Urea Consumption for Non-Agricultural Purposes of this chapter.

Emissions from fuel used for energy at ammonia plants are accounted for in the Energy chapter. The consumption of natural gas and petroleum coke as fossil fuel feedstocks for NH_3 production are adjusted for within the Energy

chapter as these fuels were consumed during non-energy related activities. More information on this methodology is described in Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Total emissions of CO_2 from ammonia production in 2021 were 12.2 MMT CO_2 Eq. (12,207 kt) and are summarized in Table 4-21 and Table 4-22. Ammonia production relies on natural gas as both a feedstock and a fuel, and as such, market fluctuations and volatility in natural gas prices affect the production of ammonia. Since 1990, emissions from ammonia production have decreased by about 15 percent. Emissions in 2021 decreased by about 6 percent from the 2020 levels. One facility in Kansas produces ammonia from petroleum coke and began operations in 2000. All other facilities use natural gas as feedstock.

Emissions from ammonia production increased steadily from 2015 to 2018, due to the addition of new ammonia production facilities and new production units at existing facilities in 2016, 2017, and 2018. Agriculture continues to drive demand for nitrogen fertilizers, accounting for approximately 88 percent of domestic ammonia consumption.

Table 4-21: CO_2 Emissions from Ammonia Production (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Ammonia Production	14.4	10.2	12.5	12.7	12.4	13.0	12.2

Table 4-22: CO_2 Emissions from Ammonia Production (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Ammonia Production	14,404	10,234	12,481	12,669	12,401	13,006	12,207

Methodology and Time-Series Consistency

Estimates of CO_2 emissions from the production of synthetic ammonia utilize a country-specific approach consistent with Tier 3 methods in the *2006 IPCC Guidelines* (IPCC 2006). This Inventory report includes methodological refinements for 2010 to 2021 that directly use the process CO_2 emissions reported to subpart G of the U.S. EPA Greenhouse Gas Reporting Program (GHGRP) (EPA 2022). The GHGRP data includes facilities using natural gas and petroleum coke as feedstock. Refinements for 1990 to 2009 emissions are based on reported and calculated data on natural gas and petroleum coke feedstock used for ammonia production, consistent with IPCC Tier 2 methods.

Emissions from fuel used for energy at ammonia plants are accounted for in the Energy chapter. This approach differs slightly from the *2006 IPCC Guidelines* which indicates that "in the case of ammonia production no distinction is made between fuel and feedstock emissions with all emissions accounted for in the IPPU Sector." Disaggregated data on fuel used for ammonia feedstock and fuel used for energy for ammonia production are not available in the United States. The Energy Information Administration (EIA), where energy use data are obtained for the Inventory (see the Energy chapter), does not provide data broken out by industrial category. EIA data are only available at the broad industry sector level. Furthermore, the GHGRP data used to estimate emissions are based on feedstock use and not fuel use.

Natural Gas Feedstock

For 2017 through 2021, facilities directly reported to GHGRP the quantity of natural gas feedstock used for ammonia production along with the carbon content of the natural gas feedstock (EPA 2022). For 2010 through 2016, the quantity of natural gas feedstock was calculated using GHGRP CO_2 emissions for 2010 through 2016, average molecular weight of the feedstock from 2017 through 2021, and average carbon content from 2017 through 2021.

For 1990 to 2009, the quantity of natural gas feedstock was not available and was estimated by multiplying the average ratio of natural gas feedstock quantity to ammonia production quantity from 2010 through 2014 by total ammonia production for each year for 1990 to 2009 (ACC 2021). The years 2010 to 2014 were used to determine the average ratio of natural gas feedstock quantity to ammonia production because that period better represents historic ammonia production from 1990 to 2009.[24] CO_2 emissions from the production of synthetic ammonia from natural gas feedstock for 1990 to 2009 were estimated using the natural gas feedstock quantity as determined above and the Inventory CO_2 emissions factor and heating content value for natural gas (consistent with values used in the Energy chapter).

Petroleum Coke Feedstock

Since 2000, one facility in the United States has produced ammonia using petroleum coke as a feedstock. For 2006 to 2021, CO_2 emissions from the production of synthetic ammonia from petroleum coke feedstock were estimated by multiplying the following: quantity of petroleum coke feedstock reported by the facility (CVR 2008 through 2021); the *Inventory* heating content value for petroleum coke (consistent with values used in the Energy chapter); the petroleum coke carbon content; and a stoichiometric CO_2/C factor of 44/12.

For 2000 to 2005, the quantity of petroleum coke feedstock was not available and was estimated by multiplying the average ratio of petroleum coke feedstock quantity to ammonia production quantity produced from petroleum coke from 2006 through 2010 by total ammonia production for 2000 to 2005 (ACC 2021). The years 2006 to 2010 were used to determine the average ratio of petroleum coke feedstock quantity to the ammonia quantity produced from petroleum coke because that period was deemed to better represent historic ammonia production from petroleum coke for the period from 2000 to 2005.

Urea Production Adjustments

Emissions of CO_2 from ammonia production from both feedstocks and for all years from 1990 to 2021 were adjusted to account for the use of some CO_2 emissions from ammonia production as a raw material in the production of urea. The CO_2 emissions reported for ammonia production are reduced by a factor of 0.733, which corresponds to a stoichiometric CO_2/urea factor of 44/60, assuming complete conversion of ammonia (NH_3) and CO_2 to urea (IPCC 2006; EFMA 2000), and multiplied by total annual domestic urea production.

All synthetic ammonia production and subsequent urea production are assumed to be from the same process—conventional catalytic reforming of natural gas feedstock, with the exception of ammonia production from petroleum coke feedstock at the one plant located in Kansas.

Table 4-23: Total Ammonia Production, Total Urea Production, and Recovered CO_2 Consumed for Urea Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Total Ammonia Production	15,425	10,143	14,070	16,010	16,410	17,020	15,420
Total Urea Production	7,450	5,270	9,030	10,700	11,400	11,500	10,500
Recovered CO_2 Consumed for Urea Production	5,463	3,865	6,622	7,847	8,360	8,433	7,700

Total ammonia production, total urea production, and recovered CO_2 consumed for urea production are shown in Table 4-23. Total ammonia production data for 2011 through 2021 were obtained from American Chemistry Council (ACC 2021). For years before 2011, ammonia production data were obtained from the Census Bureau of

[24] The number of facilities reporting to GHGRP has increased since 2010: 22 facilities reported from 2010 to 2012; 23 from 2013 to 2015; 26 in 2016; 28 in 2017 and 29 from 2018 to 2021. Using data from 2010 to 2014 excludes the newer facilities that might not be representative of facilities in earlier years.

the U.S. Department of Commerce (U.S. Census Bureau 1991 through 1994, 1998 through 2011) as reported in *Current Industrial Reports Fertilizer Materials and Related Products* annual and quarterly reports. Data on facility-level process emissions for 2010 through 2021 on natural gas feedstock used and carbon content of the natural gas feedstock starting in 2017 were obtained from GHGRP (EPA 2022). Natural gas and petroleum coke heating values come from national-level data (EIA 2023), and natural gas and petroleum coke carbon contents are the same as used in the Energy chapter calculations.

Data on urea production for 2010 through 2021 were obtained from GHGRP (EPA 2022). Urea production data for 2009 through 2010 were obtained from the U.S. Census Bureau (U.S. Census Bureau 2010 and 2011). Urea production data for 1990 through 2008 were obtained from the USGS *Minerals Yearbook: Nitrogen* (USGS 1994-2009). The U.S. Census Bureau ceased collection of urea production statistics in 2011.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for ammonia production spliced activity data from different sources: U. S. Census Bureau data for 1990 through 2010, ACC data beginning in 2011, and GHGRP data beginning in 2010 and 2017. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

The uncertainties presented in this section are primarily due to how accurately the emission factor used represents an average across all ammonia plants using natural gas feedstock. Uncertainty in the back calculation of natural gas feedstock used for 1990 through 2009 also exists. Using the average ratio of natural gas feedstock quantity to ammonia production, determined using GHGRP data from 2010 to 2014, does not account for efficiency gains in ammonia production since 1990 (e.g., potential decreases in gas usage per ton of ammonia, manufacturing shift from steam-driven turbines to electrical-drive turbines). Uncertainties are also associated with ammonia production estimates and the assumption that all ammonia production and subsequent urea production was from the same process—conventional catalytic reforming of natural gas feedstock, with the exception of one ammonia production plant located in Kansas that is manufacturing ammonia from petroleum coke feedstock. Uncertainty is also associated with the representativeness of the emission factor used for the petroleum coke-based ammonia process. It is also assumed that ammonia and urea are produced at co-located plants from the same natural gas raw material. The uncertainty of the total urea production activity data, based on USGS *Minerals Yearbook: Nitrogen* data, is a function of the reliability of reported production data and is influenced by the completeness of the survey responses. EPA assigned an uncertainty range of ±5 percent for ammonia production and a range of ±2 percent for urea production, natural gas feedstock quantity, petroleum coke feedstock quantity, and carbon content of natural gas feedstock, and using these suggested uncertainty provided in Section 3.2.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

Recovery of CO_2 from ammonia production plants for purposes other than urea production (e.g., commercial sale, etc.) has not been considered in estimating the CO_2 emissions from ammonia production, as data concerning the disposition of recovered CO_2 are not available. Such recovery may or may not affect the overall estimate of CO_2 emissions depending upon the end use to which the recovered CO_2 is applied. Further research is required to determine whether byproduct CO_2 is being recovered from other ammonia production plants for application to end uses that are not accounted for elsewhere; however, for reporting purposes, CO_2 consumption for urea production is provided in this chapter.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-24. Carbon dioxide emissions from ammonia production in 2021 were estimated to be between 11.8 and 12.6 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 12.2 MMT CO_2 Eq.

Table 4-24: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Ammonia Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Ammonia Production	CO_2	12.2	11.8	12.6	-4%	+4%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied to ammonia production emission estimates consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to ammonia facilities can be found under Subpart G (Ammonia Production) of the regulation (40 CFR Part 98).[25] EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.[26] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

As part of the QA/QC process, the calculated natural gas feedstock use data were compared with other natural gas feedstock data sources, including:

- The stoichiometric value of natural gas needed to produce the assumed amount of ammonia produced (0.414 kg CH_4 / kg NH_3) converted to C and then converted to standard cubic feet (scf) based on the C emissions factors and heating content values used in the Inventory.
- Non-fuel use of natural gas in ammonia production for NAICS code 325311 Nitrogenous Fertilizers from EIA Manufacturing Energy Consumption Survey (MECS). Data are only available for some years as the survey is only done every 4 years and some years are withheld for confidentiality reasons. The EIA MECS data are limited in coverage and for some years is below the stoichiometric quantity of feedstock needed. Differences over time could be due to coverage of the survey data
- Facility-reported data for 2017 through 2021 under subpart G of the GHGRP for feedstock use (in scf).
- Data derived from the GHGRP reported CO_2 emissions for 2010 through 2016, converted to scf based on average GHGRP reported values for C content and calculated molecular weights.

The current Inventory data are consistent with trends in the production data because the Inventory results are based on the assumed CO_2 emissions factor which is linked to production. It implies that some natural gas feedstock is used beyond the stoichiometric amount needed due to losses/efficiencies, etc.

More details on the greenhouse gas calculation, monitoring, and QA/QC methods applicable to reporting of urea produced at ammonia production facilities can be found under Section 4.6 Urea Consumption for Non-Agricultural Purposes.

[25] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

[26] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Recalculations

Based on the updated methodology, recalculations were performed for emissions from ammonia for years 1990 through 2020. Compared to the previous *Inventory*, total CO_2 emissions from ammonia production (from natural gas and petroleum coke feedstocks) increased by an average of 8.7 percent (961 kt CO_2) per year, ranging from a decrease of 4.8 percent (507 kt CO_2) in 2015 to an increase of 13.3 percent (1,203 kt CO_2) in 2007.

Planned Improvements

Currently the *Inventory* does not separately track fuel energy use for ammonia production. To be more consistent with *2006 IPCC Guidelines*, EPA is considering whether to include natural gas fuel use as part of ammonia production emissions as a future improvement. The data are still being evaluated as part of EPA's efforts to disaggregate other industrial sector categories' energy use in the Energy chapter of the Inventory. If possible, this will be incorporated in future Inventory reports. If incorporated, the fuel energy use and emissions will be removed from current reporting under Energy to avoid double counting.

4.6 Urea Consumption for Non-Agricultural Purposes

Urea is produced using ammonia (NH_3) and carbon dioxide (CO_2) as raw materials. All urea produced in the United States is assumed to be produced at ammonia production facilities where both ammonia and CO_2 are generated. There were 35 plants producing ammonia in the United States in 2021, with two additional plants sitting idle for the entire year (USGS 2022b).

The chemical reaction that produces urea is:

$$2NH_3 + CO_2 \rightarrow NH_2COONH_4 \rightarrow CO(NH_2)_2 + H_2O$$

This section accounts for CO_2 emissions associated with urea consumed exclusively for non-agricultural purposes. Emissions of CO_2 resulting from agricultural applications of urea are accounted for in Section 5.6 Urea Fertilization (CRF Source Category 3H) of the Agriculture chapter.

The industrial applications of urea include its use in adhesives, binders, sealants, resins, fillers, analytical reagents, catalysts, intermediates, solvents, dyestuffs, fragrances, deodorizers, flavoring agents, humectants and dehydrating agents, formulation components, monomers, paint and coating additives, photosensitive agents, and surface treatments agents. In addition, urea is used for abating nitrogen oxide (NO_x) emissions from coal-fired power plants and diesel transportation motors.

Emissions of CO_2 from urea consumed for non-agricultural purposes in 2021 were estimated to be 5.0 MMT CO_2 Eq. (4,989 kt) and are summarized in Table 4-25 and Table 4-26. Net CO_2 emissions from urea consumption for non-agricultural purposes have increased by approximately 32 percent from 1990 to 2021 and decreased by approximately 14.0 percent from 2020 to 2021.

Table 4-25: CO_2 Emissions from Urea Consumption for Non-Agricultural Purposes (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Consumption	3.8	3.7	5.2	6.1	6.2	5.8	5.0

Table 4-26: CO_2 Emissions from Urea Consumption for Non-Agricultural Purposes (kt CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Consumption	3,784	3,653	5,161	6,111	6,154	5,814	4,989

Methodology and Time-Series Consistency

Emissions of CO_2 resulting from urea consumption for non-agricultural purposes are estimated by multiplying the amount of urea consumed in the United States for non-agricultural purposes by a factor representing the amount of CO_2 used as a raw material to produce the urea. This method is based on the assumption that all of the carbon in urea is released into the environment as CO_2 during use, consistent with the Tier 1 method used to estimate emissions from ammonia production in the *2006 IPCC Guidelines* (IPCC 2006) which states that the "CO_2 recovered [from ammonia production] for downstream use can be estimated from the quantity of urea produced where CO_2 is estimated by multiplying urea production by 44/60, the stoichiometric ratio of CO_2 to urea."

The amount of urea consumed for non-agricultural purposes in the United States is estimated by deducting the quantity of urea fertilizer applied to agricultural lands, which is obtained directly from the Agriculture chapter (see Table 5-25), from the total domestic supply of urea as reported in Table 4-27. The domestic supply of urea is estimated based on the amount of urea produced plus urea imports and minus urea exports. A factor of 0.733 tons of CO_2 per ton of urea consumed is then applied to the resulting supply of urea for non-agricultural purposes to estimate CO_2 emissions from the amount of urea consumed for non-agricultural purposes. The 0.733 tons of CO_2 per ton of urea emission factor is based on the stoichiometry of carbon in urea. This corresponds to a stoichiometric ratio of CO_2 to urea of 44/60, assuming complete conversion of carbon in urea to CO_2 (IPCC 2006; EFMA 2000).

Urea production data for 1990 through 2008 were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook: Nitrogen* (USGS 1994 through 2009a). Urea production data for 2009 through 2010 were obtained from the U.S. Census Bureau (2011). The U.S. Census Bureau ceased collection of urea production statistics in 2011. Urea production data for 2011 through 2021 were obtained from GHGRP(EPA 2018; EPA 2022a; EPA 2022b).

Urea import data for 2021 were not available at the time of publication and were estimated using 2020 values. Urea import data for 2013 to 2020 were obtained from the USGS *Minerals Yearbook: Nitrogen* (USGS 2021a). Urea import data for 2011 and 2012 were taken from *U.S. Fertilizer Import/Exports* from the United States Department of Agriculture (USDA) Economic Research Service Data Sets (U.S. Department of Agriculture 2012). USDA suspended updates to this data after 2012. Urea import data for the previous years were obtained from the U.S. Census Bureau *Current Industrial Reports Fertilizer Materials and Related Products* annual and quarterly reports for 1997 through 2010 (U.S. Census Bureau 2001 through 2011), The Fertilizer Institute (TFI 2002) for 1993 through 1996, and the United States International Trade Commission Interactive Tariff and Trade DataWeb (U.S. ITC 2002) for 1990 through 1992 (see Table 4-27).

Urea export data for 2021 were not available at the time of publication and were estimated using 2020 values. Urea export data for 2013 to 2020 were obtained from the USGS *Minerals Yearbook: Nitrogen* (USGS 2021a). Urea export data for 1990 through 2012 were taken from *U.S. Fertilizer Import/Exports* from USDA Economic Research Service Data Sets (U.S. Department of Agriculture 2012). USDA suspended updates to this data after 2012.

Table 4-27: Urea Production, Urea Applied as Fertilizer, Urea Imports, and Urea Exports (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Urea Production	7,450	5,270	9,030	10,700	11,400	11,500	10,500
Urea Applied as Fertilizer	3,296	4,779	6,630	6,734	6,859	6,984	7,109
Urea Imports	1,860	5,026	5,510	5,110	4,410	4,190	4,190
Urea Exports	854	536	872	743	559	777	777

Urea Consumed for Non-Agricultural Purposes	5,160	4,981	7,038	8,333	8,392	7,929	6,804

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for urea consumption for non-agricultural purposes spliced activity data from different sources: USGS data for 1990 through 2008, U. S. Census Bureau data for 2009 and 2010, and GHGRP data beginning in 2011. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

There is limited publicly available data on the quantities of urea produced and consumed for non-agricultural purposes. Therefore, the amount of urea used for non-agricultural purposes is estimated based on a balance that relies on estimates of urea production, urea imports, urea exports, and the amount of urea used as fertilizer. EPA uses an uncertainty range of ±5 percent for urea imports and urea exports, consistent with the ranges for activity data that are not obtained directly from plants, and using this suggested uncertainty provided in section 3.2.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). The primary uncertainties associated with this source category are associated with the accuracy of these estimates as well as the fact that each estimate is obtained from a different data source. Because urea production estimates are no longer available from the USGS, there is additional uncertainty associated with urea produced beginning in 2011. There is also uncertainty associated with the assumption that all of the carbon in urea is released into the environment as CO_2 during use.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-28. Carbon dioxide emissions associated with urea consumption for non-agricultural purposes during 2021 were estimated to be between 4.8 and 5.2 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 4 percent below and 4 percent above the emission estimate of 5.0 MMT CO_2 Eq.

Table 4-28: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Urea Consumption for Non-Agricultural Purposes (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Urea Consumption for Non-Agricultural Purposes	CO_2	5.0	4.8	5.2	-4%	+4%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to reporting of urea production occurring at ammonia facilities can be found under Subpart G (Ammonia Manufacturing) of the regulation (40 CFR Part 98).[27] EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g.,

[27] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.[28] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. EPA also conducts QA checks of GHGRP reported urea production data against external datasets including the USGS *Minerals Yearbook* data. The comparison shows consistent trends in urea production over time.

Recalculations Discussion

Based on updated quantities of urea applied for agricultural uses for 2015 to 2020, updated urea imports from USGS for 2020, and updated urea exports from USGS for 2020, recalculations were performed for 2015 through 2020. Compared to the previous Inventory, CO_2 emissions from urea consumption for non-agricultural purposes decreased by less than 1 percent (25 kt CO_2) for 2015, less than 1 percent (41 kt CO_2) for 2016, and less than 1 percent (21 kt CO_2) for 2017; increased by 1.33 percent (80 kt CO_2) for 2018 and by 1.82 percent (110 kt CO_2) for 2019; and decreased by 2.81 percent (168 kt CO_2) for 2020.

Planned Improvements

At this time, there are no specific planned improvements for estimating CO_2 emissions from urea consumption for non-agricultural purposes.

4.7 Nitric Acid Production (CRF Source Category 2B2)

Nitrous oxide (N_2O) is emitted during the production of nitric acid (HNO_3), an inorganic compound used primarily to make synthetic commercial fertilizers. Nitric acid is also a major component in the production of adipic acid—a feedstock for nylon—and explosives. Virtually all of the nitric acid produced in the United States is manufactured by the high-temperature catalytic oxidation of ammonia (EPA 1998). There are two different nitric acid production methods: weak nitric acid and high-strength nitric acid. The first method utilizes oxidation, condensation, and absorption to produce nitric acid at concentrations between 30 and 70 percent nitric acid. High-strength acid (90 percent or greater nitric acid) can be produced from dehydrating, bleaching, condensing, and absorption of the weak nitric acid. Most U.S. plants were built between 1960 and 2000. As of 2021, there were 31 active nitric acid production plants, including one high-strength nitric acid production plant in the United States (EPA 2010; EPA 2022).

The basic process technology for producing nitric acid has not changed significantly over time. During this process, N_2O is formed as a byproduct and released from reactor vents into the atmosphere. Emissions from fuels consumed for energy purposes during the production of nitric acid are included in the Energy chapter.

Nitric acid is made from the reaction of ammonia (NH_3) with oxygen (O_2) in two stages. The overall reaction is:

$$4NH_3 + 8O_2 \rightarrow 4HNO_3 + 4H_2$$

Currently, the nitric acid industry in the United States controls emissions of NO and NO_2 (i.e., NO_x), using a combination of non-selective catalytic reduction (NSCR) and selective catalytic reduction (SCR) technologies. In the

[28] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

process of destroying NO_x, NSCR systems are also very effective at destroying N_2O. Five nitric acid plants had NSCR systems installed between 1964 and 1977, over half due to the finalization of the Nitric Acid Plant New Source Performance Standards (NSPS) which went into effect in 1971. Four additional nitric acid plants had NSCR systems installed between 2016 and 2018, as a result of EPA Consent Decrees to control NO_X emissions more effectively. NSCR systems are used in approximately one-third of the weak acid production plants. For N_2O abatement, U.S. facilities are using both tertiary (i.e., NSCR and SCR) and secondary controls (i.e., catalysts added to the ammonia reactor to lessen potential N_2O production).

Emissions from the production of nitric acid are generally directly proportional to the annual amount of nitric acid produced because emissions are calculated as the product of the total annual production and plant-specific emission factors. There are a few instances, however, where that relationship has not been directly proportional. For example, in 2015 and 2019, nitric acid production decreased and emissions increased compared to the respective preceding years. N_2O emissions for those years are calculated based on data from the GHGRP as discussed in the Methodology section below. According to data from plants reporting to GHGRP, plant-specific operations can affect the emission factor used, including: (1) site-specific fluctuations in ambient temperature and humidity, (2) catalyst age and condition, (3) process changes, such as fluctuations in process pressure or temperature and replacing the ammonia catalyst, (4) the addition, removal, maintenance, and utilization of abatement technologies, and (5) the number of nitric acid trains, which are reaction vessels where ammonia is oxidized to form nitric acid. Changes in those operating conditions for the years in question (2015 and 2019) caused changes in emission factors, which resulted in emissions changing disproportionally to production in those years.

Nitrous oxide emissions from this source were estimated to be 7.9 MMT CO_2 Eq. (30 kt of N_2O) in 2021 and are summarized in Table 4-29 and Table 4-30Emissions from nitric acid production have decreased by 27 percent since 1990, while production has increased by 8 percent over the same time period (see Table 4-29 and Table 4-30). Emissions have decreased by 39 percent since 1997, the highest year of production in the time series. From 2020 to 2021, nitric acid production decreased by 2.1 percent, leading to an overall decrease in emissions from nitric acid production of 4.8 percent from 2020 to 2021.

Table 4-29: N_2O Emissions from Nitric Acid Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Nitric Acid Production	10.8	10.1	8.3	8.5	8.9	8.3	7.9

Table 4-30: N_2O Emissions from Nitric Acid Production (kt N_2O)

Year	1990	2005	2017	2018	2019	2020	2021
Nitric Acid Production	41	38	31	32	34	31	30

Methodology and Time-Series Consistency

Emissions of N_2O were calculated using the estimation methods provided by the *2006 IPCC Guidelines* and a country-specific method utilizing EPA's GHGRP. A country-specific approach similar to the *2006 IPCC Guidelines* Tier 3 method was used to estimate N_2O emissions for 2010 through 2021, whereas the IPCC Tier 2 method was used to estimate emissions from nitric acid production for 1990 through 2009.

2010 through 2021

Process N_2O emissions and nitric acid production data were obtained directly from EPA's GHGRP for 2010 through 2021 by aggregating reported facility-level data (EPA 2022).

Since 2010, in the United States, all nitric acid facilities that produce weak nitric acid (30 to 70 percent) have been required to report annual greenhouse gas emissions data to EPA as per the requirements of the GHGRP (Subpart

V). Beginning with 2018, the rule was changed to include facilities that produce nitric acid of any strength. The only facility that produces high-strength nitric acid also produces weak nitric acid. All N_2O emissions from nitric acid production originate from the production of weak nitric acid.

Process emissions and nitric acid production reported to the GHGRP provide complete estimates of greenhouse gas emissions for the United States because there are no reporting thresholds. While facilities are allowed to stop reporting to the GHGRP if the total reported emissions from nitric acid production are less than 25,000 metric tons CO_2 Eq. per year for five consecutive years or less than 15,000 metric tons CO_2 Eq. per year for three consecutive years, no facilities have stopped reporting as a result of these provisions.[29] All nitric acid facilities are required to either calculate process N_2O emissions using a site-specific emission factor that is the average of the emission factor determined through annual performance tests for each nitric acid train under typical operating conditions or directly measure process N_2O emissions using monitoring equipment.[30]

Emissions from facilities vary from year to year, depending on the amount of nitric acid produced with and without abatement technologies and other conditions affecting the site-specific emission factor. To maintain consistency across the time series and with the rounding approaches taken by other data sets, GHGRP nitric acid data are rounded and are shown in Table 4-31.

1990 through 2009

Using GHGRP data for 2010,[31] country-specific N_2O emission factors were calculated for nitric acid production with abatement and without abatement (i.e., controlled and uncontrolled emission factors). The following 2010 emission factors were derived for production with abatement and without abatement: 3.3 kg N_2O/metric ton HNO_3 produced at plants using abatement technologies (e.g., tertiary systems such as NSCR systems) and 5.99 kg N_2O/metric ton HNO_3 produced at plants not equipped with abatement technology. Country-specific weighted emission factors were derived by weighting these emission factors by percent production with abatement and without abatement over time periods 1990 through 2008 and 2009. These weighted emission factors were used to estimate N_2O emissions from nitric acid production for years prior to the availability of GHGRP data (i.e., 1990 through 2008 and 2009). A separate weighted emission factor is included for 2009 due to data availability for that year.

EPA verified the installation dates of N_2O abatement technologies for all facilities based on GHGRP facility-level information and confirmed that all abatement technologies were accounted for in the derived emission factors (EPA 2021). No changes to N_2O abatement levels from 1990 through 2008 or for 2009 were made due to the review of GHGRP-reported N_2O abatement installation dates. Due to the lack of information on abatement equipment utilization, it is assumed that once abatement technology was installed in facilities, the equipment was consistently operational for the duration of the time series considered in this report (especially NSCRs).

The country-specific weighted N_2O emission factors were used in conjunction with annual production to estimate N_2O emissions for 1990 through 2009, using the following equations:

Equation 4-4: *2006 IPCC Guidelines* Tier 3: N_2O Emissions From Nitric Acid Production (Equation 3.6)

$$E_i = P_i \times EF_{weighted,i}$$

[29] See 40 CFR 98.2(i)(1) and 40 CFR 98.2(i)(2) for more information about these provisions.

[30] Facilities must use standard methods - either EPA Method 320 or ASTM D6348-03 for annual performance tests - and must follow associated QA/QC procedures consistent with category-specific QC of direct emission measurements during these performance tests.

[31] National N_2O process emissions, national production, and national share of nitric acid production with abatement and without abatement technology was aggregated from the GHGRP facility-level data for 2010 to 2017 (i.e., percent production with and without abatement).

$$EF_{weighted,i} = \left[\left(\%P_{c,i} \times EF_c\right) + \left(\%P_{unc,i} \times EF_{unc}\right)\right]$$

where,

E_i	=	Annual N_2O Emissions for year i (kg/yr)
P_i	=	Annual nitric acid production for year i (metric tons HNO_3)
$EF_{weighted,i}$	=	Weighted N_2O emission factor for year i (kg N_2O/metric ton HNO_3)
$\%P_{c,i}$	=	Percent national production of HNO_3 with N_2O abatement technology (%)
EF_c	=	N_2O emission factor, with abatement technology (kg N_2O/metric ton HNO_3)
$\%P_{unc,i}$	=	Percent national production of HNO_3 without N_2O abatement technology (%)
EF_{unc}	=	N_2O emission factor, without abatement technology (kg N_2O/metric ton HNO_3)
i	=	year from 1990 through 2009

- For 2009: Weighted N_2O emission factor = 5.46 kg N_2O/metric ton HNO_3.
- For 1990 through 2008: Weighted N_2O emission factor = 5.66 kg N_2O/metric ton HNO_3.

Nitric acid production data for the United States for 1990 through 2009 were obtained from the U.S. Census Bureau (U.S. Census Bureau 2008, 2009, 2010a, 2010b) (see Table 4-31). EPA used GHGRP facility-level information to verify that all reported N_2O abatement equipment were incorporated into the estimation of N_2O emissions from nitric acid production over the full time series (EPA 2021).

Table 4-31: Nitric Acid Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	7,200	6,710	7,780	8,210	8,080	7,970	7,800

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for nitric acid production spliced activity data from two different sources: U. S. Census Bureau production data for 1990 through 2009 and GHGRP production data starting in 2010. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

Uncertainty associated with the parameters used to estimate N_2O emissions includes the share of U.S. nitric acid production attributable to each emission abatement technology (i.e., utilization) over the time series (especially prior to 2010), and the associated emission factors applied to each abatement technology type. While some information has been obtained through outreach with industry associations, limited information is available over the time series (especially prior to 2010) for a variety of facility level variables, including plant-specific production levels, plant production technology (e.g., low or high pressure, etc.), and abatement technology destruction and removal efficiency rates. Production data prior to 2010 were obtained from National Census Bureau, which does not provide uncertainty estimates with their data. Facilities reporting to EPA's GHGRP must measure production using equipment and practices used for accounting purposes. While emissions are often directly proportional to production, the emission factor for individual facilities can vary significantly from year to year due to site-specific fluctuations in ambient temperature and humidity, catalyst age and condition, nitric acid production process changes, the addition or removal of abatement technologies, and the number of nitric acid trains at the facility. At this time, EPA does not estimate uncertainty of the aggregated facility-level information. As noted in the QA/QC and verification section below, EPA verifies annual facility-level reports through a multi-step process (e.g.,

combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. The annual production reported by each nitric acid facility under EPA's GHGRP and then aggregated to estimate national N_2O emissions is assumed to have low uncertainty. EPA assigned an uncertainty range of ±5 percent for facility-reported N_2O emissions, and using this suggested uncertainty provided in section 3.4.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of ±2 percent for nitric acid production, and using this suggested uncertainty provided in section 3.3.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-32. Nitrous oxide emissions from nitric acid production were estimated to be between 7.5 and 8.3 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 5 percent above the 2021 emissions estimate of 7.9 MMT CO_2 Eq.

Table 4-32: Approach 2 Quantitative Uncertainty Estimates for N_2O Emissions from Nitric Acid Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Nitric Acid Production	N_2O	7.9	7.5	8.3	-5%	+5%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to nitric acid facilities can be found under Subpart V: Nitric Acid Production of the GHGRP regulation (40 CFR Part 98).[32]

The main QA/QC activities are related to annual performance testing, which must follow either EPA Method 320 or ASTM D6348-03. EPA verifies annual facility-level GHGRP reports through a multi-step process that is tailored to the Subpart (e.g., combination of electronic checks including range checks, statistical checks, algorithm checks, year-to-year comparison checks, along with manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred (EPA 2015).[33] EPA's review of observed trends noted that while emissions have generally mirrored production, in 2015 and 2019 nitric acid production decreased compared to the previous year and emissions increased. While review is ongoing, based on feedback from the verification process to date, these changes are due to facility-specific changes (e.g., in the nitric production process and management of abatement equipment).

[32] See Subpart V monitoring and reporting regulation http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

[33] See GHGRP Verification Factsheet https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Recalculations Discussion

For the current Inventory, CO_2-equivalent estimates of total N_2O emissions from nitric acid production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N_2O has decreased from 298 to 265, leading to an overall decrease in estimates of CO_2-equivalent N_2O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, N_2O emissions decreased by 11 percent for each year of the time series, ranging from a decrease of 1.0 MMT CO_2 Eq. in 2020 to 1.6 MMT CO_2 Eq. in 1997. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Pending resources, EPA is considering a near-term improvement to both review and refine quantitative uncertainty estimates and the associated qualitative discussion.

4.8 Adipic Acid Production (CRF Source Category 2B3)

Adipic acid is produced through a two-stage process during which nitrous oxide (N_2O) is generated in the second stage. The first stage of manufacturing usually involves the oxidation of cyclohexane to form a cyclohexanone/cyclohexanol mixture. The second stage involves oxidizing this mixture with nitric acid to produce adipic acid. Nitrous oxide is generated as a byproduct of the nitric acid oxidation stage and is emitted in the waste gas stream (Thiemens and Trogler 1991). The second stage is represented by the following chemical reaction:

$$(CH_2)_5CO(cyclohexanone) + (CH_2)_5CHOH(cyclohexanol) + wHNO_3 \rightarrow HOOC(CH_2)_4COOH(adipic\ acid) + xN_2O + yH_2O$$

Process emissions from the production of adipic acid vary with the types of technologies and level of emission controls employed by a facility. In 1990, two major adipic acid-producing plants had N_2O abatement technologies in place and, as of 1998, three major adipic acid production facilities had control systems in place (Reimer et al. 1999). In 2021, thermal reduction was applied as an N_2O abatement measure at one adipic acid facility (EPA 2022). Emissions from fuels consumed for energy purposes during the production of adipic acid are accounted for in the Energy chapter.

Worldwide, only a few adipic acid plants exist. The United States, Europe, and China are the major producers, with the United States accounting for the largest share of global adipic acid production capacity in recent years. In 2021, the United States had two companies with a total of two adipic acid production facilities (one in Texas and one in Florida), following the ceased operations of a third major production facility at the end of 2015 (EPA 2022).

Adipic acid is a white crystalline solid used in the manufacture of synthetic fibers, plastics, coatings, urethane foams, elastomers, and synthetic lubricants. Commercially, it is the most important of the aliphatic dicarboxylic acids, which are used to manufacture polyesters. Eighty-four percent of all adipic acid produced in the United States is used in the production of nylon 6,6; 9 percent is used in the production of polyester polyols; 4 percent is used in the production of plasticizers; and the remaining 4 percent is accounted for by other uses, including

unsaturated polyester resins and food applications (ICIS 2007). Food grade adipic acid is used to provide some foods with a "tangy" flavor (Thiemens and Trogler 1991).

Compared to 1990, national adipic acid production in 2021 has increased by less than 1 percent to approximately 760,000 metric tons (ACC 2022). Nitrous oxide emissions from adipic acid production were estimated to be 6.6 MMT CO_2 Eq. (25 kt N_2O) in 2021 and are summarized in Table 4-33 and Table 4-34. Over the period 1990 through 2021, facilities have reduced emissions by 51 percent due to the widespread installation of pollution control measures in the late 1990s. The COVID-19 pandemic may have partially influenced the 11 percent decrease in N_2O emissions from adipic acid production between 2020 and 2021.

Significant changes in the amount of time that the N_2O abatement device at one facility was in operation has been the main cause of fluctuating emissions in recent years. These fluctuations are most evident for years where trends in emissions and adipic acid production were not directly proportional: (1) between 2016 and 2017, (2) between 2017 and 2018, and (3) between 2019 and 2020. As noted above, changes in control measures and abatement technologies at adipic acid production facilities, including maintenance of equipment, can result in annual emission fluctuations. Little additional information is available on drivers of trends, and the amount of adipic acid produced is not reported under EPA's GHGRP.

Table 4-33: N_2O Emissions from Adipic Acid Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Adipic Acid Production	13.5	6.3	6.6	9.3	4.7	7.4	6.6

Table 4-34: N_2O Emissions from Adipic Acid Production (kt N_2O)

Year	1990	2005	2017	2018	2019	2020	2021
Adipic Acid Production	51	24	25	35	18	28	25

Methodology and Time-Series Consistency

Emissions of N_2O were calculated using a combination of a country-specific approach utilizing EPA's GHGRP and Tier 2 and Tier 3 methods provided by the *2006 IPCC Guidelines*. A country-specific approach similar to the *2006 IPCC Guidelines* Tier 3 method was used to estimate emissions from adipic acid production for 2010 through 2021. For 1990 through 2009, emissions are estimated using both Tier 2 and Tier 3 methods consistent with the *2006 IPCC Guidelines.* Due to confidential business information (CBI), plant names are not provided in this section; therefore, the four adipic acid-producing facilities that have operated over the time series will be referred to as Plants 1 through 4. As noted above, one currently operating facility uses thermal reduction as an N_2O abatement technology.

2010 through 2021

All emission estimates for 2010 through 2021 were obtained through analysis of GHGRP data (EPA 2010 through 2022). Facility-level greenhouse gas emissions data were obtained from EPA's GHGRP for the years 2010 through 2021 (EPA 2010 through 2022) and aggregated to national N_2O emissions. Consistent with IPCC Tier 3 methods, all adipic acid production facilities are required to either calculate N_2O emissions using a facility-specific emission

factor developed through annual performance testing under typical operating conditions or directly measure N_2O emissions using monitoring equipment.[34]

1990 through 2009

For years 1990 through 2009, which were prior to EPA's GHGRP reporting, for both Plants 1 and 2, emission estimates were obtained directly from the plant engineers and account for reductions due to control systems in place at these plants during the time series. These prior estimates are considered CBI and hence are not published (Desai 2010, 2011). These estimates were based on continuous process monitoring equipment installed at the two facilities.

For Plant 4, 1990 through 2009 N_2O emissions were estimated using the following Tier 2 equation from the *2006 IPCC Guidelines*:

Equation 4-5: *2006 IPCC Guidelines* Tier 2: N_2O Emissions From Adipic Acid Production (Equation 3.8)

$$E_{aa} = Q_{aa} \times EF_{aa} \times (1 - [DF \times UF])$$

where,

E_{aa}	=	N_2O emissions from adipic acid production, metric tons
Q_{aa}	=	Quantity of adipic acid produced, metric tons
EF_{aa}	=	Emission factor, metric ton N_2O/metric ton adipic acid produced
DF	=	N_2O destruction factor
UF	=	Abatement system utility factor

The adipic acid production is multiplied by an emission factor (i.e., N_2O emitted per unit of adipic acid produced), which has been estimated to be approximately 0.3 metric tons of N_2O per metric ton of product (IPCC 2006). The "N_2O destruction factor" in the equation represents the percentage of N_2O emissions that are destroyed by the installed abatement technology. The "abatement system utility factor" represents the percentage of time that the abatement equipment operates during the annual production period. Plant-specific production data for Plant 4 were obtained across the time series through personal communications (Desai 2010, 2011). The plant-specific production data were then used for calculating emissions as described above.

For Plant 3, 2005 through 2009 emissions were obtained directly from the plant (Desai 2010, 2011). For 1990 through 2004, emissions were estimated using plant-specific production data and the IPCC factors as described above for Plant 4. Plant-level adipic acid production for 1990 through 2003 was estimated by allocating national adipic acid production data to the plant level using the ratio of known plant capacity to total national capacity for all U.S. plants (ACC 2022; CMR 2001, 1998; CW 1999; C&EN 1992 through 1995). For 2004, actual plant production data were obtained and used for emission calculations (CW 2005).

Plant capacities for 1990 through 1994 were obtained from *Chemical & Engineering News*, "Facts and Figures" and "Production of Top 50 Chemicals" (C&EN 1992 through 1995). Plant capacities for 1995 and 1996 were kept the same as 1994 data. The 1997 plant capacities were taken from *Chemical Market Reporter*, "Chemical Profile: Adipic Acid" (CMR 1998). The 1998 plant capacities for all four plants and 1999 plant capacities for three of the plants were obtained from *Chemical Week*, Product Focus: Adipic Acid/Adiponitrile (CW 1999). Plant capacities for the year 2000 for three of the plants were updated using *Chemical Market Reporter*, "Chemical Profile: Adipic Acid"

[34] Facilities must use standard methods, either EPA Method 320 or ASTM D6348-03 for annual performance testing, and must follow associated QA/QC procedures during these performance tests consistent with category-specific QC of direct emission measurements.

(CMR 2001). For 2001 through 2003, the plant capacities for three plants were held constant at year 2000 capacities. Plant capacity for 1999 to 2003 for the one remaining plant was kept the same as 1998.

National adipic acid production data (see Table 4-35) from 1990 through 2021 were obtained from the American Chemistry Council (ACC 2022).

Table 4-35: Adipic Acid Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	755	865	830	825	810	710	760

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for adipic acid production spliced activity data from multiple sources: plant-specific emissions data and publicly available plant capacity data for 1990 through 2009 and GHGRP emission data starting in 2010. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data sets for years where there was overlap, with findings that the data sets were consistent and adjustments were not needed.

Uncertainty

Uncertainty associated with N_2O emission estimates includes the methods used by companies to monitor and estimate emissions. While some information has been obtained through outreach with facilities, limited information is available over the time series on these methods, abatement technology destruction and removal efficiency rates, and plant-specific production levels. EPA assigned an uncertainty range of ±5 percent for facility-reported N_2O emissions, and using this suggested uncertainty provided in section 3.4.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-36. Nitrous oxide emissions from adipic acid production for 2021 were estimated to be between 6.3 and 6.9 MMT CO_2 Eq. at the 95 percent confidence level. These values indicate a range of approximately 5 percent below to 5 percent above the 2021 emission estimate of 6.6 MMT CO_2 Eq.

Table 4-36: Approach 2 Quantitative Uncertainty Estimates for N_2O Emissions from Adipic Acid Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Adipic Acid Production	N_2O	6.6	6.3	6.9	-5%	+5%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to adipic acid facilities can be found under Subpart E (Adipic Acid Production) of the GHGRP regulation (40 CFR Part 98).[35] The main

[35] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

QA/QC activities are related to annual performance testing, which must follow either EPA Method 320 or ASTM D6348-03. EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[36] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year comparisons of reported data.

Recalculations Discussion

For the current Inventory, CO_2-equivalent estimates of total N_2O emissions from adipic acid production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N_2O has decreased from 298 to 265, leading to an overall decrease in estimates of CO_2-equivalent N_2O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, N_2O emissions decreased by 11.1 percent for each year of the time series, ranging from a decrease of 0.3 MMT CO_2 Eq. in 2008 to 1.9 MMT CO_2 Eq. in 1995. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA plans to review GHGRP facility reported information on the date of abatement technology installation in order to better reflect trends and changes in emissions abatement within the industry across the time series. To date, the facility using the facility-specific emission factor developed through annual performance testing has reported no installation and no utilization of N_2O abatement technology. The facility using direct measurement of N_2O emissions has reported the use of thermal reduction as an N_2O abatement technology but is not required to report the date of installation.

4.9 Caprolactam, Glyoxal and Glyoxylic Acid Production (CRF Source Category 2B4)

Caprolactam

Caprolactam ($C_6H_{11}NO$) is a colorless monomer produced for nylon-6 fibers and plastics. A substantial proportion of the fiber is used in carpet manufacturing. Most commercial processes used for the manufacture of caprolactam begin with benzene, but toluene can also be used. The production of caprolactam can give rise to significant emissions of nitrous oxide (N_2O).

During the production of caprolactam, emissions of N_2O can occur from the ammonia oxidation step, emissions of carbon dioxide (CO_2) from the ammonium carbonate step, emissions of sulfur dioxide (SO_2) from the ammonium bisulfite step, and emissions of non-methane volatile organic compounds (NMVOCs). Emissions of CO_2, SO_2 and NMVOCs from the conventional process are unlikely to be significant in well-managed plants. Modified

[36] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

caprolactam production processes are primarily concerned with elimination of the high volumes of ammonium sulfate that are produced as a byproduct of the conventional process (IPCC 2006).

In the most commonly used process where caprolactam is produced from benzene, benzene is hydrogenated to cyclohexane which is then oxidized to produce cyclohexanone ($C_6H_{10}O$). The classical route (Raschig process) and basic reaction equations for production of caprolactam from cyclohexanone are (IPCC 2006):

$$Oxidation\ of\ NH_3\ to \frac{NO}{NO_2}$$

$$\downarrow$$

$$NH_3\ reacted\ with \frac{CO_2}{H_2O} to\ yield\ ammonium\ carbonate\ (NH_4)_2CO_3$$

$$\downarrow$$

$$(NH_4)_2CO_3\ reacted\ with \frac{NO}{NO_2} (from\ NH_3\ oxidation) to\ yield\ ammonium\ nitrite\ (NH_4NO_2)$$

$$\downarrow$$

$$NH_3\ reacted\ with \frac{SO_2}{H_2O} to\ yield\ ammonium\ bisulphite\ (NH_4HSO_3)$$

$$\downarrow$$

$$NH_4NO_2\ and\ (NH_4HSO_3) reacted\ to\ yield\ hydroxylamine\ disulphonate\ (NOH(SO_3NH_4)_2)$$

$$\downarrow$$

$$(NOH(SO_3NH_4)_2)\ hydrolised\ to\ yield\ hydroxylamine\ sulphate\ ((NH_2OH)_2.H_2SO_4)\ and$$

$$ammonium\ sulphate\ ((NH_4)_2SO_4)$$

$$\downarrow$$

$$Cylohexanone\ reaction:$$

$$C_6H_{10}O\ + \frac{1}{2}(NH_2OH)_2.H_2SO_4(+NH_3\ and\ H_2SO_4) \rightarrow C_6H_{10}NOH\ + (NH_4)_2SO_4\ + H_2O$$

$$\downarrow$$

$$Beckmann\ rearrangement:$$

$$C_6H_{10}NOH\ (+H_2SO_4\ and\ SO_2) \rightarrow C_6H_{11}NO.H_2SO_4\ (+4NH_3\ and\ H_2O) \rightarrow C_6H_{11}NO\ + 2(NH4)_2SO_4$$

In 2004, three facilities produced caprolactam in the United States (ICIS 2004). Another facility, Evergreen Recycling, was in operation from 2000 to 2001 (ICIS 2004; Textile World 2000) and from 2007 through 2015 (DOE 2011; Shaw 2015). Caprolactam production at Fibrant LLC (formerly DSM Chemicals) in Georgia ceased in 2018 (Cline 2019). As of 2021, two companies in the United States produced caprolactam at two facilities: AdvanSix (formerly Honeywell) in Virginia (AdvanSix 2022) and BASF in Texas (BASF 2022).

Nitrous oxide emissions from caprolactam production in the United States were estimated to be 1.2 MMT CO_2 Eq. (5 kt N_2O) in 2021 and are summarized in Table 4-37 and Table 4-38. National emissions from caprolactam production decreased by approximately 17 percent over the period of 1990 through 2021. Emissions in 2021 increased by approximately 6 percent from the 2020 levels. This annual increase returned caprolactam production to levels consistent with 2019 before the COVID-19 pandemic.

Table 4-37: N_2O Emissions from Caprolactam Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Caprolactam Production	1.5	1.9	1.3	1.3	1.2	1.2	1.2

Table 4-38: N_2O Emissions from Caprolactam Production (kt N_2O)

Year	1990	2005	2017	2018	2019	2020	2021
Caprolactam Production	6	7	5	5	5	4	5

Glyoxal

Glyoxal is mainly used as a crosslinking agent for vinyl acetate/acrylic resins, disinfectant, gelatin hardening agent, textile finishing agent (permanent-press cotton, rayon fabrics), and wet-resistance additive (paper coatings) (IPCC 2006). It is also used for enhanced oil-recovery. It is produced from oxidation of acetaldehyde with concentrated nitric acid, or from the catalytic oxidation of ethylene glycol, and N_2O is emitted in the process of oxidation of acetaldehyde.

Glyoxal (ethanedial) ($C_2H_2O_2$) is produced from oxidation of acetaldehyde (ethanal) (C_2H_4O) with concentrated nitric acid (HNO_3). Glyoxal can also be produced from catalytic oxidation of ethylene glycol (ethanediol) (CH_2OHCH_2OH).

Glyoxylic Acid

Glyoxylic acid is produced by nitric acid oxidation of glyoxal. Glyoxylic acid is used for the production of synthetic aromas, agrochemicals, and pharmaceutical intermediates (IPCC 2006).

EPA does not currently estimate the emissions associated with the production of glyoxal and glyoxylic acid because it is likely that these chemicals are imported and not produced in the United States. See Annex 5 for more information.

Methodology and Time-Series Consistency

Emissions of N_2O from the production of caprolactam were calculated using the estimation methods provided by the *2006 IPCC Guidelines*. The *2006 IPCC Guidelines* Tier 1 method was used to estimate emissions from caprolactam production for 1990 through 2021, as shown in this formula:

Equation 4-6: *2006 IPCC Guidelines* Tier 1: N_2O Emissions From Caprolactam Production (Equation 3.9)

$$E_{N_2O} = EF \times CP$$

where,

E_{N_2O} = Annual N_2O Emissions (kg)

EF = N_2O emission factor (default) (kg N_2O/metric ton caprolactam produced)

CP = Caprolactam production (metric tons)

During the caprolactam production process, N_2O is generated as a byproduct of the high temperature catalytic oxidation of ammonia (NH_3), which is the first reaction in the series of reactions to produce caprolactam. The amount of N_2O emissions can be estimated based on the chemical reaction shown above. Based on this formula, which is consistent with an IPCC Tier 1 approach, approximately 111.1 metric tons of caprolactam are required to generate one metric ton of N_2O, resulting in an emission factor of 9.0 kg N_2O per metric ton of caprolactam (IPCC 2006). When applying the Tier 1 method, the *2006 IPCC Guidelines* state that it is good practice to assume that there is no abatement of N_2O emissions and to use the highest default emission factor available in the guidelines.

In addition, EPA did not find support for the use of secondary catalysts to reduce N_2O emissions, such as those employed at nitric acid plants.

The activity data for caprolactam production (see Table 4-39) from 1990 to 2021 were obtained from the American Chemistry Council's *Guide to the Business of Chemistry* (ACC 2022). EPA will continue to analyze and assess alternative sources of production data as a quality control measure.

Table 4-39: Caprolactam Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	626	795	545	530	515	490	520

Carbon dioxide and methane (CH_4) emissions may also occur from the production of caprolactam, but currently the IPCC does not have methodologies for calculating these emissions associated with caprolactam production.

Methodological approaches, consistent with IPCC guidelines, have been applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Estimation of emissions of N_2O from caprolactam production can be treated as analogous to estimation of emissions of N_2O from nitric acid production. Both production processes involve an initial step of NH_3 oxidation, which is the source of N_2O formation and emissions (IPCC 2006). Therefore, uncertainties for the default emission factor values in the *2006 IPCC Guidelines* are an estimate based on default values for nitric acid plants. In general, default emission factors for gaseous substances have higher uncertainties because mass values for gaseous substances are influenced by temperature and pressure variations and gases are more easily lost through process leaks. The default values for caprolactam production have a relatively high level of uncertainty due to the limited information available (IPCC 2006). EPA assigned uncertainty bounds of ±5 percent for caprolactam production, based on expert judgment. EPA assigned an uncertainty range of ±40 percent for the N_2O emission factor, and using this suggested uncertainty provided in Section 3.5.2.1 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-40. Nitrous oxide emissions from Caprolactam, Glyoxal and Glyoxylic Acid Production for 2021 were estimated to be between 0.8 and 1.6 MMT CO_2 Eq. at the 95 percent confidence level. These values indicate a range of approximately 32 percent below to 32 percent above the 2021 emission estimate of 1.2 MMT CO_2 Eq.

Table 4-40: Approach 2 Quantitative Uncertainty Estimates for N_2O Emissions from Caprolactam, Glyoxal and Glyoxylic Acid Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Caprolactam Production	N_2O	1.2	0.8	1.6	-32%	+32%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Recalculations were performed for 2020 to reflect updated caprolactam production data from the American Chemistry Council's *Guide to the Business of Chemistry* (ACC 2022). In addition, for the current Inventory, CO_2-equivalent total emission estimates of N_2O from caprolactam production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N_2O decreased from 298 to 265, leading to an overall decrease in estimates of calculated CO_2-equivalent N_2O emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual N_2O emissions decreased by 11 percent each year, ranging from a decrease of 0.15 MMT CO_2 Eq. in 2020 to 0.25 MMT CO_2 Eq. in 2010 and 2011. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Pending resources, EPA will research other available datasets for caprolactam production and industry trends, including facility-level data. EPA continues to research the production process and emissions associated with the production of glyoxal and glyoxylic acid. Preliminary data suggests that glyoxal and glyoxylic acid may no longer be produced domestically and are largely imported to the United States. See Annex 5 for more information. This planned improvement is subject to data availability and will be implemented in the medium- to long-term.

4.10 Carbide Production and Consumption (CRF Source Category 2B5)

Carbon dioxide (CO_2) and methane (CH_4) are emitted from the production of silicon carbide (SiC), a material used for industrial abrasive applications as well as metallurgical and other non-abrasive applications in the United States. Emissions from fuels consumed for energy purposes during the production of silicon carbide are accounted for in the Energy chapter. Additionally, some metallurgical and non-abrasive applications of SiC are emissive, and while emissions should be accounted for where they occur based on *2006 IPCC Guidelines*, emissions from SiC consumption are accounted for here until additional data on SiC consumption by end-use are available.

To produce SiC, silica sand or quartz (SiO_2) is reacted with carbon (C) in the form of petroleum coke. A portion (about 35 percent) of the carbon contained in the petroleum coke is retained in the SiC. The remaining C is emitted as CO_2, CH_4, or carbon monoxide (CO). The overall reaction is shown below, but in practice, it does not proceed according to stoichiometry:

$$SiO_2 + 3C \rightarrow SiC + 2CO \; (+ O_2 \rightarrow 2CO_2)$$

Carbon dioxide and CH_4 are also emitted during the production of calcium carbide, a chemical used to produce acetylene. Carbon dioxide is implicitly accounted for in the storage factor calculation for the non-energy use of petroleum coke in the Energy chapter.

Markets for manufactured abrasives, including SiC, are heavily influenced by activity in the U.S. manufacturing sector, especially in the aerospace, automotive, furniture, housing, and steel manufacturing sectors. Specific applications of abrasive-grade SiC in 2017 included antislip abrasives, blasting abrasives, bonded abrasives, coated abrasives, polishing and buffing compounds, tumbling media, and wire-sawing abrasives. Approximately 50 percent of SiC is used in metallurgical applications, which include primarily iron and steel production, and other

non-abrasive applications, which include use in advanced or technical ceramics and refractories (USGS 1991a through 2021; Washington Mills 2023).

As a result of the economic downturn in 2008 and 2009, demand for SiC decreased in those years. Low-cost imports, particularly from China, combined with high relative operating costs for domestic producers, continue to put downward pressure on the production of SiC in the United States. Consumption of SiC in the United States has recovered somewhat from its low in 2009 to 2020; 2021 consumption data was withheld to avoid disclosing company proprietary data (USGS 1991b through 2021b).

Silicon carbide was manufactured by two facilities in the United States, one of which produced primarily non-abrasive SiC (USGS 2021). USGS production values for the United States consists of SiC used for abrasives and for metallurgical and other non-abrasive applications (USGS 2021). During the COVID-19 pandemic in 2020, the U.S. Department of Homeland Security considered abrasives manufacturing part of the critical manufacturing sector, and as a result, pandemic "stay-at-home" orders issued in March 2020 did not affect the abrasives manufacturing industry. These plants remained at full operation (USGS 2021a). Consumption of SiC decreased by approximately 25 percent in 2020 due to the pandemic and a sharp decline in imports and rebounded with an increase of approximately 30 percent from 2020 to 2021, remaining below pre-pandemic levels (U.S. Census Bureau 2005 through 2021).

Carbon dioxide emissions from SiC production and consumption in 2021 were 0.2 MMT CO_2 Eq. (172 kt CO_2), which are about 29 percent lower than emissions in 1990 (see Table 4-41 and Table 4-42). Approximately 53 percent of these emissions resulted from SiC production, while the remainder resulted from SiC consumption. Methane emissions from SiC production in 2021 were 0.01 MMT CO_2 Eq. (0.4 kt CH_4) (see Table 4-41 and Table 4-42). Emissions have not fluctuated greatly in recent years.

Table 4-41: CO_2 and CH_4 Emissions from Silicon Carbide Production and Consumption (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Production							
CO_2	0.2	0.1	0.1	0.1	0.1	0.1	0.1
CH_4	+	+	+	+	+	+	+
Consumption							
CO_2	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 4-42: CO_2 and CH_4 Emissions from Silicon Carbide Production and Consumption (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production							
CO_2	170	92	92	92	92	92	92
CH_4	1	+	+	+	+	+	+
Consumption							
CO_2	73	121	90	93	84	62	80

+ Does not exceed 0.5 kt

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emissions of CO_2 and CH_4 from the production of SiC were calculated using the Tier 1 method provided by the *2006 IPCC Guidelines*. Annual estimates of SiC production were multiplied by the default emission factors, as shown below:

Equation 4-7: *2006 IPCC Guidelines* Tier 1: Emissions from Carbide Production (Equation 3.11)

$$E_{sc,CO2} = EF_{sc,CO2} \times Q_{sc}$$

$$E_{sc,CH4} = EF_{sc,CH4} \times Q_{sc} \times \left(\frac{1\ metric\ ton}{1000\ kg}\right)$$

where,

$E_{sc,CO2}$ = CO_2 emissions from production of SiC, metric tons

$EF_{sc,CO2}$ = Emission factor for production of SiC, metric ton CO_2/metric ton SiC

Q_{sc} = Quantity of SiC produced, metric tons

$E_{sc,CH4}$ = CH_4 emissions from production of SiC, metric tons

$EF_{sc,CH4}$ = Emission factor for production of SiC, kilogram CH_4/metric ton SiC

Emission factors were taken from the *2006 IPCC Guidelines*:

- 2.62 metric tons CO_2/metric ton SiC
- 11.6 kg CH_4/metric ton SiC

Production data includes silicon carbide manufactured for abrasive applications as well as for metallurgical and other non-abrasive applications (USGS 2021).

Silicon carbide industrial abrasives production data for 1990 through 2021 were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook: Manufactured Abrasives* (USGS 1991a through 2021). Silicon carbide production data published by USGS have been rounded to the nearest 5,000 metric tons to avoid disclosing company proprietary data. For the period 1990 through 2001, reported USGS production data include production from two facilities located in Canada that ceased operations in 1995 and 2001. Using SiC production data from Canada (ECCC 2022), U.S. SiC production for 1990 through 2001 was adjusted to reflect only U.S. production.

SiC consumption for the entire time series is estimated using USGS consumption data (USGS 1991b through 2021b) and data from the U.S. International Trade Commission (USITC) database on net imports and exports of SiC (U.S. Census Bureau 2005 through 2021) (see Table 4-43). Total annual SiC consumption (utilization) was estimated by subtracting annual exports of SiC from the annual total of national SiC production and annual imports.

Emissions of CO_2 from SiC consumption for metallurgical uses were calculated by multiplying the annual utilization of SiC for metallurgical uses (reported annually in the USGS *Minerals Yearbook: Silicon*) by the carbon content of SiC (30.0 percent), which was determined according to the molecular weight ratio of SiC. Because USGS withheld consumption data for metallurgical uses from publication for 2017, 2018, and 2021 due to concerns of disclosing company-specific sensitive information, SiC consumption for 2017 and 2018 were estimated using 2016 values, and SiC consumption for 2021 was estimated using the 2020 value.

Emissions of CO_2 from SiC consumption for other non-abrasive uses were calculated by multiplying the annual SiC consumption for non-abrasive uses by the carbon content of SiC (30 percent). The annual SiC consumption for non-abrasive uses was calculated by multiplying the annual SiC consumption (production plus net imports) by the percentage used in metallurgical and other non-abrasive uses (50 percent) (USGS 1991a through 2021) and then subtracting the SiC consumption for metallurgical use.

The petroleum coke portion of the total CO_2 process emissions from silicon carbide production is adjusted for within the Energy chapter, as these fuels were consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (Section 3.1) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Table 4-43: Production and Consumption of Silicon Carbide (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Production	65,000	35,000	35,000	35,000	35,000	35,000	35,000
Consumption	132,465	220,149	163,492	168,526	152,412	113,756	146,312

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Silicon carbide production data published by the USGS is rounded to the nearest 5,000 tons and has been consistently reported at 35,000 tons since 2003 to avoid disclosure of company proprietary data. This translates to an uncertainty range of ±7 percent for SiC production (USGS 2021). There is uncertainty associated with the emission factors used because they are based on stoichiometry as opposed to monitoring of actual SiC production plants. An alternative is to calculate emissions based on the quantity of petroleum coke used during the production process rather than on the amount of silicon carbide produced; however, these data were not available. For CH_4, there is also uncertainty associated with the hydrogen-containing volatile compounds in the petroleum coke (IPCC 2006).EPA assigned an uncertainty of ±10 percent for the Tier 1 CO_2 and CH_4 emission factors for the SiC production processes, and using this suggested uncertainty provided in Section 3.6.3.1 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). There is also uncertainty associated with the use or destruction of CH_4 generated from the process, in addition to uncertainty associated with levels of production, net imports, consumption levels, and the percent of total consumption that is attributed to metallurgical and other non-abrasive uses. EPA assigned an uncertainty range of ±5 percent for the primary data inputs for consumption (i.e., crude imports, ground and refined imports, crude exports, ground and refined exports, utilization [metallurgical applications]) to calculate overall uncertainty from SiC production, and using this suggested uncertainty provided in Section 3.6.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-44. Silicon carbide production and consumption CO_2 emissions from 2021 were estimated to be between 10 percent below and 10 percent above the emission estimate of 0.17 MMT CO_2 Eq. at the 95 percent confidence level. Silicon carbide production CH_4 emissions were estimated to be between 10 percent below and 11 percent above the emission estimate of 0.01 MMT CO_2 Eq. at the 95 percent confidence level.

Table 4-44: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Silicon Carbide Production and Consumption (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Silicon Carbide Production and Consumption	CO_2	0.17	0.16	0.19	-10%	+10%
Silicon Carbide Production	CH_4	+	+	+	-10%	+11%

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Recalculations were performed for 1990 through 2001 to account for updated data on SiC production from Canada, which is used to revise production data to reflect only U.S. production. Compared to the previous Inventory, estimates of CO_2 emissions in 1997 increased by 3 kt CO_2, and estimates of CH_4 emissions increased by 11 metric tons CH_4.

Updated USITC data on 2019 SiC exports and 2020 SiC imports resulted in updated SiC consumption estimates for those years. Compared to the previous Inventory, SiC consumption values for 2019 and 2020 increased by less than 2 metric tons and 20 metric tons, respectively. These minimal increases did not impact emissions estimates, compared to the previous Inventory.

In addition, for the current Inventory, CO_2-equivalent estimates of total CH_4 emissions from carbide production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 increased from 25 to 28, leading to an overall increase in estimates for CO_2-equivalent CH_4 emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CO_2-equivalent CH_4 emissions increased by 12 percent each year, ranging from an increase of 1.0 kt CO_2 Eq. in 2002 to 2.3 kt CO_2 Eq. in 1990. The net impact on the entire category from these updates was an average annual 0.7 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA is initiating research for data on SiC consumption by end-use for consideration in updating emissions estimates from SiC consumption and to account for emissions where they occur. This planned improvement is subject to data availability and will be implemented in the medium- to long-term given significance of emissions.

EPA has not integrated aggregated facility-level GHGRP information to inform estimates of CO_2 and CH_4 from SiC production and consumption. The aggregated information (e.g., activity data and emissions) associated with silicon carbide did not meet criteria to shield underlying confidential business information (CBI) from public disclosure. EPA plans to examine the use of GHGRP silicon carbide emissions data for possible use in emission estimates consistent with both Volume 1, Chapter 6 of the *2006 IPCC Guidelines* and the latest IPCC guidance on the use of facility-level data in national inventories. This planned improvement is ongoing and has not been incorporated into this Inventory report. This is a long-term planned improvement.

4.11 Titanium Dioxide Production (CRF Source Category 2B6)

Titanium dioxide (TiO_2) is manufactured using one of two processes: the chloride process and the sulfate process. The chloride process uses petroleum coke and chlorine as raw materials and emits process-related carbon dioxide (CO_2). Emissions from fuels consumed for energy purposes during the production of titanium dioxide are accounted for in the Energy chapter. The sulfate process does not use petroleum coke or other forms of carbon as a raw material and does not emit CO_2. The chloride process is based on the following chemical reactions and does emit CO_2:

$$2FeTiO_3 + 7Cl_2 + 3C \rightarrow 2TiCl_4 + 2FeCl_3 + 3CO_2$$

$$2TiCl_4 + 2O_2 \rightarrow 2TiO_2 + 4Cl_2$$

The carbon in the first chemical reaction is provided by petroleum coke, which is oxidized in the presence of the chlorine and $FeTiO_3$ (rutile ore) to form CO_2. Since 2004, all TiO_2 produced in the United States has been produced using the chloride process, and a special grade of "calcined" petroleum coke is manufactured specifically for this purpose.

The principal use of TiO_2 is as a white pigment in paint, lacquers, and varnishes. It is also used as a pigment in the manufacture of plastics, paper, and other products. In 2021, U.S. TiO_2 production totaled 1,100,000 metric tons (USGS 2022). Five plants produced TiO_2 in the United States in 2021.

Emissions of CO_2 from titanium dioxide production in 2021 were estimated to be 1.5 MMT CO_2 Eq. (1,474 kt CO_2), which represents an increase of 23 percent since 1990 (see Table 4-45 and Table 4-46). Compared to 2020, emissions from titanium dioxide production increased by 24 percent in 2021, due to a 24 percent increase in production. The annual production increase in 2021 represents a return to production levels seen in 2019 before the COVID-19 pandemic.

Table 4-45: CO_2 Emissions from Titanium Dioxide (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Titanium Dioxide	1.2	1.8	1.7	1.5	1.5	1.2	1.5

Table 4-46: CO_2 Emissions from Titanium Dioxide (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Titanium Dioxide	1,195	1,755	1,688	1,541	1,474	1,193	1,474

Methodology and Time-Series Consistency

Emissions of CO_2 from TiO_2 production were calculated by multiplying annual national TiO_2 production by chloride process-specific emission factors using a Tier 1 approach provided in *2006 IPCC Guidelines*. The Tier 1 equation is as follows:

Equation 4-8: *2006 IPCC Guidelines* Tier 1: CO_2 Emissions from Titanium Production (Equation 3.12)

$$E_{td} = EF_{td} \times Q_{td}$$

where,

E_{td} = CO_2 emissions from TiO_2 production, metric tons

EF_{td} = Emission factor (chloride process), metric ton CO_2/metric ton TiO_2

Q_{td} = Quantity of TiO_2 produced, metric tons

The petroleum coke portion of the total CO_2 process emissions from TiO_2 production is adjusted for within the Energy chapter as these fuels were consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (Section 3.1 Fossil Fuel Combustion) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Data were obtained for the total amount of TiO_2 produced each year. For years prior to 2004, it was assumed that TiO_2 was produced using the chloride process and the sulfate process in the same ratio as the ratio of the total U.S. production capacity for each process. As of 2004, the last remaining sulfate process plant in the United States closed; therefore, 100 percent of production since 2004 used the chloride process (USGS 2005). An emission factor of 1.34 metric tons CO_2/metric ton TiO_2 was applied to the estimated chloride-process production (IPCC 2006). It

was assumed that all TiO_2 produced using the chloride process was produced using petroleum coke, although some TiO_2 may have been produced with graphite or other carbon inputs.

The emission factor for the TiO_2 chloride process was taken from the *2006 IPCC Guidelines*. Titanium dioxide production data and the percentage of total TiO_2 production capacity that used the chloride process for 1990 through 2018 (see Table 4-47) were obtained through the U.S. Geological Survey (USGS) *Minerals Yearbook: Titanium* (USGS 1991 through 2022). Production data for 2019 were obtained from the USGS Minerals Yearbook: Titanium, advanced data release of the 2019 tables (USGS 2021). Production data for 2020 and 2021 were obtained from the *Minerals Commodity Summaries: Titanium and Titanium Dioxide* (USGS 2022).[37] Data on the percentage of total TiO_2 production capacity that used the chloride process were not available for 1990 through 1993, so data from the 1994 USGS *Minerals Yearbook* were used for these years. Because a sulfate process plant closed in September 2001, the chloride process percentage for 2001 was estimated (Gambogi 2002). By 2002, only one sulfate process plant remained online in the United States, and this plant closed in 2004 (USGS 2005).

Table 4-47: Titanium Dioxide Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production	979	1,310	1,260	1,150	1,100	890	1,100

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Each year, the USGS collects titanium industry data for titanium mineral and pigment production operations. If TiO_2 pigment plants do not respond, production from the operations is estimated based on prior year production levels and industry trends. Variability in response rates fluctuates from 67 to 100 percent of TiO_2 pigment plants over the time series. EPA currently uses an uncertainty range of ±5 percent for the primary data inputs (i.e., TiO_2 production and chloride process capacity values) to calculate overall uncertainty from TiO_2 production, and using this suggested uncertainty provided in Section 3.7.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). Additionally, the EPA uses an uncertainty range of ±15 percent for the CO_2 chloride process carbon consumption rate, and using this uncertainty provided in Section 3.7.2.2 of the *2006 IPCC Guidelines* is representative of operations in the United States. based on expert judgment (RTI 2023).

Although some TiO_2 may be produced using graphite or other carbon inputs, information and data regarding these practices were not available. Titanium dioxide produced using graphite inputs, for example, may generate differing amounts of CO_2 per unit of TiO_2 produced as compared to that generated using petroleum coke in production. While the most accurate method to estimate emissions would be to base calculations on the amount of reducing agent used in each process rather than on the amount of TiO_2 produced, sufficient data were not available to do so.

As of 2004, the last remaining sulfate-process plant in the United States closed. Since annual TiO_2 production was not reported by USGS by the type of production process used (chloride or sulfate) prior to 2004 and only the percentage of total production capacity by process was reported, the percent of total TiO_2 production capacity that was attributed to the chloride process was multiplied by total TiO_2 production to estimate the amount of TiO_2 produced using the chloride process. Finally, the emission factor was applied uniformly to all chloride-process production, and no data were available to account for differences in production efficiency among chloride-process

[37] EPA has not integrated aggregated facility-level GHGRP information for titanium dioxide production facilities (40 CFR Part 98 Subpart EE). The relevant aggregated information (activity data, emission factor) from these facilities did not meet criteria to shield underlying CBI from public disclosure

plants. In calculating the amount of petroleum coke consumed in chloride-process TiO_2 production, literature data were used for petroleum coke composition. Certain grades of petroleum coke are manufactured specifically for use in the TiO_2 chloride process; however, this composition information was not available. EPA assigned an uncertainty range of ±15 percent for the Tier 1 CO_2 emission factor for the titanium dioxide (chloride route) production process, and using this uncertainty provided in Table 3.9 of the *2006 IPCC Guidelines* is representative of operations in the United States based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-48. Titanium dioxide consumption CO_2 emissions from 2021 were estimated to be between 1.3 and 1.7 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 13 percent below and 13 percent above the emission estimate of 1.5 MMT CO_2 Eq.

Table 4-48: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Titanium Dioxide Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Titanium Dioxide Production	CO_2	1.5	1.3	1.7	-13%	+13%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of the *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Updated USGS data on TiO_2 production was available for 2020, resulting in updated emissions estimates for that year. Compared to the previous Inventory, emissions for 2020 decreased by 12 percent (110 kt CO_2 Eq.).

Planned Improvements

EPA plans to examine the use of GHGRP titanium dioxide emissions and other data for possible use in emission estimates consistent with both Volume 1, Chapter 6 of the *2006 IPCC Guidelines* and the latest IPCC guidance on the use of facility-level data in national inventories.[38] This planned improvement is ongoing and has not been incorporated into this Inventory report. This is a long-term planned improvement given significance of these emissions.

[38] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

4.12 Soda Ash Production (CRF Source Category 2B7)

Carbon dioxide (CO_2) is generated as a byproduct of calcining trona ore to produce soda ash and is eventually emitted into the atmosphere. In addition, CO_2 may also be released when soda ash is consumed. Emissions from soda ash consumption not associated with glass production are reported under Section 4.4 Other Process Uses of Carbonates (CRF Category 2A4), and emissions from fuels consumed for energy purposes during the production and consumption of soda ash are accounted for in the Energy chapter.

Calcining involves placing crushed trona ore into a kiln to convert sodium bicarbonate into crude sodium carbonate that will later be filtered into pure soda ash. The emission of CO_2 during trona-based production is based on the following reaction:

$$2Na_2CO_3 \cdot NaHCO_3 \cdot 2H_2O(Trona) \rightarrow 3Na_2CO_3(Soda\ Ash) + 5H_2O + CO_2$$

Soda ash (sodium carbonate, Na_2CO_3) is a white crystalline solid that is readily soluble in water and strongly alkaline. Commercial soda ash is used as a raw material in a variety of industrial processes and in many familiar consumer products such as glass, soap and detergents, paper, textiles, and food. The largest use of soda ash is for glass manufacturing. Emissions from soda ash used in glass production are reported under Section 4.3, Glass Production (CRF Source Category 2A3). In addition, soda ash is used primarily to manufacture many sodium-based inorganic chemicals, including sodium bicarbonate, sodium chromates, sodium phosphates, and sodium silicates (USGS 2018b). Internationally, two types of soda ash are produced: natural and synthetic. The United States produces only natural soda ash and is second only to China in total soda ash production. Trona is the principal ore from which natural soda ash is made.

The United States represents about one-fifth of total world soda ash output (USGS 2021a). Only two states produce natural soda ash: Wyoming and California. Of these two states, net emissions of CO_2 from soda ash production were only calculated for Wyoming, due to specifics regarding the production processes employed in the state.[39] Based on 2021 reported data, the estimated distribution of soda ash by end-use in 2021 (excluding glass production) was chemical production, 53 percent; other uses, 16 percent; wholesale distributors (e.g., for use in agriculture, water treatment, and grocery wholesale), 11 percent; soap and detergent manufacturing, 10 percent; flue gas desulfurization, 7 percent; water treatment, 2 percent; and pulp and paper production, 2 percent (USGS 2022b).[40]

U.S. natural soda ash is competitive in world markets because it is generally considered a better-quality raw material than synthetically produced soda ash, and most of the world's soda ash is synthetic. Although the United States continues to be a major supplier of soda ash, China surpassed the United States in soda ash production in 2003, becoming the world's leading producer.

[39] In California, soda ash is manufactured using sodium carbonate-bearing brines instead of trona ore. To extract the sodium carbonate, the complex brines are first treated with CO_2 in carbonation towers to convert the sodium carbonate into sodium bicarbonate, which then precipitates from the brine solution. The precipitated sodium bicarbonate is then calcined back into sodium carbonate. Although CO_2 is generated as a byproduct, the CO_2 is recovered and recycled for use in the carbonation stage and is not emitted. A facility in a third state, Colorado, produced soda ash until the plant was idled in 2004. The lone producer of sodium bicarbonate no longer mines trona ore in the state. For a brief time, sodium bicarbonate was produced using soda ash feedstocks mined in Wyoming and shipped to Colorado. Prior to 2004, because the trona ore was mined in Wyoming, the production numbers given by the USGS included the feedstocks mined in Wyoming and shipped to Colorado. In this way, the sodium bicarbonate production that took place in Colorado was accounted for in the Wyoming numbers.

[40] Percentages may not add up to 100 percent due to independent rounding.

In 2021, CO_2 emissions from the production of soda ash from trona ore were 1.7 MMT CO_2 Eq. (1,714 kt CO_2) (see Table 4-49 and Table 4-50). Total emissions from soda ash production in 2021 increased by approximately 17 percent compared to emissions in 2020, as soda ash production returned to 2018 levels observed before the COVID-19 pandemic. Emissions have increased by approximately 20 percent from 1990 levels.

Trends in emissions have remained relatively constant over the time series with some fluctuations since 1990. In general, these fluctuations were related to the behavior of the export market and the U.S. economy. The U.S. soda ash industry saw a decline in domestic and export sales caused by adverse global economic conditions in 2009, followed by a steady increase in production through 2019 before a significant decrease in 2020 due to the COVID-19 pandemic.

Table 4-49: CO_2 Emissions from Soda Ash Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Soda Ash Production	1.4	1.7	1.8	1.7	1.8	1.5	1.7

Table 4-50: CO_2 Emissions from Soda Ash Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Soda Ash Production	1,431	1,655	1,753	1,714	1,792	1,461	1,714

Methodology and Time-Series Consistency

During the soda ash production process, trona ore is calcined in a rotary kiln and chemically transformed into a crude soda ash that requires further processing. Carbon dioxide and water are generated as byproducts of the calcination process. Carbon dioxide emissions from the calcination of trona ore can be estimated based on the chemical reaction shown above. Based on this formula and the IPCC default emission factor of 0.0974 metric tons CO_2 per metric ton of trona ore, both of which are consistent with an IPCC Tier 1 approach, one metric ton of CO_2 is emitted when approximately 10.27 metric tons of trona ore are processed (IPCC 2006). Thus, the 17.6 million metric tons of trona ore mined in 2021 for soda ash production (USGS 2022b) resulted in CO_2 emissions of approximately 1.7 MMT CO_2 Eq. (1,714 kt).

Once produced, most soda ash is consumed in chemical production, with minor amounts used in soap production, pulp and paper, flue gas desulfurization, and water treatment (excluding soda ash consumption for glass manufacturing). As soda ash is consumed for these purposes, additional CO_2 is usually emitted. Consistent with the *2006 IPCC Guidelines for National Greenhouse Gas Inventories*, emissions from soda ash consumption in chemical production processes are reported under Section 4.4 Other Process Uses of Carbonates (CRF Category 2A4).

Data is not currently available for the quantity of trona used in soda ash production. Because trona ore produced is used primarily for soda ash production, EPA assumes that all trona produced was used in soda ash production. The activity data for trona ore production (see Table 4-51) for 1990 through 2021 were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook for Soda Ash* (1994 through 2015b) and USGS *Mineral Industry Surveys for Soda Ash* (USGS 2016 through 2017, 2018a, 2019, 2020, 2021, 2022b). Soda ash production[41] data were collected by the USGS from voluntary surveys of the U.S. soda ash industry. EPA will continue to analyze and assess opportunities to use facility-level data from EPA's GHGRP to improve the emission estimates for the Soda Ash Production source category consistent with IPCC[42] and UNFCCC guidelines.

[41] EPA has assessed the feasibility of using emissions information (including activity data) from EPA's GHGRP program. At this time, the aggregated information associated with production of soda ash did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

[42] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

Table 4-51: Trona Ore Used in Soda Ash Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Trona Ore Use[a]	14,700	17,000	18,000	17,600	18,400	15,000	17,600

[a] Trona ore use is assumed to be equal to trona ore production.

Methodological approaches were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2021.

Uncertainty

Emission estimates from soda ash production have relatively low associated uncertainty levels because reliable and accurate data sources are available for the emission factor and activity data for trona-based soda ash production. One source of uncertainty is the purity of the trona ore used for manufacturing soda ash. The emission factor used for this estimate assumes the ore is 100 percent pure and likely overestimates the emissions from soda ash manufacture. The average water-soluble sodium carbonate-bicarbonate content for ore mined in Wyoming ranges from 85.5 to 93.8 percent (USGS 1995c).

EPA is aware of one facility producing soda ash from a liquid alkaline feedstock process, based on EPA's GHGRP. Soda ash production data was collected by the USGS from voluntary surveys. A survey request was sent to each of the five soda ash producers, all of which responded, representing 100 percent of the total production data (USGS 2022b). EPA assigned an uncertainty range of ±5 percent for trona production, and using the this suggested uncertainty provided in Section 3.8.2.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). EPA assigned an uncertainty range of -15 percent to 0 percent range for the trona emission factor, based on expert judgment on the purity of mined trona (USGS 1995c).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-52. Soda ash production CO_2 emissions for 2021 were estimated to be between 1.5 and 1.8 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 9 percent below and 8 percent above the emission estimate of 1.7 MMT CO_2 Eq.

Table 4-52: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Soda Ash Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Soda Ash Production	CO_2	1.7	1.5	1.8	-9%	+8%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Planned Improvements

EPA is assessing planned improvements for future reports, but at this time has no specific planned improvements for estimating CO_2 emissions from soda ash production.

4.13 Petrochemical Production (CRF Source Category 2B8)

The production of some petrochemicals results in carbon dioxide (CO_2) and methane (CH_4) emissions. Petrochemicals are chemicals isolated or derived from petroleum or natural gas. Carbon dioxide emissions from the production of acrylonitrile, carbon black, ethylene, ethylene dichloride, ethylene oxide, and methanol, and CH_4 emissions from the production of methanol and acrylonitrile are presented here and reported under IPCC Source Category 2B8. The petrochemical industry uses primary fossil fuels (i.e., natural gas, coal, petroleum, etc.) for non-fuel purposes in the production of carbon black and other petrochemicals. Emissions from fuels and feedstocks transferred out of the system for use in energy purposes (e.g., indirect or direct process heat or steam production) are currently accounted for in the Energy sector. The allocation and reporting of emissions from feedstocks transferred out of the system for use in energy purposes to the Energy chapter is consistent with the *2006 IPCC Guidelines*.

Worldwide, more than 90 percent of acrylonitrile (vinyl cyanide, C_3H_3N) is made by way of direct ammoxidation of propylene with ammonia (NH_3) and oxygen over a catalyst. This process is referred to as the SOHIO process, named after the Standard Oil Company of Ohio (SOHIO) (IPCC 2006). The primary use of acrylonitrile is as the raw material for the manufacture of acrylic and modacrylic fibers. Other major uses include the production of plastics (acrylonitrile-butadiene-styrene [ABS] and styrene-acrylonitrile [SAN]), nitrile rubbers, nitrile barrier resins, adiponitrile, and acrylamide. All U.S. acrylonitrile facilities use the SOHIO process (AN 2014). The SOHIO process involves a fluidized bed reaction of chemical-grade propylene, ammonia, and oxygen over a catalyst. The process produces acrylonitrile as its primary product, and the process yield depends on the type of catalyst used and the process configuration. The ammoxidation process produces byproduct CO_2, carbon monoxide (CO), and water from the direct oxidation of the propylene feedstock and produces other hydrocarbons from side reactions.

Carbon black is a black powder generated by the incomplete combustion of an aromatic petroleum- or coal-based feedstock at a high temperature. Most carbon black produced in the United States is added to rubber to impart strength and abrasion resistance, and the tire industry is by far the largest consumer. The other major use of carbon black is as a pigment. The predominant process used in the United States to produce carbon black is the furnace black (or oil furnace) process. In the furnace black process, carbon black oil (a heavy aromatic liquid) is continuously injected into the combustion zone of a natural gas-fired furnace. Furnace heat is provided by the natural gas and a portion of the carbon black feedstock; the remaining portion of the carbon black feedstock is pyrolyzed to carbon black. The resultant CO_2 and uncombusted CH_4 are released from thermal incinerators used as control devices, process dryers, and equipment leaks. Three facilities in the United States use other types of carbon black processes. Specifically, one facility produces carbon black by the thermal cracking of acetylene-containing feedstocks (i.e., acetylene black process), a second facility produces carbon black by the thermal cracking of other hydrocarbons (i.e., thermal black process), and a third facility produces carbon black by the open burning of carbon black feedstock (i.e., lamp black process) (EPA 2000).

Ethylene (C_2H_4) is consumed in the production processes of the plastics industry including polymers such as high, low, and linear low density polyethylene (HDPE, LDPE, LLDPE); polyvinyl chloride (PVC); ethylene dichloride; ethylene oxide; and ethylbenzene. Virtually all ethylene is produced from steam cracking of ethane, propane, butane, naphtha, gas oil, and other feedstocks. The representative chemical equation for steam cracking of ethane to ethylene is shown below:

$$C_2H_6 \rightarrow C_2H_4 + H_2$$

Small amounts of CH_4 are also generated from the steam cracking process. In addition, CO_2 and CH_4 emissions result from combustion units.

Ethylene dichloride ($C_2H_4Cl_2$) is used to produce vinyl chloride monomer, which is the precursor to polyvinyl chloride (PVC). Ethylene dichloride was also used as a fuel additive until 1996 when leaded gasoline was phased out. Ethylene dichloride is produced from ethylene by either direct chlorination, oxychlorination, or a combination of the two processes (i.e., the "balanced process"); most U.S. facilities use the balanced process. The direct chlorination and oxychlorination reactions are shown below:

$$C_2H_4 + Cl_2 \rightarrow C_2H_4Cl_2 \text{ (direct chlorination)}$$

$$C_2H_4 + \tfrac{1}{2}O_2 + 2HCl \rightarrow C_2H_4Cl_2 + 2H_2O \text{ (oxychlorination)}$$

$$C_2H_4 + 3O_2 \rightarrow 2CO_2 + 2H_2O \text{ (direct oxidation of ethylene during oxychlorination)}$$

In addition to the byproduct CO_2 produced from the direction oxidation of the ethylene feedstock, CO_2 and CH_4 emissions are also generated from combustion units.

Ethylene oxide (C_2H_4O) is used in the manufacture of glycols, glycol ethers, alcohols, and amines. Approximately 70 percent of ethylene oxide produced worldwide is used in the manufacture of glycols, including monoethylene glycol. Ethylene oxide is produced by reacting ethylene with oxygen over a catalyst. The oxygen may be supplied to the process through either an air (air process) or a pure oxygen stream (oxygen process). The byproduct CO_2 from the direct oxidation of the ethylene feedstock is removed from the process vent stream using a recycled carbonate solution, and the recovered CO_2 may be vented to the atmosphere or recovered for further utilization in other sectors, such as food production (IPCC 2006). The combined ethylene oxide reaction and byproduct CO_2 reaction is exothermic and generates heat, which is recovered to produce steam for the process. The ethylene oxide process also produces other liquid and off-gas byproducts (e.g., ethane that may be burned for energy recovery within the process. Almost all facilities, except one in Texas, use the oxygen process to manufacture ethylene oxide (EPA 2008).

Methanol (CH_3OH) is a chemical feedstock most often converted into formaldehyde, acetic acid and olefins. It is also an alternative transportation fuel, as well as an additive used by municipal wastewater treatment facilities in the denitrification of wastewater. Methanol is most commonly synthesized from a synthesis gas (i.e., "syngas" – a mixture containing H_2, CO, and CO_2) using a heterogeneous catalyst. There are a number of process techniques that can be used to produce syngas. Worldwide, steam reforming of natural gas is the most common method; most methanol producers in the United States also use steam reforming of natural gas to produce syngas. Other syngas production processes in the United States include partial oxidation of natural gas and coal gasification.

Emissions of CO_2 and CH_4 from petrochemical production in 2021 were 33.2 MMT CO_2 Eq. (33,170 kt CO_2) and 0.4 MMT CO_2 Eq. (15 kt CH_4), respectively (see Table 4-53 and Table 4-54). Carbon dioxide emissions from petrochemical production are driven primarily from ethylene production, while CH_4 emissions are almost entirely from methanol production. Since 1990, total CO_2 emissions from petrochemical production increased by 53 percent, and CH_4 emissions increased by 65 percent. Emissions of CO_2 and CH_4 were higher in 2021 than in any preceding year. Compared to 2020, CO_2 emissions increased 11 percent in 2021, and CH_4 emissions increased 21 percent. The increases are due primarily to increased ethylene and methanol production, which have been driven by the increased natural gas production in the United States over the past decade, and to recovery from a strong hurricane season that temporarily shut down many facilities in Texas and Louisiana in 2020. Emissions from carbon black also increased significantly in 2021 as the industry began to recover from the lower production in 2020 as a result of the COVID-19 pandemic.

Table 4-53: CO_2 and CH_4 Emissions from Petrochemical Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CO_2	**21.6**	**27.4**	**28.9**	**29.3**	**30.7**	**29.8**	**33.2**
Carbon Black	3.4	4.3	3.3	3.4	3.3	2.6	3.0

Ethylene	13.1	19.0	20.0	19.4	20.7	20.7	22.8
Ethylene Dichloride	0.3	0.5	0.4	0.4	0.5	0.5	0.4
Ethylene Oxide	1.1	1.5	1.3	1.3	1.4	1.7	1.9
Acrylonitrile	1.2	1.3	1.0	1.3	1.0	0.9	0.9
Methanol	2.5	0.8	2.9	3.5	3.8	3.5	4.2
CH_4	**0.2**	**0.1**	**0.3**	**0.3**	**0.4**	**0.3**	**0.4**
Acrylonitrile	+	+	+	+	+	+	+
Methanol	0.2	0.1	0.3	0.3	0.4	0.3	0.4
Total	**21.9**	**27.5**	**29.2**	**29.7**	**31.1**	**30.1**	**33.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals by gas may not sum due to independent rounding.

Table 4-54: CO_2 and CH_4 Emissions from Petrochemical Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
CO_2	**21,611**	**27,383**	**28,890**	**29,314**	**30,702**	**29,780**	**33,170**
Carbon Black	3,381	4,269	3,310	3,440	3,300	2,610	3,000
Ethylene	13,126	19,024	20,000	19,400	20,700	20,700	22,800
Ethylene Dichloride	254	455	412	440	503	456	376
Ethylene Oxide	1,123	1,489	1,250	1,300	1,370	1,680	1,930
Acrylonitrile	1,214	1,325	1,040	1,250	990	850	850
Methanol	2,513	821	2,878	3,484	3,839	3,484	4,214
CH_4	**9**	**3**	**10**	**12**	**13**	**12**	**15**
Acrylonitrile	+	+	+	+	+	+	+
Methanol	9	3	10	12	13	12	14

+ Does not exceed 0.5 kt CH_4.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emissions of CO_2 and CH_4 were calculated using the estimation methods provided by the *2006 IPCC Guidelines* and country-specific methods from EPA's GHGRP. A country-specific approach similar to the IPCC Tier 2 method was used to estimate CO_2 emissions from production of carbon black, ethylene oxide, ethylene, and ethylene dichloride for 2010 through 2021. The Tier 2 method for petrochemicals is a total feedstock carbon (C) mass balance method used to estimate total CO_2 emissions, but it is not applicable for estimating CH_4 emissions. The Carbon Black, Ethylene, Ethylene Dichloride, and Ethylene Oxide section below describes two variations of Tier 2 methods that ethylene production facilities use to calculate emissions for reporting under the GHGRP. For 1990 through 2009, CO_2 emissions from production of carbon black, ethylene oxide, ethylene, and ethylene dichloride were calculated using a Tier 1 method consistent with the *2006 IPCC Guidelines*. The *2006 IPCC Guidelines* Tier 1 method was used to estimate CO_2 and CH_4 emissions from production of acrylonitrile and methanol.[43]

As noted in the *2006 IPCC Guidelines*, the total feedstock C mass balance method (Tier 2) is based on the assumption that all of the C input to the process is converted either into primary and secondary products or into CO_2. Further, the guideline states that while the total C mass balance method estimates total C emissions from the process, it does not directly provide an estimate of the amount of the total C emissions emitted as CO_2, CH_4, or non-CH_4 volatile organic compounds (NMVOCs). This method accounts for all the C as CO_2, including CH_4.

[43] EPA has not integrated aggregated facility-level GHGRP information for acrylonitrile and methanol production. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Carbon Black, Ethylene, Ethylene Dichloride, and Ethylene Oxide

2010 through 2021

Carbon dioxide emissions and national production were aggregated directly from EPA's GHGRP dataset for 2010 through 2021 (EPA 2022). In 2021, data reported to the GHGRP included CO_2 emissions of 3,000,000 metric tons from carbon black production; 22,800,000 metric tons of CO_2 from ethylene production; 376,000 metric tons of CO_2 from ethylene dichloride production; and 1,930,000 metric tons of CO_2 from ethylene oxide production. These emissions reflect application of a country-specific approach similar to the IPCC Tier 2 method and were used to estimate CO_2 emissions from the production of carbon black, ethylene, ethylene dichloride, and ethylene oxide.

Since 2010, EPA's GHGRP, under Subpart X, requires all domestic producers of petrochemicals to report annual emissions and supplemental emissions information (e.g., production data, etc.) to facilitate verification of reported emissions. Under EPA's GHGRP, most petrochemical production facilities are required to use either a mass balance approach or CEMS to measure and report emissions for each petrochemical process unit to estimate facility-level process CO_2 emissions; ethylene production facilities also have a third option. The mass balance method is used by most facilities[44] and assumes that all the carbon input is converted into primary and secondary products, byproducts, or is emitted to the atmosphere as CO_2. To apply the mass balance, facilities must measure the volume or mass of each gaseous and liquid feedstock and product, mass rate of each solid feedstock and product, and carbon content of each feedstock and product for each process unit and sum for their facility. To apply the optional combustion methodology, ethylene production facilities must measure the quantity, carbon content, and molecular weight of the fuel to a stationary combustion unit when that fuel includes any ethylene process off-gas. These data are used to calculate the total CO_2 emissions from the combustion unit. The facility must also estimate the fraction of the emissions that is attributable to burning the ethylene process off-gas portion of the fuel. This fraction is multiplied by the total emissions to estimate the emissions from ethylene production. The QA/QC and Verification section below has a discussion of non-CO_2 emissions from ethylene production facilities.

All non-energy uses of residual fuel and some non-energy uses of "other oil" are assumed to be used in the production of carbon black; therefore, consumption of these fuels is adjusted for within the Energy chapter to avoid double-counting of emissions from fuel used in the carbon black production presented here within IPPU sector. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion (IPCC Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

1990 through 2009

Prior to 2010, for each of these 4 types of petrochemical processes, an average national CO_2 emission factor was calculated based on the GHGRP data and applied to production for earlier years in the time series (i.e., 1990 through 2009) to estimate CO_2 emissions from carbon black, ethylene, ethylene dichloride, and ethylene oxide production. For carbon black, ethylene, ethylene dichloride, and ethylene oxide carbon dioxide emission factors were derived from EPA's GHGRP data by dividing annual CO_2 emissions for petrochemical type "i" with annual production for petrochemical type "i" and then averaging the derived emission factors obtained for each calendar year 2010 through 2013 (EPA 2019). The years 2010 through 2013 were used in the development of carbon dioxide emission factors as these years are more representative of operations in 1990 through 2009 for these facilities. The average emission factors for each petrochemical type were applied across all prior years because petrochemical production processes in the United States have not changed significantly since 1990, though some operational efficiencies have been implemented at facilities over the time series.

The average country-specific CO_2 emission factors that were calculated from the GHGRP data are as follows:

[44] A few facilities producing ethylene dichloride, ethylene, and methanol used CO_2 CEMS; those CO_2 emissions have been included in the aggregated GHGRP emissions presented here.

- 2.59 metric tons CO_2/metric ton carbon black produced
- 0.79 metric tons CO_2/metric ton ethylene produced
- 0.040 metric tons CO_2/metric ton ethylene dichloride produced
- 0.46 metric tons CO_2/metric ton ethylene oxide produced

Annual production data for carbon black for 1990 through 2009 were obtained from the International Carbon Black Association (Johnson 2003 and 2005 through 2010). Annual production data for ethylene, ethylene dichloride, and ethylene oxide for 1990 through 2009 were obtained from the American Chemistry Council's (ACC's) *Business of Chemistry* (ACC 2022a).

Acrylonitrile

Carbon dioxide and methane emissions from acrylonitrile production were estimated using the Tier 1 method in the *2006 IPCC Guidelines*. Annual acrylonitrile production data were used with IPCC default Tier 1 CO_2 and CH_4 emission factors to estimate emissions for 1990 through 2021. Emission factors used to estimate acrylonitrile production emissions are as follows:

- 0.18 kg CH_4/metric ton acrylonitrile produced
- 1.00 metric tons CO_2/metric ton acrylonitrile produced

Annual acrylonitrile production data for 1990 through 2021 were obtained from ACC's *Business of Chemistry* (ACC 2022a). EPA is not able to apply the aggregated facility-level GHGRP information for acrylonitrile production needed for a Tier 2 approach. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Methanol

Carbon dioxide and methane emissions from methanol production were estimated using the Tier 1 method in the *2006 IPCC Guidelines*. Annual methanol production data were used with IPCC default Tier 1 CO_2 and CH_4 emission factors to estimate emissions for 1990 through 2021. Emission factors used to estimate methanol production emissions are as follows:

- 2.3 kg CH_4/metric ton methanol produced
- 0.67 metric tons CO_2/metric ton methanol produced

Annual methanol production data for 1990 through 2021 were obtained from the ACC's *Business of Chemistry* (ACC 2022a, ACC 2022b). EPA is not able to apply the aggregated facility-level GHGRP information for methanol production needed for a Tier 2 approach. The aggregated information associated with production of these petrochemicals did not meet criteria to shield underlying CBI from public disclosure.

Table 4-55: Production of Selected Petrochemicals (kt)

Chemical	1990	2005	2017	2018	2019	2020	2021
Carbon Black	1,307	1,651	1,240	1,280	1,210	990	1,140
Ethylene	16,542	23,975	27,800	30,500	32,400	33,500	34,700
Ethylene Dichloride	6,283	11,260	12,400	12,500	12,600	11,900	11,500
Ethylene Oxide	2,429	3,220	3,350	3,310	3,800	4,680	4,860
Acrylonitrile	1,214	1,325	1,040	1,250	990	850	850
Methanol	3,750	1,225	4,295	5,200	5,730	5,200	6,290

As noted earlier in the introduction section of the Petrochemical Production section, the allocation and reporting of emissions from both fuels and feedstocks transferred out of the system for use in energy purposes to the Energy chapter differs slightly from the *2006 IPCC Guidelines*. According to the *2006 IPCC Guidelines*, emissions from fuel combustion from petrochemical production should be allocated to this source category within the IPPU chapter.

Due to national circumstances, EIA data on primary fuel for feedstock use within the energy balance are presented by commodity only, with no resolution on data by industry sector (i.e., petrochemical production). In addition, under EPA's GHGRP, reporting facilities began reporting in 2014 on annual feedstock quantities for mass balance and CEMS methodologies (79 FR 63794), as well as the annual average carbon content of each feedstock (and molecular weight for gaseous feedstocks) for the mass balance methodology beginning in reporting year 2017 (81 FR 89260).[45] The United States is currently unable to report non-energy fuel use from petrochemical production under the IPPU chapter due to CBI issues. Therefore, consistent with *2006 IPCC Guidelines*, fuel consumption data reported by EIA are modified to account for these overlaps to avoid double-counting. More information on the non-energy use of fossil fuel feedstocks for petrochemical production can be found in Annex 2.3.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for ethylene production, ethylene dichloride production, and ethylene oxide production spliced activity data from two different sources: ACC for 1990 through 2009 and GHGRP for 2010 through 2021. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data sets for years where there was overlap. For ethylene production, the data sets were determined to be consistent, and adjustments were not needed. For ethylene dichloride production and ethylene oxide production, the data sets were determined to be inconsistent. The GHGRP data includes production of ethylene dichloride and ethylene oxide as intermediates while it is unclear if the ACC data does; therefore, no adjustments were made to the ethylene dichloride and ethylene oxide activity data for 1990 through 2009 because the *2006 IPCC Guidelines* indicate that it is not good practice to use the overlap technique when the data sets are inconsistent. The methodology for carbon black production also spliced activity data from two different sources: ICBA for 1990 through 2009 and GHGRP for 2010 through 2021. The overlap technique was applied to these data for 2010 and 2011. The data sets were determined to be consistent, and adjustments were not needed.

Uncertainty

The CO_2 and CH_4 emission factors used for methanol and acrylonitrile production are based on a limited number of studies. Using plant-specific factors instead of default or average factors could increase the accuracy of the emission estimates; however, such data were not available for the current Inventory report. For methanol, EPA assigned an uncertainty range of ±30 percent for the CO_2 emission factor and -80 percent to +30 percent for the CH_4 emission factor, and using this suggested uncertainty provided in Table 3.27 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). For acrylonitrile, EPA assigned an uncertainty range of ±60 percent for the CO_2 emission factor and ±10 percent for the CH_4 emission factor, and using this suggested uncertainty provided in Table 3.27 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of the quantitative uncertainty analysis for the CO_2 emissions from carbon black production, ethylene, ethylene dichloride, and ethylene oxide are based on reported GHGRP data. Refer to the Methodology section for more details on how these emissions were calculated and reported to EPA's GHGRP. EPA assigned CO_2 emissions from carbon black, ethylene, ethylene dichloride, and ethylene oxide production an uncertainty range of ±5 percent, and using this suggested uncertainty provided in Table 3.27 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). In the absence of other data, these values have been assessed as reasonable. There is some uncertainty in the applicability of the average emission factors for each petrochemical type across all prior years. While petrochemical production processes in the United States have not changed significantly since 1990, some operational efficiencies have been implemented at facilities over the time series.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-56. Petrochemical production CO_2 emissions from 2021 were estimated to be between 31.4 and 35.0 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 6 percent above the emission estimate of 33.2 MMT CO_2 Eq. Petrochemical production CH_4 emissions from 2021 were estimated to be between

[45] See https://www.epa.gov/ghgreporting/historical-rulemakings.

0.14 and 0.50 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 58 percent below to 48 percent above the emission estimate of 0.4 MMT CO_2 Eq.

Table 4-56: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Petrochemical Production and CO_2 Emissions from Petrochemical Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Petrochemical Production	CO_2	33.2	31.4	35.0	-5%	+6%
Petrochemical Production	CH_4	0.4	0.14	0.50	-58%	+48%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For Petrochemical Production, QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan, as described in the QA/QC and Verification Procedures section of the IPPU chapter and Annex 8. Source-specific quality control measures for this category included the QA/QC requirements and verification procedures of EPA's GHGRP. More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to petrochemical facilities can be found under Subpart X (Petrochemical Production) of the regulation (40 CFR Part 98).[46] EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[47] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. EPA also conducts QA checks of GHGRP reported production data by petrochemical type against external datasets.

For ethylene, ethylene dichloride, and ethylene oxide, it is possible to compare CO_2 emissions calculated using the GHGRP data to the CO_2 emissions that would have been calculated using the Tier 1 approach if GHGRP data were not available. For ethylene, the GHGRP emissions were within 5 percent of the emissions calculated using the Tier 1 approach prior to 2017; in 2017 through 2021, the GHGRP emissions have been between 7 percent and 18 percent lower than what would be calculated using the Tier 1 approach. For ethylene dichloride, the GHGRP emissions are typically higher than the Tier 1 emissions by up to 25 percent, but in 2021, GHGRP emissions were a few percentage points lower than the Tier 1 emissions. For ethylene oxide, GHGRP emissions typically vary from the Tier 1 emissions by up to ±20 percent, but in 2021, the GHGRP emissions are significantly higher than the Tier 1 emissions. This is likely due to GHGRP data capturing the production of ethylene oxide as an intermediate in the onsite production of ethylene glycol.

EPA's GHGRP mandates that all petrochemical production facilities report their annual emissions of CO_2, CH_4, and N_2O from each of their petrochemical production processes. Source-specific quality control measures for the Petrochemical Production category included the QA/QC requirements and verification procedures of EPA's GHGRP. The QA/QC requirements differ depending on the calculation methodology used.

[46] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

[47] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

As part of a planned improvement effort, EPA has assessed the potential of using GHGRP data to estimate CH_4 emissions from ethylene production. As discussed in the Methodology and Time Series Consistency section above, CO_2 emissions from ethylene production in this chapter are based on data reported under the GHGRP, and these emissions are calculated using a Tier 2 approach that assumes all of the carbon in the fuel (i.e., ethylene process off-gas) is converted to CO_2. Ethylene production facilities also calculate and report CH_4 emissions under the GHGRP when they use the optional combustion methodology. The facilities calculate CH_4 emissions from each combustion unit that burns off-gas from an ethylene production process unit using a Tier 1 approach based on the total quantity of fuel burned, a default higher heating value, and a default emission factor. Because multiple other types of fuel in addition to the ethylene process unit off-gas may be burned in these combustion units, the facilities also report an estimate of the fraction of emissions that is due to burning the ethylene process off-gas component of the total fuel. Multiplying the total emissions by the estimated fraction provides an estimate of the CH_4 emissions from the ethylene production process unit. These ethylene production facilities also calculate CH_4 emissions from flares that burn process vent emissions from ethylene processes. The emissions are calculated using either a Tier 2 approach based on measured gas volumes and measured carbon content or higher heating value, or a Tier 1 approach based on the measured gas flow and a default emission factor. Nearly all ethylene production facilities use the optional combustion methodology under the GHGRP, and the sum of reported CH_4 emissions from combustion in stationary combustion units and flares at all of these facilities is on the same order of magnitude as the combined CH_4 emissions presented in this chapter from methanol and acrylonitrile production. The CH_4 emissions from ethylene production under the GHGRP have not been included in this chapter because this approach double counts carbon (i.e., all of the carbon in the CH_4 emissions is also included in the CO_2 emissions from the ethylene process units). EPA continues to assess the GHGRP data for ways to better disaggregate the data and incorporate it into the inventory.

These facilities are also required to report emissions of N_2O from combustion of ethylene process off-gas in both stationary combustion units and flares. Facilities using CEMS (consistent with a Tier 3 approach) are also required to report emissions of CH_4 and N_2O from combustion of petrochemical process-off gases in flares. Preliminary analysis of the aggregated reported CH_4 and N_2O emissions from facilities using CEMS and N_2O emissions from facilities using the optional combustion methodology suggests that these annual emissions are less than 0.4 percent of total petrochemical emissions, which is not significant enough to prioritize for inclusion in the report at this time. Pending resources and significance, EPA may include these N_2O emissions in future reports to enhance completeness.

Future QC efforts to validate the use of Tier 1 default emission factors and report on the comparison of Tier 1 emission estimates and GHGRP data are described below in the Planned Improvements section.

Recalculations Discussion

The acrylonitrile and methanol production quantities for 2020 were updated with the revised values in ACC's Business of Chemistry (ACC 2022a, ACC 2022b). These changes resulted in a 0.8 percent (240 kt) decrease in total petrochemical CO_2 Eq. emissions for 2020, compared to the previous Inventory.

In addition, for the current Inventory, CO_2-equivalent estimates of total CH_4 emissions from acrylonitrile and methanol production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 increased from 25 to 28, leading to an overall increase in estimates for CO_2-equivalent CH_4 emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CH_4 emissions increased by 12 percent each year, ranging from an increase of 5.4 kt CO_2 Eq. in 2011 to 42.1 kt CO_2 Eq. in 1997. The net impact on the entire category from these updates was an average annual 0.1 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Improvements include completing category-specific QC of activity data and emission factors, along with further assessment of CH_4 and N_2O emissions to enhance completeness in reporting of emissions from U.S. petrochemical production, pending resources, significance and time-series consistency considerations. For example, EPA is planning additional assessment of ways to use CH_4 data from the GHGRP in the Inventory. One possible approach EPA is assessing would be to adjust the CO_2 emissions from the GHGRP downward by subtracting the carbon that is also included in the reported CH_4 emissions, per the discussion in the Petrochemical Production QA/QC and Verification section, above. As of this current report, timing and resources have not allowed EPA to complete this analysis of activity data, emissions, and emission factors and remains a priority improvement within the IPPU chapter.

Pending resources, a secondary potential improvement for this source category would focus on continuing to analyze the fuel and feedstock data from EPA's GHGRP to better disaggregate energy-related emissions and allocate them more accurately between the Energy and IPPU sectors of the Inventory. It is important to ensure no double counting of emissions between fuel combustion, non-energy use of fuels, and industrial process emissions. For petrochemical feedstock production, EPA review of the categories suggests this is not a significant issue since the non-energy use industrial release data includes different categories of sources and sectors than those included in the IPPU emissions category for petrochemicals. As noted previously in the methodology section, data integration is not available at this time because feedstock data from the EIA used to estimate non-energy uses of fuels are aggregated by fuel type, rather than disaggregated by both fuel type and particular industries. Also, GHGRP-reported data on quantities of fuel consumed as feedstocks by petrochemical producers are unable to be used due to the data failing GHGRP CBI aggregation criteria. EPA will continue to look for ways to incorporate this data into future Inventories that will allow for easier data integration between the non-energy uses of fuels category and the petrochemicals category presented in this chapter. This planned improvement is still under development and has not been completed to report on progress in this current Inventory.

4.14 HCFC-22 Production (CRF Source Category 2B9a)

Trifluoromethane (HFC-23 or CHF_3) is generated as a byproduct during the manufacture of chlorodifluoromethane (HCFC-22), which is primarily employed in refrigeration and air conditioning systems and as a chemical feedstock for manufacturing synthetic polymers. Between 1990 and 2000, U.S. production of HCFC-22 increased significantly as HCFC-22 replaced chlorofluorocarbons (CFCs) in many applications. Between 2000 and 2007, U.S. production fluctuated but generally remained above 1990 levels. In 2008 and 2009, U.S. production declined markedly and has remained near 2009 levels since. Because HCFC-22 depletes stratospheric ozone, its production for non-feedstock uses was phased out in 2020 under the U.S. Clean Air Act.[48] Feedstock production, however, is permitted to continue indefinitely.

HCFC-22 is produced by the reaction of chloroform ($CHCl_3$) and hydrogen fluoride (HF) in the presence of a catalyst, $SbCl_5$. The reaction of the catalyst and HF produces $SbCl_xF_y$, (where $x + y = 5$), which reacts with chlorinated hydrocarbons to replace chlorine atoms with fluorine. The HF and chloroform are introduced by submerged piping into a continuous-flow reactor that contains the catalyst in a hydrocarbon mixture of chloroform and partially fluorinated intermediates. The vapors leaving the reactor contain HCFC-21 ($CHCl_2F$), HCFC-22 ($CHClF_2$), HFC-23

[48] As construed, interpreted, and applied in the terms and conditions of the *Montreal Protocol on Substances that Deplete the Ozone Layer* [42 U.S.C. §7671m(b), CAA §614].

(CHF_3), HCl, chloroform, and HF. The under-fluorinated intermediates (HCFC-21) and chloroform are then condensed and returned to the reactor, along with residual catalyst, to undergo further fluorination. The final vapors leaving the condenser are primarily HCFC-22, HFC-23, HCl and residual HF. The HCl is recovered as a useful byproduct, and the HF is removed. Once separated from HCFC-22, the HFC-23 may be released to the atmosphere, recaptured for use in a limited number of applications, or destroyed.

Two facilities produced HCFC-22 in the United States in 2021. Emissions of HFC-23 from this activity in 2021 were estimated to be 2.2 MMT CO_2 Eq. (0.1 kt) (see Table 4-57 and Table 4-58). This quantity represents a 27 percent increase from 2020 emissions and a 94 percent decrease from 1990 emissions. The decrease from 1990 emissions was caused primarily by changes in the HFC-23 emission rate (kg HFC-23 emitted/kg HCFC-22 produced). The increase from 2020 emissions was caused by both an increase in the HFC-23 emission rate at one plant and an increase in the total quantity of HCFC-22 produced. The long-term decrease in the emission rate is primarily attributable to six factors: (a) five plants that did not capture and destroy the HFC-23 generated have ceased production of HCFC-22 since 1990; (b) one plant that captures and destroys the HFC-23 generated began to produce HCFC-22; (c) one plant implemented and documented a process change that reduced the amount of HFC-23 generated; (d) the same plant began recovering HFC-23, primarily for destruction and secondarily for sale; (e) another plant began destroying HFC-23; and (f) the same plant, whose emission rate was higher than that of the other two plants, ceased production of HCFC-22 in 2013.

Table 4-57: HFC-23 Emissions from HCFC-22 Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
HCFC-22 Production	38.6	16.8	4.3	2.7	3.1	1.8	2.2

Table 4-58: HFC-23 Emissions from HCFC-22 Production (kt HFC-23)

Year	1990	2005	2017	2018	2019	2020	2021
HCFC-22 Production	3	1	+	+	+	+	+

+ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

To estimate HFC-23 emissions for five of the eight HCFC-22 plants that have operated in the United States since 1990, methods comparable to the Tier 3 methods in the *2006 IPCC Guidelines* (IPCC 2006) were used throughout the time series. Emissions for 2010 through 2021 were obtained through reports submitted by U.S. HCFC-22 production facilities to EPA's Greenhouse Gas Reporting Program (GHGRP). EPA's GHGRP mandates that all HCFC-22 production facilities report their annual emissions of HFC-23 from HCFC-22 production processes and HFC-23 destruction processes. Previously, data were obtained by EPA through collaboration with an industry association that received voluntarily reported HCFC-22 production and HFC-23 emissions annually from all U.S. HCFC-22 producers from 1990 through 2009. These emissions were aggregated and reported to EPA on an annual basis.

For the other three plants, the last of which closed in 1993, methods comparable to the Tier 1 method in the *2006 IPCC Guidelines* were used. Emissions from these three plants have been calculated using the recommended emission factor for unoptimized plants operating before 1995 (0.04 kg HCFC-23/kg HCFC-22 produced).

The five plants that have operated since 1994 measure (or, for the plants that have since closed, measured) concentrations of HFC-23 as well as mass flow rates of process streams to estimate their generation of HFC-23. Plants using thermal oxidation to abate their HFC-23 emissions monitor the performance of their oxidizers to verify that the HFC-23 is almost completely destroyed. One plant that releases a small fraction of its byproduct HFC-23 periodically measures HFC-23 concentrations at process vents using gas chromatography. This information is combined with information on quantities of products (e.g., HCFC-22) to estimate HFC-23 emissions.

To estimate 1990 through 2009 emissions, reports from an industry association were used that aggregated HCFC-22 production and HFC-23 emissions from all U.S. HCFC-22 producers and reported them to EPA (ARAP 1997, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, and 2010). To estimate 2010 through 2021

emissions, facility-level data (including both HCFC-22 production and HFC-23 emissions) reported through EPA's GHGRP were analyzed. In 1997 and 2008, comprehensive reviews of plant-level estimates of HFC-23 emissions and HCFC-22 production were performed (RTI 1997; RTI 2008). The 1997 and 2008 reviews enabled U.S. totals to be reviewed, updated, and where necessary, corrected, and also for plant-level uncertainty analyses (Monte-Carlo simulations) to be performed for 1990, 1995, 2000, 2005, and 2006. Estimates of annual U.S. HCFC-22 production are presented in Table 4-59.

Table 4-59: HCFC-22 Production (kt)

Year	1990	2005	2012	2017	2018	2019	2020	2021
Production	139	156	96	C	C	C	C	C

C (CBI)

Note: HCFC-22 production in 2013 through 2021 is considered Confidential Business Information (CBI) as there were only two producers of HCFC-22 in those years.

Uncertainty

The uncertainty analysis presented in this section was based on a plant-level Monte Carlo Stochastic Simulation for 2006. The Monte Carlo analysis used estimates of the uncertainties in the individual variables in each plant's estimating procedure. This analysis was based on the generation of 10,000 random samples of model inputs from the probability density functions for each input. A normal probability density function was assumed for all measurements and biases except the equipment leak estimates for one plant; a log-normal probability density function was used for this plant's equipment leak estimates. The simulation for 2006 yielded a 95-percent confidence interval for U.S. emissions of 6.8 percent below to 9.6 percent above the reported total.

The relative errors yielded by the Monte Carlo Stochastic Simulation for 2006 were applied to the U.S. emission estimate for 2021. The resulting estimates of absolute uncertainty are likely to be reasonably accurate because (1) the methods used by the two remaining plants to estimate their emissions are not believed to have changed significantly since 2006, and (2) although the distribution of emissions among the plants has changed between 2006 and 2021 (because one plant has closed), the plant that currently accounts for most emissions had a relative uncertainty in its 2006 (as well as 2005) emissions estimate that was similar to the relative uncertainty for total U.S. emissions. Thus, the closure of one plant is not likely to have a large impact on the uncertainty of the national emission estimate.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-60. HFC-23 emissions from HCFC-22 production were estimated to be between 2.1 and 2.5 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 7 percent below and 10 percent above the emission estimate of 2.2 MMT CO_2 Eq.

Table 4-60: Approach 2 Quantitative Uncertainty Estimates for HFC-23 Emissions from HCFC-22 Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
HCFC-22 Production	HFC-23	2.2	2.1	2.5	-7%	+10%

[a] Range of emissions reflects a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the

introduction of the IPPU chapter (see Annex 8 for more details). Under the GHGRP, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[49] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

The GHGRP also requires source-specific quality control measures for the HCFC-22 Production category. Under EPA's GHGRP, HCFC-22 producers are required to (1) measure concentrations of HFC-23 and HCFC-22 in the product stream at least weekly using equipment and methods (e.g., gas chromatography) with an accuracy and precision of 5 percent or better at the concentrations of the process samples, (2) measure mass flows of HFC-23 and HCFC-22 at least weekly using measurement devices (e.g., flowmeters) with an accuracy and precision of 1 percent of full scale or better, (3) calibrate mass measurement devices at the frequency recommended by the manufacturer using traceable standards and suitable methods published by a consensus standards organization, (4) calibrate gas chromatographs at least monthly through analysis of certified standards, and (5) document these calibrations.

Recalculations

For the current Inventory, the CO_2-equivalent estimates of total HFC-23 emissions from HCFC-22 production have been revised to reflect the 100-year global warming potential (GWP) for HFC-23 provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP has been applied across the entire time series for consistency. With this change, the GWP of HFC-23 has decreased from 14,800 to 12,400, leading to a decrease of 16 percent in CO_2-equivalent HFC-23 emissions in every year compared to the previous inventory. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

4.15 Carbon Dioxide Consumption (CRF Source Category 2B10)

Carbon dioxide (CO_2) is used for a variety of commercial applications, including food processing, chemical production, carbonated beverage production, and refrigeration, and is also used in petroleum production for enhanced oil recovery (EOR). CO_2 used for EOR is injected underground to enable additional petroleum to be produced. For the purposes of this analysis, CO_2 used in food and beverage applications is assumed to be emitted to the atmosphere. A further discussion of CO_2 used in EOR is described in the Energy chapter in Box 3-6 titled "Carbon Dioxide Transport, Injection, and Geological Storage" and is not included in this section.

Carbon dioxide is produced from naturally-occurring CO_2 reservoirs, as a byproduct from the energy and industrial production processes (e.g., ammonia production, fossil fuel combustion, ethanol production), and as a byproduct from the production of crude oil and natural gas, which contain naturally occurring CO_2 as a component.

[49] EPA (2015). Greenhouse Gas Reporting Program Report Verification. Available online at: https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

In 2021, the amount of CO_2 produced and captured for commercial applications and subsequently emitted to the atmosphere was 5.0 MMT CO_2 Eq. (4,990 kt) (see Table 4-61 and Table 4-62). This is less than a 1 percent increase (20 kt) from 2020 levels and is an increase of approximately 239 percent since 1990.

Table 4-61: CO_2 Emissions from CO_2 Consumption (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CO_2 Consumption	1.5	1.4	4.6	4.1	4.9	5.0	5.0

Table 4-62: CO_2 Emissions from CO_2 Consumption (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
CO_2 Consumption	1,472	1,375	4,580	4,130	4,870	4,970	4,990

Methodology and Time-Series Consistency

Carbon dioxide emission estimates for 1990 through 2021 utilize a country-specific method and were based on the quantity of CO_2 extracted and transferred for industrial applications (i.e., non-EOR end-uses). Some of the CO_2 produced by these facilities is used for EOR, and some is used in other commercial applications (e.g., chemical manufacturing, food and beverage).

2010 through 2021

For 2010 through 2021, data from EPA's GHGRP (Subpart PP) were aggregated from facility-level reports to develop a national-level estimate for use in the Inventory (EPA 2022). Facilities report CO_2 extracted or produced from natural reservoirs and industrial sites, and CO_2 captured from energy and industrial processes and transferred to various end-use applications to EPA's GHGRP. This analysis includes only reported CO_2 transferred to food and beverage end-uses. EPA is continuing to analyze and assess integration of CO_2 transferred to other end-uses to enhance the completeness of estimates under this source category. Other end-uses include industrial applications, such as metal fabrication. EPA is analyzing the information reported to ensure that other end-use data excludes non-emissive applications and publication will not reveal CBI. Additionally, a small amount of CO_2 is used as a refrigerant; use and emissions from this application are reported under Section 4.24 Substitution of Ozone Depleting Substances (CRF Source Category 2F). Reporters subject to EPA's GHGRP Subpart PP are also required to report the quantity of CO_2 that is imported and/or exported. Currently, these data are not publicly available through the GHGRP due to data confidentiality reasons and hence are excluded from this analysis.

Facilities subject to Subpart PP of EPA's GHGRP are required to measure CO_2 extracted or produced. More details on the calculation and monitoring methods applicable to extraction and production facilities can be found under Subpart PP: Suppliers of Carbon Dioxide of the regulation, Part 98.[50] The number of facilities that reported data to EPA's GHGRP Subpart PP (Suppliers of Carbon Dioxide) for 2010 through 2021 is much higher (ranging from 44 to 53) than the number of facilities included in the Inventory for the 1990 to 2009 time period prior to the availability of GHGRP data (4 facilities). The difference is largely due to the fact the 1990 to 2009 data includes only CO_2 transferred to end-use applications from naturally occurring CO_2 reservoirs and excludes industrial sites.

1990 through 2009

For 1990 through 2009, data from EPA's GHGRP are not available. For this time period, CO_2 production data from four naturally-occurring CO_2 reservoirs were used to estimate annual CO_2 emissions. These facilities were Jackson

[50] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

Dome in Mississippi, Bravo and West Bravo Domes in New Mexico, and McCallum Dome in Colorado. The facilities in Mississippi and New Mexico produced CO_2 for use in both EOR and in other commercial applications (e.g., chemical manufacturing, food production). The fourth facility in Colorado (McCallum Dome) produced CO_2 for commercial applications only (New Mexico Bureau of Geology and Mineral Resources 2006).

Carbon dioxide production data and the percentage of production that was used for non-EOR applications for the Jackson Dome, Mississippi facility were obtained from Advanced Resources International (ARI 2006, 2007) for 1990 to 2000, and from the Annual Reports of Denbury Resources (Denbury Resources 2002 through 2010) for 2001 to 2009 (see Table 4-63). Denbury Resources reported the average CO_2 production in units of MMCF CO_2 per day for 2001 through 2009 and reported the percentage of the total average annual production that was used for EOR. Production from 1990 to 1999 was set equal to 2000 production, due to lack of publicly available production data for 1990 through 1999. Carbon dioxide production data for the Bravo Dome and West Bravo Dome were obtained from ARI for 1990 through 2009 (ARI 1990 to 2010). Data for the West Bravo Dome facility were only available for 2009. The percentage of total production that was used for non-EOR applications for the Bravo Dome and West Bravo Dome facilities for 1990 through 2009 were obtained from New Mexico Bureau of Geology and Mineral Resources (Broadhead 2003; New Mexico Bureau of Geology and Mineral Resources 2006). Production data for the McCallum Dome (Jackson County), Colorado facility were obtained from the Colorado Oil and Gas Conservation Commission (COGCC) for 1999 through 2009 (COGCC 2014). Production data for 1990 to 1998 and percentage of production used for EOR were assumed to be the same as for 1999, due to lack of publicly available data.

Table 4-63: CO_2 Production (kt CO_2) and the Percent Used for Non-EOR Applications

Year	Jackson Dome, MS CO_2 Production (kt) (% Non-EOR)	Bravo Dome, NM CO_2 Production (kt) (% Non-EOR)	West Bravo Dome, NM CO_2 Production (kt) (% Non-EOR)	McCallum Dome, CO CO_2 Production (kt) (% Non-EOR)	Total CO_2 Production from Extraction and Capture Facilities (kt)	% Non-EOR[a]
1990	1,344 (100%)	63 (1%)	+	65 (100%)	NE	NE
2005	1,254 (27%)	58 (1%)	+	63 (100%)	NE	NE
2017	IE	IE	IE	IE	59,900[b]	8%
2018	IE	IE	IE	IE	58,400[b]	7%
2019	IE	IE	IE	IE	61,300[b]	8%
2020	IE	IE	IE	IE	44,700[b]	11%
2021	IE	IE	IE	IE	43,980[b]	11%

+ Does not exceed 0.5 percent.

NE (Not Estimated)

IE (Included Elsewhere)

[a] Includes only food and beverage applications.

[b] For 2010 through 2021, the publicly available GHGRP data were aggregated at the national level based on GHGRP CBI criteria. The Dome-specific CO_2 production values are accounted for (i.e. included elsewhere) in the Total CO_2 Production from Extraction and Capture Facilities values starting in 2010 and are not able to be disaggregated.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. The methodology for CO_2 consumption spliced activity data from two different sources: Industry data for 1990 through 2009 and GHGRP data starting in 2010. Consistent with the *2006 IPCC Guidelines*, the overlap technique was applied to compare the two data dets for years where there was overlap. The data sets were determined to be inconsistent; the GHGRP data include CO_2 from industrial sources while the industry data do not. No adjustments were made to the activity data for 1990 through 2009 because the *2006 IPCC Guidelines* indicate that it is not good practice to use the overlap technique when the data sets are inconsistent.

Uncertainty

There is uncertainty associated with the data reported through EPA's GHGRP. Specifically, there is uncertainty associated with the amount of CO_2 consumed for food and beverage applications, given the GHGRP does have provisions that Subpart PP reporters are not required to report to the GHGRP if their emissions fall below certain thresholds, in addition to the exclusion of the amount of CO_2 transferred to all other end-use categories. This latter category might include CO_2 quantities that are being used for non-EOR industrial applications such as firefighting. Second, uncertainty is associated with the exclusion of imports/exports data for CO_2 suppliers. Currently these data are not publicly available through EPA's GHGRP and hence are excluded from this analysis. EPA verifies annual facility-level reports through a multi-step process (e.g., combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent. Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred.[51] Given the lack of specific uncertainty ranges available on the data used, EPA uses an uncertainty range of ±5 percent for CO_2 consumed for food and beverage applications. The uncertainty range is derived from the default range for solvent use in Section 5.5 of Chapter 3 of the *2006 IPCC Guidelines*. These values are representative of CO_2 used in food and beverage based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-64. Carbon dioxide consumption CO_2 emissions for 2021 were estimated to be between 4.7 and 5.2 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 5 percent below to 5 percent above the emission estimate of 5.0 MMT CO_2 Eq.

Table 4-64: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from CO_2 Consumption (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
CO_2 Consumption	CO_2	5.0	4.7	5.2	-5%	+5%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). More details on the greenhouse gas calculation, monitoring and QA/QC methods applicable to CO_2 Consumption can be found under Subpart PP (Suppliers of Carbon Dioxide) of the regulation (40 CFR Part 98).[52] EPA verifies annual facility-level GHGRP reports through a multi-step process (e.g., combination of electronic checks and manual reviews) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[53] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

[51] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

[52] See http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title40/40cfr98_main_02.tpl.

[53] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Recalculations Discussion

No recalculations were performed for the 1990 through 2020 portion of the time series.

Planned Improvements

EPA will continue to evaluate the potential to include additional GHGRP data on other emissive end-uses to improve the accuracy and completeness of estimates for this source category. Particular attention will be made to ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[54]

These improvements are still in process and will be incorporated into future Inventory reports. These are near-to medium-term improvements.

4.16 Phosphoric Acid Production (CRF Source Category 2B10)

Phosphoric acid (H_3PO_4) is a basic raw material used in the production of phosphate-based fertilizers. Phosphoric acid production from natural phosphate rock is a source of carbon dioxide (CO_2) emissions, due to the chemical reaction of the inorganic carbon (calcium carbonate) component of the phosphate rock.

Phosphate rock is mined in Florida and North Carolina, which account for more than 75 percent of total domestic output, and in Idaho and Utah (USGS 2022). It is used primarily as a raw material for wet-process phosphoric acid production. The composition of natural phosphate rock varies, depending on the location where it is mined. Natural phosphate rock mined in the United States generally contains inorganic carbon in the form of calcium carbonate (limestone) and may also contain organic carbon.

The phosphoric acid production process involves chemical reaction of the calcium phosphate ($Ca_3(PO_4)_2$) component of the phosphate rock with sulfuric acid (H_2SO_4) and recirculated phosphoric acid (H_3PO_4) (EFMA 2000). The generation of CO_2, however, is due to the associated limestone-sulfuric acid reaction, as shown below:

$$CaCO_3 + H_2SO_4 + H_2O \rightarrow CaSO_4 \cdot 2H_2O + CO_2$$

Total U.S. phosphate rock production in 2021 was an estimated 23.0 million metric tons (USGS 2022). Total imports of phosphate rock to the United States in 2021 were 2.4 million metric tons (USGS 2022). Between 2017 and 2020, most of the imported phosphate rock (87 percent) came from Peru, with 13 percent from Morocco (USGS 2022). All phosphate rock mining companies in the United States are vertically integrated with fertilizer plants that produce phosphoric acid located near the mines. The phosphoric acid production facilities that use imported phosphate rock are located in Louisiana.

Between 1990 and 2021, domestic phosphate rock production decreased by nearly 54 percent. Total CO_2 emissions from phosphoric acid production were 0.9 MMT CO_2 Eq. (909 kt CO_2) in 2021 (see Table 4-65 and Table 4-66). Domestic consumption of phosphate rock in 2021 was estimated to have decreased 1 percent relative to

[54] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

2020 levels. The COVID-19 pandemic did not impact the domestic phosphate rock market as both the fertilizer industry and related agricultural businesses were considered essential industries and were unaffected by pandemic "stay-at-home" orders issued in March 2020 (USGS 2021a).

Table 4-65: CO_2 Emissions from Phosphoric Acid Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Phosphoric Acid Production	1.5	1.3	1.0	0.9	0.9	0.9	0.9

Table 4-66: CO_2 Emissions from Phosphoric Acid Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Phosphoric Acid Production	1,529	1,342	1,025	937	909	901	909

Methodology and Time-Series Consistency

The United States uses a country-specific methodology consistent with an IPCC Tier 1 approach to calculate emissions from production of phosphoric acid from phosphate rock.[55] Carbon dioxide emissions from production of phosphoric acid from phosphate rock are estimated by multiplying the average amount of inorganic carbon (expressed as CO_2) contained in the natural phosphate rock as calcium carbonate by the amount of phosphate rock that is used annually to produce phosphoric acid, accounting for domestic production and net imports for consumption. The estimation methodology is as follows:

Equation 4-9: CO_2 Emissions from Phosphoric Acid Production

$$E_{pa} = C_{pr} \times Q_{pr}$$

where,

E_{pa} = CO_2 emissions from phosphoric acid production, metric tons

C_{pr} = Average amount of carbon (expressed as CO_2) in natural phosphate rock, metric ton CO_2/ metric ton phosphate rock

Q_{pr} = Quantity of phosphate rock used to produce phosphoric acid

The CO_2 emissions calculation methodology assumes that all of the inorganic C (calcium carbonate) content of the phosphate rock reacts to produce CO_2 in the phosphoric acid production process and is emitted with the stack gas. The methodology also assumes that none of the organic C content of the phosphate rock is converted to CO_2 and that all of the organic C content remains in the phosphoric acid product.

From 1993 to 2004, the U.S. Geological Survey (USGS) *Mineral Yearbook: Phosphate Rock* disaggregated phosphate rock mined annually in Florida and North Carolina from phosphate rock mined annually in Idaho and Utah, and reported the annual amounts of phosphate rock exported and imported for consumption (see Table 4-67). For the years 1990 through 1992, and 2005 through 2021, only nationally aggregated mining data was reported by USGS. For the years 1990, 1991, and 1992, the breakdown of phosphate rock mined in Florida and North Carolina and the amount mined in Idaho and Utah are approximated using data reported by USGS for the average share of U.S. production in those states from 1993 to 2004. For the years 2005 through 2021, the same approximation method is used, but the share of U.S. production was assumed to be consistent with the ratio of production capacity in those states, which were obtained from the USGS commodity specialist for phosphate rock (USGS 2012; USGS 2021b). For 1990 through 2021, data on U.S. domestic consumption of phosphate rock, consisting of domestic reported sales and use of phosphate rock, exports of phosphate rock (primarily from Florida and North Carolina),

[55] The *2006 IPCC Guidelines* do not provide a method for estimating process emissions (CO_2) from Phosphoric Acid Production.

and imports of phosphate rock for consumption, were obtained from USGS *Minerals Yearbook: Phosphate Rock* (USGS 1994 through 2015b) and from USGS *Minerals Commodity Summaries: Phosphate Rock* (USGS 2016 through 2021a, 2022). From 2004 through 2021, the USGS reported no exports of phosphate rock from U.S. producers (USGS 2022).

The carbonate content of phosphate rock varies depending upon where the material is mined. Composition data for domestically mined and imported phosphate rock were provided by the Florida Institute of Phosphate Research, now known as the Florida Industrial and Phosphate Research Institute (FIPR 2003a). Phosphate rock mined in Florida contains approximately 1 percent inorganic C, and phosphate rock imported from Morocco contains approximately 1.46 percent inorganic C. Calcined phosphate rock mined in North Carolina and Idaho contains approximately 0.41 percent and 0.27 percent inorganic C, respectively (see Table 4-67). Similar to the phosphate rock mined in Morocco, phosphate rock mined in Peru contains approximately 5 percent CO_2 (Golder Associates and M3 Engineering 2016).

Carbonate content data for phosphate rock mined in Florida are used to calculate the CO_2 emissions from consumption of phosphate rock mined in Florida and North Carolina (more than 75 percent of domestic production), and carbonate content data for phosphate rock mined in Morocco and Peru are used to calculate CO_2 emissions from consumption of imported phosphate rock. The CO_2 emissions calculation assumes that all of the domestic production of phosphate rock is used in uncalcined form. As of 2006, the USGS noted that one phosphate rock producer in Idaho produces calcined phosphate rock; however, no production data were available for this single producer (USGS 2006). The USGS confirmed that no significant quantity of domestic production of phosphate rock is in the calcined form (USGS 2012).

Table 4-67: Phosphate Rock Domestic Consumption, Exports, and Imports (kt)

Location/Year	1990	2005	2017	2018	2019	2020	2021
U.S. Domestic Consumption[a]	49,800	35,200	26,300	23,300	23,400	22,600	23,000
FL and NC	*42,494*	*28,160*	*20,510*	*18,170*	*18,250*	*17,630*	*17,940*
ID and UT	*7,306*	*7,040*	*5,790*	*5,130*	*5,150*	*4,970*	*5,060*
Exports—FL and NC	6,240	0	0	0	0	0	0
Imports	451	2,630	2,470	2,770	2,140	2,520	2,400
Total U.S. Consumption	**44,011**	**37,830**	**28,770**	**26,070**	**25,540**	**25,120**	**25,400**

[a] U.S. domestic consumption values are based on reported phosphate rock sold or used by producers.
Note: Totals may not sum due to independent rounding.

Table 4-68: Chemical Composition of Phosphate Rock (Percent by Weight)

Composition	Central Florida	North Florida	North Carolina (calcined)	Idaho (calcined)	Morocco	Peru
Total Carbon (as C)	1.60	1.76	0.76	0.60	1.56	NA
Inorganic Carbon (as C)	1.00	0.93	0.41	0.27	1.46	NA
Organic Carbon (as C)	0.60	0.83	0.35	0.00	0.10	NA
Inorganic Carbon (as CO_2)	3.67	3.43	1.50	1.00	5.00	5.00

NA (Not Available)
Sources: FIPR (2003a), Golder Associates and M3 Engineering (2016)

Methodological approaches were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2021.

Uncertainty

Phosphate rock production data used in the emission calculations were developed by the USGS through monthly and semiannual voluntary surveys of the active phosphate rock mines during 2021. Prior to 2006, USGS provided

the data disaggregated regionally; however, beginning in 2006, only total U.S. phosphate rock production was reported. Regional production for 2021 was estimated based on regional production data from 2017 to 2020 and multiplied by regionally-specific emission factors. There is uncertainty associated with the degree to which the estimated 2021 regional production data represents actual production in those regions. Total U.S. phosphate rock production data are not considered to be a significant source of uncertainty because all the domestic phosphate rock producers report their annual production to the USGS. Data for exports of phosphate rock used in the emission calculations are reported to the USGS by phosphate rock producers and are not considered to be a significant source of uncertainty. Data for imports for consumption are based on international trade data collected by the U.S. Census Bureau. These U.S. government economic data are not considered to be a significant source of uncertainty. Based on expert judgement of the USGS, EPA assigned an uncertainty range of ±5 percent to the percentage of phosphate rock produced from Florida and North Carolina, and ±5 percent to phosphoric acid production and imports, based on expert judgment (Jasinki 2012).

An additional source of uncertainty in the calculation of CO_2 emissions from phosphoric acid production is the carbonate composition of phosphate rock, as the composition of phosphate rock varies depending upon where the material is mined and may also vary over time. The Inventory relies on one study (FIPR 2003a) of chemical composition of the phosphate rock; limited data are available beyond this study. Another source of uncertainty is the disposition of the organic carbon content of the phosphate rock. A representative of FIPR indicated that in the phosphoric acid production process, the organic C content of the mined phosphate rock generally remains in the phosphoric acid product, which is what produces the color of the phosphoric acid product (FIPR 2003b). Organic carbon is therefore not included in the calculation of CO_2 emissions from phosphoric acid production.

A third source of uncertainty is the assumption that all domestically-produced phosphate rock is used in phosphoric acid production and used without first being calcined. Calcination of the phosphate rock would result in conversion of some of the organic C in the phosphate rock into CO_2; however, according to air permit information available to the public, at least one facility has calcining units permitted for operation (NCDENR 2013).

Finally, USGS indicated that in 2021 less than 5 percent of domestically-produced phosphate rock was used to manufacture elemental phosphorus and other phosphorus-based chemicals, rather than phosphoric acid (USGS 2022). According to USGS, there is only one domestic producer of elemental phosphorus, in Idaho, and no data were available concerning the annual production of this single producer. Elemental phosphorus is produced by reducing phosphate rock with coal coke, and it is therefore assumed that 100 percent of the carbonate content of the phosphate rock will be converted to CO_2 in the elemental phosphorus production process. The calculation for CO_2 emissions assumes that phosphate rock consumption, for purposes other than phosphoric acid production, results in CO_2 emissions from 100 percent of the inorganic carbon content in phosphate rock, but none from the organic carbon content.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-69. 2021 phosphoric acid production CO_2 emissions were estimated to be between 0.8 and 1.1 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 18 percent below and 20 percent above the emission estimate of 0.9 MMT CO_2 Eq.

Table 4-69: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Phosphoric Acid Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Phosphoric Acid Production	CO_2	0.9	0.8	1.1	-18%	+20%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details).

Recalculations Discussion

Recalculations were performed for 2020 to reflect an updated value for the total U.S. production of phosphate rock based on updated USGS data. This update resulted in a decrease of 37 kt CO_2 in 2020.

Planned Improvements

EPA continues to evaluate potential improvements to the Inventory estimates for this source category, which include direct integration of EPA's GHGRP data for 2010 through 2021 along with assessing applicability of reported GHGRP data to update the inorganic C content of phosphate rock for prior years to ensure time-series consistency. Specifically, EPA would need to assess that averaged inorganic C content data (by region or other approaches) meets GHGRP confidential business information (CBI) screening criteria. EPA would then need to assess the applicability of GHGRP data for the averaged inorganic C content (by region or other approaches) from 2010 through 2021, along with other information to inform estimates in prior years in the required time series (1990 through 2009) based on the sources of phosphate rock used in production of phosphoric acid over time. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[56] These long-term planned improvements are still in development by EPA and have not been implemented into the current Inventory report.

4.17 Iron and Steel Production (CRF Source Category 2C1) and Metallurgical Coke Production

Iron and steel production is a multi-step process that generates process-related emissions of carbon dioxide (CO_2) and methane (CH_4) as raw materials are refined into iron and then transformed into crude steel. Emissions from conventional fuels (e.g., natural gas, fuel oil) consumed for energy purposes during the production of iron and steel are accounted for in the Energy chapter.

Iron and steel production includes seven distinct production processes: metallurgical coke production, sinter production, direct reduced iron (DRI) production, pellet production, pig iron[57] production, electric arc furnace (EAF) steel production, and basic oxygen furnace (BOF) steel production. The number of production processes at a

[56] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

[57] Pig iron is the common industry term to describe what should technically be called crude iron. Pig iron is a subset of crude iron that has lost popularity over time as industry trends have shifted. Throughout this report, pig iron will be used interchangeably with crude iron, but it should be noted that in other data sets or reports pig iron and crude iron may not be used interchangeably and may provide different values.

particular plant is dependent upon the specific plant configuration. Most process CO_2 generated from the iron and steel industry is a result of the production of crude iron.

In addition to the production processes mentioned above, CO_2 is also generated at iron and steel mills through the consumption of process byproducts (e.g., blast furnace gas, coke oven gas) used for various purposes including heating, annealing, and electricity generation. Process byproducts sold off-site for use as synthetic natural gas are also accounted for in these calculations. In general, CO_2 emissions are generated in these production processes through the reduction and consumption of various carbon-containing inputs (e.g., ore, scrap, flux, coke byproducts). Fugitive CH_4 emissions can also be generated from these processes, as well as from sinter, direct iron, and pellet production.

In 2021, approximately eleven integrated iron and steel steelmaking facilities utilized BOFs to refine and produce steel from iron, and raw steel was produced at 101 facilities across the United States. Approximately 29 percent of steel production was attributed to BOFs and 71 percent to EAFs (USGS 2022). The trend in the United States for integrated facilities has been a shift towards fewer BOFs and more EAFs. EAFs use scrap steel as their main input and use significantly less energy than BOFs. There are also 14 cokemaking facilities, of which 3 facilities are co-located with integrated iron and steel facilities (ACCCI 2021). In the United States, 6 states account for roughly 52 percent of total raw steel production: Indiana, Alabama, Tennessee, Kentucky, Mississippi, and Arkansas (AISI 2022).

Total annual production of crude steel in the United States was fairly constant between 2000 and 2008 and ranged from a low of 99,320,000 tons to a high of 109,880,000 tons (2001 and 2004, respectively). Due to the decrease in demand caused by the global economic downturn (particularly from the automotive industry), crude steel production in the United States sharply decreased to 65,459,000 tons in 2009. Crude steel production was fairly constant from 2011 through 2014, and after a dip in production from 2014 to 2015, crude steel production has slowly and steadily increased for the past few years. Crude steel production dipped again in 2020 due to the COVID-19 pandemic and increased close to pre-pandemic levels in 2021. The United States was the fourth largest producer of raw steel in the world, behind China, India and Japan, accounting for approximately 4.4 percent of world production in 2021 (AISI 2004 through 2022).

The majority of CO_2 emissions from the iron and steel production process come from the use of metallurgical coke in the production of pig iron and from the consumption of other process byproducts, with lesser amounts emitted from the use of carbon-containing flux and from the removal of carbon from pig iron used to produce steel.

According to the *2006 IPCC Guidelines*, the production of metallurgical coke from coking coal is considered to be an energy use of fossil fuel, and the use of coke in iron and steel production is considered to be an industrial process source. The *2006 IPCC Guidelines* suggest that emissions from the production of metallurgical coke should be reported separately in the Energy sector, while emissions from coke consumption in iron and steel production should be reported in the Industrial Processes and Product Use sector. The approaches and emission estimates for both metallurgical coke production and iron and steel production, however, are presented here because much of the relevant activity data is used to estimate emissions from both metallurgical coke production and iron and steel production. For example, some byproducts (e.g., coke oven gas) of the metallurgical coke production process are consumed during iron and steel production, and some byproducts of the iron and steel production process (e.g., blast furnace gas) are consumed during metallurgical coke production. Emissions associated with the consumption of these byproducts are attributed at the point of consumption. Emissions associated with the use of conventional fuels (e.g., natural gas, fuel oil) for electricity generation, heating and annealing, or other miscellaneous purposes downstream of the iron and steelmaking furnaces are reported in the Energy chapter.

Metallurgical Coke Production

Emissions of CO_2 from metallurgical coke production in 2021 were 3.2 MMT CO_2 Eq. (3,224 kt CO_2) (see Table 4-70 and Table 4-71). Emissions increased by 39 percent from 2020 to 2021 and have decreased by 43 percent since

1990. Coke production in 2021 was about 21 percent higher than in 2020 and 55 percent below 1990 (EIA 2022, AISI 2022).

Significant activity data for 2021 and 2020 were not available in time for publication of this report due to industry consolidation that impacts the publication of data without revealing confidential business information. Activity data for these years were estimated using 2019 values adjusted based on GHGRP emissions data, as described in the Methodology and Time-Series Consistency section below.

Table 4-70: CO_2 Emissions from Metallurgical Coke Production (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	5.6	3.9	2.0	1.3	3.0	2.3	3.2

Table 4-71: CO_2 Emissions from Metallurgical Coke Production (kt CO_2)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	5,608	3,921	1,978	1,282	3,006	2,325	3,224

Iron and Steel Production

Emissions of CO_2 and CH_4 from iron and steel production in 2021 were 38.4 MMT CO_2 Eq. (38,432 kt) and 0.0082 MMT CO_2 Eq. (0.3 kt CH_4), respectively (see Table 4-72 through Table 4-75). Emissions from iron and steel production increased by 9 percent from 2020 to 2021 and have decreased by 61 percent since 1990, due to restructuring of the industry, technological improvements, and increased scrap steel utilization. Carbon dioxide emission estimates include emissions from the consumption of carbonaceous materials in the blast furnace, EAF, and BOF, as well as blast furnace gas and coke oven gas consumption for other activities at the steel mill.

Significant activity data for 2021 and 2020 were not available in time for publication of this report due to industry consolidation that impacts the publication of data without revealing confidential business information. Activity data for these years were estimated using 2019 values adjusted based on GHGRP emissions data, as described in the Methodology and Time-Series Consistency section below.

In 2021, domestic production of pig iron increased by 21 percent from 2020 levels. Overall, domestic pig iron production has declined since the 1990s; pig iron production in 2021 was 54 percent lower than in 2000 and 55 percent below 1990. Carbon dioxide emissions from iron production have decreased by 80 percent (36.6 MMT CO_2 Eq.) since 1990. Carbon dioxide emissions from steel production have decreased by 31 percent (2.4 MMT CO_2 Eq.) since 1990, while overall CO_2 emissions from iron and steel production have declined by 61 percent (60.7 MMT CO_2 Eq.) from 1990 to 2021.

Table 4-72: CO_2 Emissions from Iron and Steel Production (MMT CO_2 Eq.)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	2.4	1.7	0.9	0.9	0.9	0.7	0.8
Iron Production	45.7	17.7	8.2	9.6	9.4	8.4	9.1
Pellet Production	1.8	1.5	0.9	0.9	0.9	0.8	0.8
Steel Production	8.0	9.4	6.5	6.0	5.8	5.7	5.5
Other Activities[a]	41.2	35.9	22.4	24.1	23.2	19.8	22.1
Total	**99.1**	**66.2**	**38.8**	**41.6**	**40.1**	**35.4**	**38.4**

[a] Includes emissions from blast furnace gas and coke oven gas combustion for activities at the steel mill other than consumption in blast furnace, EAFs, or BOFs.

Note: Totals may not sum due to independent rounding.

Table 4-73: CO_2 Emissions from Iron and Steel Production (kt)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	2,448	1,663	869	937	876	749	836
Iron Production	45,706	17,661	8,234	9,583	9,360	8,409	9,121
Pellet Production	1,817	1,503	867	924	878	751	838
Steel Production	7,964	9,395	6,465	5,982	5,812	5,657	5,517
Other Activities [a]	41,194	35,934	22,396	24,149	23,158	19,820	22,119
Total	**99,129**	**66,156**	**38,832**	**41,576**	**40,084**	**35,387**	**38,432**

[a] Includes emissions from blast furnace gas and coke oven gas combustion for activities at the steel mill other than consumption in blast furnace, EAFs, or BOFs.
Note: Totals may not sum due to independent rounding.

Table 4-74: CH_4 Emissions from Iron and Steel Production (MMT CO_2 Eq.)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	+	+	+	+	+	+	+

+ Does not exceed 0.05 MMT CO_2 Eq.

Table 4-75: CH_4 Emissions from Iron and Steel Production (kt)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	0.9	0.6	+	+	+	+	+

+ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

Emission estimates for metallurgical coke, EAF steel production, and BOF steel production presented in this chapter utilize a country-specific approach based on Tier 2 methodologies provided by the *2006 IPCC Guidelines*. These Tier 2 methodologies call for a mass balance accounting of the carbonaceous inputs and outputs during the iron and steel production process and the metallurgical coke production process. Estimates for pig iron production apply Tier 2 methods consistent with the *2006 IPCC Guidelines*. Tier 1 methods are used for certain iron and steel production processes (i.e., sinter production, pellet production and DRI production) for which available data are insufficient to apply a Tier 2 method (e.g., country-specific carbon contents of inputs and outputs are not known). The majority of emissions are captured with higher tier methods, as sinter production, pellet production, and DRI production only account for roughly 8 percent of total iron and steel production emissions.

The Tier 2 methodology equation is as follows:

Equation 4-10: CO_2 Emissions from Coke, Pig Iron, EAF Steel, and BOF Steel Production, based on *2006 IPCC Guidelines* Tier 2 Methodologies

$$E_{CO_2} = \left[\sum_a (Q_a \times C_a) - \sum_b (Q_b \times C_b)\right] \times \frac{44}{12}$$

where,

E_{CO2}	=	Emissions from coke, pig iron, EAF steel, or BOF steel production, metric tons
a	=	Input material *a*
b	=	Output material *b*
Q_a	=	Quantity of input material *a*, metric tons
C_a	=	Carbon content of input material *a*, metric tons C/metric ton material

Q_b = Quantity of output material *b*, metric tons

C_b = Carbon content of output material *b*, metric tons C/metric ton material

44/12 = Stoichiometric ratio of CO_2 to C

The Tier 1 methodology equations are as follows:

Equation 4-11: *2006 IPCC Guidelines* Tier 1: Emissions from Sinter, Direct Reduced Iron, and Pellet Production (Equations 4.6, 4.7, and 4.8)

$$E_{s,p} = Q_s \times EF_{s,p}$$

$$E_{d,CO2} = Q_d \times EF_{d,CO2}$$

$$E_{p,CO2} = Q_p \times EF_{p,CO2}$$

where,

$E_{s,p}$ = Emissions from sinter production process for pollutant *p* (CO_2 or CH_4), metric ton

Q_s = Quantity of sinter produced, metric tons

$EF_{s,p}$ = Emission factor for pollutant *p* (CO_2 or CH_4), metric ton *p*/metric ton sinter

$E_{d,CO2}$ = Emissions from DRI production process for CO_2, metric ton

Q_d = Quantity of DRI produced, metric tons

$EF_{d,CO2}$ = Emission factor for CO_2, metric ton CO_2/metric ton DRI

$E_{p,CO2}$ = Emissions from pellet production process for CO_2, metric ton

Q_p = Quantity of pellets produced, metric tons

$EF_{p,CO2}$ = Emission factor for CO_2, metric ton CO_2/metric ton pellets produced

A significant number of activity data that serve as inputs to emissions calculations were unavailable for 2021 and 2020 at the time of publication and were estimated using 2019 values. In addition, to account for the impacts of the COVID-19 pandemic in 2020, the EPA used process emissions data from the EPA's Greenhouse Gas Reporting Program (GHGRP) subpart Q for the iron and steel sector to adjust the estimated values for 2021 and 2020. GHGRP process emissions data decreased by approximately 14 percent from 2019 to 2020 and increased by approximately 12% from 2020 to 2021 (EPA 2022). These percentage changes were applied to 2019 activity data values to produce an estimate for 2021 and 2020 data.

Metallurgical Coke Production

Coking coal is used to manufacture metallurgical coke which is used primarily as a reducing agent in the production of iron and steel but is also used in the production of other metals including zinc and lead (see Zinc Production and Lead Production sections of this chapter). Emissions associated with producing metallurgical coke from coking coal are estimated and reported separately from emissions that result from the iron and steel production process. To estimate emissions from metallurgical coke production, a Tier 2 method provided by the *2006 IPCC Guidelines* was utilized. The amount of carbon contained in materials produced during the metallurgical coke production process (i.e., coke, coke breeze and coke oven gas) is deducted from the amount of carbon contained in materials consumed during the metallurgical coke production process (i.e., natural gas, blast furnace gas, and coking coal). For calculations, activity data for these inputs, including natural gas, blast furnace gas, and coking coke consumed for metallurgical coke production, are in units consistent with the carbon content values. Light oil, which is produced during the metallurgical coke production process, is excluded from the deductions due to data limitations. The amount of carbon contained in these materials is calculated by multiplying the material-specific

carbon content by the amount of material consumed or produced (see Table 4-76). The amount of coal tar produced was approximated using a production factor of 0.03 tons of coal tar per ton of coking coal consumed. The amount of coke breeze produced was approximated using a production factor of 0.075 tons of coke breeze per ton of coking coal consumed (Steiner 2008; DOE 2000). Data on the consumption of carbonaceous materials (other than coking coal) as well as coke oven gas production were available for integrated steel mills only (i.e., steel mills with co-located coke plants); therefore, carbonaceous material (other than coking coal) consumption and coke oven gas production were excluded from emission estimates for merchant coke plants. Carbon contained in coke oven gas used for coke-oven underfiring was not included in the deductions to avoid double-counting.

Table 4-76: Material Carbon Contents for Metallurgical Coke Production

Material	kg C/kg
Coal Tar[a]	0.62
Coke[a]	0.83
Coke Breeze[a]	0.83
Coking Coal[b]	0.75
Material	**kg C/GJ**
Coke Oven Gas[c]	12.1
Blast Furnace Gas[c]	70.8

[a] Source: IPCC (2006), Vol. 3 Chapter 4, Table 4.3
[b] Source: EIA (2017b)
[c] Source: IPCC (2006), Vol. 2 Chapter 1, Table 1.3

Although the *2006 IPCC Guidelines* provide a Tier 1 CH_4 emission factor for metallurgical coke production (i.e., 0.1 g CH_4 per metric ton of coke production), it is not appropriate to use because CO_2 emissions were estimated using the Tier 2 mass balance methodology. The mass balance methodology makes a basic assumption that all carbon that enters the metallurgical coke production process either exits the process as part of a carbon-containing output or as CO_2 emissions. This is consistent with a preliminary assessment of aggregated facility-level greenhouse gas CH_4 emissions reported by coke production facilities under EPA's GHGRP. The assessment indicates that CH_4 emissions from coke production are insignificant and below 500 kt or 0.05 percent of total national emissions. Pending resources and significance, EPA continues to assess the possibility of including these emissions in future Inventories to enhance completeness but has not incorporated these emissions into this report.

Data relating to the mass of coking coal consumed at metallurgical coke plants and the mass of metallurgical coke produced at coke plants were taken from the Energy Information Administration (EIA) *Quarterly Coal Report: October through December* (EIA 1998 through 2019) and EIA *Quarterly Coal Report: January through March* (EIA 2021 through 2022) (see Table 4-77). Data on the volume of natural gas consumption, blast furnace gas consumption, and coke oven gas production for metallurgical coke production at integrated steel mills were obtained from the American Iron and Steel Institute (AISI) *Annual Statistical* Report (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008) (see Table 4-78). These data from the AISI *Annual Statistical Report* were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

The factor for the quantity of coal tar produced per ton of coking coal consumed was provided by AISI (Steiner 2008). The factor for the quantity of coke breeze produced per ton of coking coal consumed was obtained through Table 2-1 of the report *Energy and Environmental Profile of the U.S. Iron and Steel Industry* (DOE 2000). Data on natural gas consumption and coke oven gas production at merchant coke plants were not available and were excluded from the emission estimate. Carbon contents for metallurgical coke, coal tar, coke oven gas, and blast furnace gas were provided by the *2006 IPCC Guidelines*. The carbon content for coke breeze was assumed to equal the carbon content of coke. Carbon contents for coking coal was from EIA.

Table 4-77: Production and Consumption Data for the Calculation of CO_2 Emissions from Metallurgical Coke Production (Thousand Metric Tons)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Metallurgical Coke Production							
Coking Coal Consumption at Coke Plants	35,269	21,259	15,910	16,635	16,261	13,076	15,957
Coke Production at Coke Plants	25,054	15,167	11,746	12,525	11,676	9,392	11,381
Coke Breeze Production	2,645	1,594	1,193	1,248	1,220	981	1,197
Coal Tar Production	1,058	638	477	499	488	392	479

Table 4-78: Production and Consumption Data for the Calculation of CO_2 Emissions from Metallurgical Coke Production (Million ft^3)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Metallurgical Coke Production							
Coke Oven Gas Production	250,767	114,213	74,997	80,750	77,692	66,492	74,206
Natural Gas Consumption	599	2,996	2,103	2,275	2,189	1,873	2,091
Blast Furnace Gas Consumption	24,602	4,460	3,683	4,022	3,914	3,350	3,738

Iron and Steel Production

To estimate emissions from pig iron production in the blast furnace, the amount of carbon contained in the produced pig iron and blast furnace gas were deducted from the amount of carbon contained in inputs (i.e., metallurgical coke, sinter, natural ore, pellets, natural gas, fuel oil, coke oven gas, carbonate fluxes or slagging materials, and direct coal injection). For calculations, activity data for these inputs, including coke consumed for pig iron production, are in units consistent with the carbon content values. The carbon contained in the pig iron, blast furnace gas, and blast furnace inputs was estimated by multiplying the material-specific carbon content by each material type (see Table 4-79). In the absence of a default carbon content value from the *2006 IPCC Guidelines* for pellet, sinter, or natural ore consumed for pig iron production, a country-specific approach based on Tier 2 methodology is used. Pellet, sinter, and natural ore used as an input for pig iron production is assumed to have the same carbon content as direct reduced iron (2 percent). Carbon in blast furnace gas used to pre-heat the blast furnace air is combusted to form CO_2 during this process. Carbon contained in blast furnace gas used as a blast furnace input was not included in the deductions to avoid double-counting.

Emissions from steel production in EAFs were estimated by deducting the carbon contained in the steel produced from the carbon contained in the EAF anode, charge carbon, and scrap steel added to the EAF. Small amounts of carbon from DRI and pig iron to the EAFs were also included in the EAF calculation. For BOFs, estimates of carbon contained in BOF steel were deducted from carbon contained in inputs such as natural gas, coke oven gas, fluxes (i.e., limestone and dolomite), and pig iron. In each case, the carbon was calculated by multiplying material-specific carbon contents by each material type (see Table 4-79). For EAFs, the amount of EAF anode consumed was approximated by multiplying total EAF steel production by the amount of EAF anode consumed per metric ton of steel produced (0.002 metric tons EAF anode per metric ton steel produced [Steiner 2008]). The amount of carbon-containing flux (i.e., limestone and dolomite) used in EAF and BOF steel production was deducted from the "Other Process Uses of Carbonates" source category (CRF Source Category 2A4) to avoid double-counting.

Carbon dioxide emissions from the consumption of blast furnace gas and coke oven gas for other activities occurring at the steel mill were estimated by multiplying the amount of these materials consumed for these purposes by the material-specific carbon content (see Table 4-79).

Table 4-79: Material Carbon Contents for Iron and Steel Production

Material	kg C/kg

Coke	0.83
Direct Reduced Iron	0.02
Dolomite	0.13
EAF Carbon Electrodes	0.82
EAF Charge Carbon	0.83
Limestone	0.12
Pig Iron	0.04
Steel	0.01
Material	**kg C/GJ**
Coke Oven Gas	12.1
Blast Furnace Gas	70.8

Source: IPCC (2006), Table 4.3. Coke Oven Gas and Blast Furnace Gas, Table 1.3.

Carbon dioxide emissions associated with sinter production, direct reduced iron production, pellet production, pig iron production, steel production, and other steel mill activities were summed to calculate the total CO_2 emissions from iron and steel production (see Table 4-72 and Table 4-73).

The sinter production process results in fugitive emissions of CH_4, which are emitted via leaks in the production equipment, rather than through the emission stacks or vents of the production plants. The fugitive emissions were calculated by applying Tier 1 emission factors taken from the *2006 IPCC Guidelines* for sinter production (see Table 4-80). Although the *2006 IPCC Guidelines* also provide a Tier 1 methodology for CH_4 emissions from pig iron production, it is not appropriate to use because CO_2 emissions for pig iron production are estimated using the Tier 2 mass balance methodology. The mass balance methodology makes a basic assumption that all carbon that enters the pig iron production process either exits the process as part of a carbon-containing output or as CO_2 emissions; the estimation of CH_4 emissions is precluded. Annual analysis of facility-level emissions reported during iron production further supports this assumption and indicates that CH_4 emissions are below 500 kt CO_2 Eq. and well below 0.05 percent of total national emissions. The production of direct reduced iron could also result in emissions of CH_4 through the consumption of fossil fuels (e.g., natural gas, etc.); however, these emission estimates are excluded due to data limitations. Pending further analysis and resources, EPA may include these emissions in future reports to enhance completeness. EPA is still assessing the possibility of including these emissions in future reports and have not included this data in the current report.

Table 4-80: CH_4 Emission Factors for Sinter and Pig Iron Production

Material Produced	Factor	Unit
Sinter	0.07	kg CH_4/metric ton

Source: IPCC (2006), Table 4.2.

Emissions of CO_2 from sinter production, direct reduced iron production, and pellet production were estimated by multiplying total national sinter production, total national direct reduced iron production, and total national pellet production by Tier 1 CO_2 emission factors (see Table 4-81). Because estimates of sinter production, direct reduced iron production, and pellet production were not available, production was assumed to equal consumption.

Table 4-81: CO_2 Emission Factors for Sinter Production, Direct Reduced Iron Production, and Pellet Production

Material Produced	Metric Ton CO_2/Metric Ton
Sinter	0.2
Direct Reduced Iron	0.7
Pellet Production	0.03

Source: IPCC (2006), Table 4.1.

The consumption of coking coal, natural gas, distillate fuel, and coal used in iron and steel production are adjusted for within the Energy chapter to avoid double-counting of emissions reported within the IPPU chapter as these fuels were consumed during non-energy related activities. More information on this methodology and examples of adjustments made between the IPPU and Energy chapters are described in Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Sinter consumption and pellet consumption data for 1990 through 2020 were obtained from AISI's *Annual Statistical Report* (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008) (see Table 4-82). These data from the AISI *Annual Statistical Report* were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

In general, direct reduced iron (DRI) consumption data were obtained from the U.S. Geological Survey (USGS) *Minerals Yearbook – Iron and Steel Scrap* (USGS 1991 through 2020) and personal communication with the USGS Iron and Steel Commodity Specialist (Tuck 2023). Data for DRI consumed in EAFs were not available for the years 1990 and 1991. EAF DRI consumption in 1990 and 1991 was calculated by multiplying the total DRI consumption for all furnaces by the EAF share of total DRI consumption in 1992. Data for DRI consumed in BOFs were not available for the years 1990 through 1993. BOF DRI consumption in 1990 through 1993 was calculated by multiplying the total DRI consumption for all furnaces (excluding EAFs and cupola) by the BOF share of total DRI consumption (excluding EAFs and cupola) in 1994.

The Tier 1 CO_2 emission factors for sinter production, direct reduced iron production and pellet production were obtained through the *2006 IPCC Guidelines* (IPCC 2006). Time-series data for pig iron production, coke, natural gas, fuel oil, sinter, and pellets consumed in the blast furnace; pig iron production; and blast furnace gas produced at the iron and steel mill and used in the metallurgical coke ovens and other steel mill activities were obtained from AISI's *Annual Statistical Report* (AISI 2004 through 2021) and through personal communications with AISI (Steiner 2008) (see Table 4-82 and Table 4-83). Data including blast furnace gas, coke oven gas, natural gas, limestone, sinter, and natural ore consumption for blast furnaces, coke production, and steelmaking furnaces (EAFs and BOFs) from the AISI Annual Statistical Report were withheld for 2021 and 2020, so the 2019 values were used as estimated data for the missing 2021 and 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Similarly, the percent of total steel production for EAF and BOF steelmaking processes were withheld for 2021, so the 2020 values were used as estimated data for the missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

Data for EAF steel production, carbon-containing flux, EAF charge carbon, and natural gas consumption were obtained from AISI's *Annual Statistical Report* (AISI 2004 through 2022) and through personal communications with AISI (AISI 2006 through 2016, Steiner 2008). The factor for the quantity of EAF anode consumed per ton of EAF steel produced was provided by AISI (Steiner 2008). Data for BOF steel production, carbon-containing flux, natural gas, natural ore, pellet, sinter consumption as well as BOF steel production were obtained from AISI's *Annual Statistical Report* (AISI 2004 through 2022) and through personal communications with AISI (Steiner 2008). Data for EAF consumption of natural gas and BOF consumption of coke oven gas, limestone, and natural ore from the AISI *Annual Statistical Report* were not available for 2021, so 2020 values were used as estimated data for the

missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Data for EAF and BOF scrap steel, pig iron, and DRI consumption were obtained from the USGS *Minerals Yearbook – Iron and Steel Scrap* (USGS 1991 through 2021) and personal communication with the USGS Iron and Steel Commodity Specialist (Tuck 2023). Data on coke oven gas and blast furnace gas consumed at the iron and steel mill (other than in the EAF, BOF, or blast furnace) were obtained from AISI's *Annual Statistical Report* (AISI 2004 through 2021) and through personal communications with AISI (Steiner 2008). These data were not available for 2021, so 2020 values were used as estimated data for the missing 2021 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section. Some data from the AISI Annual Statistical Report on natural gas consumption were withheld for 2020, so the 2019 values were used as estimated data for the missing 2020 values and adjusted using GHGRP emissions data, as described earlier in this Methodology and Time-Series Consistency section.

Data on blast furnace gas and coke oven gas sold for use as synthetic natural gas were obtained from EIA's *Natural Gas Annual* (EIA 2020). Carbon contents for direct reduced iron, EAF carbon electrodes, EAF charge carbon, limestone, dolomite, pig iron, and steel were provided by the *2006 IPCC Guidelines*. The carbon contents for natural gas, fuel oil, and direct injection coal were obtained from EIA (EIA 2017b) and EPA (EPA 2010). Heat contents for fuel oil and direct injection coal were obtained from EIA (EIA 1992, 2011); natural gas heat content was obtained from Table 37 of AISI's *Annual Statistical Report* (AISI 2004 through 2021). Heat contents for coke oven gas and blast furnace gas were provided in Table 37 of AISI's *Annual Statistical Report* (AISI 2004 through 2021) and confirmed by AISI staff (Carroll 2016).

Table 4-82: Production and Consumption Data for the Calculation of CO_2 and CH_4 Emissions from Iron and Steel Production (Thousand Metric Tons)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Sinter Production	12,239	8,315	4,347	4,687	4,378	3,747	4,182
Direct Reduced Iron Production	517	1,303	C	C	C	C	C
Pellet Production	60,563	50,096	28,916	30,793	29,262	25,044	27,949
Pig Iron Production							
Coke Consumption	24,946	13,832	7,101	7,618	7,291	6,240	6,964
Pig Iron Production	49,669	37,222	22,395	24,058	22,302	18,320	22,246
Direct Injection Coal Consumption	1,485	2,573	2,125	2,569	2,465	2,110	2,354
EAF Steel Production							
EAF Anode and Charge Carbon Consumption	67	1,127	1,127	1,133	1,137	1,118	1,130
Scrap Steel Consumption	42,691	46,600	C	C	C	C	C
Flux Consumption	319	695	998	998	998	998	998
EAF Steel Production	33,511	52,194	55,825	58,904	61,172	51,349	57,307
BOF Steel Production							
Pig Iron Consumption	47,307	34,400	C	C	C	C	C
Scrap Steel Consumption	14,713	11,400	C	C	C	C	C
Flux Consumption	576	582	408	408	363	311	347
BOF Steel Production	43,973	42,705	25,788	27,704	26,591	21,384	23,865

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Table 4-83: Production and Consumption Data for the Calculation of CO_2 Emissions from Iron and Steel Production (Million ft^3 unless otherwise specified)

Source/Activity Data	1990	2005	2017	2018	2019	2020	2021
Pig Iron Production							
Natural Gas Consumption	56,273	59,844	38,142	40,204	37,934	32,465	36,232
Fuel Oil Consumption (thousand gallons)	163,397	16,170	4,352	3,365	2,321	1,986	2,217

Coke Oven Gas Consumption	22,033	16,557	12,459	13,337	12,926	11,063	12,346
Blast Furnace Gas Production	1,439,380	1,299,980	808,499	871,860	836,033	715,509	798,522
EAF Steel Production							
Natural Gas Consumption	15,905	19,985	8,105	8,556	9,115	7,801	8,706
BOF Steel Production							
Coke Oven Gas Consumption	3,851	524	374	405	389	333	372
Other Activities							
Coke Oven Gas Consumption	224,883	97,132	62,164	67,008	64,377	55,096	61,489
Blast Furnace Gas Consumption	1,414,778	1,295,520	804,816	867,838	832,119	712,159	794,783

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The estimates of CO_2 emissions from metallurgical coke production are based on assessing uncertainties in material production and consumption data and average carbon contents. Uncertainty is associated with the total U.S. coking coal consumption, total U.S. coke production, and materials consumed during this process. Data for coking coal consumption and metallurgical coke production are from different data sources (EIA) than data for other carbonaceous materials consumed at coke plants (AISI), which does not include data for merchant coke plants. There is uncertainty associated with the fact that coal tar and coke breeze production were estimated based on coke production because coal tar and coke breeze production data were not available. Since merchant coke plant data is not included in the estimate of other carbonaceous materials consumed at coke plants, the mass balance equation for CO_2 from metallurgical coke production cannot be reasonably completed; therefore, for the purpose of this analysis, uncertainty parameters are applied to primary data inputs to the calculation (i.e., coking coal consumption and metallurgical coke production) only.

The estimates of CO_2 emissions from iron and steel production are based on material production and consumption data and average carbon contents. There is uncertainty associated with the assumption that pellet production, direct reduced iron and sinter consumption are equal to production. There is uncertainty with the representativeness of the associated IPCC default emission factors. There is uncertainty associated with the assumption that all coal used for purposes other than coking coal is for direct injection coal. There is also uncertainty associated with the carbon contents for pellets, sinter, and natural ore, which are assumed to equal the carbon contents of direct reduced iron, when consumed in the blast furnace. There is uncertainty associated with the consumption of natural ore under current industry practices. For EAF steel production, there is uncertainty associated with the amount of EAF anode and charge carbon consumed due to inconsistent data throughout the time series. Also for EAF steel production, there is uncertainty associated with the assumption that 100 percent of the natural gas attributed to "steelmaking furnaces" by AISI is process-related and nothing is combusted for energy purposes. Uncertainty is also associated with the use of process gases such as blast furnace gas and coke oven gas. Data are not available to differentiate between the use of these gases for processes at the steel mill versus for energy generation (i.e., electricity and steam generation); therefore, all consumption is attributed to iron and steel production. These data and carbon contents produce a relatively accurate estimate of CO_2 emissions; however, there are uncertainties associated with each.

For calculating the emissions estimates from iron and steel and metallurgical coke production, EPA utilizes a number of data points taken from the AISI *Annual Statistical Report* (ASR). This report serves as a benchmark for information on steel companies in United States, regardless if they are a member of AISI, which represents

integrated producers (i.e., blast furnace and EAF). During the compilation of the 1990 through 2016 Inventory report EPA initiated conversation with AISI to better understand and update the qualitative and quantitative uncertainty metrics associated with AISI data elements. AISI estimates their data collection response rate to range from 75 to 90 percent, with certain sectors of the iron and steel industry not being covered by the ASR; therefore, there is some inherent uncertainty in the values provided in the AISI ASR, including material production and consumption data. There is also some uncertainty to which materials produced are exported to Canada. As indicated in the introduction to this section, the trend for integrated facilities has moved to more use of EAFs and fewer BOFs. This trend may not be completely captured in the current data which also increases uncertainty. EPA assigned an uncertainty range of ±10 percent for the primary data inputs (e.g., consumption and production values for each production process, heat and carbon content values) to calculate overall uncertainty from iron and steel production, and using this suggested uncertainty provided in Table 4.4 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). During EPA's discussion with AISI, AISI noted that an uncertainty range of ±5 percent would be a more appropriate approximation to reflect their coverage of integrated steel producers in the United States. EPA will continue to assess the best range of uncertainty for these values. EPA assigned an uncertainty range of ±25 percent for the Tier 1 CO_2 emission factors for the sinter, direct reduced iron, and pellet production processes, and using this suggested uncertainty provided in Table 4.4 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-84 for metallurgical coke production and iron and steel production. Total CO_2 emissions from metallurgical coke production and iron and steel production for 2021 were estimated to be between 33.8 and 49.6 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 19 percent below and 19 percent above the emission estimate of 41.7 MMT CO_2 Eq. Total CH_4 emissions from metallurgical coke production and iron and steel production for 2021 were estimated to be between 0.007 and 0.010 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 20 percent below and 21 percent above the emission estimate of 0.008 MMT CO_2 Eq.

Table 4-84: Approach 2 Quantitative Uncertainty Estimates for CO_2 and CH_4 Emissions from Iron and Steel Production and Metallurgical Coke Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Metallurgical Coke & Iron and Steel Production	CO_2	41.7	33.8	49.6	-19%	+19%
Metallurgical Coke & Iron and Steel Production	CH_4	+	+	+	-20%	+21%

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

Recalculations were performed for the year 2020 with updated values for DRI, pig iron, and scrap steel consumption for both BOF and EAF steel production. Compared to the previous Inventory, CO_2 emissions from steel production increased by less than 1 percent (7 kt CO_2).

In addition, for the current Inventory, CO_2-equivalent estimates of CH_4 emissions from sinter production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CO_2-equivalent CH_4 increased from 25 to 28 between the AR4 and AR5 reports, leading to an overall increase in calculated CO_2-equivalent CH_4 emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CH_4 emissions from sinter production increased by 12 percent each year, ranging from 0.78 kt CO_2 Eq. in 2009 to 2.6 kt CO_2 Eq. in 1993. The net impact on the entire category from these updates was an annual 0.002 percent increase in emissions for each year of the time series, reflecting the relative low contribution of CH_4 emissions to the overall category. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Significant activity data for 2021 and 2020 were not available for this report and were estimated using 2019 values and adjusted using GHGRP emissions data. EPA will continue to explore sources of 2021 and 2020 data and other estimation approaches. EPA will evaluate and analyze data reported under EPA's GHGRP to improve the emission estimates for Iron and Steel Production process categories. Particular attention will be made to ensure time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[58] This is a near to medium-term improvement, and per preliminary work, EPA estimates that the earliest this improvement could be incorporated is the 2024 Inventory submission.

Additional improvements include accounting for emission estimates for the production of metallurgical coke in the Energy chapter as well as identifying the amount of carbonaceous materials, other than coking coal, consumed at merchant coke plants. Other potential improvements include identifying the amount of coal used for direct injection and the amount of coke breeze, coal tar, and light oil produced during coke production. Efforts will also be made to identify information to better characterize emissions from the use of process gases and fuels within the Energy and IPPU chapters. Additional efforts will be made to improve the reporting between the IPPU and Energy chapters, particularly the inclusion of a quantitative summary of the carbon balance in the United States. This planned improvement is a long-term improvement and is still in development. It is not included in this current Inventory report. EPA estimates that the earliest this improvement could be incorporated is the 2024 Inventory submission.

4.18 Ferroalloy Production (CRF Source Category 2C2)

Carbon dioxide (CO_2) and methane (CH_4) are emitted from the production of several ferroalloys. Ferroalloys are composites of iron (Fe) and other elements such as silicon (Si), manganese (Mn), and chromium (Cr). Emissions from fuels consumed for energy purposes during the production of ferroalloys are accounted for in the Energy

[58] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

chapter. Emissions from the production of two types of ferrosilicon (25 to 55 percent and 56 to 95 percent silicon), silicon metal (96 to 99 percent silicon), and miscellaneous alloys (32 to 65 percent silicon) have been calculated.

Emissions from the production of ferrochromium and ferromanganese are not included because of the small number of manufacturers of these materials in the United States. Government information disclosure rules prevent the publication of production data for these production facilities. Additionally, production of ferrochromium in the United States ceased in 2009 (USGS 2013a).

Similar to emissions from the production of iron and steel, CO_2 is emitted when metallurgical coke is oxidized during a high-temperature reaction with iron and the selected alloying element. Due to the strong reducing environment, CO is initially produced and eventually oxidized to CO_2. A representative reaction equation for the production of 50 percent ferrosilicon (FeSi) is given below:

$$Fe_2O_3 + 2SiO_2 + 7C \rightarrow 2FeSi + 7CO$$

While most of the carbon contained in the process materials is released to the atmosphere as CO_2, a percentage is also released as CH_4 and other volatiles. The amount of CH_4 that is released is dependent on furnace efficiency, operation technique, and control technology.

Ferroalloys are used to alter the material properties of the steel. Ferroalloys are produced in conjunction with the iron and steel industry, often at co-located facilities, and production trends closely follow that of the iron and steel industry. As of 2018, 11 facilities in the United States produce ferroalloys (USGS 2022b).

Emissions of CO_2 from ferroalloy production in 2021 were 1.6 MMT CO_2 Eq. (1,567 kt CO_2) (see Table 4-85 and Table 4-86), which is a 14 percent increase since 2020 and a 27 percent reduction since 1990. Emissions of CH_4 from ferroalloy production in 2021 were 0.01 MMT CO_2 Eq. (0.4 kt CH_4), which is a 14 percent increase since 2020 and a 35 percent decrease since 1990. The decrease in emissions since 1990 can largely be attributed to the closure of two facilities in 2018. The increase in emissions from 2020 can be attributed to one facility reopening its ferrosilicon production facility after shutting down in 2020 due to decreased demand during the COVID-19 pandemic (USGS 2022a).

Table 4-85: CO_2 and CH_4 Emissions from Ferroalloy Production (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	2.2	1.4	2.0	2.1	1.6	1.4	1.6
CH_4	+	+	+	+	+	+	+
Total	**2.2**	**1.4**	**2.0**	**2.1**	**1.6**	**1.4**	**1.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

Table 4-86: CO_2 and CH_4 Emissions from Ferroalloy Production (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	2,152	1,392	1,975	2,063	1,598	1,377	1,567
CH_4	1	+	1	1	+	+	+

+ Does not exceed 0.5 kt

Methodology and Time-Series Consistency

Emissions of CO_2 and CH_4 from ferroalloy production were calculated[59] using a Tier 1 method from the *2006 IPCC*

[59] EPA has not integrated aggregated facility-level GHGRP information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with production of ferroalloys did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

Guidelines by multiplying annual ferroalloy production by material-specific default emission factors provided by IPCC (IPCC 2006). The Tier 1 equations for CO_2 and CH_4 emissions are as follows:

Equation 4-12: *2006 IPCC Guidelines* Tier 1: CO_2 Emissions for Ferroalloy Production (Equation 4.15)

$$E_{CO_2} = \sum_i (MP_i \times EF_i)$$

where,

E_{CO2} = CO_2 emissions, metric tons

MP_i = Production of ferroalloy type *i*, metric tons

EF_i = Generic emission factor for ferroalloy type *i*, metric tons CO_2/metric ton specific ferroalloy product

Equation 4-13: *2006 IPCC Guidelines* Tier 1: CH_4 Emissions for Ferroalloy Production (Equation 4.18)

$$E_{CH_4} = \sum_i (MP_i \times EF_i)$$

where,

E_{CH4} = CH_4 emissions, kg

MP_i = Production of ferroalloy type *i*, metric tons

EF_i = Generic emission factor for ferroalloy type *i*, kg CH_4/metric ton specific ferroalloy product

Default emission factors were used because country-specific emission factors are not currently available. The following emission factors were used to develop annual CO_2 and CH_4 estimates:

- Ferrosilicon, 25 to 55 percent Si and Miscellaneous Alloys, 32 to 65 percent Si: 2.5 metric tons CO_2/metric ton of alloy produced, 1.0 kg CH_4/metric ton of alloy produced.
- Ferrosilicon, 56 to 95 percent Si: 4.0 metric tons CO_2/metric ton alloy produced, 1.0 kg CH_4/metric ton of alloy produced.
- Silicon Metal: 5.0 metric tons CO_2/metric ton metal produced, 1.2 kg CH_4/metric ton metal produced.

It was assumed that 100 percent of the ferroalloy production was produced using petroleum coke in an electric arc furnace process (IPCC 2006), although some ferroalloys may have been produced with coking coal, wood, other biomass, or graphite carbon inputs. The amount of petroleum coke consumed in ferroalloy production was calculated assuming that the petroleum coke used is 90 percent carbon (C) and 10 percent inert material (Onder and Bagdoyan 1993).

The use of petroleum coke for ferroalloy production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Ferroalloy production data for 1990 through 2021 (see Table 4-87) were obtained from the U.S. Geological Survey (USGS) through the *Minerals Yearbook: Silicon* (USGS 1996 through 2022). The following data were available from the USGS publications for the time series:

- Ferrosilicon, 25 to 55 percent Si: Annual production data were available from 1990 through 2010.
- Ferrosilicon, 56 to 95 percent Si: Annual production data were available from 1990 through 2010.

- Silicon Metal: Annual production data were available from 1990 through 2005. Production data for 2005 were used as estimates for 2006 through 2010 because data for these years were not available due to government information disclosure rules.
- Miscellaneous Alloys, 32 to 65 percent Si: Annual production data were available from 1990 through 1998. Starting 1999, USGS reported miscellaneous alloys and ferrosilicon containing 25 to 55 percent silicon as a single category.

Starting with the 2011 publication, USGS ceased publication of production quantity by ferroalloy product and began reporting all the ferroalloy production data as a single category (i.e., Total Silicon Materials Production). This is due to the small number of ferroalloy manufacturers in the United States and government information disclosure rules. Ferroalloy product shares developed from the 2010 production data (i.e., ferroalloy product production divided by total ferroalloy production) were used with the total silicon materials production quantity to estimate the production quantity by ferroalloy product type for 2011 through 2021 (USGS 2017 through 2022).

Table 4-87: Production of Ferroalloys (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Ferrosilicon 25%-55%	321,385	123,000	181,775	189,846	147,034	126,681	144,227
Ferrosilicon 56%-95%	109,566	86,100	160,390	167,511	129,736	111,778	127,259
Silicon Metal	145,744	148,000	175,835	183,642	142,229	122,541	139,514
Misc. Alloys 32-65%	72,442	NA	NA	NA	NA	NA	NA

NA (Not Available) for product type, aggregated with ferrosilicon (25-55% Si)

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

Annual ferroalloy production was reported by the USGS in three broad categories until the 2010 publication: ferroalloys containing 25 to 55 percent silicon (including miscellaneous alloys), ferroalloys containing 56 to 95 percent silicon, and silicon metal (through 2005 only, 2005 value used as an estimate for 2006 through 2010). Starting with the *2011 Minerals Yearbook: Silicon*, USGS started reporting all the ferroalloy production under a single category: total silicon materials production. The total silicon materials quantity was allocated across the three categories, based on the 2010 production shares for the three categories. Refer to the Methodology section for further details. Additionally, production data for silvery pig iron (alloys containing less than 25 percent silicon) are not reported by the USGS to avoid disclosing proprietary company data. Emissions from this production category, therefore, were not estimated.

Some ferroalloys may be produced using wood or other biomass as a primary or secondary carbon source (carbonaceous reductants); however, information and data regarding these practices were not available. Emissions from ferroalloys produced with wood or other biomass would not be counted under this source because wood-based carbon is of biogenic origin.[60] Even though emissions from ferroalloys produced with coking coal or graphite inputs would be counted in national trends, they may be generated with varying amounts of CO_2 per unit of ferroalloy produced. The most accurate method for these estimates would be to base calculations on the amount of reducing agent used in the process, rather than the amount of ferroalloys produced. These data, however, were not available, and are also often considered confidential business information.

Emissions of CH_4 from ferroalloy production will vary depending on furnace specifics, such as type, operation technique, and control technology. Higher heating temperatures and techniques such as sprinkle charging would

[60] Emissions and sinks of biogenic carbon are accounted for in the Land Use, Land-Use Change, and Forestry chapter.

reduce CH_4 emissions; however, specific furnace information was not available or included in the CH_4 emission estimates.

EPA assigned a uncertainty range of ±25 percent for the primary emission factors (i.e., ferrosilicon 25-55% Si, ferrosilicon 56-95% Si, and silicon metal), and an uncertainty range of ±5 percent for the 2010 production values for ferrosilicon 25-55% Si, ferrosilicon 56-95% Si, and silicon metal production and the 2021 total silicon materials production value used to calculate emissions from overall ferroalloy production. Using these suggested uncertainties provided in in Table 4.9 of Section 4.3.3.2 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-88. Ferroalloy production CO_2 emissions from 2021 were estimated to be between 1.4 and 1.8 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 13 percent below and 13 percent above the emission estimate of 1.6 MMT CO_2 Eq. Ferroalloy production CH_4 emissions were estimated to be between a range of approximately 13 percent below and 13 percent above the emission estimate of 0.01 MMT CO_2 Eq.

Table 4-88: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Ferroalloy Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Ferroalloy Production	CO_2	1.6	1.4	1.8	-13%	+13%
Ferroalloy Production	CH_4	+	+	+	-13%	+13%

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8.

Recalculations Discussion

Recalculations were completed for 2014 based on revised total silicon materials production data from USGS. Compared to the previous Inventory, estimates of CO_2 emissions from ferroalloy production in 2014 increased by 4.8 percent (92 kt CO_2), and estimates of CH_4 emissions increased by 4.9 percent (0.026 kt CH_4).

In addition, for the current Inventory, CO_2-equivalent estimates of total CH_4 emissions from ferroalloy production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 increased from 25 to 28 between the AR4 and AR5 reports, leading to an overall increase in CO_2-equivalent estimates for CH_4 emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual CH_4 emissions increased by 12 percent each year, ranging from 1.1 kt CO_2 Eq. in 2003 to 2.0 kt CO_2 Eq. in 1990. The net impact on the entire category from these updates was an average annual 0.09 percent increase in emissions for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Pending available resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC procedures for the Ferroalloy Production source category. Given the small number of facilities and reporting thresholds, particular attention will be made to ensure completeness and time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[61] This is a long-term planned improvement, and EPA is still assessing the possibility of incorporating this improvement into the Inventory. This improvement has not been included in the current Inventory report.

4.19 Aluminum Production (CRF Source Category 2C3)

Aluminum is a lightweight, malleable, and corrosion-resistant metal that is used in many manufactured products, including aircraft, automobiles, bicycles, and kitchen utensils. As of recent reporting, the United States was the ninth[62] largest producer of primary aluminum, tied with Iceland with an aluminum production of 880 thousand metric tons, with approximately 1.3 percent of the world total production (USGS 2021). The United States was also a major importer of primary aluminum. The production of primary aluminum—in addition to consuming large quantities of electricity—results in process-related emissions of carbon dioxide (CO_2) and two perfluorocarbons (PFCs): perfluoromethane (CF_4) and perfluoroethane (C_2F_6).

Carbon dioxide is emitted during the aluminum smelting process when alumina (aluminum oxide, Al_2O_3) is reduced to aluminum using the Hall-Héroult reduction process. The reduction of the alumina occurs through electrolysis in a molten bath of natural or synthetic cryolite (Na_3AlF_6). The reduction cells contain a carbon (C) lining that serves as the cathode. Carbon is also contained in the anode, which can be a C mass of paste, coke briquettes, or prebaked C blocks from petroleum coke. During reduction, most of this C is oxidized and released to the atmosphere as CO_2.

Process emissions of CO_2 from aluminum production were estimated to be 1.5 MMT CO_2 Eq. (1,541 kt) in 2021 (see Table 4-89). The C anodes consumed during aluminum production consist of petroleum coke and, to a minor extent, coal tar pitch. The petroleum coke portion of the total CO_2 process emissions from aluminum production is considered to be a non-energy use of petroleum coke and is accounted for here and not under the CO_2 from Fossil Fuel Combustion source category of the Energy sector. Similarly, the coal tar pitch portion of these CO_2 process emissions is accounted for here.

Table 4-89: CO_2 Emissions from Aluminum Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Aluminum Production	6.8	4.1	1.2	1.5	1.9	1.7	1.5

[61] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

[62] Based on the U.S. USGS (2021) Aluminum factsheet, assuming all countries grouped under the "other countries" categories all have lower production than the U.S. Available at: https://pubs.usgs.gov/periodicals/mcs2022/mcs2022-aluminum.pdf

Table 4-90: CO_2 Emissions from Aluminum Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Aluminum Production	6,831	4,142	1,205	1,455	1,880	1,748	1,541

In addition to CO_2 emissions, the aluminum production industry is also a source of PFC emissions. During the smelting process, when the alumina ore content of the electrolytic bath falls below critical levels required for electrolysis, rapid voltage increases occur, which are termed High Voltage Anode Effects (HVAEs) HVAEs cause C from the anode and fluorine from the dissociated molten cryolite bath to combine, thereby producing fugitive emissions of CF_4 and C_2F_6. In general, the magnitude of emissions for a given smelter and level of production depends on the frequency and duration of these anode effects. As the frequency and duration of the anode effects increase, emissions increase. Another type of anode effect, Low Voltage Anode Effects (LVAEs), became a concern in the early 2010s as the aluminum industry increasingly began to use cell technologies with higher amperage and additional anodes (IPCC 2019). LVAEs emit CF_4 and are included in PFC emission totals from 2006 forward.

Since 1990, emissions of CF_4 and C_2F_6 have both declined by 95 and 97 percent respectively, to 0.82 MMT CO_2 Eq. of CF_4 (0.1 kt) and 0.10 MMT CO_2 Eq. of C_2F_6 (0.01 kt) in 2021, respectively, as shown in Table 4-91 and Table 4-92. This decline is due both to reductions in domestic aluminum production and to actions taken by aluminum smelting companies to reduce the frequency and duration of anode effects. These actions include technology and operational changes such as employee training, use of computer monitoring, and changes in alumina feeding techniques. Since 1990, aluminum production has declined by 78 percent, while the combined CF_4 and C_2F_6 emission rate (per metric ton of aluminum produced) has been reduced by 78 percent. PFC emissions decreased by approximately 36 percent between 2020 and 2021. Aluminum production also decreased in 2021, down 13 percent from 2020.

Table 4-91: PFC Emissions from Aluminum Production (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CF_4	16.1	2.6	0.7	1.0	1.1	1.2	0.8
C_2F_6	3.2	0.5	0.3	0.4	0.3	0.2	0.1
Total	**19.3**	**3.1**	**1.0**	**1.4**	**1.4**	**1.4**	**0.9**

Note: Totals may not sum due to independent rounding.

Table 4-92: PFC Emissions from Aluminum Production (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CF_4	2.4	0.4	0.1	0.2	0.2	0.2	0.1
C_2F_6	0.3	+	+	+	+	+	+

In 2021, U.S. primary aluminum production totaled approximately 0.88 million metric tons, a 13 percent decrease from 2020 production levels (USGS 2022). In 2021, three companies managed production at six operational primary aluminum smelters in five states. Two smelters operated at full capacity during 2021, while four smelters operated at reduced capacity (USGS 2022). Domestic smelters were operating at about 55 percent of capacity of 1.64 million tons per year at year end 2021 (USGS 2022).

Methodology and Time-Series Consistency

Process CO_2 and PFC (i.e., CF_4 and C_2F_6) emission estimates from primary aluminum production for 2010 through 2021 are available from EPA's GHGRP Subpart F (Aluminum Production) (EPA 2022). Under EPA's GHGRP, facilities began reporting primary aluminum production process emissions (for 2010) in 2011; as a result, GHGRP data (for

2010 through 2021) are available to be incorporated into the Inventory. EPA's GHGRP mandates that all facilities that contain an aluminum production process must report: CF_4 and C_2F_6 emissions from anode effects in all prebake and Søderberg electrolysis cells, CO_2 emissions from anode consumption during electrolysis in all prebake and Søderberg cells, and all CO_2 emissions from onsite anode baking. To estimate the process emissions, EPA's GHGRP uses the process-specific equations detailed in Subpart F (aluminum production).[63] These equations are based on the Tier 2/Tier 3 IPCC (2006) methods for primary aluminum production, and Tier 1 methods when estimating missing data elements. It should be noted that the same methods (i.e., *2006 IPCC Guidelines*) were used for estimating the emissions prior to the availability of the reported GHGRP data in the Inventory. Prior to 2010, aluminum production data were provided through EPA's Voluntary Aluminum Industrial Partnership (VAIP).

As previously noted, the use of petroleum coke for aluminum production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion [CRF Source Category 1A]) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Process CO_2 Emissions from Anode Consumption and Anode Baking

Carbon dioxide emission estimates for the years prior to the introduction of EPA's GHGRP in 2010 were estimated using *2006 IPCC Guidelines* methods, but individual facility reported data were combined with process-specific emissions modeling. These estimates were based on information previously gathered from EPA's Voluntary Aluminum Industrial Partnership (VAIP) program, U.S. Geological Survey (USGS) Mineral Commodity reviews, and The Aluminum Association (USAA) statistics, among other sources. Since pre- and post-GHGRP estimates use the same methodology, emission estimates are comparable across the time series.

Most of the CO_2 emissions released during aluminum production occur during the electrolysis reaction of the C anode, as described by the following reaction:

$$2Al_2O_3 + 3C \rightarrow 4Al + 3CO_2$$

For prebake smelter technologies, CO_2 is also emitted during the anode baking process. These emissions can account for approximately 10 percent of total process CO_2 emissions from prebake smelters.

Depending on the availability of smelter-specific data, the CO_2 emitted from electrolysis at each smelter was estimated from: (1) the smelter's annual anode consumption, (2) the smelter's annual aluminum production and rate of anode consumption (per ton of aluminum produced) for previous and/or following years, or (3) the smelter's annual aluminum production and IPCC default CO_2 emission factors. The first approach tracks the consumption and carbon content of the anode, assuming that all C in the anode is converted to CO_2. Sulfur, ash, and other impurities in the anode are subtracted from the anode consumption to arrive at a C consumption figure. This approach corresponds to either the IPCC Tier 2 or Tier 3 method, depending on whether smelter-specific data on anode impurities are used. The second approach interpolates smelter-specific anode consumption rates to estimate emissions during years for which anode consumption data are not available. This approach avoids substantial errors and discontinuities that could be introduced by reverting to Tier 1 methods for those years. The last approach corresponds to the IPCC Tier 1 method (IPCC 2006) and is used in the absence of present or historic anode consumption data.

The equations used to estimate CO_2 emissions in the Tier 2 and 3 methods vary depending on smelter type (IPCC 2006). For Prebake cells, the process formula accounts for various parameters, including net anode consumption, and the sulfur, ash, and impurity content of the baked anode. For anode baking emissions, the formula accounts

[63] Code of Federal Regulations, Title 40: Protection of Environment, Part 98: Mandatory Greenhouse Gas Reporting, Subpart F—Aluminum Production. See https://www.ecfr.gov/cgi-bin/text-idx?SID=24a41781dfe4218b339e914de03e8727&mc=true&node=pt40.23.98&rgn=div5#sp40.23.98.f.

for packing coke consumption, the sulfur and ash content of the packing coke, as well as the pitch content and weight of baked anodes produced. For Søderberg cells, the process formula accounts for the weight of paste consumed per metric ton of aluminum produced, and pitch properties, including sulfur, hydrogen, and ash content.

Through the VAIP, anode consumption (and some anode impurity) data have been reported for 1990, 2000, 2003, 2004, 2005, 2006, 2007, 2008, and 2009. Where available, smelter-specific process data reported under the VAIP were used; however, if the data were incomplete or unavailable, information was supplemented using industry average values recommended by IPCC (2006). Smelter-specific CO_2 process data were provided by 18 of the 23 operating smelters in 1990 and 2000, by 14 out of 16 operating smelters in 2003 and 2004, 14 out of 15 operating smelters in 2005, 13 out of 14 operating smelters in 2006, 5 out of 14 operating smelters in 2007 and 2008, and 3 out of 13 operating smelters in 2009. For years where CO_2 emissions data or CO_2 process data were not reported by these companies, estimates were developed through linear interpolation, and/or assuming representative (e.g., previously reported or industry default) values.

In the absence of any previous historical smelter-specific process data (i.e., 1 out of 13 smelters in 2009; 1 out of 14 smelters in 2006, 2007, and 2008; 1 out of 15 smelters in 2005; and 5 out of 23 smelters between 1990 and 2003), CO_2 emission estimates were estimated using Tier 1 Søderberg and/or Prebake emission factors (metric ton of CO_2 per metric ton of aluminum produced) from IPCC (2006).

Process PFC Emissions from Anode Effects

High Voltage Anode Effects

Smelter-specific PFC emissions from aluminum production for 2010 through 2021 were reported to EPA under its GHGRP. To estimate their PFC emissions from HVAEs and report them under EPA's GHGRP, smelters use an approach identical to the Tier 3 approach in the *2006 IPCC Guidelines* (IPCC 2006). Specifically, they use a smelter-specific slope coefficient as well as smelter-specific operating data to estimate an emission factor using the following equation:

$$PFC = S \times AE$$

$$AE = F \times D$$

where,

PFC	=	CF_4 or C_2F_6, kg/MT aluminum
S	=	Slope coefficient, PFC/AE
AE	=	Anode effect, minutes/cell-day
F	=	Anode effect frequency per cell-day
D	=	Anode effect duration, minutes

They then multiply this emission factor by aluminum production to estimate PFC emissions from HVAEs. All U.S. aluminum smelters are required to report their emissions under EPA's GHGRP.

Perfluorocarbon emissions for the years prior to 2010 were estimated using the same equation, but the slope-factor used for some smelters was technology-specific rather than smelter-specific, making the method a Tier 2 rather than a Tier 3 approach for those smelters. Emissions and background data were reported to EPA under the VAIP. For 1990 through 2009, smelter-specific slope coefficients were available and were used for smelters representing between 30 and 94 percent of U.S. primary aluminum production. The percentage changed from year to year as some smelters closed or changed hands and as the production at remaining smelters fluctuated. For

smelters that did not report smelter-specific slope coefficients, IPCC technology-specific slope coefficients were applied (IPCC 2006). The slope coefficients were combined with smelter-specific anode effect data collected by aluminum companies and reported under the VAIP to estimate emission factors over time. For 1990 through 2009, smelter-specific anode effect data were available for smelters representing between 80 and 100 percent of U.S. primary aluminum production. Where smelter-specific anode effect data were not available, representative values (e.g., previously reported or industry averages) were used.

For all smelters, emission factors were multiplied by annual production to estimate annual emissions at the smelter level. For 1990 through 2009, smelter-specific production data were available for smelters representing between 30 and 100 percent of U.S. primary aluminum production. (For the years after 2000, this percentage was near the high end of the range.) Production at non-reporting smelters was estimated by calculating the difference between the production reported under VAIP and the total U.S. production supplied by USGS, and then allocating this difference to non-reporting smelters in proportion to their production capacity. Emissions were then aggregated across smelters to estimate national emissions.

Table 4-93: Summary of HVAE Emissions

Year	1990	2005	2017	2018	2019	2020	2021
MMT CO_2 Eq.	19.3	3.1	0.9	1.4	1.4	1.4	0.9

Low Voltage Anode Effects

LVAE emissions of CF_4 were estimated for 2006 through 2021 based on the Tier 1 (technology-specific, production-based) method in the *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2019). Prior to 2006, LVAE emissions are believed to have been negligible.[64] The Tier 1 method is used in the LVAE emissions calculations from aluminum production in the absence of smelter-specific data available to quantify the LVAE-specific process emissions. National aluminum production estimates (allocated to smelters as described below) and the technology used in individual smelters were the best available data to perform the emissions calculations, as smelter-specific production data is not publicly available.

The following equation was used to estimate LVAE PFC emissions:

Equation 4-14: CF_4 Emissions Resulting from Low Voltage Anode Effects

$$LVAE\ E_{CF4} = LVAE\ EF_{CF4} \times MP$$

where,

LVAE E_{CF4} = LVAE emissions of CF_4 from aluminum production, kg CF_4

LVAE EF_{CF4} = LVAE emission factor for CF_4 (default by cell technology type)

MP = metal production by cell technology type, tons Al.

In the LVAE emissions calculations, the Metal Production (MP) factor is calculated differently for the years 2006 through 2009 than for 2010 and beyond. For years prior to GHGRP reporting (2006 through 2009), the MP factor is calculated by dividing the annual production reported by USGS with the total U.S. capacity reported for this specific year, based on the USGS yearbook and applying this national utilization factor to each facility's production

[64] The *2019 Refinement* states, "Since 2006, the global aluminum industry has undergone changes in technology and operating conditions that make LVAE emissions much more prevalent[12]; these changes have occurred not only through uptake of newer technologies (e.g., $PFPB_L$ to $PFPB_M$) but also during upgrades within the same technology in order to maximize productivity and reduce energy use" (IPCC 2019). Footnote #12 uses the example of $PFPB_L$, which is prevalent in the United States, as an older technology that has been upgraded.

capacity to obtain an estimated facility production value. For GHGRP reporting years (2010+), the methodology to calculate the MP value was changed to allocate the total annual production reported by USAA, based on the distribution of CO_2 emissions amongst the operating smelters in a specific year. The latter improves the accuracy of the LVAE emissions estimates over assuming capacity utilization is the same at all smelters. The main drawback of using this methodology to calculate the MP factor is that, in some instances, it led to production estimates that are slightly larger (less than six percent) than the production capacity reported that year. In practice, this is most likely explained by the differences in process efficiencies at each facility and to a lesser extent, differences in measurements and methods used by each facility to obtain their CO_2 estimates and the degree of uncertainty in the USGS annual production reporting.

Once LVAE emissions were estimated, they were then combined with HVAE emissions estimates to calculate total PFC emissions from aluminum production.

Table 4-94: Summary of LVAE Emissions

Year	2006	2017	2018	2019	2020	2021
MMT CO_2 Eq.	0.13	0.05	0.05	0.07	0.06	0.05

Production Data

Between 1990 and 2009, production data were provided under the VAIP by 21 of the 23 U.S. smelters that operated during at least part of that period. For the non-reporting smelters, production was estimated based on the difference between reporting smelters and national aluminum production levels as reported to USGS, with allocation to specific smelters based on reported production capacities (USGS 1990 through 2009).

National primary aluminum production data for 2010 through 2021 were compiled using USGS Mineral Industry Surveys, and the USGS Mineral Commodity Summaries.

Table 4-95: Production of Primary Aluminum (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	4,048	2,481	741	891	1,093	1,012	880

Methodological approaches were applied to the entire time-series to ensure time-series consistency from 1990 through 2020.

Uncertainty

Uncertainty was estimated for the CO_2, CF_4, and C_2F_6 emission values reported by each individual facility to EPA's GHGRP, taking into consideration the uncertainties associated with aluminum production, anode effect minutes, and slope factors. The uncertainty bounds used for these parameters were established based on information collected under the VAIP and held constant through 2021. Uncertainty surrounding the reported CO_2, CF_4, and C_2F_6 emission values were determined to have a normal distribution with uncertainty ranges of approximately 6 percent below to 6 percent above, 16 percent below to 16 percent above, and 20 percent below to 20 percent above their 2021 emission estimates, respectively.

For LVAE, since emission values were not reported through EPA's GHGRP but estimated instead through a Tier 1 methodology, the uncertainty analysis examined uncertainty associated with primary capacity data as well as technology-specific emission factors. Uncertainty for each facility's primary capacity, reported in the USGS Yearbook, was estimated to have a Pert Beta distribution with an uncertainty range of 7 percent below to 7 percent above the capacity estimates based on the uncertainty of reported capacity data, the number of years since the facility reported new capacity data, and uncertainty in capacity utilization. Uncertainty was applied to LVAE emission factors according to technology using the uncertainty ranges provided in the *2019 Refinement to*

the 2006 IPCC Guidelines. An uncertainty range for Horizontal Stud Søderberg (HSS) technology was not provided in the *2019 Refinement to the 2006 IPCC Guidelines* due to insufficient data, so a normal distribution and uncertainty range of ±99 percent was applied for that technology based on expert judgment. A Monte Carlo analysis was applied to estimate the overall uncertainty of the CO_2, CF_4, and C_2F_6 emission estimates for the U.S. aluminum industry as a whole, and the results are provided below.

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-85. Aluminum production-related CO_2 emissions were estimated to be between 1.50 and 1.58 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 2 percent below to 3 percent above the emission estimate of 1.54 MMT CO_2 Eq. Also, production-related CF_4 emissions were estimated to be between 0.75 and 0.89 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 9 percent below to 9 percent above the emission estimate of 0.82 MMT CO_2 Eq. Aluminum production-related C_2F_6 emissions were estimated to be between 0.09 and 0.11 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 11 percent below to 11 percent above the emission estimate of 0.10 MMT CO_2 Eq. Finally, Aluminum production-related aggregated PFCs emissions were estimated to be between 0.85 and 0.99 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 8 percent below to 8 percent above the emission estimate of 0.922 MMT CO_2 Eq.

Table 4-96: Approach 2 Quantitative Uncertainty Estimates for CO_2 and PFC Emissions from Aluminum Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Aluminum Production	CO_2	1.54	1.50	1.58	-2%	3%
Aluminum Production	CF_4	0.82	0.75	0.89	-9%	9%
Aluminum Production	C_2F_6	0.10	0.09	0.11	-11%	11%
Aluminum Production	PFCs	0.92	0.85	0.99	-8%	8%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[65] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

The total primary aluminum production estimates were updated to reflect data reported to the USGS (as detailed in Production Data section above) for all years 1990 to 2021. Previously, production estimates from the U.S.

[65] GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

Aluminum Association and other external resources were used for some years. The data from USGS are compiled from the U.S. Geological Survey monthly surveys sent to the primary aluminum smelters owned by the companies operating in the United States. In recent years, all companies who were sent the surveys responded, making USGS data the most accurate available. These data source modifications did lead to minor differences in the greenhouse gas emissions calculations for some years between 2000 and 2009. No historical or current production estimates publicly available were found to be broken down into smelter specific production estimates. In addition, for the current Inventory, CO_2-equivalent emissions totals of CF_4 and C_2F_6 from Aluminum production have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of CF_4 and C_2F_6 have decreased, leading to an overall decrease in calculated CO_2-equivalent emissions from Aluminum production. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CF_4 emissions was a 10 percent decrease and the average annual change in CO_2-equivalent C_2F_6 emissions was a 9 percent decrease for the time series. The net impact from these updates was an average annual 10 percent decrease in CO_2-equivalent total PFC emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

4.20 Magnesium Production and Processing (CRF Source Category 2C4)

The magnesium metal production and casting industry uses sulfur hexafluoride (SF_6) as a cover gas to prevent the rapid oxidation of molten magnesium in the presence of air. Sulfur hexafluoride has been used in this application around the world for more than thirty years. A dilute gaseous mixture of SF_6 with dry air and/or carbon dioxide (CO_2) is blown over molten magnesium metal to induce and stabilize the formation of a protective crust. A small portion of the SF_6 reacts with the magnesium to form a thin molecular film of mostly magnesium oxide and magnesium fluoride. The amount of SF_6 reacting in magnesium production and processing is considered to be negligible and thus all SF_6 used is assumed to be emitted into the atmosphere. Alternative cover gases, such as AM-cover™ (containing HFC-134a), Novec™ 612 (FK-5-1-12) and dilute sulfur dioxide (SO_2) systems can and are being used by some facilities in the United States. However, many facilities in the United States are still using traditional SF_6 cover gas systems. Carbon dioxide is also released during primary magnesium production if carbonate based raw materials, such as dolomite, are used. During the processing of these raw materials to produce magnesium, calcination occurs which results in a release of CO_2 emissions.

The magnesium industry emitted 1.1 MMT CO_2 Eq. (0.05 kt) of SF_6, 0.04 MMT CO_2 Eq. (0.03 kt) of HFC-134a, and 0.003 MMT CO_2 Eq. (2.9 kt) of CO_2 in 2021. This represents an increase of approximately 24 percent from total 2020 emissions (see Table 4-97 and Table 4-98) and an increase in SF_6 emissions by 26 percent. In 2021, total HFC-134a emissions decreased from 0.052 MMT CO_2 Eq. to 0.040 MMT CO_2 Eq., or a 24 percent decrease as compared to 2020 emissions. FK 5-1-12 emissions in 2021 were consistent with 2020. The emissions of the carrier gas, CO_2, decreased from 2.97 kt in 2020 to 2.92 kt in 2021, or 2 percent.

Table 4-97: SF_6, HFC-134a, FK 5-1-12 and CO_2 Emissions from Magnesium Production and Processing (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
SF_6	5.4	2.9	1.0	1.1	0.9	0.9	1.1
HFC-134a	0.0	0.0	0.1	0.1	0.1	0.1	+
CO_2	0.1	+	+	+	+	+	+
FK 5-1-12[a]	*0.0*	*0.0*	+	+	+	+	+

Total	**5.5**	**2.9**	**1.1**	**1.1**	**1.0**	**0.9**	**1.2**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Emissions of FK 5-1-12 are not included in totals.

Note: Totals may not sum due to independent rounding.

Table 4-98: SF_6, HFC-134a, FK 5-1-12 and CO_2 Emissions from Magnesium Production and Processing (kt)

Year	1990	2005	2017	2018	2019	2020	2021
SF_6	+	+	+	+	+	+	+
HFC-134a	0.0	0.0	+	+	+	+	+
CO_2	128.4	3.3	3.3	1.6	2.4	3.0	2.9
FK 5-1-12 [a]	*0.0*	*0.0*	*+*	*+*	*+*	*+*	*+*

+ Does not exceed 0.5 kt

[a] Emissions of FK 5-1-12 are not included in totals.

Methodology and Time-Series Consistency

Emission estimates for the magnesium industry incorporate information provided by industry participants in EPA's SF_6 Emission Reduction Partnership for the Magnesium Industry as well as emissions data reported through Subpart T (Magnesium Production and Processing) of EPA's GHGRP. The Partnership started in 1999 and, in 2010, participating companies represented 100 percent of U.S. primary and secondary production and 16 percent of the casting sector production (i.e., die, sand, permanent mold, wrought, and anode casting). SF_6 emissions for 1999 through 2010 from primary production, secondary production (i.e., recycling), and die casting were generally reported by Partnership participants. Partners reported their SF_6 consumption, which is assumed to be equivalent to emissions. Along with SF_6, some Partners reported their HFC-134a and FK 5-1-12 consumed, which is also assumed to be equal to emissions. The last reporting year under the Partnership was 2010. Emissions data for 2011 through 2020 are obtained through EPA's GHGRP. Under the program, owners or operators of facilities that have a magnesium production or casting process must report emissions from use of cover or carrier gases, which include SF_6, HFC-134a, FK 5-1-12 and CO_2. Consequently, cover and carrier gas emissions from magnesium production and processing were estimated for three time periods, depending on the source of the emissions data: 1990 through 1998 (pre-EPA Partnership), 1999 through 2010 (EPA Partnership), and 2011 through 2021 (EPA GHGRP). The methodologies described below also make use of magnesium production data published by the U.S. Geological Survey (USGS) as available.

1990 through 1998

To estimate emissions for 1990 through 1998, industry SF_6 emission factors were multiplied by the corresponding metal production and consumption (casting) statistics from USGS. For this period, it was assumed that there was no use of HFC-134a or FK 5-1-12 cover gases, and hence emissions were not estimated for these alternatives.

Sulfur hexafluoride emission factors from 1990 through 1998 were based on a number of sources and assumptions. Emission factors for primary production were available from U.S. primary producers for 1994 and 1995. The primary production emission factors were 1.2 kg SF_6 per metric ton for 1990 through 1993, and 1.1 kg SF_6 per metric ton for 1994 through 1997. The emission factor for secondary production from 1990 through 1998 was assumed to be constant at the 1999 average Partner value. An emission factor for die casting of 4.1 kg SF_6 per metric ton, which was available for the mid-1990s from an international survey (Gjestland and Magers 1996), was used for years 1990 through 1996. For 1996 through 1998, the emission factor for die casting was assumed to decline linearly to the level estimated based on Partner reports in 1999. This assumption is consistent with the trend in SF_6 sales to the magnesium sector that was reported in the RAND survey of major SF_6 manufacturers, which showed a decline of 70 percent from 1996 to 1999 (RAND 2002). Sand casting emission factors for 1990 through 2001 were assumed to be the same as the 2002 emission factor. The emission factors for the other processes (i.e., permanent mold, wrought, and anode casting), about which less is known, were assumed to remain

constant at levels defined in Table 4-97. The emission factors for the other processes (i.e., permanent mold, wrought, and anode casting) were based on discussions with industry representatives.

The quantities of CO_2 carrier gas used for each production type have been estimated using the 1999 estimated CO_2 emissions data and the annual calculated rate of change of SF_6 use in the 1990 through 1999 time period. For each year and production type, the rate of change of SF_6 use between the current year and the subsequent year was first estimated. This rate of change was then applied to the CO_2 emissions of the subsequent year to determine the CO_2 emission of the current year.

Carbon dioxide emissions from the calcination of dolomite in the primary production of magnesium were calculated based on the *2006 IPCC Guidelines* Tier 2 method by multiplying the estimated primary production of magnesium by an emissions factor of 3.62 kilogram of CO_2 per kilogram of magnesium produced.[66] For 1990 through 1998, production was estimated to be equal to the production capacity of the facility.

1999 through 2010

The 1999 through 2010 emissions from primary and secondary production were based on information provided by EPA's industry Partners. In some instances, there were years of missing Partner data, including SF_6 consumption and metal processed. For these situations, emissions were estimated through interpolation where possible, or by holding company-reported emissions (as well as production) constant from the previous year. For alternative cover gases, including HFC-134a and FK 5-1-12, mainly reported data was relied upon. That is, unless a Partner reported using an alternative cover gas, it was not assumed it was used. Emissions of alternate gases were also estimated through linear interpolation where possible.

The die casting emission estimates for 1999 through 2010 were also based on information supplied by industry Partners. When a Partner was determined to be no longer in production, its metal production and usage rates were set to zero. Missing data on emissions or metal input was either interpolated or held constant at the last available reported value. In 1999 through 2010, Partners were assumed to account for all die casting tracked by USGS. For 1999, die casters who were not Partners were assumed to be similar to Partners who cast small parts. Due to process requirements, these casters consume larger quantities of SF_6 per metric ton of processed magnesium than casters that process large parts. Consequently, emission estimates from this group of die casters were developed using an average emission factor of 5.2 kg SF_6 per metric ton of magnesium. This emission factor was developed using magnesium production and SF_6 usage data for the year 1999. In 2008, the derived emission factor for die casting began to increase after many years of largely decreasing emission factors. As determined through an analysis of activity data reported from the USGS, this increase is due to a temporary decrease in production at many facilities between 2008 and 2010, which reflects the change in production that occurred during the recession.

The emissions from other casting operations were estimated by multiplying emission factors (kg SF_6 per metric ton of metal produced or processed) by the amount of metal produced or consumed from USGS, with the exception of some years for which Partner sand casting emissions data are available. The emission factors for sand casting activities were acquired through the data reported by the Partnership for 2002 to 2006. For 1999 through 2001, the sandcasting emission factor was held constant at the 2002 Partner-reported level. For 2007 through 2010, the sandcasting Partner did not report and the reported emission factor from 2005 was applied to the Partner and to all other sand casters. Activity data for 2005 was obtained from USGS (USGS 2005b).

The emission factors for primary production, secondary production and sand casting for the 1999 to 2010 are not published to protect company-specific production information. However, the emission factor for primary production has not risen above the average 1995 Partner value of 1.1 kg SF_6 per metric ton. The emission factors

[66] See https://www.ipcc-nggip.iges.or.jp/public/2006gl/pdf/3_Volume3/V3_4_Ch4_Metal_Industry.pdf.

for the other industry sectors (i.e., permanent mold, wrought, and anode casting) were based on discussions with industry representatives. The emission factors for casting activities are provided below in Table 4-99.

The emissions of HFC-134a and FK-5-1-12 were included in the estimates for only instances where Partners reported that information to the Partnership. Emissions of these alternative cover gases were not estimated for instances where emissions were not reported.

Carbon dioxide carrier gas emissions were estimated using the emission factors developed based on GHGRP-reported carrier gas and cover gas data, by production type. It was assumed that the use of carrier gas, by production type, is proportional to the use of cover gases. Therefore, an emission factor, in kg CO_2 per kg cover gas and weighted by the cover gases used, was developed for each of the production types. GHGRP data, on which these emissions factors are based, was available for primary, secondary, die casting and sand casting. The emission factors were applied to the quantity of all cover gases used (SF_6, HFC-134a, and FK-5-1-12) by production type in this time period for producers that reported CO_2 emissions from 2011-2020 through the GHGP. Carrier gas emissions for the 1999 through 2010 time period were only estimated for those Partner companies that reported using CO_2 as a carrier gas through the GHGRP. Using this approach helped ensure time-series consistency. Emissions of carrier gases for permanent mold, wrought, and anode processes were estimated using the ratio of total CO_2 emissions to total cover gas emissions for primary, secondary, die and sand in a given year and the total SF_6 emissions from each permanent mold, wrought, and anodes processes respectively in that same year. CO_2 emissions from the calcination of dolomite were estimated using the same approach as described above. At the end of 2001, the sole magnesium production plant operating in the United States that produced magnesium metal using a dolomitic process that resulted in the release of CO_2 emissions ceased its operations (USGS 1995b through 2020).

Table 4-99: SF_6 Emission Factors (kg SF_6 per metric ton of magnesium)

Year	Die Casting[a]	Permanent Mold	Wrought	Anodes
1999	1.75[b]	2	1	1
2000	0.72	2	1	1
2001	0.72	2	1	1
2002	0.71	2	1	1
2003	0.81	2	1	1
2004	0.79	2	1	1
2005	0.77	2	1	1
2006	0.88	2	1	1
2007	0.64	2	1	1
2008	0.97	2	1	1
2009	1.41	2	1	1
2010	1.43	2	1	1

[a] Weighted average includes all die casters, Partners and non-Partners. For the majority of the time series (2000 through 2010), Partners made up 100 percent of die casters in the United States.

[b] Weighted average that includes an estimated emission factor of 5.2 kg SF_6 per metric ton of magnesium for die casters that do not participate in the Partnership.

2011 through 2021

For 2011 through 2021, for the primary and secondary producers, GHGRP-reported cover and carrier gases emissions data were used. For sand and die casting, some emissions data was obtained through EPA's GHGRP. Additionally, in 2018 a new GHGRP reporter began reporting permanent mold emissions. The balance of the emissions for this industry segment was estimated based on previous Partner reporting (i.e., for Partners that did not report emissions through EPA's GHGRP) or were estimated by multiplying emission factors by the amount of metal produced or consumed. Partners who did not report through EPA's GHGRP were assumed to have continued

to emit SF_6 at the last reported level, which was from 2010 in most cases, unless publicly available sources indicated that these facilities have closed or otherwise eliminated SF_6 emissions from magnesium production (ARB 2015). Many Partners that did report through the GHGRP showed increases in SF_6 emissions driven by increased production related to a continued economic recovery after the 2008 recession. One Partner in particular reported an anonymously large increase in SF_6 emissions from 2010 to 2011, further driving increases in emissions between the two time periods of inventory estimates. All Partners were assumed to have continued to consume magnesium at the last reported level. Where the total metal consumption estimated for the Partners fell below the U.S. total reported by USGS, the difference was multiplied by the emission factors discussed in the section above, i.e., non-partner emission factors. For the other types of production and processing (i.e., permanent mold, wrought, and anode casting), emissions were estimated by multiplying the industry emission factors with the metal production or consumption statistics obtained from USGS (USGS 2022). USGS data for 2021 were not yet available at the time of the analysis, so the 2020 values were held constant through 2021 as an estimate.

Emissions of carrier gases for permanent mold, wrought, and anode processes were estimated using an approach consistent with the 1999 through 2010 time series.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021. *2006 IPCC Guidance* methodologies were used throughout the timeseries, mainly either a Tier 2 or Tier 3 approach depending on available data.

Uncertainty

Uncertainty surrounding the total estimated emissions in 2021 is attributed to the uncertainties around SF_6, HFC-134a, and CO_2 emission estimates. To estimate the uncertainty surrounding the estimated 2021 SF_6 emissions from magnesium production and processing, the uncertainties associated with three variables were estimated: (1) emissions reported by magnesium producers and processors for 2021 through EPA's GHGRP, (2) emissions estimated for magnesium producers and processors that reported via the Partnership in prior years but did not report 2021 emissions through EPA's GHGRP, and (3) emissions estimated for magnesium producers and processors that did not participate in the Partnership or report through EPA's GHGRP. An uncertainty of 5 percent was assigned to the emissions (usage) data reported by each GHGRP reporter for all the cover and carrier gases (per the *2006 IPCC Guidelines*). If facilities did not report emissions data during the current reporting year through EPA's GHGRP, SF_6 emissions data were held constant at the most recent available value reported through the Partnership. The uncertainty associated with these values was estimated to be 30 percent for each year of extrapolation (per the *2006 IPCC Guidelines*). The uncertainty of the total inventory estimate remained relatively constant between 2020 and 2021.

Alternate cover gas and carrier gases data was set equal to zero if the facilities did not report via the GHGRP. For those industry processes that are not represented in the Partnership, such as permanent mold and wrought casting, SF_6 emissions were estimated using production and consumption statistics reported by USGS and estimated process-specific emission factors (see Table 4-100). The uncertainties associated with the emission factors and USGS-reported statistics were assumed to be 75 percent and 25 percent, respectively. Emissions associated with die casting and sand casting activities utilized emission factors based on Partner reported data with an uncertainty of 75 percent. In general, where precise quantitative information was not available on the uncertainty of a parameter, a conservative (upper-bound) value was used.

Additional uncertainties exist in these estimates that are not addressed in this methodology, such as the basic assumption that SF_6 neither reacts nor decomposes during use. The melt surface reactions and high temperatures associated with molten magnesium could potentially cause some gas degradation. Previous measurement studies have identified SF_6 cover gas degradation in die casting applications on the order of 20 percent (Bartos et al. 2007). Sulfur hexafluoride may also be used as a cover gas for the casting of molten aluminum with high magnesium content; however, the extent to which this technique is used in the United States is unknown.

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-100. Total emissions associated with magnesium production and processing were estimated to be between 1.08 and 1.24 MMT CO_2 Eq.

at the 95 percent confidence level. This indicates a range of approximately 7.0 percent below to 7.1 percent above the 2021 emission estimate of 1.16 MMT CO_2 Eq. The uncertainty estimates for 2021 are slightly lower to the uncertainty reported for 2020 in the previous Inventory. This decrease in uncertainty is attributed to the increased proportion of SF_6 emissions that were calculated using data from GHGRP reporting facilities, which are more accurate than emissions calculated using proxy or estimation methods for non-reporters.

Table 4-100: Approach 2 Quantitative Uncertainty Estimates for SF_6, HFC-134a and CO_2 Emissions from Magnesium Production and Processing (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Magnesium Production	SF_6, HFC-134a, CO_2	1.2	1.1	1.2	-7.0%	7.1%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the U.S. Inventory QA/QC plan, which is in accordance with Volume 1, Chapter 6 of *2006 IPCC Guidelines* as described in the introduction of the IPPU chapter (see Annex 8 for more details). For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[67] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

Recalculations Discussion

GHGRP-reported emissions for CO_2 and SF_6 were updated for a die casting and a permanent mold facility for their 2020 reported emissions data resulting in resulting in decreased 2020 CO_2 and SF_6 emissions. Another die casting facility that was a late reporters to the GHGRP have had emissions back casted to 2001, increasing SF_6 emissions in those years (Kramer 2000). CO_2 emissions from one facility which was previously interpolated for 2014 has emissions data available on the FLIGHT tool and has been updated accordingly, resulting in a decrease in 2014 CO_2 emissions.

One facility's Fluorinated Ketone and CO_2 emissions from 2016 were updated as an interpolation between reported 2015 and 2017 emissions, in alignment with previous updates to that facility's SF_6 emissions, leading to increased CO_2 emissions and decreased fluorinated ketone emissions. HFC-134a emissions from one facility which were not previously accounted in the estimate summary have been accounted for, leading to an increase in 2019 HFC-134a emissions. CO_2 emissions from one facility were previously held constant from their 2018 emissions, further research indicated that holding emissions from their 2017 emissions was more reflective of current conditions and was updated, resulting in increased 2019 and 2020 CO_2 emissions from that facility.

[67] GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

In addition, for the current Inventory, estimates of gas emissions from SF_6, HFC-134a, CO_2, and Fluorinated Ketone have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP value for SF_6 increased from 22,800 to 23,500 leading to an increase in emissions. The GWP value for HFC-13a decreased from 1,430 to 1,300 leading to a decrease in emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in SF_6 emissions was a 3.1 percent increase and the average annual change in HFC-134a emissions was 4.5 percent decrease for the time series. While the GWP value CO_2 remained the same, calculations of CO_2 emissions from Permanent Mold, Wrought, and Anode Emissions tied to emissions of SF_6 led to 0.02 percent increase in CO_2 emissions. Overall, emissions from magnesium production and processing increased over the time series. The net impact from these updates was an average annual 2.8 percent increase in emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Cover gas research conducted over the last decade has found that SF_6 used for magnesium melt protection can have degradation rates on the order of 20 percent in die casting applications (Bartos et al. 2007). Current emission estimates assume (per the *2006 IPCC Guidelines*) that all SF_6 utilized is emitted to the atmosphere. Additional research may lead to a revision of the *2006 IPCC Guidelines* to reflect this phenomenon and until such time, developments in this sector will be monitored for possible application to the Inventory methodology.

Additional emissions are generated as byproducts from the use of alternate cover gases, which are not currently accounted for. Research on this topic is developing, and as reliable emission factors become available, these emissions will be incorporated into the Inventory.

An additional die casting facility that was a late reporter to the GHGRP will have emissions back cast based on further outreach to determine what years they started die casting. This value will be taken out of the non-reported emissions from die casters for the years affected.

4.21 Lead Production (CRF Source Category 2C5)

In 2021, lead was produced in the United States using only secondary production processes. Until 2014, lead production in the United States involved both primary and secondary processes—both of which emit carbon dioxide (CO_2) (Sjardin 2003). Emissions from fuels consumed for energy purposes during the production of lead are accounted for in the Energy chapter.

Primary production of lead through the direct smelting of lead concentrate produces CO_2 emissions as the lead concentrates are reduced in a furnace using metallurgical coke (Sjardin 2003). Primary lead production, in the form of direct smelting, previously occurred at a single smelter in Missouri. This primary lead smelter was closed at the end of 2013, and a small amount of residual lead was processed during demolition of the facility in 2014 (USGS 2015). Beginning in 2015, primary lead production no longer occurred in the United States.

Similar to primary lead production, CO_2 emissions from secondary lead production result when a reducing agent, usually metallurgical coke, is added to the smelter to aid in the reduction process. Carbon dioxide emissions from secondary production also occur through the treatment of secondary raw materials (Sjardin 2003). Secondary production primarily involves the recycling of lead acid batteries and post-consumer scrap at secondary smelters. Secondary lead production in the United States has fluctuated over the past 20 years, reaching a high of 1,180,000

metric tons in 2007, and declined for three successive years between 2019 and 2021. In 2021, secondary lead production accounted for 100 percent of total U.S. lead production. The lead-acid battery industry accounted for about 92 percent of the reported U.S. lead consumption in 2021 (USGS 2022b).

In 2021, secondary lead production in the United States decreased by approximately 4 percent compared to 2020, due to the closure of a secondary lead smelter in South Carolina (Battery Industry 2021) and reduced production from several other secondary lead smelters (USGS 2022b). Secondary lead production in 2021 is 7 percent higher than in 1990 (USGS 1994 and 2022b). The United States has become more reliant on imported refined lead, owing to the closure of the last primary lead smelter in 2013. Exports of spent starting-lighting-ignition (SLI) batteries decreased between 2014 and 2017, and subsequently recovered beginning in 2018. Exports were 14 percent higher in the first 9 months of 2021 compared to the same time period in 2014 (USGS 2015 through 2022b). In the first 9 months of 2021, 25.5 million spent SLI lead-acid batteries were exported, 29 percent more than that in the same time period in 2020 (USGS 2022b).

Emissions of CO_2 from lead production in 2021 were 0.4 MMT CO_2 Eq. (446 kt), which is a 4 percent decrease compared to 2020 and a 14 percent decrease compared to 1990 (see Table 4-101 and Table 4-102).

The United States was the third largest mine producer of lead in the world, behind China and Australia, and accounted for approximately 7 percent of world production in 2021 (USGS 2022b).

Table 4-101: CO_2 Emissions from Lead Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Lead Production	0.5	0.6	0.5	0.5	0.5	0.5	0.4

Table 4-102: CO_2 Emissions from Lead Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Lead Production	516	553	513	527	531	464	446

Methodology and Time-Series Consistency

The methods used to estimate emissions for lead production[68] are based on Sjardin's work (Sjardin 2003) for lead production emissions and Tier 1 methods from the *2006 IPCC Guidelines*. The Tier 1 equation is as follows:

Equation 4-15: *2006 IPCC Guidelines* Tier 1: CO_2 Emissions From Lead Production (Equation 4.32)

$$CO_2\ Emissions = (DS \times EF_{DS}) + (S \times EF_S)$$

where,

DS = Lead produced by direct smelting, metric ton

S = Lead produced from secondary materials

EF_{DS} = Emission factor for direct smelting, metric tons CO_2/metric ton lead product

EF_S = Emission factor for secondary materials, metric tons CO_2/metric ton lead product

For primary lead production using direct smelting, Sjardin (2003) and the *2006 IPCC Guidelines* provide an emission factor of 0.25 metric tons CO_2/metric ton lead. For secondary lead production, Sjardin (2003) and the *2006 IPCC Guidelines* provide an emission factor of 0.25 metric tons CO_2/metric ton lead for direct smelting, as well as an

[68] EPA has not integrated aggregated facility-level Greenhouse Gas Reporting Program (GHGRP) information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with Lead Production did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

emission factor of 0.2 metric tons CO_2/metric ton lead produced for the treatment of secondary raw materials (i.e., pretreatment of lead acid batteries). Since the secondary production of lead involves both the use of the direct smelting process and the treatment of secondary raw materials, Sjardin recommends an additive emission factor to be used in conjunction with the secondary lead production quantity. The direct smelting factor (0.25) and the sum of the direct smelting and pretreatment emission factors (0.45) are multiplied by total U.S. primary and secondary lead production, respectively, to estimate CO_2 emissions.

The production and use of coking coal for lead production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (Section 3.1 Fossil Fuel Combustion (CRF Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

The 1990 through 2021 activity data for primary and secondary lead production (see Table 4-103) were obtained from the U.S. Geological Survey (USGS 1995 through 2022b).

Table 4-103: Lead Production (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Primary	404,000	143,000	0	0	0	0	0
Secondary	922,000	1,150,000	1,140,000	1,170,000	1,180,000	1,030,000	990,000

Methodological approaches discussed below were applied to applicable years to ensure time-series consistency in emissions from 1990 through 2021.

Uncertainty

Uncertainty associated with lead production relates to the emission factors and activity data used. The direct smelting emission factor used in primary production is taken from Sjardin (2003) who averaged the values provided by three other studies (Dutrizac et al. 2000; Morris et al. 1983; Ullman 1997). For secondary production, Sjardin (2003) added a CO_2 emission factor associated with battery treatment. The applicability of these emission factors to plants in the United States is uncertain. EPA assigned an uncertainty range of ±20 percent for these emission factors, and using this suggested uncertainty provided in Table 4.23 of the *2006 IPCC Guidelines* for a Tier 1 emission factor by process type is appropriate based on expert judgment (RTI 2023).

There is also a smaller level of uncertainty associated with the accuracy of primary and secondary production data provided by the USGS which is collected via voluntary surveys; the uncertainty of the activity data is a function of the reliability of reported plant-level production data and the completeness of the survey response. EPA currently uses an uncertainty range of ±10 percent for primary and secondary lead production, and using this suggested uncertainty provided in Table 4.23 of the *2006 IPCC Guidelines* for Tier 1 national production data is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-104. Lead production CO_2 emissions in 2021 were estimated to be between 0.4 and 0.5 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 15 percent below and 15 percent above the emission estimate of 0.4 MMT CO_2 Eq.

Table 4-104: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Lead Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Lead Production	CO_2	0.4	0.4	0.5	-15%	+15%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Initial review of activity data show that EPA's GHGRP Subpart R lead production data and resulting emissions are fairly consistent with those reported by USGS. EPA is still reviewing available GHGRP data, reviewing QC analysis to understand differences in data reporting (i.e., threshold implications), and assessing the possibility of including this planned improvement in future Inventory reports (see Planned Improvements section below). Currently, GHGRP data are used for QA purposes only.

Recalculations Discussion

Recalculations were implemented for 2014, 2018, 2019, and 2020, based on revised USGS data for secondary lead production. Compared to the previous Inventory, emissions increased by 4 percent (18 kt CO_2) for 2014, 3 percent (14 kt CO_2) for 2018, and less than 1 percent (4 kt CO_2) for 2019. Emissions decreased by 6 percent (31 kt CO_2) for 2020.

Planned Improvements

Pending resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC for the Lead Production source category, in particular considering completeness of reported lead production given the reporting threshold. Particular attention will be made to ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[69]

4.22 Zinc Production (CRF Source Category 2C6)

Zinc production in the United States consists of both primary and secondary processes. Of the primary and secondary processes currently used in the United States, only the electrothermic and Waelz kiln secondary processes result in non-energy carbon dioxide (CO_2) emissions (Viklund-White 2000). Emissions from fuels consumed for energy purposes during the production of zinc are accounted for in the Energy chapter.

[69] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

The majority of zinc produced in the United States is used for galvanizing. Galvanizing is a process where zinc coating is applied to steel in order to prevent corrosion. Zinc is used extensively for galvanizing operations in the automotive and construction industry. Zinc is also used in the production of zinc alloys and brass and bronze alloys (e.g., brass mills, copper foundries, and copper ingot manufacturing). Zinc compounds and dust are also used, to a lesser extent, by the agriculture, chemicals, paint, and rubber industries.

Production of zinc can be conducted with a range of pyrometallurgical (e.g., electrothermic furnace, Waelz kiln, flame reactor, batch retorts, Pinto process, and PIZO process) and hydrometallurgical (e.g., hydrometallurgical recovery, solvent recovery, solvent extraction-electrowinning, and electrolytic) processes. Hydrometallurgical production processes are assumed to be non-emissive since no carbon is used in these processes (Sjardin 2003). Primary production in the United States is conducted through the electrolytic process, while secondary techniques include the electrothermic and Waelz kiln processes, as well as a range of other processes. Worldwide primary zinc production also employs a pyrometallurgical process using an Imperial Smelting Furnace; however, this process is not used in the United States (Sjardin 2003).

In the electrothermic process, roasted zinc concentrate and secondary zinc products enter a sinter feed where they are burned to remove impurities before entering an electric retort furnace. Metallurgical coke is added to the electric retort furnace as a carbon-containing reductant. This concentration step, using metallurgical coke and high temperatures, reduces the zinc oxides and produces vaporized zinc, which is then captured in a vacuum condenser. This reduction process also generates non-energy CO_2 emissions.

$$ZnO + C \rightarrow Zn(gas) + CO_2 \qquad \text{(Reaction 1)}$$

$$ZnO + CO \rightarrow Zn(gas) + CO_2 \qquad \text{(Reaction 2)}$$

In the Waelz kiln process, electric arc furnace (EAF) dust, which is captured during the recycling of galvanized steel, enters a kiln along with a reducing agent (typically carbon-containing metallurgical coke). When kiln temperatures reach approximately 1,100 to 1,200 degrees Celsius, zinc fumes are produced, which are combusted with air entering the kiln. This combustion forms zinc oxide, which is collected in a baghouse or electrostatic precipitator, and is then leached to remove chloride and fluoride. The use of carbon-containing metallurgical coke in a high-temperature fuming process results in non-energy CO_2 emissions. Through this process, approximately 0.33 metric tons of zinc is produced for every metric ton of EAF dust treated (Viklund-White 2000).

In the flame reactor process, a waste feed stream, which can include EAF dust, is processed in a high-temperature environment (greater than 2,000 °C) created by the combustion of natural gas or coal and oxygen-enriched air. Volatile metals, including zinc, are forced into the gas phase and drawn into a combustion chamber, where air is introduced and oxidation occurs. The metal oxide product is then collected in a dust collection system (EPA 1992).

In 2021, the only companies in the United States that used emissive technology to produce secondary zinc products were Befesa Holding US Inc (Befesa) and Steel Dust Recycling (SDR). The secondary zinc facilities operated by Befesa were acquired from American Zinc Recycling (AZR) (formerly “Horsehead Corporation”) in 2021. PIZO Operating Company, LLC (PIZO) operated a secondary zinc production facility that processed EAF dust in Blytheville, AR from 2009 to 2012.

For Befesa, EAF dust is recycled in Waelz kilns at their Calumet, IL; Palmerton, PA; Rockwood, TN; and Barnwell, SC facilities. The former AZR facility in Beaumont, TX processed EAF dust via flame reactor from 1993 through 2009 (AZR 2021; Horsehead 2014). These Waelz kiln and flame reactor facilities produce intermediate zinc products (crude zinc oxide or calcine). Prior to 2014, most of output from these facilities were transported to their Monaca, PA facility where the products were smelted into refined zinc using electrothermic technology. In April 2014, the Monaca smelter was permanently closed and replaced by a new facility in Mooresboro, NC in 2014.

The Mooresboro facility uses a hydrometallurgical process (i.e., solvent extraction with electrowinning technology) to produce zinc products, which is assumed to be non-emissive as described above. Production at the Mooresboro facility was idled in April 2016 and re-started in March 2020, with plans to be at full capacity by 2021 (Recycling Today 2020). Direct consumption of coal, coke, and natural gas were replaced with electricity consumption (Horsehead 2012b). The Mooresboro facility uses leaching and solvent extraction (SX) technology combined with

electrowinning, melting, and casting technology. In this process, Waelz Oxide (WOX) is first washed in water to remove soluble elements such as chlorine, potassium, and sodium, and then is leached in a sulfuric acid solution to dissolve the contained zinc creating a pregnant liquor solution (PLS). The PLS is then processed in a solvent extraction step in which zinc is selectively extracted from the PLS using an organic solvent creating a purified zinc-loaded electrolyte solution. The loaded electrolyte solution is then fed into the electrowinning process in which electrical energy is applied across a series of anodes and cathodes submerged in the electrolyte solution causing the zinc to deposit on the surfaces of the cathodes. As the zinc metal builds up on these surfaces, the cathodes are periodically harvested in order to strip the zinc from their surfaces (Horsehead 2015).

SDR recycles EAF dust into intermediate zinc products using Waelz kilns and sells the intermediate products to companies who smelt it into refined products.

Emissions of CO_2 from zinc production in 2021 were estimated to be 1.0 MMT CO_2 Eq. (969 kt CO_2) (see Table 4-105 and Table 4-106). All 2021 CO_2 emissions resulted from secondary zinc production processes. Emissions from zinc production in the United States have increased overall since 1990 due to a gradual shift from non-emissive primary production to emissive secondary production. In 2021, emissions were estimated to be 53 percent higher than they were in 1990. Emissions decreased 1 percent from 2020 levels.

In 2021, global zinc mine production, or primary production, recovered from the reduced output experienced in 2020 due largely to the COVID-19 pandemic. U.S. primary zinc production mirrored this global trend. While total refined zinc production increased in 2020 due to the reopening of an idled secondary zinc refinery, consumption of refined zinc decreased in association with a decline in the U.S. steel industry as a result of the COVID-19 pandemic. Refined zinc production increased in 2021, along with zinc consumption (USGS 2022).

Table 4-105: CO_2 Emissions from Zinc Production (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Zinc Production	0.6	1.0	0.9	1.0	1.0	1.0	1.0

Table 4-106: CO_2 Emissions from Zinc Production (kt CO_2)

Year	1990	2005	2017	2018	2019	2020	2021
Zinc Production	632	1,030	900	999	1,026	977	969

In 2021, United States primary and secondary refined zinc production were estimated to total 220,000 metric tons (USGS 2022) (see Table 4-107). Domestic zinc mine production increased in 2021 compared to 2020 owing partially to a decrease in production at the Red Dog Mine in Alaska and the closure of the Pend Oreille Mine in Washington State in July 2019. Primary zinc production (primary slab zinc) in 2018 is used as an estimate for 2019 through 2021 due to the lack of available data. Secondary zinc production in 2020 increased by 250 percent compared to 2019 and was largely influenced by the reopening of the idled AZR secondary zinc refinery in Mooresboro, NC in March 2020 (USGS 2021; AZP 2021). From 2020 to 2021, secondary zinc production increased by 51 percent. Secondary zinc production from the reopened facility was estimated by subtracting estimated primary zinc production from the total zinc production value obtained from the USGS *Minerals Yearbook: Zinc*. Production of secondary zinc reached its lowest point in the time series in 2019, following the closure of the Monaca, PA smelter in 2014 and technical and environmental issues with the Mooresboro, NC facility which reopened in 2020, as noted above.

Table 4-107: Zinc Production (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
Primary	262,704	191,120	117,000	101,000	101,000	101,000	101,000
Secondary	95,708	156,000	15,000	15,000	14,000	79,000	119,000
Total	**358,412**	**347,120**	**132,000**	**116,000**	**115,000**	**180,000**	**220,000**

Methodology and Time-Series Consistency

The methods used to estimate non-energy CO_2 emissions from zinc production[70] using the electrothermic primary production and Waelz kiln secondary production processes are based on Tier 1 methods from the *2006 IPCC Guidelines* (IPCC 2006). The Tier 1 equation used to estimate emissions from zinc production is as follows:

Equation 4-16: *2006 IPCC Guidelines* Tier 1: CO_2 Emissions From Zinc Production (Equation 4.33)

$$E_{CO2} = Zn \times EF_{default}$$

where,

E_{CO2}	=	CO_2 emissions from zinc production, metric tons
Zn	=	Quantity of zinc produced, metric tons
$EF_{default}$	=	Default emission factor, metric tons CO_2/metric ton zinc produced

The Tier 1 emission factors provided by IPCC for Waelz kiln-based secondary production were derived from metallurgical coke consumption factors and other data presented in Vikland-White (2000). These coke consumption factors as well as other inputs used to develop the Waelz kiln emission factors are shown below. IPCC does not provide an emission factor for electrothermic processes due to limited information; therefore, the Waelz kiln-specific emission factors were also applied to zinc produced from electrothermic processes. Starting in 2014, refined zinc produced in the United States used hydrometallurgical processes and is assumed to be non-emissive.

For Waelz kiln-based production, IPCC recommends the use of emission factors based on EAF dust consumption, if possible, rather than the amount of zinc produced since the amount of reduction materials used is more directly dependent on the amount of EAF dust consumed. Since only a portion of emissive zinc production facilities consume EAF dust, the emission factor based on zinc production is applied to the non-EAF dust consuming facilities, while the emission factor based on EAF dust consumption is applied to EAF dust consuming facilities.

The Waelz kiln emission factor based on the amount of zinc produced was developed based on the amount of metallurgical coke consumed for non-energy purposes per ton of zinc produced (i.e., 1.19 metric tons coke/metric ton zinc produced) (Viklund-White 2000), and the following equation:

Equation 4-17: Waelz Kiln CO_2 Emission Factor for Zinc Produced

$$EF_{Waelz\ Kiln} = \frac{1.19\ metric\ tons\ coke}{metric\ tons\ zinc} \times \frac{0.85\ metric\ tons\ C}{metric\ tons\ coke} \times \frac{3.67\ metric\ tons\ CO_2}{metric\ tons\ C} = \frac{3.70\ metric\ tons\ CO_2}{metric\ tons\ zinc}$$

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. Refined zinc production levels for AZR's Monaca, PA facility (utilizing electrothermic technology) were available from the company for years 2005 through 2013 (Horsehead 2008, 2011, 2012, 2013, and 2014). The Monaca facility was permanently shut down in April 2014 and replaced by AZR's new facility in Mooresboro, NC. The new facility uses hydrometallurgical process to produce refined zinc products. Hydrometallurgical production processes are assumed to be non-emissive since no carbon is used in these processes (Sjardin 2003).

Metallurgical coke consumption for non-EAF dust consuming facilities for 1990 through 2004 were extrapolated using the percentage change in annual refined zinc production at secondary smelters in the United States, as provided by the U.S. Geological Survey (USGS) *Minerals Yearbook: Zinc* (USGS 1995 through 2006). Metallurgical

[70] EPA has not integrated aggregated facility-level Greenhouse Gas Reporting Program (GHGRP) information to inform these estimates. The aggregated information (e.g., activity data and emissions) associated with Zinc Production did not meet criteria to shield underlying confidential business information (CBI) from public disclosure.

coke consumption for 2005 through 2013 were based on the secondary zinc production values obtained from the Horsehead Corporation Annual Report Form 10-K: 2005 through 2008 from the 2008 10-K (Horsehead Corp 2009); 2009 and 2010 from the 2010 10-K (Horsehead Corp. 2011); and 2011 through 2013 from the associated 10-K (Horsehead Corp. 2012a, 2013, 2014). Metallurgical coke consumption levels for 2014 and later were zero due to the closure of the AZR (formerly "Horsehead Corporation") electrothermic furnace facility in Monaca, PA. The secondary zinc produced values for each year were then multiplied by the 3.70 metric tons CO_2/metric ton zinc produced emission factor to develop CO_2 emission estimates for the AZR electrothermic furnace facility.

The Waelz kiln emission factor based on the amount of EAF dust consumed was developed based on the amount of metallurgical coke consumed per ton of EAF dust consumed (i.e., 0.4 metric tons coke/metric ton EAF dust consumed) (Viklund-White 2000), and the following equation:

Equation 4-18: Waelz Kiln CO_2 Emission Factor for EAF Dust Consumed

$$EF_{EAF\ Dust} = \frac{0.4\ metric\ tons\ coke}{metric\ tons\ EAF\ Dust} \times \frac{0.85\ metric\ tons\ C}{metric\ tons\ coke} \times \frac{3.67\ metric\ tons\ CO_2}{metric\ tons\ C} = \frac{1.24\ metric\ tons\ CO_2}{metric\ tons\ EAF\ Dust}$$

Metallurgical coke consumption for EAF dust consuming facilities for 1990 through 2021 were calculated based on the values of EAF dust consumed. The values of EAF dust consumed for Befesa, SDR, and PIZO are explained below. The total amount of EAF dust consumed by the Waelz kilns currently operated by Befesa was available from AZR (formerly "Horsehead Corporation") in financial reports for years 2006 through 2015 (Horsehead 2007, 2008, 2010a, 2011, 2012a, 2013, 2014, 2015, and 2016), from correspondence with AZR for 2016through 2019 (AZR 2020), and from correspondence with Befesa for 2020 and 2021 (Befesa 2022). The EAF dust consumption values for each year were then multiplied by the 1.24 metric tons CO_2/metric ton EAF dust consumed emission factor to develop CO_2 emission estimates for Befesa's Waelz kiln facilities.

The amount of EAF dust consumed by SDR and their total production capacity were obtained from SDR's facility in Alabama for the years 2011 through 2021 (SDR 2012, 2014, 2015, 2017, 2018, 2021, 2022). The SDR facility has been operational since 2008, underwent expansion in 2011 to include a second unit (operational since early- to mid-2012), and expanded its capacity again in 2017 (SDR 2018). Annual consumption data for SDR was not publicly available for the years 2008, 2009, and 2010. These data were estimated using data for AZR's Waelz kilns for 2008 through 2010 (Horsehead 2007, 2008, 2010a, 2010b, 2011). Annual capacity utilization ratios were calculated using AZR's annual consumption and total capacity for the years 2008 through 2010. AZR's annual capacity utilization ratios were multiplied with SDR's total capacity to estimate SDR's consumption for each of the years, 2008 through 2010 (SDR 2013). The 1.24 metric tons CO_2/metric ton EAF dust consumed emission factor was then applied to SDR's estimated EAF dust consumption to develop CO_2 emission estimates for those Waelz kiln facilities.

PIZO's facility in Arkansas was operational from 2009 to 2012 (PIZO 2021). The amount of EAF dust consumed by PIZO's facility for 2009 through 2012 was not publicly available. EAF dust consumption for PIZO's facility for 2009 and 2010 were estimated by calculating annual capacity utilization of AZR's Waelz kilns and multiplying this utilization ratio by PIZO's total capacity (PIZO 2012). EAF dust consumption for PIZO's facility for 2011 through 2012 were estimated by applying the average annual capacity utilization rates for AZR and SDR (Grupo PROMAX) to PIZO's annual capacity (Horsehead 2012; SDR 2012; PIZO 2012). The 1.24 metric tons CO_2/metric ton EAF dust consumed emission factor was then applied to PIZO's estimated EAF dust consumption to develop CO_2 emission estimates for those Waelz kiln facilities.

The production and use of coking coal for zinc production is adjusted for within the Energy chapter as this fuel was consumed during non-energy related activities. Additional information on the adjustments made within the Energy sector for Non-Energy Use of Fuels is described in both the Methodology section of CO_2 from Fossil Fuel Combustion (3.1 Fossil Fuel Combustion (CRF Source Category 1A)) and Annex 2.1, Methodology for Estimating Emissions of CO_2 from Fossil Fuel Combustion.

Beginning with the 2017 USGS *Minerals Commodity Summary: Zinc*, United States primary and secondary refined zinc production were reported as one value, total refined zinc production. Prior to this publication, primary and secondary refined zinc production statistics were reported separately. For years 2016 through 2021, only one

facility produced primary zinc. Primary zinc produced from this facility was subtracted from the USGS 2016 to 2021 total zinc production statistic to estimate secondary zinc production for these years. Primary zinc production data was not available for 2019 through 2021 and was estimated using 2018 values (Nyrstar 2019).

Uncertainty

The uncertainty associated with these estimates is two-fold, relating to activity data and emission factors used.

First, there is uncertainty associated with the amount of EAF dust consumed in the United States to produce secondary zinc using emission-intensive Waelz kilns. The estimate for the total amount of EAF dust consumed in Waelz kilns is based on combining the totals for (1) the EAF dust consumption value obtained for the kilns currently operated by Befesa (formerly operated by AZR or Horsehead Corporation) and (2) an EAF dust consumption value obtained from the Waelz kiln facility operated by SDR. For the 1990 through 2015 estimates, EAF dust consumption values for the kilns currently operated by Befesa were obtained from annual financial reports to the Securities and Exchange Commission (SEC) by AZR. In 2016, AZR reorganized as a private company and ceased providing annual reports to the SEC (Recycling Today 2017). EAF dust consumption values for subsequent years from the Befesa kilns and SDR have been obtained from personal communication with facility representatives. Since actual EAF dust consumption information is not available for PIZO's facility (2009 through 2010) and SDR's facility (2008 through 2010), the amount is estimated by multiplying the EAF dust recycling capacity of the facility (available from the company's website) by the capacity utilization factor for AZR (which was available from Horsehead Corporation financial reports).The EAF dust consumption for PIZO's facility for 2011 through 2012 was estimated by multiplying the average capacity utilization factor developed from AZR and SDR's annual capacity utilization rates by PIZO's EAF dust recycling capacity. Therefore, there is uncertainty associated with the assumption used to estimate PIZO's annual EAF dust consumption values for 2009 through 2012 and SDR's annual EAF dust consumption values for 2008 through 2010. EPA uses an uncertainty range of ±5 percent for these EAF dust consumption data inputs, based upon expert judgment from the USGS commodity specialist.

Second, there is uncertainty associated with the emission factors used to estimate CO_2 emissions from secondary zinc production processes. The Waelz kiln emission factors are based on materials balances for metallurgical coke and EAF dust consumed as provided by Viklund-White (2000). Therefore, the accuracy of these emission factors depend upon the accuracy of these materials balances. Data limitations prevented the development of emission factors for the electrothermic process. Therefore, emission factors for the Waelz kiln process were applied to both electrothermic and Waelz kiln production processes. EPA assigned an uncertainty range of ±20 percent for the Tier 1 Waelz kiln emission factors, which are provided by Viklund-White in the form of metric tons of coke per metric ton of EAF dust consumed and metric tons of coke per metric ton of zinc produced, and using this suggested uncertainty provided in Table 4.25 of the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023). In order to convert coke consumption rates to CO_2 emission rates, values for the heat and carbon content of coke were obtained from Table 4.2 – Tier 2 of the *2006 IPCC Guidelines*. An uncertainty range of ±10 percent was assigned to these coke data elements, and using these suggested uncertainties provided in Table 4.25 of the *2006 IPCC Guidelines*, Tier 2 – National Reducing Agent & Process Materials Data is appropriate based on expert judgment (RTI 2023).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-108. Zinc production CO_2 emissions from 2021 were estimated to be between 0.8 and 1.2 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 18 percent below and 21 percent above the emission estimate of 1.0 MMT CO_2 Eq.

Table 4-108: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Zinc Production (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Zinc Production	CO_2	1.0	0.8	1.2	-18%	+21%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

Recalculations were performed for the year 2020 based on updated EAF dust consumption data. Compared to the previous Inventory, emissions from zinc production decreased by 3 percent (31 kt CO_2).

Planned Improvements

Pending resources and prioritization of improvements for more significant sources, EPA will continue to evaluate and analyze data reported under EPA's GHGRP that would be useful to improve the emission estimates and category-specific QC for the Zinc Production source category, in particular considering completeness of reported zinc production given the reporting threshold. Given the small number of facilities in the United States, particular attention will be made to risks for disclosing CBI and ensuring time-series consistency of the emissions estimates presented in future Inventory reports, consistent with IPCC and UNFCCC guidelines. This is required as the facility-level reporting data from EPA's GHGRP, with the program's initial requirements for reporting of emissions in calendar year 2010, are not available for all inventory years (i.e., 1990 through 2009) as required for this Inventory. In implementing improvements and integration of data from EPA's GHGRP, the latest guidance from the IPCC on the use of facility-level data in national inventories will be relied upon.[71] This is a long-term planned improvement, and EPA is still assessing the possibility of including this improvement in future Inventory reports.

4.23 Electronics Industry (CRF Source Category 2E)

The electronics industry uses multiple greenhouse gases in its manufacturing processes. In semiconductor manufacturing, these include long-lived fluorinated greenhouse gases used for plasma etching and chamber cleaning (CRF Source Category 2E1), fluorinated heat transfer fluids used for temperature control and other applications (CRF Source Category 2E4), and nitrous oxide (N_2O) used to produce thin films through chemical vapor deposition and in other applications (reported under CRF Source Category 2H3). Similar to semiconductor manufacturing, the manufacturing of micro-electro-mechanical systems (MEMS) devices (reported under CRF

[71] See http://www.ipcc-nggip.iges.or.jp/public/tb/TFI_Technical_Bulletin_1.pdf.

Source Category 2E5 Other) and photovoltaic (PV) cells (CRF Source Category 2E3) requires the use of multiple long-lived fluorinated greenhouse gases for various processes.

The gases most commonly employed in the electronics industry are trifluoromethane (hydrofluorocarbon (HFC)-23 or CHF_3), perfluoromethane (CF_4), perfluoroethane (C_2F_6), nitrogen trifluoride (NF_3), and sulfur hexafluoride (SF_6), although other fluorinated compounds such as perfluoropropane (C_3F_8) and perfluorocyclobutane (c-C_4F_8) are also used. The exact combination of compounds is specific to the process employed.

In addition to emission estimates for these seven commonly used fluorinated gases, this Inventory contains emissions estimates for N_2O and other HFCs and unsaturated, low-GWP PFCs including C_5F_8, C_4F_6, HFC-32, HFC-41, and HFC-134a. These additional HFCs and PFCs are emitted from etching and chamber cleaning processes in much smaller amounts, accounting for 0.02 percent of emissions (in CO_2 Eq.) from these processes.

For semiconductors, a single 300 mm silicon wafer that yields between 400 to 600 semiconductor products (devices or chips) may require more than 100 distinct fluorinated-gas-using process steps, principally to deposit and pattern dielectric films. Plasma etching (or patterning) of dielectric films, such as silicon dioxide and silicon nitride, is performed to provide pathways for conducting material to connect individual circuit components in each device. The patterning process uses plasma-generated fluorine atoms, which chemically react with exposed dielectric film to selectively remove the desired portions of the film. The material removed as well as undissociated fluorinated gases flow into waste streams and, unless emission abatement systems are employed, into the atmosphere. Plasma enhanced chemical vapor deposition (PECVD) chambers, used for depositing dielectric films, are cleaned periodically using fluorinated and other gases. During the cleaning cycle the gas is converted to fluorine atoms in plasma, which etches away residual material from chamber walls, electrodes, and chamber hardware. Undissociated fluorinated gases and other products pass from the chamber to waste streams and, unless abatement systems are employed, into the atmosphere.

In addition to emissions of unreacted gases, some fluorinated compounds can also be transformed in the plasma processes into different fluorinated compounds which are then exhausted, unless abated, into the atmosphere. For example, when C_2F_6 is used in cleaning or etching, CF_4 is typically generated and emitted as a process byproduct. In some cases, emissions of the byproduct gas can rival or even exceed emissions of the input gas, as is the case for NF_3 used in remote plasma chamber cleaning, which often generates CF_4 as a byproduct.

Besides dielectric film etching and PECVD chamber cleaning, much smaller quantities of fluorinated gases are used to etch polysilicon films and refractory metal films like tungsten.

Nitrous oxide is used in manufacturing semiconductor devices to produce thin films by CVD and nitridation processes as well as for N-doping of compound semiconductors and reaction chamber conditioning (Doering 2000).

Liquid perfluorinated compounds are also used as heat transfer fluids (F-HTFs) for temperature control, device testing, cleaning substrate surfaces and other parts, and soldering in certain types of semiconductor manufacturing production processes. Leakage and evaporation of these fluids during use is a source of fluorinated gas emissions (EPA 2006). Unweighted F-HTF emissions consist primarily of perfluorinated amines, hydrofluoroethers, perfluoropolyethers (specifically, PFPMIEs), and perfluoroalkylmorpholines. Three percent or less consist of HFCs, PFCs, and SF_6 (where PFCs are defined as compounds including only carbon and fluorine). With the exceptions of the hydrofluoroethers and most of the HFCs, all of these compounds are very long-lived in the atmosphere and have global warming potentials (GWPs) near 10,000.[72]

[72] The GWP of PFPMIE, a perfluoropolyether used as an F-HTF, is included in the IPCC *Fourth Assessment Report* with a value of 10,300. The GWPs of the perfluorinated amines and perfluoroalkylmorpholines that are used as F-HTFs have not been evaluated in the peer-reviewed literature. However, evaluations by the manufacturer indicate that their GWPs are near 10,000 (78 FR 20632), which is expected given that these compounds are both saturated and fully fluorinated. EPA assigns a default GWP of 10,000 to compounds that are both saturated and fully fluorinated and that do not have chemical-specific GWPs in either the Fourth or the Fifth Assessment Reports.

MEMS and photovoltaic cell manufacturing require thin film deposition and etching of material with a thickness of one micron or more, so the process is less intricate and complex than semiconductor manufacturing. The manufacturing process is different than semiconductors, but generally employs similar techniques. Like semiconductors, MEMS and photovoltaic cell manufacturers use fluorinated compounds for etching, cleaning reactor chambers, and temperature control. CF_4, SF_6, and the Bosch process (which consists of alternating steps of SF_6 and C_4F_8) are used to manufacture MEMS (EPA 2010). Photovoltaic cell manufacturing predominately uses CF_4, to etch crystalline silicon wafers, and C_2F_6 or NF_3 during chamber cleaning after deposition of SiN_x films (IPCC 2006), although other F-GHGs may be used. Similar to semiconductor manufacturing, both MEMS and photovoltaic cell manufacturing use N_2O in depositing films and other manufacturing processes. MEMS and photovoltaic manufacturing may also employ HTFs for cooling process equipment (EPA 2010).

Emissions from all fluorinated greenhouse gases (including F-HTFs) and N_2O for semiconductors, MEMS and photovoltaic cells manducating are presented in Table 4-109 below for the years 1990, 2005, and the period 2017 to 2021. The rapid growth of the electronics industry and the increasing complexity (growing number of layers and functions)[73] of electronic products led to an increase in emissions of 152 percent between 1990 and 1999, when emissions peaked at 8.4 MMT CO_2 Eq. Emissions began to decline after 1999, reaching a low point in 2009 before rebounding to 2006 emission levels and more or less plateauing at the current level, which represents a 43 percent decline from 1999 to 2021. Together, industrial growth, adoption of emissions reduction technologies (including but not limited to abatement technologies) and shifts in gas usages resulted in a net increase in emissions of approximately 45 percent between 1990 and 2021. Total emissions from semiconductor manufacture in 2021 were higher than 2020 emissions, increasing by 10 percent, largely due to a large increase in SF_6 and CF_4 emissions. The increases in SF_6 are seen in facilities that manufacture 200 mm wafer size that do not have abatement systems installed. Increases in CF_4 can be attributed to facilities that manufacture 300 mm wafer sizes that do have abatement systems installed.

For U.S. semiconductor manufacturing in 2021, total CO_2-equivalent emissions of all fluorinated greenhouse gases and N_2O from deposition, etching, and chamber cleaning processes were estimated to be 4.8 MMT CO_2 Eq. This is a decrease in emissions from 1999 of 43 percent, and an increase in emissions from 1990 of 45 percent. These trends are driven by the above stated reasons.

Photovoltaic cell and MEMS manufacturing emissions of all fluorinated greenhouse gases are in Table 4-109. While EPA has developed a simple methodology to estimate emissions from non-reporters and to back-cast emissions from these sources for the entire time series, there is very high uncertainty associated with these emission estimates.

The emissions reported by facilities manufacturing MEMS included emissions of C_2F_6, C_3F_8, c-C_4F_8, CF_4, HFC-23, NF_3, N_2O and SF_6,[74] and were equivalent to only 0.110 percent to 0.249 percent of the total reported emissions from electronics manufacturing in 2011 to 2021. F-GHG emissions, the primary type of emissions for MEMS, ranged from 0.0003 to 0.012 MMT CO_2 Eq. from 1991 to 2021. Based upon information in the World Fab Forecast (WFF), it appears that some GHGRP reporters that manufacture both semiconductors and MEMS are reporting their emissions as only from semiconductor manufacturing (GHGRP reporters must choose a single classification per fab). Emissions from non-reporters have not been estimated.

Total CO_2-equivalent emissions from manufacturing of photovoltaic cells were estimated to range from 0.0003 MMT CO_2 Eq. to 0.0330 MMT CO_2 Eq. from 1998 to 2021 and were equivalent to between 0.003 percent to 0.60

[73] Complexity is a term denoting the circuit required to connect the active circuit elements (transistors) on a chip. Increasing miniaturization, for the same chip size, leads to increasing transistor density, which, in turn, requires more complex interconnections between those transistors. This increasing complexity is manifested by increasing the levels (i.e., layers) of wiring, with each wiring layer requiring fluorinated gas usage for its manufacture.

[74] Gases not reported by MEMS manufacturers to the GHGRP are currently listed as "NE" in the CRF. Since no facilities report using these gases, emissions of these gases are not estimated for this sub-sector. However, there is insufficient data to definitively conclude that they are not used by non-reporting facilities.

percent of the total reported emissions from electronics manufacturing. F-GHG emissions, the primary type of emissions for photovoltaic cells, ranged from 0.0003 to 0.032 MMT CO_2 Eq. from 1998 to 2021. Emissions from manufacturing of photovoltaic cells were estimated using an emission factor developed from reported data from a single manufacturer between 2015 and 2016. This emission factor was then applied to production capacity estimates from non-reporting facilities. Reported emissions from photovoltaic cell manufacturing consisted of CF_4, C_2F_6, c-C_4F_8, CHF_3, NF_3, and N_2O.[75]

Emissions of F-HTFs, grouped by HFCs, PFCs or SF_6 are presented in Table 4-109. Emissions of F-HTFs that are not HFCs, PFCs or SF_6 are not included in inventory totals and are included for informational purposes only.

Since reporting of F-HTF emissions began under EPA's GHGRP in 2011, total F-HTF emissions (reported and estimated non-reported) have fluctuated between 0.6 MMT CO_2 Eq. and 0.9 MMT CO_2 Eq., with an overall declining trend between 2011 to 2021. An analysis of the data reported to EPA's GHGRP indicates that F-HTF emissions account for anywhere between 11 percent and 17 percent of total annual emissions (F-GHG, N_2O and F-HTFs) from semiconductor manufacturing.[76] Table 4-111 shows F-HTF emissions in tons by compound group based on reporting to EPA's GHGRP during years 2014 through 2020.[77]

Table 4-109: PFC, HFC, SF_6, NF_3, and N_2O Emissions from Electronics Industry (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
CF_4	0.8	1.0	1.5	1.6	1.5	1.5	1.6
C_2F_6	1.8	1.8	1.1	1.0	0.9	0.8	0.8
C_3F_8	+	0.1	0.1	0.1	0.1	0.1	0.1
C_4F_8	0.0	0.1	0.1	0.1	0.1	0.1	0.1
HFC-23	0.2	0.2	0.3	0.3	0.3	0.3	0.4
SF_6	0.5	0.8	0.7	0.8	0.8	0.8	0.9
NF_3	+	0.4	0.5	0.5	0.5	0.6	0.6
C_4F_6	+	+	+	+	+	+	+
C_5F_8	+	+	+	+	+	+	+
CH_2F_2	+	+	+	+	+	+	+
CH_3F	+	+	+	+	+	+	+
CH_2FCF_3	+	+	+	+	+	+	+
Total Semiconductors	**3.3**	**4.3**	**4.3**	**4.4**	**4.1**	**4.1**	**4.5**
CF_4	0.0	+	+	+	+	+	+
C_2F_6	0.0	+	+	+	+	+	+
C_3F_8	0.0	+	0.0	0.0	0.0	0.0	0.0
C_4F_8	0.0	+	+	+	+	+	+
HFC-23	0.0	+	+	+	+	+	+
SF_6	0.0	+	+	+	+	+	+
NF_3	0.0	0.0	+	+	+	+	+
Total MEMS	**0.0**	**+**	**+**	**+**	**+**	**+**	**+**
CF_4	0.0	+	+	+	+	+	+

[75] Gases not reported by PV manufacturers to the GHGRP are currently listed as "NE" in the CRF. Since no facilities report using these gases, emissions of these gases are not estimated for this sub-sector. However, there is insufficient data to definitively conclude that they are not used by non-reporting facilities.

[76] Emissions data for HTFs (in tons of gas) from the semiconductor industry from 2011 through 2020 were obtained from the EPA GHGRP annual facility emissions reports.

[77] Many fluorinated heat transfer fluids consist of perfluoropolymethylisopropyl ethers (PFPMIEs) of different molecular weights and boiling points that are distilled from a mixture. "BP 200 °C" (and similar terms below) indicate the boiling point of the fluid in degrees Celsius. For more information, see https://www.regulations.gov/document?D=EPA-HQ-OAR-2009-0927-0276.

C_2F_6	0.0	+	+	+	+	+	+
C_4F_8	0.0	+	+	+	+	+	+
HFC-23	0.0	+	+	+	+	+	+
SF_6	0.0	0.0	0.0	0.0	0.0	0.0	0.0
NF_3	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total PV	**0.0**	**+**	**+**	**+**	**+**	**+**	**+**
N_2O (Semiconductors)	+	0.1	0.2	0.2	0.2	0.3	0.3
N_2O (MEMS)	0.0	+	+	+	+	+	+
N_2O (PV)	0.0	+	+	+	+	+	+
Total N_2O	**+**	**0.1**	**0.2**	**0.2**	**0.2**	**0.3**	**0.3**
HFC, PFC and SF_6 F-HTFs	0.0	+	+	+	+	+	+
Total Electronics Industry	**3.3**	**4.5**	**4.6**	**4.7**	**4.3**	**4.4**	**4.8**

+ Does not exceed 0.05 MMT CO_2 Eq.

Table 4-110: PFC, HFC, SF_6, NF_3, and N_2O Emissions from Semiconductor Manufacture (Metric Tons)

Year	1990	2005	2017	2018	2019	2020	2021
CF_4	114.8	145.3	219.8	234.7	219.1	224.8	236.7
C_2F_6	160.0	163.4	97.7	92.9	79.1	70.4	75.8
C_3F_8	0.4	7.3	11.7	12.1	10.1	9.0	10.6
C_4F_8	0.0	10.9	5.8	6.0	5.7	5.7	6.3
HFC-23	14.6	14.1	25.7	26.5	25.5	26.6	30.3
SF_6	21.7	33.4	30.1	33.2	32.3	31.9	38.4
NF_3	2.8	26.2	32.8	34.0	33.1	36.0	39.5
C_4F_6	0.7	0.9	0.9	0.8	0.9	0.8	1.0
C_5F_8	0.5	0.6	0.8	0.5	1.2	0.4	0.4
CH_2F_2	0.6	0.8	1.1	0.9	1.0	1.1	1.0
CH_3F	1.4	1.8	2.3	2.4	2.5	2.8	2.9
CH_2FCF_3	+	+	+	+	+	+	+
N_2O	135.9	463.3	912.9	853.8	781.6	993.9	1,062.1

+ Does not exceed 0.05 MT.

Table 4-111: F-HTF Emissions from Electronics Manufacture by Compound Group (kt CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
HFCs	0.0	1.0	3.6	2.7	1.1	0.9	1.1
PFCs	0.0	3.8	9.1	10.0	8.4	7.8	5.4
SF_6	0.0	5.4	16.7	13.2	6.0	12.8	9.0
HFEs	0.0	41.2	2.9	4.6	1.3	5.3	3.8
PFPMIEs	0.0	109.8	148.5	183.0	171.7	150.2	148.3
Perfluoalkylromorpholines	0.0	65.9	52.3	58.6	56.5	61.0	53.5
Perfluorotrialkylamines	0.0	208.6	384.1	410.7	363.6	380.4	359.8
Total F-HTFs	**0.0**	**435.8**	**617.2**	**682.8**	**608.6**	**618.3**	**580.9**

Note: Emissions of F-HTFs that are not HFCs, PFCs or SF_6 are not included in inventory totals and are included for informational purposes only. Emissions presented for informational purposes include HFEs, PFPMIEs, perfluoroalkylmorpholines, and perfluorotrialkylamines.

Methodology and Time-Series Consistency

Emissions are based on data reported through Subpart I, Electronics Manufacture, of EPA's GHGRP, semiconductor manufacturing Partner-reported emissions data received through EPA's PFC[78] Reduction/Climate Partnership, EPA's PFC Emissions Vintage Model (PEVM)—a model that estimates industry emissions from etching and chamber cleaning processes in the absence of emission control strategies (Burton and Beizaie 2001)[79]—and estimates of industry activity (i.e., total manufactured layer area and manufacturing capacity). The availability and applicability of reported emissions data from the EPA Partnership and EPA's GHGRP and activity data differ across the 1990 through 2021 time series. Consequently, fluorinated greenhouse gas (F-GHG) emissions from etching and chamber cleaning processes for semiconductors were estimated using seven distinct methods, one each for the periods 1990 through 1994, 1995 through 1999, 2000 through 2006, 2007 through 2010, 2011 and 2012, 2013 and 2014, and 2015 through 2021. Nitrous oxide emissions were estimated using five distinct methods, one each for the period 1990 through 1994, 1995 through 2010, 2011 and 2012, 2013 and 2014, and 2015 through 2021. The methodology discussion below for these time periods focuses on semiconductor emissions from etching, chamber cleaning, and uses of N_2O. Other emissions for MEMS, photovoltaic cells, and HTFs were estimated using the approaches described immediately below.

MEMS

GHGRP-reported emissions (F-GHG and N_2O) from the manufacturing of MEMS are available for the years 2011 to 2021. Emissions from manufacturing of MEMS for years prior to 2011 were calculated by linearly interpolating emissions between 1990 (at zero MMT CO_2 Eq.) and 2011, the first year where emissions from manufacturing of MEMS was reported to the GHGRP. Based upon information in the World Fab Forecast (WFF), it appears that some GHGRP reporters that manufacture both semiconductors and MEMS are reporting their emissions as only from semiconductor manufacturing; however, emissions from MEMS manufacturing are likely being included in semiconductor totals. Emissions were not estimated for non-reporters.

Photovoltaic Cells

GHGRP-reported emissions (F-GHG and N_2O) from the manufacturing of photovoltaic cells are available for 2011, 2012, 2015, and 2016 from two manufacturers. EPA estimates the emissions from manufacturing of PVs from non-reporting facilities by multiplying the estimated capacity of non-reporters by a calculated F-GHG emission factor and N_2O emission factor based on GHGRP reported emissions from the manufacturer (in MMT CO_2 Eq. per megawatt) that reported emissions in 2015 and 2016. This manufacture's emissions are expected to be more representative of emissions from the sector, as their emissions were consistent with consuming only CF_4 for etching processes and are a large-scale manufacturer, representing 28 percent of the U.S. production capacity in 2016. The second photovoltaic manufacturer only produced a small fraction of U.S. production (<4 percent). They also reported the use of NF_3 in remote plasma cleaning processes, which does not have an emission factor in Part 98 for PV manufacturing, requiring them to report emissions equal to consumption. The total F-GHG emissions from non-reporters are then disaggregated into individual gases using the gas distribution from the 2015 to 2016 manufacturer. Manufacturing capacities in megawatts were drawn from DisplaySearch, a 2015 Congressional Research Service Report on U.S. Solar Photovoltaic Manufacturing, and self-reported capacity by GHGRP reporters. EPA estimated that during the 2015 to 2016 period, 28 percent of manufacturing capacity in the United States was represented through reported GHGRP emissions. Capacities are estimated for the full time series by linearly scaling the total U.S. capacity between zero in 1997 to the total capacity reported of crystalline silicon (c-Si) PV

[78] In the context of the EPA Partnership and PEVM, PFC refers to perfluorocompounds, not perfluorocarbons.

[79] A Partner refers to a participant in the U.S. EPA PFC Reduction/Climate Partnership for the Semiconductor Industry. Through a Memorandum of Understanding (MoU) with the EPA, Partners voluntarily reported their PFC emissions to the EPA by way of a third party, which aggregated the emissions through 2010.

manufacturing in 2000 in DisplaySearch and then linearly scaling between the total capacity of c-Si PV manufacturing in DisplaySearch in 2009 to the total capacity of c-Si PV manufacturing reported in the Congressional Research Service report in 2012. Capacities were held constant for non-reporters for 2012 to 2019. In 2020, non-reporter capacity declined due to the closure of several PV manufacturing plants. This capacity was held constant for 2021. Average emissions per MW from the GHGRP reporter in 2015 and 2016 were then applied to the total capacity prior to 2015. Emissions for 2014 from the GHGRP reporter that reported in 2015 and 2016 were scaled to the number of months open in 2014. For 1998 through 2021, emissions per MW (capacity) from the GHGRP reporter were applied to the non-reporters. For 2017 through 2021, there are no reported PV emissions. Therefore, emissions were estimated using the EPA-derived emission factor and estimated manufacturing capacity from non-reporters only.

HTFs

Facility emissions of F-HTFs from semiconductor manufacturing are reported to EPA under its GHGRP and are available for the years 2011 through 2021. EPA estimates the emissions of F-HTFs from non-reporting semiconductor facilities by calculating the ratio of GHGRP-reported fluorinated HTF emissions to GHGRP reported F-GHG emissions from etching and chamber cleaning processes, and then multiplying this ratio by the F-GHG emissions from etching and chamber cleaning processes estimated for non-reporting facilities. Fluorinated HTF use in semiconductor manufacturing is assumed to have begun in the early 2000s and to have gradually displaced other HTFs (e.g., de-ionized water and glycol) in semiconductor manufacturing (EPA 2006). For time-series consistency, EPA interpolated the share of F-HTF emissions to F-GHG emissions between 2000 (at 0 percent) and 2011 (at 17 percent) and applied these shares to the unadjusted F-GHG emissions during those years to estimate the fluorinated HTF emissions.

Semiconductors

1990 through 1994

From 1990 through 1994, Partnership data were unavailable, and emissions were modeled using PEVM (Burton and Beizaie 2001).[80] The 1990 to 1994 emissions are assumed to be uncontrolled, since reduction strategies such as chemical substitution and abatement were yet to be developed.

PEVM is based on the recognition that fluorinated greenhouse gas emissions from semiconductor manufacturing vary with: (1) the number of layers that comprise different kinds of semiconductor devices, including both silicon wafer and metal interconnect layers, and (2) silicon consumption (i.e., the area of semiconductors produced) for each kind of device. The product of these two quantities, Total Manufactured Layer Area (TMLA), constitutes the activity data for semiconductor manufacturing. PEVM also incorporates an emission factor that expresses emissions per unit of manufactured layer-area. Emissions are estimated by multiplying TMLA by this emission factor.

PEVM incorporates information on the two attributes of semiconductor devices that affect the number of layers: (1) linewidth technology (the smallest manufactured feature size),[81] and (2) product type (discrete, memory or

[80] Various versions of the PEVM exist to reflect changing industrial practices. From 1990 to 1994 emissions estimates are from PEVM v1.0, completed in September 1998. The emission factor used to estimate 1990 to 1994 emissions is an average of the 1995 and 1996 emissions factors, which were derived from Partner reported data for those years.

[81] By decreasing features of Integrated Circuit components, more components can be manufactured per device, which increases its functionality. However, as those individual components shrink it requires more layers to interconnect them to achieve the functionality. For example, a microprocessor manufactured with 65 nm feature sizes might contain as many as 1 billion transistors and require as many as 11 layers of component interconnects to achieve functionality, while a device

logic).[82] For each linewidth technology, a weighted average number of layers is estimated using VLSI product-specific worldwide silicon demand data in conjunction with complexity factors (i.e., the number of layers per Integrated Circuit (IC) specific to product type (Burton and Beizaie 2001; ITRS 2007). PEVM derives historical consumption of silicon (i.e., square inches) by linewidth technology from published data on annual wafer starts and average wafer size (VLSI Research, Inc. 2012).

The emission factor in PEVM is the average of four historical emission factors, each derived by dividing the total annual emissions reported by the Partners for each of the four years between 1996 and 1999 by the total TMLA estimated for the Partners in each of those years. Over this period, the emission factors varied relatively little (i.e., the relative standard deviation for the average was 5 percent). Since Partners are believed not to have applied significant emission reduction measures before 2000, the resulting average emission factor reflects uncontrolled emissions and hence may be use here to estimate 1990 through 1994 emissions. The emission factor is used to estimate U.S. uncontrolled emissions using publicly available data on world (including U.S.) silicon consumption.

As it was assumed for this time period that there was no consequential adoption of fluorinated-gas-reducing measures, a fixed distribution of fluorinated-gas use was assumed to apply to the entire U.S. industry to estimate gas-specific emissions. This distribution was based upon the average fluorinated-gas purchases made by semiconductor manufacturers during this period and the application of IPCC default emission factors for each gas (Burton and Beizaie 2001).

PEVM only addressed the seven main F-GHGs (CF_4, C_2F_6, C_3F_8, c-C_4F_8, HFC-23, SF_6, and NF_3) used in semiconductor manufacturing. Through reporting under Subpart I of EPA's GHGRP, data on other F-GHGs (C_4F_6, C_5F_8, HFC-32, HFC-41, HFC-134a) used in semiconductor manufacturing became available and EPA was therefore able to extrapolate this data across the entire 1990 to 2021 timeseries. To estimate emissions for these "other F-GHGs", emissions data from Subpart I between 2014 to 2016 were used to estimate the average share or percentage contribution of these gases as compared to total F-GHG emissions. Subpart I emission factors were updated for 2014 by EPA as a result of a larger set of emission factor data becoming available, so reported data from 2011 through 2013 was not utilized for the average. To estimate non-reporter emissions from 2011-2021, the average emissions data from Subpart I of 2011 to 2021 was used.

To estimate N_2O emissions, it was assumed the proportion of N_2O emissions estimated for 1995 (discussed below) remained constant for the period of 1990 through 1994.

1995 through 1999

For 1995 through 1999, total U.S. emissions were extrapolated from the total annual emissions reported by the Partners (1995 through 1999). Partner-reported emissions are considered more representative (e.g., in terms of capacity utilization in a given year) than PEVM-estimated emissions and are used to generate total U.S. emissions when applicable. The emissions reported by the Partners were divided by the ratio of the total capacity of the plants operated by the Partners and the total capacity of all of the semiconductor plants in the United States; this ratio represents the share of capacity attributable to the Partnership. This method assumes that Partners and non-Partners have identical capacity utilizations and distributions of manufacturing technologies. Plant capacity data is contained in the World Fab Forecast (WFF) database and its predecessors, which is updated quarterly. Gas-specific emissions were estimated using the same method as for 1990 through 1994.

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manufactured with 130 nm feature size might contain a few hundred million transistors and require 8 layers of component interconnects (ITRS 2007).

[82] Memory devices manufactured with the same feature sizes as microprocessors (a logic device) require approximately one-half the number of interconnect layers, whereas discrete devices require only a silicon base layer and no interconnect layers (ITRS 2007). Since discrete devices did not start using PFCs appreciably until 2004, they are only accounted for in the PEVM emissions estimates from 2004 onwards.

For this time period emissions of other F-GHGs (C_4F_6, C_5F_8, HFC-32, HFC-41, HFC-134a) were estimated using the method described above for 1990 to 1994.

For this time period, the N_2O emissions were estimated using an emission factor that was applied to the annual, total U.S. TMLA manufactured. The emission factor was developed using a regression-through-the-origin (RTO) model: GHGRP reported N_2O emissions were regressed against the corresponding TMLA of facilities that reported no use of abatement systems. Details on EPA's GHGRP reported emissions and development of emission factor using the RTO model are presented in the 2011 through 2012 section. The total U.S. TMLA for 1995 through 1999 was estimated using PEVM.

2000 through 2006

Emissions for the years 2000 through 2006—the period during which Partners began the consequential application of fluorinated greenhouse gas-reduction measures—were estimated using a combination of Partner-reported emissions and adjusted PEVM modeled emissions. The emissions reported by Partners for each year were accepted as the quantity emitted from the share of the industry represented by those Partners. Remaining emissions, those from non-Partners, were estimated using PEVM, with one change. To ensure time-series consistency and to reflect the increasing use of remote clean technology (which increases the efficiency of the production process while lowering emissions of fluorinated greenhouse gases), the average non-Partner emission factor (PEVM emission factor) was assumed to begin declining gradually during this period. Specifically, the non-Partner emission factor for each year was determined by linear interpolation, using the end points of 1999 (the original PEVM emission factor) and 2011 (a new emission factor determined for the non-Partner population based on GHGRP-reported data, described below).

The portion of the U.S. total emissions attributed to non-Partners is obtained by multiplying PEVM's total U.S. emissions figure by the non-Partner share of U.S. total silicon capacity for each year as described above.[83] Gas-specific emissions from non-Partners were estimated using linear interpolation between the gas-specific emissions distributions of 1999 (assumed to be the same as that of the total U.S. Industry in 1994) and 2011 (calculated from a subset of non-Partners that reported through the GHGRP as a result of emitting more than 25,000 MT CO_2 Eq. per year). Annual updates to PEVM reflect published figures for actual silicon consumption from VLSI Research, Inc., revisions and additions to the world population of semiconductor manufacturing plants, and changes in IC fabrication practices within the semiconductor industry (see ITRS 2008 and Semiconductor Equipment and

[83] This approach assumes that the distribution of linewidth technologies is the same between Partners and non-Partners. As discussed in the description of the method used to estimate 2007 emissions, this is not always the case.

Materials Industry 2011).[84, 85, 86] For this time period emissions of other F-GHGs (C_4F_6, C_5F_8, HFC-32, HFC-41, HFC-134a) were estimated using the method described above for 1990 to 1994.

Nitrous oxide emissions were estimated using the same methodology as the 1995 through 1999 methodology.

2007 through 2010

For the years 2007 through 2010, emissions were also estimated using a combination of Partner reported emissions and adjusted PEVM modeled emissions to provide estimates for non-Partners; however, two improvements were made to the estimation method employed for the previous years in the time series. First, the 2007 through 2010 emission estimates account for the fact that Partners and non-Partners employ different distributions of manufacturing technologies, with the Partners using manufacturing technologies with greater transistor densities and therefore greater numbers of layers.[87] Second, the scope of the 2007 through 2010 estimates was expanded relative to the estimates for the years 2000 through 2006 to include emissions from research and development (R&D) fabs. This additional enhancement was feasible through the use of more detailed data published in the WFF. PEVM databases were updated annually as described above. The published world average capacity utilization for 2007 through 2010 was used for production fabs, while for R&D fabs a 20 percent figure was assumed (SIA 2009).

In addition, publicly available utilization data was used to account for differences in fab utilization for manufacturers of discrete and IC products for 2010 emissions for non-Partners. The Semiconductor Capacity Utilization (SICAS) Reports from SIA provides the global semiconductor industry capacity and utilization, differentiated by discrete and IC products (SIA 2009 through 2011). PEVM estimates were adjusted using technology-weighted capacity shares that reflect the relative influence of different utilization. Gas-specific emissions for non-Partners were estimated using the same method as for 2000 through 2006.

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[84] Special attention was given to the manufacturing capacity of plants that use wafers with 300 mm diameters because the actual capacity of these plants is ramped up to design capacity, typically over a 2 to 3 year period. To prevent overstating estimates of partner-capacity shares from plants using 300 mm wafers, *design* capacities contained in WFF were replaced with estimates of *actual installed* capacities for 2004 published by Citigroup Smith Barney (2005). Without this correction, the partner share of capacity would be overstated, by approximately 5 percent. For perspective, approximately 95 percent of all new capacity additions in 2004 used 300 mm wafers, and by year-end those plants, on average, could operate at approximately 70 percent of the design capacity. For 2005, actual installed capacities were estimated using an entry in the World Fab Watch database (April 2006 Edition) called "wafers/month, 8-inch equivalent," which denoted the actual installed capacity instead of the fully-ramped capacity. For 2006, actual installed capacities of new fabs were estimated using an average monthly ramp rate of 1100 wafer starts per month (wspm) derived from various sources such as semiconductor fabtech, industry analysts, and articles in the trade press. The monthly ramp rate was applied from the first-quarter of silicon volume (FQSV) to determine the average design capacity over the 2006 period.

[85] In 2006, the industry trend in co-ownership of manufacturing facilities continued. Several manufacturers, who are Partners, now operate fabs with other manufacturers, who in some cases are also Partners and in other cases are not Partners. Special attention was given to this occurrence when estimating the Partner and non-Partner shares of U.S. manufacturing capacity.

[86] Two versions of PEVM are used to model non-Partner emissions during this period. For the years 2000 to 2003 PEVM v3.2.0506.0507 was used to estimate non-Partner emissions. During this time, discrete devices did not use PFCs during manufacturing and therefore only memory and logic devices were modeled in the PEVM v3.2.0506.0507. From 2004 onwards, discrete device fabrication started to use PFCs, hence PEVM v4.0.0701.0701, the first version of PEVM to account for PFC emissions from discrete devices, was used to estimate non-Partner emissions for this time period.

[87] EPA considered applying this change to years before 2007 but found that it would be difficult due to the large amount of data (i.e., technology-specific global and non-Partner TMLA) that would have to be examined and manipulated for each year. This effort did not appear to be justified given the relatively small impact of the improvement on the total estimate for 2007 and the fact that the impact of the improvement would likely be lower for earlier years because the estimated share of emissions accounted for by non-Partners is growing as Partners continue to implement emission-reduction efforts.

For this time period emissions of other F-GHGs (C_5F_8, CH_2F_2, CH_3F, CH_2FCF_3, $C_2H_2F_4$) were estimated using the method described above for 1990 to 1994.

Nitrous oxide emissions were estimated using the same methodology as the 1995 through 1999 methodology.

2011 through 2012

The fifth method for estimating emissions from semiconductor manufacturing covers the period 2011 through 2012. This methodology differs from previous years because the EPA's Partnership with the semiconductor industry ended (in 2010) and reporting under EPA's GHGRP began. Manufacturers whose estimated uncontrolled emissions equal or exceed 25,000 MT CO_2 Eq. per year (based on default F-GHG-specific emission factors and total capacity in terms of substrate area) are required to report their emissions to EPA. This population of reporters to EPA's GHGRP included both historical Partners of EPA's PFC Reduction/Climate Partnership as well as non-Partners some of which use gallium arsenide (GaAs) technology in addition to Si technology.[88] Emissions from the population of manufacturers that were below the reporting threshold were also estimated for this time period using EPA-developed emission factors and estimates of facility-specific production obtained from WFF. Inventory totals reflect the emissions from both reporting and non-reporting populations.

Under EPA's GHGRP, semiconductor manufacturing facilities report emissions of F-GHGs (for all types of F-GHGs) used in etch and clean processes as well as emissions of fluorinated heat transfer fluids. (Fluorinated heat transfer fluids are used to control process temperatures, thermally test devices, and clean substrate surfaces, among other applications.) They also report N_2O emissions from CVD and other processes. The F-GHGs and N_2O were aggregated, by gas, across all semiconductor manufacturing GHGRP reporters to calculate gas-specific emissions for the GHGRP-reporting segment of the U.S. industry. At this time, emissions that result from heat transfer fluid use that are HFC, PFC and SF_6 are included in the total emission estimates from semiconductor manufacturing, and these GHGRP-reported emissions have been compiled and presented in Table 4-109. F-HTF emissions resulting from other types of gases (e.g., HFEs) are not presented in semiconductor manufacturing totals in Table 4-109 and Table 4-110 but are shown in Table 4-111 for informational purposes.

Changes to the default emission factors and default destruction or removal efficiencies (DREs) used for GHGRP reporting affected the emissions trend between 2013 and 2014. These changes did not reflect actual emission rate changes but data improvements. Therefore, for the current Inventory, EPA adjusted the time series of GHGRP-reported data for 2011 through 2013 to ensure time-series consistency using a series of calculations that took into account the characteristics of a facility (e.g., wafer size and abatement use). To adjust emissions for facilities that did not report abatement in 2011 through 2013, EPA simply applied the revised emission factors to each facility's estimated gas consumption by gas, process type and wafer size. In 2014, EPA also started collecting information on fab-wide DREs and the gases abated by process type, which were used in calculations for adjusting emissions from facilities that abated F-GHGs in 2011 through 2013.

- To adjust emissions for facilities that abated emissions in 2011 through 2013, EPA first calculated the quantity of gas abated in 2014 using reported F-GHG emissions, the revised default DREs (or the estimated site-specific DRE,[89] if a site-specific DRE was indicated), and the fab-wide DREs reported in 2014.[90] To adjust emissions for facilities that abated emissions in 2011 through 2013, EPA first estimated

[88] GaAs and Si technologies refer to the wafer on which devices are manufactured, which use the same PFCs but in different ways.

[89] EPA generally assumed site-specific DREs were as follows: CF_4, Etch (90 percent); all other gases, Etch (98 percent); NF_3, Clean (95 percent); CF_4, Clean (80 percent), and all other gases, Clean (80 percent). There were a few exceptions where a higher DRE was assumed to ensure the calculations operated correctly when there was 100 percent abatement.

[90] If abatement information was not available for 2014 or the reported incorrectly in 2014, data from 2015 or 2016 was substituted.

the percentage of gas passing through abatement systems for remote plasma clean in 2014 using the ratio of emissions reported for CF_4 and NF_3.

- EPA then estimated the quantity of NF_3 abated for remote plasma clean in 2014 using the ratio of emissions reported for CF_4 (which is not abated) and NF_3. This abated quantity was then subtracted from the total abated quantity calculated as described in the bullet above.
- To account for the resulting remaining abated quantity, EPA assumed that the percentage of gas passing through abatement systems was the same across all remaining gas and process type combinations where abatement was reported for 2014.
- The percentage of gas abated was then assumed to be the same in 2011 through 2013 (if the facility claimed abatement that year) as in 2014 for each gas abated in 2014.

The revised emission factors and DREs were then applied to the estimated gas consumption for each facility by gas, process type and wafer size.[91]

For the segment of the semiconductor industry that is below EPA's GHGRP reporting threshold, and for R&D facilities, which are not covered by EPA's GHGRP, emission estimates are based on EPA-developed emission factors for the F-GHGs and N_2O and estimates of manufacturing activity. The new emission factors (in units of mass of CO_2 Eq./TMLA [million square inches (MSI)]) are based on the emissions reported under EPA's GHGRP by facilities without abatement and on the TMLA estimates for these facilities based on the WFF (SEMI 2012, 2013).[92] In a refinement of the method used to estimate emissions for the non-Partner population for prior years, different emission factors were developed for different subpopulations of fabs, disaggregated by wafer size (200 mm and 300 mm). For each of these groups, a subpopulation-specific emission factor was obtained using a regression-through-the-origin (RTO) model: facility-reported aggregate emissions of seven F-GHGs (CF_4, C_2F_6, C_3F_8, c-C_4F_8, CHF_3, SF_6 and NF_3)[93] were regressed against the corresponding TMLA to estimate an aggregate F-GHG emissions factor (CO_2 Eq./MSI TMLA), and facility-reported N_2O emissions were regressed against the corresponding TMLA to estimate a N_2O emissions factor (CO_2 Eq./MSI TMLA). For each subpopulation, the slope of the RTO model is the emission factor for that subpopulation. Information on the use of point-of-use abatement by non-reporting fabs was not available; thus, EPA conservatively assumed that non-reporting facilities did not use point-of-use abatement.

For 2011 and 2012, estimates of TMLA relied on the capacity utilization of the fabs published by the U.S. Census Bureau's Historical Data Quarterly Survey of Plant Capacity Utilization (USCB 2011, 2012). Similar to the assumption for 2007 through 2010, facilities with only R&D activities were assumed to utilize only 20 percent of their manufacturing capacity. All other facilities in the United States are assumed to utilize the average percent of the manufacturing capacity without distinguishing whether fabs produce discrete products or logic products.

Non-reporting fabs were then broken out into subpopulations by wafer size (200 mm and 300 mm). using information available through the WFF. The appropriate emission factor was applied to the total TMLA of each subpopulation of non-reporting facilities to estimate the CO_2-equivalent emissions of that subpopulation.

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[91] Since facilities did not report by fab before 2014, fab-wide DREs were averaged if a facility had more than one fab. For facilities that reported more than one wafer size per facility, the percentages of a facility's emissions per wafer size were estimated in 2014 and applied to earlier years, if possible. If the percentage of emissions per wafer size were unknown, a 50/50 split was used.

[92] EPA does not have information on fab-wide DREs for this time period, so it is not possible to estimate uncontrolled emissions from fabs that reported point-of-use abatement. These fabs were therefore excluded from the regression analysis. (They are still included in the national totals.)

[93] Only seven gases were aggregated because inclusion of F-GHGs that are not reported in the Inventory results in overestimation of emission factor that is applied to the various non-reporting subpopulations.

Gas-specific, CO_2-equivalent emissions for each subpopulation of non-reporting facilities were estimated using the corresponding reported distribution of gas-specific, CO_2-equivalent emissions from which the aggregate emission factors, based on GHGRP-reported data, were developed. Estimated in this manner, the non-reporting population accounted for 4.9 and 5.0 percent of U.S. emissions in 2011 and 2012, respectively. The GHGRP-reported emissions and the calculated non-reporting population emissions are summed to estimate the total emissions from semiconductor manufacturing.

2013 and 2014

For 2013 and 2014, as for 2011 and 2012, F-GHG and N_2O emissions data received through EPA's GHGRP were aggregated, by gas, across all semiconductor-manufacturing GHGRP reporters to calculate gas-specific emissions for the GHGRP-reporting segment of the U.S. industry. However, for these years WFF data was not available. Therefore, an updated methodology that does not depend on the WFF derived activity data was used to estimate emissions for the segment of the industry that are not covered by EPA's GHGRP. For the facilities that did not report to the GHGRP (i.e., which are below EPA's GHGRP reporting threshold or are R&D facilities), emissions were estimated based on the proportion of total U.S. emissions attributed to non-reporters for 2011 and 2012. EPA used a simple averaging method by first estimating this proportion for both F-GHGs and N_2O for 2011, 2012, and 2015 and 2016, resulting in one set of proportions for F-GHGs and one set for N_2O, and then applied the average of each set to the 2013 and 2014 GHGRP reported emissions to estimate the non-reporters' emissions. Fluorinated gas-specific, CO_2-equivalent emissions for non-reporters were estimated using the corresponding reported distribution of gas-specific, CO_2-equivalent emissions reported through EPA's GHGRP for 2013 and 2014.

GHGRP-reported emissions in 2013 were adjusted to capture changes to the default emission factors and default destruction or removal efficiencies used for GHGRP reporting, affecting the emissions trend between 2013 and 2014. EPA used the same method to make these adjustments as described above for 2011 and 2012 GHGRP data.

2015 through 2021

Similar to the methods described above for 2011 and 2012, and 2013 and 2014, EPA relied upon emissions data reported directly through the GHGRP. For 2015 through 2021, EPA took an approach similar to the one used for 2011 and 2012 to estimate emissions for the segment of the semiconductor industry that is below EPA's GHGRP reporting threshold, and for R&D facilities, which are not covered by EPA's GHGRP. However, in a change from previous years, EPA was able to develop new annual emission factors for 2015 through 2021 using TMLA from WFF and a more comprehensive set of emissions, i.e., fabs with as well as without abatement control, as new information about the use of abatement in GHGRP fabs and fab-wide were available. Fab-wide DREs represent total fab CO_2 Eq.-weighted controlled F-GHG and N_2O emissions (emissions after the use of abatement) divided by total fab CO_2 Eq.-weighted uncontrolled F-GHG and N_2O emissions (emission prior to the use of abatement).

Using information about reported emissions and the use of abatement and fab-wide DREs, EPA was able to calculate uncontrolled emissions (each total F-GHG and N_2O) for every GHGRP reporting fab. Using this, coupled with TMLA estimated using methods described above (see 2011 through 2012), EPA derived emission factors by year, gas type (F-GHG or N_2O), and wafer size (200 mm and less or 300 mm) by dividing the total annual emissions reported by GHGRP reporters by the total TMLA estimated for those reporters. These emission factors were multiplied by estimates of non-reporter TMLA to arrive at estimates of total F-GHG and N_2O emissions for non-reporters for each year. For each wafer size, the total F-GHG emissions were disaggregated into individual gases using the shares of total emissions represented by those gases in the emissions reported to the GHGRP by unabated fabs producing that wafer size.

Data Sources

GHGRP reporters, which consist of former EPA Partners and non-Partners, estimated their emissions using a default emission factor method established by EPA. Like the Tier 2c Method in the *2019 Refinement to the 2006 IPCC Guidelines*, this method uses different emission and byproduct generation factors for different F-GHGs and process types and uses factors for different wafer sizes (i.e., 300mm vs. 150 and 200mm) and CVD clean subtypes

(in situ thermal, in situ plasma, and remote plasma). Starting with 2014 reported emissions, EPA's GHGRP required semiconductor manufacturers to apply updated emission factors to estimate their F-GHG emissions. For the years 2011 through 2013 reported emissions, semiconductor manufacturers used older emission factors to estimate their F-GHG emissions (Federal Register / Vol. 75, No. 230 /December 1, 2010, 74829). Subpart I emission factors were updated for 2014 by EPA as a result of a larger set of emission factor data becoming available as part of the Subpart I petition process, which took place from 2011 through 2013. In addition to semiconductor manufacturing, GHGRP also includes reported emissions from MEMS and PV producers.

Historically, semiconductor industry partners estimated and reported their emissions using a range of methods and uneven documentation. It is assumed that most Partners used a method at least as accurate as the IPCC's Tier 2a Methodology, recommended in the *2006 IPCC Guidelines*. Partners are estimated to have accounted for between 56 and 79 percent of F-GHG emissions from U.S. semiconductor manufacturing between 1995 and 2010, with the percentage declining in recent years as Partners increasingly implemented abatement measures.

Estimates of operating plant capacities and characteristics for Partners and non-Partners were derived from the Semiconductor Equipment and Materials Industry (SEMI) WFF (formerly World Fab Watch) database (1996 through 2012, 2013, 2016, 2018, and 2021) (e.g., Semiconductor Materials and Equipment Industry 2021). Actual worldwide capacity utilizations for 2008 through 2010 were obtained from Semiconductor International Capacity Statistics (SICAS) (SIA 2009 through 2011). Estimates of the number of layers for each linewidth was obtained from International Technology Roadmap for Semiconductors: 2013 Edition (Burton and Beizaie 2001; ITRS 2007; ITRS 2008; ITRS 2011; ITRS 2013). PEVM utilized the WFF, SICAS, and ITRS, as well as historical silicon consumption estimates published by VLSI. Actual quarterly U.S. capacity utilizations for 2011, 2012, 2014 to 2021 were obtained from the U.S. Census Bureau's Historical Data Quarterly Survey of Plant Capacity Utilization (USCB 2011, 2012, 2015, 2016, 2017, 2018, 2019, 2020, 2021).

Estimates of PV manufacturing capacity, which are used to calculate emissions from non-reporting facilities, are based on data from two sources. A historical market analysis from DisplaySearch provided estimates of U.S. manufacturing capacity from 2000-2009 (DisplaySearch 2010). Domestic PV cell production for 2012 was obtained from a Congressional Research Service report titled *U.S. Solar Photovoltaic Manufacturing: Industry Trends, Global Competition, Federal Support* (Platzer 2015).

Uncertainty

A quantitative uncertainty analysis of this source category was performed using the IPCC-recommended Approach 2 uncertainty estimation methodology, the Monte Carlo Stochastic Simulation technique. The Monte Carlo Stochastic Simulation was performed on the total emissions estimate from the Electronics Industry, represented in equation form as:

Equation 4-19: Total Emissions from Electronics Industry

$$\text{Total Emissions } (\mathrm{E}_T) = \text{Semiconductors F} - \text{GHG and } N_2\text{O Emissions } (\mathrm{E}_{Semi}) + \text{MEMS F} - \text{GHG and } N_2\text{O Emissions } (\mathrm{E}_{MEMS}) + \text{PV F} - \text{GHG and } N_2\text{O Emissions } (\mathrm{E}_{PV}) + \text{HFC, PFC and SF6 F} - \text{HTFs Emissions } (\mathrm{E}_{HTF})$$

The uncertainty in the total emissions for the Electronics Industry, presented in Table 4-112 below, results from the convolution of four distributions of emissions, namely from semiconductors manufacturing, MEMS manufacturing, PV Manufacturing and emissions of Heat Transfer Fluids. The approaches for estimating uncertainty in each of the sources are described below:

Semiconductors Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from semiconductor manufacturing, represented in equation form as:

Equation 4-20: Total Emissions from Semiconductor Manufacturing

$$\begin{aligned}\text{Semiconductors F}-\text{GHG and } N_2\text{O Emissions } (\text{E}_{Semi}) \\ = \text{ GHGRP Reported F}-\text{GHG Emissions } (\text{ER}, \text{F}-\text{GHG}, \text{Semi}) + \text{ Non} \\ - \text{Reporters' Estimated F}-\text{GHG Emissions } \left(\text{E}_{\text{NR,F}-\text{GHG,Semi}}\right) \\ + \text{ GHGRP Reported } N_2\text{O Emissions } \left(\text{E}_{\text{R},N_2\text{O,Semi}}\right) + \text{ Non} \\ - \text{Reporters' Estimated } N_2\text{O Emissions } \left(\text{E}_{\text{NR,N2O,Semi}}\right)\end{aligned}$$

The uncertainty in E_{Semi} results from the convolution of four distributions of emissions, $E_{R,F\text{-}GHG,Semi}$ $E_{R,N2O,Semi}$ $E_{NR,F\text{-}GHG,Semi}$ and $E_{NR,N2O,Semi}$. The approaches for estimating each distribution and combining them to arrive at the reported 95 percent confidence interval (CI) for E_{Semi} are described in the remainder of this section.

The uncertainty estimate of $E_{R,\,F\text{-}GHG,Semi}$, or GHGRP-reported F-GHG emissions, is developed based on gas-specific uncertainty estimates of emissions for two industry segments, one processing 200 mm or less wafers and one processing 300 mm wafers. Uncertainties in emissions for each gas and industry segment are based on an uncertainty analysis conducted during the assessment of emission estimation methods for the Subpart I rulemaking in 2012 (see Technical Support for Modifications to the Fluorinated Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I, docket EPA–HQ–OAR–2011–0028).[94] This assessment relied on facility-specific gas information by gas and wafer size, and incorporated uncertainty associated with both emission factors and gas consumption quantities. The 2012 analysis did not consider the use of abatement.

For the industry segment that manufactured 200 mm wafers, estimates of uncertainty at a 95 percent CI ranged from ±29 percent for C_3F_8 to ±10 percent for CF_4. For the corresponding 300 mm industry segment, estimates of uncertainty at the 95 percent CI ranged from ±36 percent for C_4F_8 to ±16 percent for CF_4. For gases for which uncertainty was not analyzed in the 2012 assessment (e.g., CH_2F_2), EPA applied the 95 percent CI range equivalent to the range for the gas and industry segment with the highest uncertainty from the 2012 assessment. These gas and wafer-specific uncertainty estimates were developed to represent uncertainty at a facility-level, but they are applied to the total emissions across all the facilities that did not abate emissions as reported under EPA's GHGRP at a national-level. Hence, it is noted that the uncertainty estimates used may be overestimating the uncertainties at a national-level.

For those facilities reporting abatement of emissions under EPA's GHGRP, estimates of uncertainties for the no abatement industry segments are modified to reflect the use of full abatement (abatement of all gases from all cleaning and etching equipment) and partial abatement. These assumptions used to develop uncertainties for the partial and full abatement facilities are identical for 200 mm and 300 mm wafer processing facilities. For all facilities reporting gas abatement, a triangular distribution of destruction or removal efficiency is assumed for each gas. The triangular distributions range from an asymmetric and highly uncertain distribution of zero percent minimum to 90 percent maximum with 70 percent most likely value for CF_4 to a symmetric and less uncertain distribution of 85 percent minimum to 95 percent maximum with 90 percent most likely value for C_4F_8, NF_3, and

[94] On November 13, 2013, EPA published a final rule revising Subpart I (Electronics Manufacturing) of the GHGRP (78 FR 68162). The revised rule includes updated default emission factors and updated default destruction and removal efficiencies that are slightly different from those that semiconductor manufacturers were required to use to report their 2012 emissions. The uncertainty analyses that were performed during the development of the revised rule focused on these updated defaults but are expected to be reasonably representative of the uncertainties associated with the older defaults, particularly for estimates at the country level. (They may somewhat underestimate the uncertainties associated with the older defaults at the facility level.) For simplicity, the 2012 estimates are assumed to be unbiased although in some cases, the updated (and therefore more representative) defaults are higher or lower than the older defaults. Multiple models and sensitivity scenarios were run for the Subpart I analysis. The uncertainty analysis presented here made use of the Input gas and wafer size model (Model 1) under the following conditions: Year = 2010, f = 20, n = SIA3.

SF_6. For facilities reporting partial abatement, the distribution of fraction of the gas fed through the abatement device, for each gas, is assumed to be triangularly distributed as well. It is assumed that no more than 50 percent of the gases are abated (i.e., the maximum value) and that 50 percent is the most likely value, and the minimum is zero percent. Consideration of abatement then resulted in four additional industry segments, two 200-mm wafer-processing segments (one fully and one partially abating each gas) and two 300-mm wafer-processing segment (one fully and the other partially abating each gas). Gas-specific emission uncertainties were estimated by convolving the distributions of unabated emissions with the appropriate distribution of abatement efficiency for fully and partially abated facilities using a Monte Carlo simulation.

The uncertainty in $E_{R,F\text{-}GHG,Semi}$ is obtained by allocating the estimates of uncertainties to the total GHGRP-reported emissions from each of the six industry segments, and then running a Monte Carlo simulation which results in the 95 percent CI for emissions from GHGRP-reporting facilities ($E_{R,F\text{-}GHG,Semi}$).

The uncertainty in $E_{R,N2O,Semi}$ is obtained by assuming that the uncertainty in the emissions reported by each of the GHGRP reporting facilities results from the uncertainty in quantity of N_2O consumed and the N_2O emission factor (or utilization). Similar to analyses completed for Subpart I (see Technical Support for Modifications to the Fluorinated Greenhouse Gas Emission Estimation Method Option for Semiconductor Facilities under Subpart I, docket EPA–HQ–OAR–2011–0028), the uncertainty of N_2O consumed was assumed to be 20 percent. Consumption of N_2O for GHGRP reporting facilities was estimated by back-calculating from emissions reported and assuming no abatement. The quantity of N_2O utilized (the complement of the emission factor) was assumed to have a triangular distribution with a minimum value of zero percent, mode of 20 percent and maximum value of 84 percent. The minimum was selected based on physical limitations, the mode was set equivalent to the Subpart I default N_2O utilization rate for chemical vapor deposition, and the maximum was set equal to the maximum utilization rate found in ISMI Analysis of Nitrous Oxide Survey Data (ISMI 2009). The inputs were used to simulate emissions for each of the GHGRP reporting, N_2O-emitting facilities. The uncertainty for the total reported N_2O emissions was then estimated by combining the uncertainties of each facilities' reported emissions using Monte Carlo simulation.

The estimate of uncertainty in $E_{NR,\ F\text{-}GHG,Semi}$ and $E_{NR,\ N2O,Semi}$ entailed developing estimates of uncertainties for the emissions factors and the corresponding estimates of TMLA.

The uncertainty in TMLA depends on the uncertainty of two variables—an estimate of the uncertainty in the average annual capacity utilization for each level of production of fabs (e.g., full scale or R&D production) and a corresponding estimate of the uncertainty in the number of layers manufactured. For both variables, the distributions of capacity utilizations and number of manufactured layers are assumed triangular for all categories of non-reporting fabs. The most probable utilization is assumed to be 82 percent, with the highest and lowest utilization assumed to be 89 percent, and 70 percent, respectively. For the triangular distributions that govern the number of possible layers manufactured, it is assumed the most probable value is one layer less than reported in the ITRS; the smallest number varied by technology generation between one and two layers less than given in the ITRS and largest number of layers corresponded to the figure given in the ITRS.

The uncertainty bounds for the average capacity utilization and the number of layers manufactured are used as inputs in a separate Monte Carlo simulation to estimate the uncertainty around the TMLA of both individual facilities as well as the total non-reporting TMLA of each sub-population.

The uncertainty around the emission factors for non-reporting facilities is dependent on the uncertainty of the total emissions (MMT CO_2 Eq. units) and the TMLA of each reporting facility in that category. For each wafer size for reporting facilities, total emissions were regressed on TMLA (with an intercept forced to zero) for 10,000 emission and 10,000 TMLA values in a Monte Carlo simulation, which results in 10,000 total regression coefficients (emission factors). The 2.5^{th} and the 97.5^{th} percentile of these emission factors are determined, and the bounds are assigned as the percent difference from the estimated emission factor.

The next step in estimating the uncertainty in emissions of reporting and non-reporting facilities in semiconductor manufacture is convolving the distribution of reported emissions, emission factors, and TMLA using Monte Carlo simulation. For this Monte Carlo simulation, the distributions of the reported F-GHG gas- and wafer size-specific emissions are assumed to be normally distributed, and the uncertainty bounds are assigned at 1.96 standard

deviations around the estimated mean. The were some instances, though, where departures from normality were observed for variables, including for the distributions of the gas- and wafer size-specific N_2O emissions, TMLA, and non-reporter emission factors, both for F-GHGs and N_2O. As a result, the distributions for these parameters were assumed to follow a pert beta distribution.

MEMS Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from MEMS manufacturing, represented in equation form as:

Equation 4-21: Total Emissions from MEMS Manufacturing

$$\text{MEMS F-GHG and } N_2O \text{ Emissions } (E_{MEMS}) = \text{GHGRP Reported F-GHG Emissions } (E_{R,F\text{-}GHG,MEMS}) + \text{GHGRP Reported } N_2O \text{ Emissions } (E_{R,N2O,\,MEMS})$$

$$\text{MEMS F} - \text{GHG and } N_2O \text{ Emissions } (E_{MEMS}) = \text{GHGRP Reported F} - \text{GHG Emissions } \left(E_{R,F-GHG,MEMS}\right) + \text{GHGRP Reported } N_2O \text{ Emissions } \left(E_{R,N_2O,MEMS}\right)$$

Emissions from MEMS manufacturing are only quantified for GHGRP reporters. MEMS manufacturers that report to the GHGRP all report the use of 200 mm wafers. Some MEMS manufacturers report using abatement equipment. Therefore, the estimates of uncertainty at the 95 percent CI for each gas emitted by MEMS manufacturers are set equal to the gas-specific uncertainties for manufacture of 200mm semiconductor wafers with partial abatement. The same assumption is applied for uncertainty levels for GHGRP reported MEMS N_2O emissions ($E_{R,N2O,MEMS}$).

PV Manufacture Emission Uncertainty

The Monte Carlo Stochastic Simulation was performed on the emissions estimate from PV manufacturing, represented in equation form as:

Equation 4-22: Total Emissions from PV Manufacturing

$$\text{PV F-GHG and } N_2O \text{ Emissions } (E_{PV}) = \text{Non-Reporters' Estimated F-GHG Emissions } (E_{NR,F\text{-}GHG,PV}) + \text{Non-Reporters' Estimated } N_2O \text{ Emissions } (E_{NR,N2O,PV})$$

$$\text{PV F} - \text{GHG and } N_2O \text{ Emissions } (E_{PV}) = \text{Non} - \text{Reporters' Estimated F} - \text{GHG Emissions } \left(E_{NR,F-GHG,PV}\right) + \text{Non} - \text{Reporters' Estimated N2O Emissions } \left(E_{NR,N_2O,PV}\right)$$

Emissions from PV manufacturing are only estimated for non-GHGRP reporters. There were no reported emissions from PV manufacturing in GHGRP in 2021. The "Non-Reporters' Estimated F-GHG Emissions" term in Equation 4-22 was estimated using an emission factor developed using emissions from reported data in 2015 and 2016 and total non-reporters' capacity. Due to a lack of information and data and because they represent similar physical and chemical processes, the uncertainty at the 95 percent CI level for non-reporter PV capacity is assumed to be the same as the uncertainty in non-reporter TMLA for semiconductor manufacturing. Similarly, the uncertainty for the PV manufacture emission factors are assumed to be the same as the uncertainties in emission factors used for non-reporters in semiconductor manufacture.

Heat Transfer Fluids Emission Uncertainty

There is a lack of data related to the uncertainty of emission estimates of heat transfer fluids used for electronics manufacture. Therefore, per the *2006 IPCC Guidelines* (IPCC 2006, Volume 3, Chapter 6), uncertainty bounds of 20 percent were applied to estimate uncertainty associated with the various types of heat transfer fluids, including PFCs, HFC, and SF_6, at the national level.

The results of the Approach 2 quantitative uncertainty analysis for electronics manufacturing are summarized in Table 4-112. These results were obtained by convolving—using Monte Carlo simulation—the distributions of emissions for each reporting and non-reporting facility that manufactures semiconductors, MEMS, or PVs and use heat transfer fluids. The emissions estimate for total U.S. F-GHG, N_2O, and HTF emissions from electronics manufacturing were estimated to be between 4.88 and 5.50 MMT CO_2 Eq. at a 95 percent CI level. This range represents 6 percent below to 6 percent above the 2021 emission estimate of 5.19 MMT CO_2 Eq. for all emissions from electronics manufacture. This range and the associated percentages apply to the estimate of total emissions rather than those of individual gases. Uncertainties associated with individual gases will be somewhat higher than the aggregate but were not explicitly modeled.

Table 4-112: Approach 2 Quantitative Uncertainty Estimates for HFC, PFC, SF_6, NF_3 and N_2O Emissions from Electronics Manufacture (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound[b]	Upper Bound[b]	Lower Bound	Upper Bound
Electronics Industry	HFC, PFC, SF_6, NF_3, and N_2O	4.8	4.5	5.1	-6%	6%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.
[b] Absolute lower and upper bounds were calculated using the corresponding lower and upper bounds in percentages.

QA/QC and Verification

For its GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[95] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8 for more details.

Recalculations Discussion

Any resubmitted emissions data reported to EPA's GHGRP from all prior years were updated in this Inventory. Additionally, EPA made the following changes:

- To estimate non-reporter F-GHG and N_2O emissions, EPA relies on data reported through Subpart I and the World Fab Forecast. This process requires EPA to map facilities that report through Subpart I and which are also represented in the World Fab Forecast. For this Inventory update, EPA identified and made corrections to a few instances of this mapping based on new information and additional reviews of the data. This had minimal effects on emission estimates.

[95] GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

- EPA re-ran regression analyses for years 2010 to 2020 to reflect updates to Subpart I and the World Fab Forecast. These changes had minor effects on the emission factors, standard error, and R^2 values for all years. This resulted in the recalculation of non-reporter's F-GHG and N_2O estimates for all years.
- To estimate emissions for "other F-GHGs" in the years prior to 2011, emissions data from Subpart I were used to estimate the average share or percentage contribution of these gases as compared to total F-GHG emissions. Previously, the emissions data between 2011-2020 was used to calculate this average. However, the average in this Inventory was updated to only include 2014-2016. This change was made to make a more realistic estimate of the distribution of other F-GHGs pre-2011. This will also hold the pre-2011 other F-GHGs emissions constant in future inventories. Emissions data from 2011-2013 was not used as the 2011-2013 data did not reflect the updated emissions factors in Subpart I.
- To estimate emissions of HFCs, PFCs, and SF_6 from F-HTFs between 2001 and 2010, emissions data from Subpart I were used to estimate the average share or percentage contribution of these gases as compared to total F-HTFs emissions. Previously, this average was calculated using Subpart I data from 2011 to 2021. However, to estimate the distribution of these gases between 2001 and 2010 more realistically, emissions data from 2011 to 2013 was averaged instead. This will hold the pre-2011 emissions constant in future inventories.
- Previously, F-GHG emissions from a PV manufacturer not-reporting through the GHGRP were held constant from 2013 through the most recent Inventory year. EPA determined that this manufacturer ceased operations in 2019, so their reported emissions were changed to zero for 2020 and beyond.
- To improve the uncertainty analysis for this source category other F-GHGs from semiconductor manufacturing, HFC, PFC, and SF_6 emissions from the use of heat transfer fluids and emissions resulting from the manufacturing of PVs and MEMS were included in total uncertainty estimates.

Overall, the impact of these recalculations led to an average decrease of 0.004 MMT CO_2 Eq. (0.083 percent) across the time series (1990 through 2020).

For the current Inventory, estimates of CO_2-equivalent F-GHGs, N_2O, and F-HTF emissions from the electronics inventory have been revised to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of CF_4, C_2F_6, and NF_3, three of the most significant contributors to total emissions in this source category, have decreased, leading to a decrease in calculated CO_2-equivalent emissions from those F-GHGs. In contrast, the GWP of SF_6, another significant contributor to total emissions in this source category, has increased, leading to an increase in calculated CO_2-equivalent emissions for this F-GHG. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual change in CO_2-equivalent emissions across the time series 1990-2020 for CF_4, C_2F_6, NF_3, and SF_6 were 11 percent decrease, 9 percent decrease, 9 percent decrease, and 8 percent increase, respectively. The net impact from these updates and the additional updates noted above was an average annual 7.5 percent decrease in CO_2-equivalent emissions for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

The Inventory methodology uses data reported through the EPA Partnership (for earlier years) and EPA's GHGRP (for later years) to extrapolate the emissions of the non-reporting population. While these techniques are well developed, the understanding of the relationship between the reporting and non-reporting populations is limited. Further analysis of the reporting and non-reporting populations could aid in the accuracy of the non-reporting population extrapolation in future years. In addition, the accuracy of the emissions estimates for the non-reporting population could be further increased through EPA's further investigation of and improvement upon the accuracy of estimated activity in the form of TMLA.

The Inventory uses utilization from two different sources for various time periods–SEMI to develop PEVM and to estimate non-Partner emissions for the period 1995 to 2010 and U.S. Census Bureau for 2011 through 2021. SEMI reported global capacity utilization for manufacturers through 2011. U.S. Census Bureau capacity utilization include U.S. semiconductor manufacturers as well as assemblers. Further analysis on the impacts of using a new and different source of utilization data could prove to be useful in better understanding of industry trends and impacts of utilization data sources on historical emission estimates.

Estimates of semiconductor non-reporter and non-Partner emissions are based on EPA-developed emission factors for the time periods pre-2010, 2011 through 2012, and 2015 through 2021. Based on the data available for these time periods, the methods used to develop emission factors for non-reporters and non-Partners are slightly inconsistent for semiconductors (e.g., how data representing emissions and TMLA from the manufacture of various wafer sizes are aggregated or disaggregated for purposes of calculating emission factors). Further analyses to support potentially adjusting the methods for developing these emission factors could be done to better ensure consistency across the time series.

The methodology for estimating semiconductor emissions from non-reporters uses data from the International Technology Roadmap for Semiconductors (ITRS) on the number of layers associated with various technology node sizes. The ITRS has now been replaced by the International Roadmap for Devices and Systems (IRDS), which has published updated data on the number of layers used in each device type and node size (in nanometers). Incorporating this updated dataset will improve the accuracy of emissions estimates from non-reporting semiconductor fabs.

4.24 Substitution of Ozone Depleting Substances (CRF Source Category 2F)

Hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and carbon dioxide (CO_2) are used as alternatives to several classes of ozone-depleting substances (ODSs) that are being phased out under the terms of the *Montreal Protocol* and the Clean Air Act Amendments of 1990.[96] Ozone-depleting substances—chlorofluorocarbons (CFCs), halons, carbon tetrachloride, methyl chloroform, and hydrochlorofluorocarbons (HCFCs)—are used in a variety of industrial applications including refrigeration and air conditioning equipment, solvent cleaning, foam production, sterilization, fire extinguishing, and aerosols. Although HFCs and PFCs are not harmful to the stratospheric ozone layer, they are potent greenhouse gases. On December 27, 2020, the American Innovation and Manufacturing (AIM) Act was enacted by Congress and directs EPA to address HFCs by phasing down production and consumption (i.e., production plus import minus export), maximizing reclamation and minimizing releases from equipment, and facilitating the transition to next-generation technologies through sector-based restrictions. Emission estimates for HFCs, PFCs, and CO_2 used as substitutes for ODSs are provided in Table 4-113 and Table 4-114.[97]

Table 4-113: Emissions of HFCs, PFCs, and CO_2 from ODS Substitutes (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
HFC-23	0.0	+	+	+	+	+	+
HFC-32	0.0	0.3	5.3	6.1	6.8	7.7	9.4

[96] [42 U.S.C § 7671, CAA Title VI].

[97] Emissions of ODSs are not included here consistent with UNFCCC reporting guidelines for national inventories noted in Box 4-1. See Annex 6.2 for more details on emissions of ODSs. Emissions from CO_2 used in the food and beverage industry are separately reported in Chapter 4.15 Carbon Dioxide Consumption but does not include CO_2 in ODS substitute use sectors as a refrigerant, foam blowing agent, or fire extinguishing agent.

HFC-125	+	8.2	45.4	48.6	52.9	57.5	65.9
HFC-134a	+	72.8	58.8	56.4	55.3	54.1	50.0
HFC-143a	+	10.0	30.1	29.7	29.9	29.9	30.0
HFC-236fa	0.0	0.9	1.0	0.9	0.9	0.9	0.8
CF_4	0.0	+	+	+	+	+	+
CO_2	+	+	+	+	+	+	+
Others[a]	0.3	7.1	15.5	16.0	16.1	15.9	16.3
Total	**0.3**	**99.4**	**156.1**	**157.8**	**162.0**	**166.1**	**172.5**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Others represent an unspecified mix of HFCs and PFCs, which includes HFC-152a, HFC-227ea, HFC-245fa, HFC-365mfc, HFC-43-10mee, HCFO-1233zd(E), HFO-1234yf, HFO-1234ze(E), HFO-1336mzz(Z), C_4F_{10}, and PFC/PFPEs, the latter being a proxy for a diverse collection of PFCs and perfluoropolyethers (PFPEs) employed for solvent applications. For estimating purposes, the GWP value used for PFC/PFPEs was based upon n-C_6F_{14}.

Note: Totals may not sum due to independent rounding.

Table 4-114: Emissions of HFCs, PFCs, and CO_2 from ODS Substitution (Metric Tons)

Gas	1990	2005	2017	2018	2019	2020	2021
HFC-23	0	1	2	2	2	2	2
HFC-32	0	397	7,832	8,937	10,077	11,374	13,846
HFC-125	+	2,580	14,308	15,335	16,682	18,153	20,803
HFC-134a	+	56,029	45,264	43,419	42,558	41,590	38,447
HFC-143a	+	2,093	6,264	6,188	6,230	6,234	6,240
HFC-236fa	0	118	124	118	112	108	104
CF_4	0	2	6	7	7	7	8
CO_2	14	1,325	2,879	3,093	3,303	3,516	3,734
Others[a]	M	M	M	M	M	M	M

+ Does not exceed 0.5 MT.

M (Mixture of Gases).

[a] Others represent an unspecified mix of HFCs and PFCs, which includes HFC-152a, HFC-227ea, HFC-245fa, HFC-365mfc, HFC-43-10mee, HCFO-1233zd(E), HFO-1234yf, HFO-1234ze(E), HFO-1336mzz(Z), C_4F_{10}, and PFC/PFPEs, the latter being a proxy for a diverse collection of PFCs and perfluoropolyethers (PFPEs) employed for solvent applications.

In 1990 and 1991, the only significant emissions of HFCs and PFCs as substitutes to ODSs were relatively small amounts of HFC-152a—used as an aerosol propellant and also a component of the refrigerant blend R-500 used in chillers. Beginning in 1992, HFC-134a was used in growing amounts as a refrigerant in motor vehicle air-conditioners and in refrigerant blends such as R-404A.[98] In 1993, the use of HFCs in foam production began, and in 1994 ODS substitutes for halons entered widespread use in the United States as halon production was phased out. In 1995, these compounds also found applications as solvents. Non-fluorinated ODS substitutes, such as CO_2, have been used in place of ODS in certain foam production and fire extinguishing uses since the 1990s.

The use and subsequent emissions of HFCs, PFCs, and CO_2 as ODS substitutes has been increasing from small amounts in 1990 to 172.5 MMT CO_2 Eq. emitted in 2021. This increase was in large part the result of efforts to phase out CFCs, HCFCs, and other ODSs in the United States. Use and emissions of HFCs are expected to start decreasing in the next few years and continue downward as production and consumption of HFCs are phased down to 15 percent of their baseline levels by 2036 through an allowance allocation and trading program established by EPA. Improvements in recovery practices and the use of alternative gases and technologies, through

[98] R-404A contains HFC-125, HFC-143a, and HFC-134a.

voluntary actions and in response to potential future regulations under the AIM Act, will also contribute to a reduction in HFC use and emissions.

Table 4-115 presents emissions of HFCs, PFCs, and CO_2 as ODS substitutes by end-use sector for 1990 through 2021. The refrigeration and air-conditioning sector is further broken down by sub-sector. The end-use sectors that contributed the most toward emissions of HFCs, PFCs, and CO_2 as ODS substitutes in 2021 include refrigeration and air-conditioning (139.1 MMT CO_2 Eq., or approximately 81 percent), aerosols (17.7 MMT CO_2 Eq., or approximately 10 percent), and foams (10.8 MMT CO_2 Eq., or approximately 6 percent). Within the refrigeration and air-conditioning end-use sector residential unitary AC, part of the Residential Stationary Air-conditioning subsector shown below, was the highest emitting end-use (38.5 MMT CO_2 Eq.), followed by large retail food, which is part of the Commercial Refrigeration subsector. Each of the end-use sectors is described in more detail below.

Table 4-115: Emissions of HFCs, PFCs, and CO_2 from ODS Substitutes (MMT CO_2 Eq.) by Sector

Sector	1990	2005	2017	2018	2019	2020	2021
Refrigeration/Air Conditioning	**+**	**83.0**	**120.2**	**122.4**	**126.2**	**130.3**	**139.1**
Commercial Refrigeration	+	14.9	40.8	39.6	40.2	40.6	41.0
Domestic Refrigeration	+	0.2	1.2	1.2	1.2	1.2	1.1
Industrial Process Refrigeration	+	1.8	12.6	13.8	15.0	16.2	17.4
Transport Refrigeration	+	1.6	6.4	6.9	7.4	7.9	8.4
Mobile Air Conditioning	+	61.5	30.7	28.7	26.6	24.6	22.9
Residential Stationary Air Conditioning	+	1.2	22.8	26.0	29.1	32.9	41.1
Commercial Stationary Air Conditioning	+	1.7	5.7	6.2	6.6	6.9	7.3
Aerosols	**0.2**	**10.2**	**17.7**	**16.7**	**17.0**	**17.3**	**17.7**
Foams	**+**	**3.5**	**13.8**	**14.2**	**14.1**	**13.7**	**10.8**
Solvents	**+**	**1.6**	**1.9**	**2.0**	**2.0**	**2.0**	**2.1**
Fire Protection	**+**	**1.1**	**2.4**	**2.6**	**2.7**	**2.7**	**2.8**
Total	**0.3**	**99.4**	**156.1**	**157.8**	**162.0**	**166.1**	**172.5**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Refrigeration/Air Conditioning

The refrigeration and air-conditioning sector includes a wide variety of equipment types that have historically used CFCs or HCFCs. End-uses within this sector include motor vehicle air-conditioning, retail food refrigeration, refrigerated transport (e.g., ship holds, truck trailers, railway freight cars), household refrigeration, residential and small commercial air-conditioning and heat pumps, chillers (large comfort cooling), cold storage facilities, and industrial process refrigeration (e.g., systems used in food processing, chemical, petrochemical, pharmaceutical, oil and gas, and metallurgical industries). As the ODS phaseout has taken effect, most equipment has been retrofitted or replaced to use HFC-based substitutes. Common HFCs in use today in refrigeration/air-conditioning equipment are HFC-134a, R-410A,[99] R-404A, and R-507A.[100] Lower-GWP options such as hydrofluoroolefin (HFO)-1234yf in motor vehicle air-conditioning, R-717 (ammonia) in cold storage and industrial applications, and R-744 (carbon dioxide) and HFC/HFO blends in retail food refrigeration, are also being used. Manufacturers of residential and

[99] R-410A contains HFC-32 and HFC-125.

[100] R-507A, also called R-507, contains HFC-125 and HFC-143a.

commercial air conditioning have announced their plans to use HFC-32 and R-454B[101] in the future, and at least one manufacturer has announced the availability of chillers operating on HFC-32 as of 2023 (Carrier, 2023). These refrigerants are emitted to the atmosphere during equipment operation (as a result of component failure, leaks, and purges), as well as at manufacturing (if charged at the factory), installation, servicing, and disposal events.

Aerosols

Aerosol propellants are used in metered dose inhalers (MDIs) and a variety of personal care products and technical/specialty products (e.g., duster sprays and safety horns). Pharmaceutical companies that produce MDIs—a type of inhaled therapy used to treat asthma and chronic obstructive pulmonary disease—have replaced the use of CFCs with HFC-propellant alternatives. The earliest ozone-friendly MDIs were produced with HFC-134a, but the industry is using HFC-227ea as well. Conversely, since the use of CFC propellants in other types of aerosols was banned in 1978, most non-medical consumer aerosol products have not transitioned to HFCs, but to "not-in-kind" technologies, such as solid or roll-on deodorants and finger-pump sprays. The transition away from ODSs in specialty aerosol products has also led to the introduction of non-fluorocarbon alternatives (e.g., hydrocarbon propellants) in certain applications, in addition to HFC-134a or HFC-152a. Other low-GWP options such as HFO-1234ze(E) are being used as well. These propellants are released into the atmosphere as the aerosol products are used.

Foams

Chlorofluorocarbons and HCFCs have traditionally been used as foam blowing agents to produce polyurethane (PU), polystyrene, polyolefin, and phenolic foams, which are used in a wide variety of products and applications. Since the *Montreal Protocol*, flexible PU foams as well as other types of foam, such as polystyrene sheet, polyolefin, and phenolic foam, have transitioned almost completely away from fluorocompounds into alternatives such as CO_2 and hydrocarbons. The majority of rigid PU foams have transitioned to HFCs—primarily HFC-134a and HFC-245fa. Today, these HFCs are used to produce PU appliance, PU commercial refrigeration, PU spray, and PU panel foams—used in refrigerators, vending machines, roofing, wall insulation, garage doors, and cold storage applications. In addition, HFC-152a, HFC-134a, and CO_2 are used to produce polystyrene sheet/board foam, which is used in food packaging and building insulation. Low-GWP fluorinated foam blowing agents in use include HFO-1234ze(E) and HCFO-1233zd(E). Emissions of blowing agents occur when the foam is manufactured as well as during the foam lifetime and at foam disposal, depending on the particular foam type.

Solvents

Chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), and to a lesser extent carbon tetrachloride (CCl_4) were historically used as solvents in a wide range of cleaning applications, including precision, electronics, and metal cleaning. Since their phaseout, metal cleaning end-use applications have primarily transitioned to non-fluorocarbon solvents and not-in-kind processes. The precision and electronics cleaning end-uses have transitioned in part to high-GWP gases, due to their high reliability, excellent compatibility, good stability, low toxicity, and selective solvency. These applications rely on HFC-43-10mee, HFC-365mfc, HFC-245fa, and to a lesser extent, PFCs. Electronics cleaning involves removing flux residue that remains after a soldering operation for printed circuit boards and other contamination-sensitive electronics applications. Precision cleaning may apply to either electronic components or to metal surfaces, and is characterized by products, such as disk drives, gyroscopes, and optical components, that require a high level of cleanliness and generally have complex shapes, small clearances, and other cleaning challenges. The use of these solvents yields fugitive emissions of these HFCs and PFCs.

[101] R-454B contains HFC-32 and HFO-1234yf.

Fire Protection

Fire protection applications include portable fire extinguishers ("streaming" applications) that originally used halon 1211, and total flooding applications that originally used halon 1301, as well as some halon 2402. Since the production and import of virgin halons were banned in the United States in 1994, the halon replacement agent of choice in the streaming sector has been dry chemical, although HFC-236fa is also used to a limited extent. In the total flooding sector, HFC-227ea has emerged as the primary replacement for halon 1301 in applications that require clean agents. Other HFCs, such as HFC-23 and HFC-125, are used in smaller amounts. The majority of HFC-227ea in total flooding systems is used to protect essential electronics, as well as in civil aviation, military mobile weapons systems, oil/gas/other process industries, and merchant shipping. Fluoroketone FK-5-1-12 is also used as a low-GWP option and 2-BTP is being considered. As fire protection equipment is tested or deployed, emissions of these fire protection agents occur.

Methodology and Time-Series Consistency

A detailed Vintaging Model of ODS-containing equipment and products was used to estimate the actual—versus potential—emissions of various ODS substitutes, including HFCs, PFCs, and CO_2. The name of the model refers to the fact that it tracks the use and emissions of various compounds for the annual "vintages" of new equipment that enter service in each end-use. The Vintaging Model predicts ODS and ODS substitute use in the United States based on modeled estimates of the quantity of equipment or products sold each year containing these chemicals and the amount of the chemical required to manufacture and/or maintain equipment and products over time. Emissions for each end-use were estimated by applying annual leak rates and release profiles, which account for the lag in emissions from equipment as they leak over time. By aggregating the data for 78 different end-uses, the model produces estimates of annual use and emissions of each compound. Further information on the Vintaging Model is contained in Annex 3.9.

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Given that emissions of ODS substitutes occur from thousands of different kinds of equipment and from millions of point and mobile sources throughout the United States, emission estimates must be made using analytical tools such as the Vintaging Model or the methods outlined in IPCC (2006). Though the model is more comprehensive than the IPCC default methodology, significant uncertainties still exist with regard to the levels of equipment sales, equipment characteristics, and end-use emissions profiles that were used to estimate annual emissions for the various compounds.

The uncertainty analysis quantifies the level of uncertainty associated with the aggregate emissions across the 78 end-uses in the Vintaging Model. In order to calculate uncertainty, functional forms were developed to simplify some of the complex "vintaging" aspects of some end-use sectors, especially with respect to refrigeration and air-conditioning, and to a lesser degree, fire extinguishing. These sectors calculate emissions based on the entire lifetime of equipment, not just equipment put into commission in the current year, thereby necessitating simplifying equations. The functional forms used variables that included growth rates, emission factors, transition from ODSs, change in charge size as a result of the transition, disposal quantities, disposal emission rates, and either stock (e.g., number of air conditioning units in operation) for the current year or ODS consumption before transition to alternatives began (e.g., in 1985 for most end-uses). Uncertainty was estimated around each variable within the functional forms based on expert judgment, and a Monte Carlo analysis was performed.

The most significant sources of uncertainty for the ODS Substitutes source category include the total stock of refrigerant installed in industrial process refrigeration and cold storage equipment, as well as the charge size for technical aerosols using HFC-134a.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 4-116. Substitution of ozone depleting substances HFC and PFC emissions were estimated to be between 165.2 and 197.8 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 4.2 percent below to 14.7 percent above the emission estimate of 172.5 MMT CO_2 Eq.

Table 4-116: Approach 2 Quantitative Uncertainty Estimates for HFC and PFC Emissions from ODS Substitutes (MMT CO_2 Eq. and Percent)

Source	Gases	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Substitution of Ozone Depleting Substances	HFCs and PFCs	172.5	165.2	197.8	-4.2%	+14.7%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter. Category specific QA/QC findings are described below.

The QA and verification process for individual gases and sources in the Vintaging Model includes review against up-to-date market information, including equipment stock estimates, leak rates, and sector transitions to new chemicals and technologies. In addition, comparisons against published emission and consumption sources by gas and by source are performed when available as described further below. Independent peer reviews of the Vintaging Model are periodically performed, including one conducted in 2017 (EPA 2018), to confirm Vintaging Model estimates and identify updates. For the purposes of reporting emissions to protect Confidential Business Information (CBI), some HFCs and PFCs are grouped into an unspecified mix. The HFCs and PFCs within this unspecified mix of HFCs and PFCs are modelled and verified individually in the same process as all other gases and sources in the Vintaging Model.

Comparison of Reported Consumption to Modeled Consumption of HFCs

Data from EPA's Greenhouse Gas Reporting Program (GHGRP)[102] was also used to perform quality assurance as a reference scenario check on the modeled net supply of HFCs, from which the modeled emissions from this source category are derived as specified in *2006 IPCC Guidelines for National Greenhouse Gas Inventories*.

Reported Net Supply (GHGRP Top-Down Estimate). Consumption patterns demonstrated through data reported under GHGRP Subpart OO (Suppliers of Industrial Greenhouse Gases) and Subpart QQ (Importers and Exporters of Fluorinated Greenhouse Gases Contained in Pre-Charged Equipment or Closed-Cell Foams) were compared to the modeled demand for new saturated HFCs used as ODS substitutes from the Vintaging Model. The collection of data from suppliers of HFCs enables EPA to calculate the reporters' aggregated net supply–the sum of the quantities of chemical produced or imported into the United States less the sum of the quantities of chemical

[102] For the GHGRP data, EPA verifies annual facility-level and company-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015). Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data.

transformed (used as a feedstock in the production of other chemicals), destroyed, or exported from the United States.[103] This allows for an overall quality assurance check on the modeled demand for new chemical in the Vintaging Model as a proxy for total amount supplied, which is similar to net supply, as an input to the emission calculations in the model. Under EPA's GHGRP, suppliers (i.e., producers, importers, and exporters) of HFCs under Subpart OO[104] began annually reporting their production, transformation, destruction, imports, and exports to EPA in 2011 (for supply that occurred in 2010) and suppliers of HFCs under Subpart QQ began annually reporting their imports and exports to EPA in 2012 (for supply that occurred in 2011).

Note, GHGRP data reported under subparts QQ and OO are not used directly to estimate emissions of ODS Substitutes because they do not include complete information on the sectors or end-uses in which that chemical will be used. Therefore, it does not provide the data that would be needed to calculate the source or time that a chemical is emitted. Reports to the GHGRP on production and bulk import (Subpart OO) do not currently include any information on expected end-uses. Published data on fluorinated gases contained in pre-charged equipment and closed-cell foams (Subpart QQ) does not provide information on the type of product imported or exported. Furthermore, the information from both subparts would not capture the entire market in the United States.

Modeled Consumption (Vintaging Model Bottom-Up Estimate). The Vintaging Model, used to estimate emissions from this source category, calculates chemical demand based on the quantity of equipment and products sold, serviced and retired each year, and the amount of the chemical required to manufacture and/or maintain the equipment and products on an end-use basis.[105] It is assumed that the total demand equals the amount supplied by either new production, chemical import, or quantities recovered (often reclaimed) and placed back on the market. In the Vintaging Model, demand for new chemical, as a proxy for consumption, is calculated as any chemical demand (either for new equipment or for servicing existing equipment) that cannot be met through recycled or recovered material.[106] No distinction is made in the Vintaging Model between whether that need is met through domestic production or imports. To calculate emissions, the Vintaging Model estimates the quantity released from equipment over time, which varies by product type as detailed in Annex 3.9.1. Thus, verifying the Vintaging Model's calculated consumption against GHGRP reported data, which does not provide details on the end-uses where the chemical is used, is not an exact comparison of the Vintaging Model's emission estimates, but is believed to provide an overall check of the underlying data.

Overall, the Vintaging Model estimates for consumption are lower than the GHGRP data by an average of 13.5 percent across the time series (i.e., 2012 through 2021). The difference is greatest during the last four years (2018 through 2021). A summary of findings from this comparison, potential causes for differences, and related planned improvements are discussed below. Annex 3.9.2 provides additional information on the comparison of the data from the GHGRP and Vintaging Model, and a more detailed discussion of the results.

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[103] Chemical that is exported, transformed, or destroyed—unless otherwise imported back to the United States—will never be emitted in the United States.

[104] Among other provisions, the AIM Act of 2020 directed EPA to develop a U.S. production baseline and a U.S. consumption baseline and to phase down HFC production and consumption relative to those baselines. Data reported to the GHGRP under Subpart OO are relevant to the production and consumption baselines. The data below include aggregated Subpart OO data for AIM-listed HFCs for reporting years 2012 through 2021 from all companies that reported AIM-listed HFCs, though not all species were reported in each reporting year.

[105] The model builds an inventory of the in-use stock of equipment and products and ODSs and HFCs in each of the sub-applications. Emissions are subsequently estimated by applying annual and disposal emission rates to each population of equipment and products. See Annex 3.9.1. for further details on the model.

[106] The Vintaging Model does not calculate "consumption" as defined under the Montreal Protocol and the AIM Act, because the model includes chemical supplied to pre-charge equipment made overseas and sent to the domestic market and does not include chemical produced or imported in the United States but placed in products shipped to foreign markets.

Comparison of Emissions Derived from Atmospheric Measurements to Modeled Emissions

Emissions of some fluorinated greenhouse gases are estimated for the contiguous United States by scientists at the National Oceanic and Atmospheric Administration (NOAA) and were used to perform additional quality control by comparing the emission estimates derived from atmospheric measurements by NOAA to the bottom-up emission estimates from the Vintaging Model. The *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2019) Volume 1: General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. Further, it identified fluorinated gases as one of most suitable greenhouse gases for such comparisons. The *2019 Refinement* makes this conclusion on fluorinated gases based on the lack of natural sources, the potential uncertainties in bottom-up inventory methods for some sources, the long life of many of these gases, and the well-known loss mechanisms. Unlike the more abundant gases in the Inventory, since there are no known natural sources of HFCs, the HFC emission sources included in this Inventory account for the majority of total emissions detectable in the atmosphere, and the estimates derived from atmospheric measurements are driven solely by anthropogenic emissions.

The *2019 Refinement* provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC 2019 Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC 2019 Volume 1, Chapter 6).

Emission estimates for four key HFCs (HFC-134a, HFC-125, HFC-143a, and HFC-32) from atmosphere measurements for 2008 through 2014 (Hu et al., 2017) were examined in the 2022 Inventory (EPA 2022b). Recently updated estimates from 2008 through 2020 inferred from the same methodology (Hu et al., 2022; Montzka et al., 2023), available at Hu et al. (2023), were used here for an updated comparison over a longer time series. This provides a quality check on the modeled emissions reported above. Annex 3.9.2 provides additional details on the data from NOAA as compared to the Vintaging Model and a more detailed discussion of the results. Potential Inventory updates identified due to the current comparison with atmospheric-derived emission estimates are noted in the Planned Improvements section below.

Summary of Comparisons

Comparing the Vintaging Model's estimates to GHGRP-reported estimates of supply and emissions estimates derived from atmospheric measurements, particularly for more widely used chemicals, can help validate the model. These comparisons show that Vintaging Model consumption estimates are well within the same order of magnitude as the actual consumption data as reported to EPA's GHGRP although the differences in reported net supply and modeled demand are still significant, in particular for more recent years. Using a Tier 2 bottom-up modeling methodology to estimate emissions requires assumptions and expert judgment so it is expected that the model will have limitations. The differences (i.e., higher net supply seen in GHGRP compared to the modeled supply) are likely due in part to temporal discrepancies, including 1) the top-down data are reported at the time of actual production or import, and the bottom-up data are calculated at the time of actual placement on the market and 2) stockpiling of chemicals by suppliers and distributors to produce or import additional quantities of HFCs for various reasons such as expectations that prices may increase, or supplies may decrease, in the future (e.g., in response to regulations under the AIM Act). Based on information collected by the EPA during previous ODS phasedowns at the time, such stockpiling behavior was seen, and it is concluded that such behavior similarly exists amongst HFC suppliers in anticipation of current and recently promulgated controls on HFCs. Any such activity would increase the GHGRP data as compared to the modeled data. This effect is likely the major reason why there is a divergence in this comparison, with the GHGRP data in 2017 through 2021 (i.e., the years following agreement of the Kigali Amendment to the Montreal Protocol) significantly higher than the modeled data and the final year before AIM regulations took effect. Improvements of the model methodology to incorporate a temporal factor could be investigated. Additional discussion on potential reasons for differences are discussed in Annex 3.9.2.

The comparisons of modeled emissions for four key HFCs show reasonable agreement with atmospheric measurement derivations of emissions from Hu et al. (2023), though certain chemicals and during certain years

differences can be significant. From consideration of EPA and NOAA results, EPA finds that emissions of HFC-32 and HFC-125, used predominantly in the stationary air conditioning sector, are increasing relatively rapidly. On the other hand, emissions for HFC-143a have stabilized, consistent with less use of this chemical due to the transition away from higher-GWP refrigerants (e.g., R-404A to R-407A in commercial refrigeration). Magnitudes of emission for HFC-134a, the HFC emitted in the largest quantities from the United States, are fairly similar on average when estimated from either approach over the 2008-2020 period, but the decrease derived from the inventory analysis does not appear to be reflected in the atmosphere-derived estimates. Hence, areas for further research that may improve the modeling are highlighted in the Planned Improvements section.

Considering the strengths and weaknesses of three independent approaches for estimating consumption and emissions of these HFCs, in most instances the estimates provide added confidence in EPA's understanding of total U.S. emissions for these chemicals and how they've change over time and, furthermore, the comparisons have helped identify areas for potential improvement in the future. Annex 3.9.2 provides a more detailed discussion of the results.

Recalculations Discussion

For the current Inventory, updates to the Vintaging Model included updating 2021 growth rates for residential and commercial unitary air-conditioning to align with annual sales estimates published by AHRI. Projected growth rates were updated for residential unitary air-conditioning to align with projected residential housing available from the Energy Information Administration (EIA) and commercial unitary air-conditioning growth rates were updated based on new commercial floorspace growth projections from EIA (EPA 2022a).

Refrigerant transitions for road transport and modern rail transport were updated to reflect manufacturer announcements regarding the use of R-452A in place of R-404A (EPA 2022b). Manufacturing emissions for domestic refrigerator foam were adjusted to only include equipment manufactured within the United States, including those that are produced for export, and excluding those that are imported with foam.

The current Inventory also began reporting CO_2 emissions from ODS substitute use as a refrigerant, foam blowing agent, and fire extinguishing agent. The impact of this addition has very little effect to total emissions across the timer series; for example, CO_2 emissions represent 0.002 percent of CO_2-equivalent total emissions in 2021.

In addition, for the current Inventory, CO_2-equivalent emissions totals of HFCs and PFCs from ODS substitutes have been revised to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report (AR5)* (IPCC 2013). AR5 GWP values differ slightly from those presented in AR4 (IPCC 2007) used in the previous inventories. The AR5 GWPs have been applied across the entire time series for consistency. The GWPs of HFC-134a and HFC-125, the two most significant contributors to total emissions in this source category, have decreased, from 1,430 to 1,300 and from 3,500 to 3,170, respectively, leading to a decrease in calculated CO_2-equivalent emissions for those HFCs. In contrast, the GWPs of HFC-32 and HFC-143a, the third and fourth most significant contributors to total emissions in this source category, have increased, from 675 to 677 and from 4,470 to 4,800, respectively, leading to an increase in calculated CO_2-equivalent emissions for those HFCs. Compared to the previous Inventory which applied 100-year GWP values from AR4, the average annual changes in CO_2-equivalent emissions across the time series 1990-2020 for the four most prevalent HFCs were a 9 percent decrease for HFC-134a, 9 percent decrease for HFC-125, 0.3 percent increase for HFC-32, and 7 percent increase for HFC-143a. The net impact from these updates and the additional updates noted above was an average annual 5.6 percent decrease in total emissions for the time series. Further discussion on this update and the overall impacts of updating the GWPs values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Future improvements to the Vintaging Model are planned for the Refrigeration and Air-conditioning, Fire Suppression, and Aerosols sectors. Specifically, refrigerated storage space estimates published biannually from the United States Department of Agriculture (USDA) are being compared to cold storage warehouse space currently

estimated in the Vintaging Model. EPA is also reviewing the addition of an end-use representing multi-split air-conditioning units. Streaming agent fire suppression lifetimes, market size, and growth rates and flooding agent fire suppression market transitions are under review to align more closely with real world activities. In addition, further refinement of HFC consumption in MDIs is expected from review of data collected on HFC use for MDI production, imports, and exports in response to requests for application-specific allowances for MDIs. EPA expects these revisions to be prepared for the 2024 or 2025 Inventory submission.

As discussed above, future reporting under the AIM Act may provide useful information for verification purposes and possible improvements to the Vintaging Model, such as information on HFC stockpiling behaviors. EPA expects this reporting by early 2023 and incorporation into the 2024 or 2025 report. Should the data suggest structural changes to the model, such as the handling of stockpiles before use, EPA expects to introduce the revised model for the 2025 or 2026 Inventory submission.

Several potential improvements to the Inventory were identified in the 2022 Inventory submission based on the comparisons discussed above—net supply values from the GHGRP and emission estimates derived from atmospheric measurements—and remain valid. To estimate HFC emissions for just the contiguous United States, matching the coverage by the atmospheric measurements, EPA will investigate the availability of data from Alaska, Hawaii, and U.S. territories. This is planned by the 2025 Inventory submission. To improve estimates of HFC-125 and HFC-143a, further research into the refrigeration market can be made. Research in this industry on the shift away from blends such as R-404A or success in lowering emission rates could be used to improve the Inventory estimate. This is planned for the 2024 Inventory cycle. That said, for the years where both the atmospheric measurements and the model display a roughly constant emission of HFC-143a at similar levels, the new results suggest robust estimates for the refrigeration market. Uncertainty estimates by species would aid in comparisons to atmospheric data. EPA will explore the possibility of revising the Monte Carlo analysis to differentiate between species, starting with the higher-emitted HFCs identified above, in a future (i.e., 2024 or 2025) Inventory submission. Reclamation reports and, when available, information gathered under the AIM Act, could be used to improve the understanding of how chemical moves through the economy and could resolve some of the temporal effects discussed in Annex 3.9.2. This would likely require revisions to the basic model structure and could be introduced for the 2025 or 2026 Inventory submission. The additional data from the atmospheric measurements suggests additional items to investigate. The faster uptick in HFC-32 and HFC-125 emissions suggests additional emissions of R-410A compared to the model's estimation. Further investigation into the emission rate, whether that varies over time, stocks, lifetimes, and other factors will be investigated for the 2025 Inventory submission.

4.25 Electrical Transmission and Distribution (CRF Source Category 2G1)

The largest use of sulfur hexafluoride (SF_6), both in the United States and internationally, is as an electrical insulator and interrupter in equipment that transmits and distributes electricity (RAND 2004). The gas has been employed by the electric power industry in the United States since the 1950s because of its dielectric strength and arc-quenching characteristics. It is used in gas-insulated substations, circuit breakers, and other switchgear. SF_6 has replaced flammable insulating oils in many applications and allows for more compact substations in dense urban areas. Another greenhouse gas emitted in much smaller amounts by the electric power industry is tetrafluoromethane (CF_4), which is mixed with SF_6 to avoid liquefaction at low temperatures (Middleton 2000). While mixed gas circuit breakers are more common in extremely cold climates in geographies outside of the United States, some U.S. manufacturers of electrical equipment are emitting CF_4 during the manufacturing of equipment designed to hold the SF_6/CF_4 gas mixture. However, no electrical transmission and distribution facilities in the United States have reported emissions of or equipment using CF_4. SF_6 emissions exceed PFC emissions from electric power systems on both a GWP-unweighted and GWP-weighted basis.

Fugitive emissions of SF_6 and CF_4 can escape from gas-insulated substations and switchgear through seals, especially from older equipment. The gas can also be released during equipment manufacturing, installation, servicing, and disposal. Emissions of SF_6 and CF_4 from equipment manufacturing and from electrical transmission and distribution systems were estimated to be 5.98 MMT CO_2 Eq. (0.3 kt) in 2021. This quantity represents a 76 percent decrease from the estimate for 1990 (see Table 4-117 and Table 4-118). There are a few potential causes for this decrease: a sharp increase in the price of SF_6 during the 1990s and a growing awareness of the environmental impact of SF_6 emissions through programs such as EPA's voluntary SF_6 Emission Reduction Partnership for Electric Power Systems (Partnership) and EPA's GHGRP, regulatory drivers at the state and local levels, and research and development of alternative gases to SF_6 that can be used in gas-insulated substations. Utilities participating in the Partnership have lowered their emission factor from 13 percent in 1999 (kg SF_6 emitted per kg of nameplate capacity) to 1 percent in 2021. SF_6 emissions reported by electric power systems to EPA's GHGRP have decreased by 42 percent from 2011 to 2021,[107] with much of the reduction seen from utilities that are not participants in the Partnership. These utilities may be making relatively large reductions in emissions as they take advantage of relatively large and/or inexpensive emission reduction opportunities (i.e., "low hanging fruit," such as replacing major leaking circuit breakers) that Partners have already taken advantage of under the voluntary program (Ottinger et al. 2014). However, total emissions from electrical transmission and distribution in 2021 were higher than 2020 emissions, increasing by 2.17 percent, largely due to a large increase in transmission miles.

Table 4-117: SF_6 and CF_4 Emissions from Electric Power Systems and Electrical Equipment Manufacturers (MMT CO_2 Eq.)

Year	Electric Power Systems	Electrical Equipment Manufacturers	Total
1990	24.3	0.3	**24.7**
2005	11.2	0.7	**11.8**
2017	5.2	0.3	**5.5**
2018	4.9	0.3	**5.2**
2019	5.7	0.4	**6.1**
2020	5.3	0.5	**5.9**
2021	5.6	0.4	**6.0**

Note: Totals may not sum due to independent rounding.

[107] Analysis of emission trends from facilities reporting to EPA's GHGRP is imperfect due to an inconsistent group of reporters year to year. A facility that has reported total non-biogenic greenhouse gas emissions below 15,000 metric tons of carbon dioxide equivalent (MT CO_2 Eq.) for three consecutive years or below 25,000 MT CO_2 Eq. for five consecutive years to EPA's GHGRP can discontinue reporting for all direct emitter subparts. For this sector, most of the variability in the group of reporters is due to facilities exiting the GHGRP due to being below one of these thresholds; however, facilities must re-enter the program if their emissions at a later date are above 25,000 MT CO_2 Eq., which may occur for a variety of reasons, including changes in facility size and changes in emission rates.

Table 4-118: SF_6 and CF_4 Emissions from Electric Power Systems and Electrical Equipment Manufacturers (kt)

Year	SF_6 Emissions	CF_4 Emissions
1990	1.0	NO
2005	0.5	0.00031
2017	0.2	+
2018	0.2	NO
2019	0.3	0.00006
2020	0.2	0.00002
2021	0.3	0.00016

+ Does not exceed 0.000005 kt.
NO (Not Occurring)

Methodology and Time-Series Consistency

The estimates of emissions from Electrical Transmission and Distribution are comprised of emissions from electric power systems and emissions from the manufacture of electrical equipment. The methodologies for estimating both sets of emissions are described below.

1990 through 1998 Emissions from Electric Power Systems

Emissions from electric power systems from 1990 through 1998 were estimated based on (1) the emissions estimated for this source category in 1999, which, as discussed in the next section, were based on the emissions reported during the first year of EPA's SF_6 Emission Reduction Partnership for Electric Power Systems (Partnership), and (2) the RAND survey of global SF_6 emissions. Because most utilities participating in the Partnership reported emissions only for 1999 through 2011, modeling was used to estimate SF_6 emissions from electric power systems for the years 1990 through 1998. To perform this modeling, U.S. emissions were assumed to follow the same trajectory as global emissions from this source during the 1990 through 1999 period. To estimate global emissions, the RAND survey of global SF_6 sales was used, together with the following equation for estimating emissions, which is derived from the mass-balance equation for chemical emissions (Volume 3, Equation 7.3) in the *2006 IPCC Guidelines*.[108] (Although Equation 7.3 of the *2006 IPCC Guidelines* appears in the discussion of substitutes for ozone-depleting substances, it is applicable to emissions from any long-lived pressurized equipment that is periodically serviced during its lifetime.)

Equation 4-23: Estimation for SF_6 Emissions from Electric Power Systems

Emissions (kilograms SF_6) = SF_6 purchased to refill existing equipment (kilograms) + nameplate capacity of retiring equipment (kilograms) [109]

Note that the above equation holds whether the gas from retiring equipment is released or recaptured; if the gas is recaptured, it is used to refill existing equipment, thereby lowering the amount of SF_6 purchased by utilities for this purpose.

[108] Ideally, sales to utilities in the United States between 1990 and 1999 would be used as a model. However, this information was not available. There were only two U.S. manufacturers of SF_6 during this time period, so it would not have been possible to conceal sensitive sales information by aggregation.

[109] Nameplate capacity is defined as the amount of SF_6 within fully charged electrical equipment.

Gas purchases by utilities and equipment manufacturers from 1961 through 2003 are available from the RAND (2004) survey. To estimate the quantity of SF_6 released or recovered from retiring equipment, the nameplate capacity of retiring equipment in a given year was assumed to equal 81.2 percent of the amount of gas purchased by electrical equipment manufacturers 40 years previous (e.g., in 2000, the nameplate capacity of retiring equipment was assumed to equal 81.2 percent of the gas purchased in 1960). The remaining 18.8 percent was assumed to have been emitted at the time of manufacture. The 18.8 percent emission factor is an average of IPCC default SF_6 emission rates for Europe and Japan for 1995 (IPCC 2006). The 40-year lifetime for electrical equipment is also based on IPCC (2006). The results of the two components of the above equation were then summed to yield estimates of global SF_6 emissions from 1990 through 1999.

U.S. emissions between 1990 and 1999 are assumed to follow the same trajectory as global emissions during this period. To estimate U.S. emissions, global emissions for each year from 1990 through 1998 were divided by the estimated global emissions from 1999. The result was a time series of factors that express each year's global emissions as a multiple of 1999 global emissions. Historical U.S. emissions were estimated by multiplying the factor for each respective year by the estimated U.S. emissions of SF_6 from electric power systems in 1999 (estimated to be 14.0 MMT CO_2 Eq.).

Two factors may affect the relationship between the RAND sales trends and actual global emission trends. One is utilities' inventories of SF_6 in storage containers. When SF_6 prices rise, utilities are likely to deplete internal inventories before purchasing new SF_6 at the higher price, in which case SF_6 sales will fall more quickly than emissions. On the other hand, when SF_6 prices fall, utilities are likely to purchase more SF_6 to rebuild inventories, in which case sales will rise more quickly than emissions. This effect was accounted for by applying 3-year smoothing to utility SF_6 sales data. The other factor that may affect the relationship between the RAND sales trends and actual global emissions is the level of imports from and exports to Russia and China. SF_6 production in these countries is not included in the RAND survey and is not accounted for in any another manner by RAND. However, atmospheric studies confirm that the downward trend in estimated global emissions between 1995 and 1998 was real (see the Uncertainty discussion below).

1999 through 2021 Emissions from Electric Power Systems

Emissions from electric power systems from 1999 to 2021 were estimated based on: (1) reporting from utilities participating in EPA's SF_6 Emission Reduction Partnership for Electric Power Systems (Partners), which began in 1999; (2) reporting from utilities covered by EPA's GHGRP, which began in 2012 for emissions occurring in 2011 (GHGRP-Only Reporters); and (3) the relationship between utilities' reported emissions and their transmission miles as reported in the 2001, 2004, 2007, 2010, 2013, and 2016 Utility Data Institute (UDI) Directories of Electric Power Producers and Distributors (UDI 2001, 2004, 2007, 2010, 2013, and 2017), and 2019, 2020, and 2021 Homeland Infrastructure Foundation-Level Data (HIFLD) (HIFLD 2019, 2020, and 2021), which was applied to the electric power systems that do not report to EPA (Non-Reporters). Total U.S. transmission mileage was interpolated between 2016 and 2019 to estimate transmission mileage of electric power systems in 2017 and 2018. (Transmission miles are defined as the miles of lines carrying voltages above 34.5 kV).

Partners

Over the period from 1999 to 2021, Partner utilities, which for inventory purposes are defined as utilities that either currently are or previously have been part of the Partnership,[110] represented 49 percent, on average, of total U.S. transmission miles. Partner utilities estimated their emissions using a Tier 3 utility-level mass balance approach (IPCC 2006). If a Partner utility did not provide data for a particular year, emissions were interpolated between years for which data were available or extrapolated based on Partner-specific transmission mile growth

[110] Starting in the 1990 to 2015 Inventory, partners who had reported three years or less of data prior to 2006 were removed. Most of these Partners had been removed from the list of current Partners but remained in the Inventory due to the extrapolation methodology for non-reporting partners.

rates. In 2012, many Partners began reporting their emissions (for 2011 and later years) through EPA's GHGRP (discussed further below) rather than through the Partnership. In 2021, less than 1 percent of the total emissions attributed to Partner utilities were reported through Partnership reports. Approximately 99.7 percent of the total emissions attributed to Partner utilities were reported and verified through EPA's GHGRP.[111] Overall, the emission rates reported by Partners have decreased significantly throughout the time series.

Non-Partners

Non-Partners consist of two groups: Utilities that have reported to the GHGRP beginning in 2012 (reporting 2011 emissions) or later years (GHGRP-only Reporters) and utilities that have never reported to the GHGRP (Non-Reporters). EPA's GHGRP requires users of SF_6 in electric power systems to report emissions if the facility has a total SF_6 nameplate capacity that exceeds 17,820 pounds. (This quantity is the nameplate capacity that would result in annual SF_6 emissions equal to 25,000 metric tons of CO_2 equivalent at the historical emission rate reported under the Partnership.) As under the Partnership, electric power systems that report their SF_6 emissions under EPA's GHGRP are required to use the Tier 3 utility-level mass-balance approach. GHGRP-Only Reporters accounted for 16 percent of U.S. transmission miles and 13 percent of estimated U.S. emissions from electric power system in 2021.[112]

From 1999 through 2010, emissions from both GHGRP-only Reporters and Non-Reporters were estimated in the same way. From 1999 through 2008, emissions were estimated using the results of a regression analysis that correlated the 1999 emissions from Partner utilities with their 1999 transmission miles.[113] The 1999 regression coefficient (emission factor) was held constant through 2008 and multiplied by the transmission miles estimated for the non-Partners for each year.

The 1999 regression equation for Non-Partners was developed based on the emissions reported by a subset of Partner utilities who reported non-zero emissions and non-zero transmission miles (representing approximately 50 percent of total U.S. transmission miles). The regression equation for 1999 is displayed in the equation below.

Equation 4-24: Regression Equation for Estimating SF_6 Emissions of Non-Reporting Facilities in 1999

$$\text{Emissions (kg)} = 0.771 \times \text{Transmission Miles}$$

For reasons discussed further below in the Recalculations section, the emission factor for the non-Partners was assumed to decrease beginning in 2009, trending toward the regression coefficient (emission factor) calculated for the GHGRP-only reporters based on their reported 2011 emissions and transmission miles. Emission factors for 2009 and 2010 were linearly interpolated between the 1999 and 2011 emission factors. For 2009, the emissions of non-Partners were estimated by multiplying their transmission miles by the interpolated 2009 emission factor (0.65 kg/transmission mile).

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[111] Only data reported as of August 12, 2022 are used in the emission estimates for the prior year of reporting. Emissions for Partners that did not report to the Partnership or GHGRP are extrapolated for three years using a utility-specific transmission mile growth rate. After four consecutive years of non-reporting they are included in the 'non-reporting Partners' category. It should be noted that data reported through EPA's GHGRP must go through a verification process. For electric power systems, verification involved a series of electronic range, completeness, and algorithm checks for each report submitted.

[112] GHGRP-reported and Partner transmission miles from a number of facilities were equal to zero with non-zero emissions. These facilities emissions were added to the emissions totals for their respective parent companies when identifiable and not included in the regression equation when not identifiable or applicable. Other facilities reported non-zero transmission miles with zero emissions, or zero transmission miles and zero emissions. These facilities were not included in the development of the regression equations (discussed further below). These emissions are already implicitly accounted for in the relationship between transmission miles and emissions.

[113] In the United States, SF_6 is contained primarily in transmission equipment rated above 34.5 kV.

The 2011 regression equation was developed based on the emissions reported by GHGRP-Only Reporters who reported non-zero emissions and non-zero transmission miles (representing approximately 23 percent of total U.S. transmission miles). The regression equation for 2011 is displayed below.

Equation 4-25: Regression Equation for Estimating SF_6 Emissions of GHGRP-Only Reporters in 2011

$$\text{Emissions (kg)} = 0.397 \times \text{Transmission Miles}$$

For 2011 and later years, the emissions of GHGRP-only reporters were generally equated to their reported emissions, unless they did not report. The emissions of GHGRP-only reporters that have years of non-reporting between reporting years are gap filled by interpolating between reported values.

For 2010 and later years, the emissions of non-Reporters were estimated by multiplying their transmission miles by the estimated 2010 emission factor (0.52 kg/transmission mile), which was held constant from 2010 through 2021.

Off-ramping GHGRP Facilities

The GHGRP program has an "off-ramp" provision (40 CFR Part 98.2(i)) that exempts facilities from reporting under certain conditions. If reported total greenhouse gas emissions are below 15,000 metric tons of carbon dioxide equivalent (MT CO_2 Eq.) for three consecutive years or below 25,000 MT CO_2 Eq. for five consecutive years, the facility may elect to discontinue reporting. Emissions of GHGRP reporters that have off-ramped are extrapolated for three years of non-reporting using a utility-specific transmission mile growth rate. After three consecutive years of non-reporting, emissions for facilities that off-ramped from GHGRP were estimated using an emissions rate derived from the reported emissions and transmission miles of GHGRP-only reporters in the respective year.

Table 4-119: GHGRP-only Average Emission Rate (kg per mile)

	2011		2017	2018	2019	2020	2021
Average emission rate	0.40		0.24	0.22	0.28	0.26	0.25

Table 4-120: Categorization of Utilities and Timeseries for Application of Corresponding Emission Estimation Methodologies

Categorization of Utilities	Timeseries
Partners	1999 - 2021
Non-Partners (GHGRP-Only)	2011 – 2021
Non-Partners (Remaining Non-Reporting Utilities)	1999 – 2021
Off-ramping GHGRP Facilities	2017 – 2021

Total Industry Emissions

As a final step, total electric power system emissions from 1999 through 2021 were determined for each year by summing the Partner reported and estimated emissions (reported data was available through the EPA's SF_6 Emission Reduction Partnership for Electric Power Systems), the GHGRP-only reported emissions, off-ramping GHGRP Facilities (non-reporters), non-reporters who eventually report to GHGRP, and the non-reporting utilities' emissions.

Non-Partner Transmission Miles

Data on transmission miles for each Non-Reporter for the years 2000, 2003, 2006, and 2009, 2012, and 2016 were obtained from the 2001, 2004, 2007, 2010, 2013, and 2017 UDI Directories of Electric Power Producers and Distributors, respectively (UDI 2001, 2004, 2007, 2010, 2013, and 2017). For 2019, 2020, and 2021 non-reporter transmission mileage was derived by subtracting reported transmission mileage data from the total U.S. transmission mileage from 2019, 2020, and 2021 HIFLD Data (HIFLD 2019, 2020, and 2021). The following trends in transmission miles have been observed over the time series:

- The U.S. transmission system grew by over 22,000 miles between 2000 and 2003 yet declined by almost 4,000 miles between 2003 and 2006. Given these fluctuations, periodic increases are assumed to occur gradually. Therefore, transmission mileage was assumed to increase at an annual rate of 1.2 percent between 2000 and 2003 and decrease by 0.20 percent between 2003 and 2006.
- The U.S. transmission system's annual growth rate grew to 1.7 percent from 2006 to 2009 as transmission miles increased by more than 33,000 miles.
- The annual growth rate for 2009 through 2012 was calculated to be 1.5 percent as transmission miles grew yet again by over 30,000 miles during this time period.
- The annual transmission mile growth rate for 2012 through 2016 was calculated to be 0.4 percent, as transmission miles increased by approximately 10,250 miles.
- The annual transmission mile growth rate for 2016 through 2020 was calculated to be 0.7 percent, as transmission miles increased by approximately 20,300 miles.
- The annual transmission mile growth rate for 2020 through 2021 was calculated to be 2.2 percent, as transmission miles increased by approximately 16,152 miles.

Transmission miles for each year for non-reporters were calculated by interpolating between UDI reported values obtained from the 2001, 2004, 2007, 2010, 2013 and 2017 UDI directories and 2019 HIFLD data. In cases where a non-reporter previously reported the GHGRP or the Partnership, transmission miles were interpolated between the most recently reported value and the next available UDI value.

1990 through 2021 Emissions from Manufacture of Electrical Equipment

Three different methods were used to estimate 1990 to 2021 emissions from original electrical equipment manufacturers (OEMs).

- OEM SF_6 emissions from 1990 through 2000 were derived by assuming that manufacturing emissions equaled 10 percent of the quantity of SF_6 provided with new equipment. The 10 percent emission rate is the average of the "ideal" and "realistic" manufacturing emission rates (4 percent and 17 percent, respectively) identified in a paper prepared under the auspices of the International Council on Large Electric Systems (CIGRE) in February 2002 (O'Connell et al. 2002). The quantity of SF_6 provided with new equipment was estimated based on statistics compiled by the National Electrical Manufacturers Association (NEMA). These statistics were provided for 1990 to 2000.
- OEM SF_6 emissions from 2000 through 2010 were estimated by (1) interpolating between the emission rate estimated for 2000 (10 percent) and an emission rate estimated for 2011 based on reporting by OEMs through the GHGRP (5.7 percent), and (2) estimating the quantities of SF_6 provided with new equipment for 2001 to 2010. The quantities of SF_6 provided with new equipment were estimated using Partner reported data and the total industry SF_6 nameplate capacity estimate (156.5 MMT CO_2 Eq. in 2010). Specifically, the ratio of new nameplate capacity to total nameplate capacity of a subset of Partners for which new nameplate capacity data was available from 1999 to 2010 was calculated. These ratios were then multiplied by the total industry nameplate capacity estimate for each year to derive the amount of SF_6 provided with new equipment for the entire industry. Additionally, to obtain the 2011 emission rate (necessary for estimating 2001 through 2010 emissions), the estimated 2011 emissions (estimated using the third methodology listed below) were divided by the estimated total quantity of SF_6 provided with new equipment in 2011. The 2011 quantity of SF_6 provided with new equipment was estimated in the same way as the 2001 through 2010 quantities.
- OEM CF_4 emissions from 1991 through 2010 were estimated by using an average ratio of reported SF_6 and CF_4 emissions from 2011 through 2013. This ratio was applied to the estimated SF_6 emissions for 1991 through 2010 to arrive at CF_4 emissions. CF_4 emissions are estimated starting in 1991 and assumed zero prior to 1991 based on the entry of the CF_4/SF_6 gas mixture into the market (Middleton 2000).

- OEM emissions from 2011 through 2021 were estimated using the SF_6 and CF_4 emissions from OEMs reporting to the GHGRP, and an assumption that these reported emissions account for a conservatively low estimate of 50 percent of the total emissions from all U.S. OEMs (those that report and those that do not).
- OEM SF_6 emissions from facilities off-ramping from the GHGRP were determined by extrapolation. First, emission growth rates were calculated for each reporting year for each OEM reporting facility as well as an average emissions growth rate (2011-to present). Averages of reported emissions from last three consecutive reporting years were multiplied by the average growth rate for each off-ramping OEM to estimate emissions for the non-reporting year(s).

Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

To estimate the uncertainty associated with emissions of SF_6 and CF_4 from Electrical Transmission and Distribution, uncertainties associated with four quantities were estimated: (1) emissions from Partners, (2) emissions from GHGRP-Only Reporters, (3) emissions from Non-Reporters, and (4) emissions from manufacturers of electrical equipment. A Monte Carlo analysis was then applied to estimate the overall uncertainty of the emissions estimate.

Total emissions from the SF_6 Emission Reduction Partnership include emissions from both reporting (through the Partnership or EPA's GHGRP) and non-reporting Partners. For reporting Partners, individual Partner-reported SF_6 data was assumed to have an uncertainty of 10 percent. Based on a Monte Carlo analysis, the cumulative uncertainty of all Partner-reported data was estimated to be 6.3 percent. The uncertainty associated with extrapolated or interpolated emissions from non-reporting Partners was assumed to be 20 percent.

For GHGRP-Only Reporters, reported SF_6 data was assumed to have an uncertainty of 10 percent. Based on a Monte Carlo analysis, the cumulative uncertainty of all GHGRP-Only reported data was estimated to be 8.3 percent.

As discussed below, EPA has substantially revised its method for estimating emissions from non-Reporters, assuming that the average emission rate of non-Reporters has declined much more slowly than the average emission rate of reporting facilities rather than declining at the same rate. This assumption brings the U.S. SF_6 emissions estimated in this Inventory into better agreement with the U.S. SF_6 emissions inferred from atmospheric observations. However, it must be emphasized that the actual emission rates of non-Reporters remain unknown. It is possible that they are lower or even higher than estimated here. One possibility is that SF_6 sources other than electric power systems are contributing to the emissions inferred from atmospheric observations, implying that the emissions from non-Reporters are lower than estimated here. Another is that the emissions inferred from atmospheric measurements are over- (or under-) estimated, implying that emissions from no-Reporters could be either lower or higher than estimated here. These uncertainties are difficult to quantify and are not reflected in the estimated uncertainty below. The estimated uncertainty below accounts only for the two sources of uncertainty associated with the regression equations used to estimate emissions in 2019 from Non-Reporters: (1) uncertainty in the coefficients (as defined by the regression standard error estimate), and (2) the uncertainty in total transmission miles for Non-Reporters. Uncertainties were also estimated regarding (1) estimates of SF_6 and CF_4 emissions from OEMs reporting to EPA's GHGRP, and (2) the assumption on the percent share of OEM emissions from OEMs reporting to EPA's GHGRP.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 1-57. Electrical Transmission and Distribution SF_6 and CF_4 emissions were estimated to be between 4.6 and 7.4 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 23 percent below and 24 percent above the emission estimate of 6.0 MMT CO_2 Eq.

Table 4-121: Approach 2 Quantitative Uncertainty Estimates for SF_6 and CF_4 Emissions from Electrical Transmission and Distribution (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to 2021 Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Electrical Transmission and Distribution	SF_6 and CF_4	6.0	4.6	7.4	-23%	+24%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

In addition to the uncertainty quantified above for the 2021 estimate, there is uncertainty associated with the emission rates of GHGRP-only facilities before 2011 and of non-Reporters throughout the time series. As noted above in the discussion of the uncertainty of non-Reporters for 2021, these uncertainties are difficult to quantify.

There is also uncertainty associated with using global SF_6 sales data to estimate U.S. emission trends from 1990 through 1999. However, the trend in global emissions implied by sales of SF_6 appears to reflect the trend in global emissions implied by changing SF_6 concentrations in the atmosphere. That is, emissions based on global sales declined by 29 percent between 1995 and 1998 (RAND 2004), and emissions based on atmospheric measurements declined by 17 percent over the same period (Levin et al. 2010).

Several pieces of evidence indicate that U.S. SF_6 emissions were reduced as global emissions were reduced. First, the decreases in sales and emissions coincided with a sharp increase in the price of SF_6 that occurred in the mid-1990s and that affected the United States as well as the rest of the world. A representative from DILO, a major manufacturer of SF_6 recycling equipment, stated that most U.S. utilities began recycling rather than venting SF_6 within two years of the price rise. Finally, the emissions reported by the one U.S. utility that reported its emissions for all the years from 1990 through 1999 under the Partnership showed a downward trend beginning in the mid-1990s.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter and Annex 8 for more details. Category specific QC findings are described below.

For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., including a combination of pre-and post-submittal electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent (EPA 2015).[114] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with a number of general and category-specific QC procedures including: range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions.

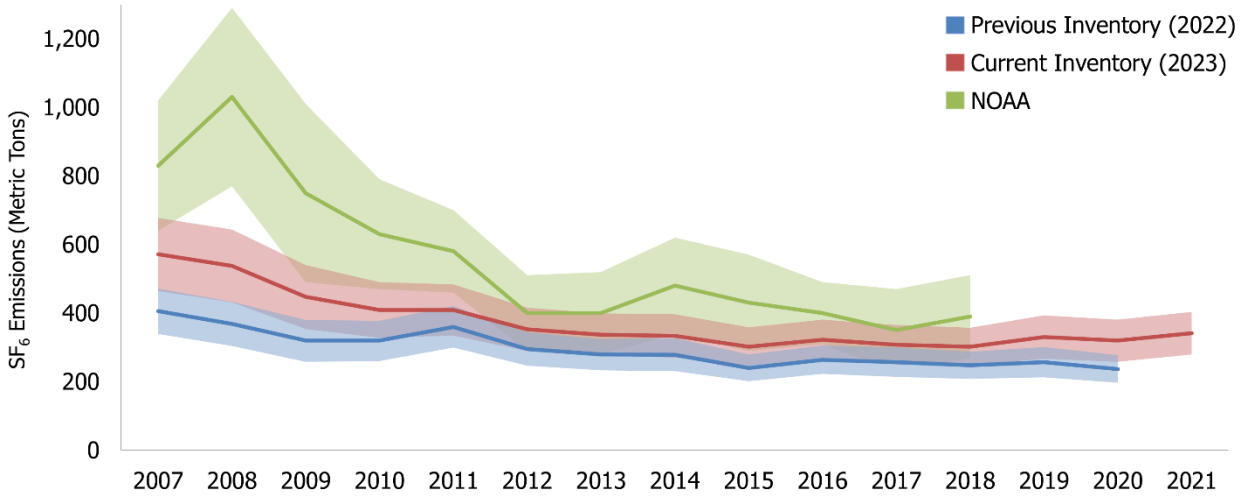
Comparison of Emissions Derived from Atmospheric Measurements to Emissions from Bottom-up Estimates

Emissions of SF_6 have been estimated for the contiguous United States by the National Oceanic and Atmospheric Administration (NOAA) based on atmospheric measurements. To provide additional quality control for the SF_6 emissions estimates presented in this inventory, USEPA and NOAA compared the 2007-2018 emission estimates derived from atmospheric measurements by NOAA to the emission estimates for SF_6-emitting source categories in

[114] GHGRP Report Verification Factsheet. See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

this inventory, of which electrical transmission and distribution is by far the largest.[115] The *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2019) Volume 1: General Guidance and Reporting, Chapter 6: Quality Assurance, Quality Control and Verification notes that atmospheric concentration measurements can provide independent data sets as a basis for comparison with inventory estimates. Further, it identifies fluorinated gases as particularly suited for such comparisons. The *2019 Refinement* makes this conclusion for fluorinated gases based on their lack of significant natural sources,[116] their generally long atmospheric lifetimes, their well-known loss mechanisms, and the potential uncertainties in bottom-up inventory methods for some of their sources. Unlike non-fluorinated greenhouse gases (CO_2, CH_4, and N_2O), SF_6 has no significant natural sources; therefore, the SF_6 estimates derived from atmospheric measurements are driven overwhelmingly by anthropogenic emissions. The *2019 Refinement* provides guidance on conducting such comparisons (as summarized in Table 6.2 of IPCC 2019 Volume 1, Chapter 6) and provides guidance on using such comparisons to identify areas of improvement in national inventories (as summarized in Box 6.5 of IPCC 2019 Volume 1, Chapter 6). Emission estimates derived from atmospheric measurements of SF_6 made at NOAA and described in Hu et al. (2022) were used in this comparison.

Figure 4-3: U.S. Emissions of SF_6 Comparison[a]



[a]Sources: NOAA data from Hu et al. 2022; EPA 1990-2020 inventory estimates from EPA 2022.

As shown in Figure 4-3, a significant gap existed between the atmosphere-derived emissions for 2007-2018 available in Hu et al., and the inventory estimates for the same years in the previous Inventory, particularly in 2010 and earlier years, before reporting through the GHGRP began.[117] With the revisions in methodology described above and below in the "Recalculations" section, the gap between the atmosphere-derived emissions and the estimates in this Inventory is smaller. Nevertheless, differences remain between the atmosphere-derived

[115] Other SF_6-emitting source categories included in this inventory include Magnesium Production and Processing and Electronics Manufacturing.

[116] See Harnisch and Eisenhauer, 1998.

[117] The uncertainties in the NOAA estimates are drawn from Hu et al. (2002). To estimate the 2007-2020 and 2007-2021 uncertainties of EPA's total SF_6 emissions in the previous and current Inventories, the relative uncertainty for each SF_6-emitting category for 2020 or 2021, as applicable, was assumed to apply to the emissions from that source category in all previous years. The relative uncertainty for each source category was then multiplied by the previous Inventory or current Inventory SF_6 emissions estimate for that source category for each year to calculate the absolute uncertainties for each source category for each year in each time series. Finally, these uncertainties were then combined across source categories using Monte Carlo analysis to develop the total uncertainty of SF_6 emissions across the source categories.

emissions and the Inventory estimates, especially before 2011. The EPA is continuing to research potential contributors to this difference. One potential contributor to the difference before 2011 is an SF_6 production plant that operated in Metropolis, Illinois, through 2010, and which is currently unaccounted for in the Inventory. While EPA never received reported emissions from this plant, based on production capacity data from 2006 and the broad range of emission factors observed for production of SF_6 and other fluorinated gases, the plant's SF_6 emissions would likely have ranged between 30 and 300 metric tons yr^{-1} (Hu et al. 2022). Emissions at the upper end of this range would explain most of the gap in 2007 and 2008, and a tapering down of emissions through 2010 might have been expected as the plant reduced production on its way to shutting down. EPA plans to include estimates of emissions from this plant in a future submission of the Inventory. See Planned Improvements below.

Recalculations Discussion

Based in part on comparisons with atmospheric data, the historical emissions estimated for this source category have undergone major revisions for the period 1990 through 2021, namely for non-Partners. Other, relatively smaller recalculations include an adjustment to OEM SF_6 emissions to address GHGRP off-ramping facilities and a correction to earlier year data for two facilities:

- To determine emissions from OEM facilities that have ceased reporting to the GHGRP as a result of the off-ramping provision, emissions were estimated by multiplying the average of reported emissions from the prior three consecutive years by the average growth rate of SF_6 emissions for all reporting years.
- Significant incongruities were identified and corrected in the reported data for two historical nameplate capacities of reporter facilities with one instance in 2011 and the other instance in 2013. In each instance, corrections were made by calculating the expected nameplate capacity using data reported by the facility in the prior year.

Updates were also made to reporter emissions where facilities had resubmitted data.

Recalculations of Non-Partner Emissions

As discussed above, results of research conducted by the National Oceanic Atmospheric Administration (Hu et al. 2022) reveal that total U.S. emissions of SF_6 were likely significantly higher than previously estimated in the inventory, particularly for the years before 2012, when reporting of emissions from electric power systems began under the GHGRP. In addition, the research indicates that U.S. emissions of SF_6 trended strongly downward from 2008 to 2009, and the downward trend continued through 2012.

In evaluating possible drivers for the difference and the strong downward trend, EPA identified non-Partner utilities as a potentially significant contributor. As discussed above, non-Partner utilities consist of two groups: (1) utilities that were required to report to the GHGRP for the first time in 2012 (GHGRP-only reporters) and (2) utilities that have never been required to the GHGRP because they fall under the reporting threshold (non-reporters). The emission rates of the GHGRP-only facilities before 2011 are not known, and the emission rates of non-reporters are not known for any year of the time series. A simple assumption would be that the emission rates of the non-Partners have been the same as those of the Partners. However, this assumption is uncertain because the Partners and non-Partners are distinct populations whose emission rates may have varied in magnitude, trend, or both. For example, both the Partners and the GHGRP-only reporters have reduced their emission rates over time. The extent to which non-Partners and, for more recent years, non-reporters have also reduced emission rates depends on how much the observed reductions are due to industry-wide trends (such as improved electrical equipment design and materials and greater availability of SF_6 recycling equipment) versus emission reduction efforts that result directly from tracking and reporting emissions (such as improved SF_6 handling practices and equipment refurbishment or replacement campaigns). In general, non-reporting facilities would be expected to show reductions related to industry-wide trends, but not reductions related to tracking and reporting emissions.

EPA has previously revised assumptions regarding the emission rates of non-Partner utilities based on ongoing review and statistical analysis of data from the Partnership and the GHGRP. In U.S. Inventories submitted in 2012 and earlier years, non-Partners were assumed to have the same emission rate per transmission mile as the

Partners (except certain outliers) had in 1999, when the Partnership began. Because Partners significantly decreased their emission rates as the Partnership continued, the assumption that non-Partners continued to emit at the Partners' 1999 rate caused the estimated emission rates for Partners and non-Partners to diverge over time. In 2012, the submittal of the first set of reports (for 2011) by GHGRP-only utilities provided some insight into the emission rates of non-Partner utilities. When the emission rates of Partners and GHGRP-only facilities were compared in 2012, no statistically significant difference was found. Thus, in the U.S. Inventories submitted in 2013 through 2022, EPA assumed that the emission rates per transmission mile of non-reporting utilities (and of GHGRP-only utilities before 2011) were similar to those of Partners (before 2011) and then of GHGRP reporters (in and after 2011). Specifically, non-reporter emissions for 2011 and later years were estimated by multiplying non-reporter transmission miles by regression coefficients derived for reporting facilities for the same year. Non-reporter and GHGRP-only emissions for 1999 through 2006 were estimated by linearly interpolating between the 1999 regression coefficient (based on 1999 Partner data) and 2006 regression coefficient. Non-reporter and GHGRP-only emissions for 2007 through 2010 were estimated by linearly interpolating between the 2006 regression coefficient and the 2011 regression coefficient.

The results of the comparison with the atmosphere-derived emissions suggest that, rather than decreasing in tandem with the emission rates of the Partners from 1999 onward, the emission rates of the non-Partners may have remained high until 2008, decreasing sharply thereafter. In 2008, EPA began to develop the GHGRP, and the final rule establishing the GHGRP scope and reporting requirements for electric power systems was published in 2010. Thus, the trend is consistent with the hypothesis that non-Partner utilities, faced with the possibility of being required to calculate and report their SF_6 emissions, began to take action to understand and reduce those emissions in 2009. Resources for tracking, and to some extent, reducing, emissions were available on EPA's website for the Partnership and elsewhere. The importance of tracking and reporting emissions to emission reduction efforts is supported by analysis of the emissions reported by both Partner and GHGRP-only utilities. Both sets of data show that emissions declined most rapidly during the first three years of reporting (1999-2001 for the Partners; 2011-2013 for the GHGRP-only utilities). In addition, while there was no statistically significant difference (at the 95% confidence level) between the Partner and GHGRP-only facility emission rates in 2011, subsequent analysis of the data shows that the emission rates of the GHGRP-only facilities were, on average, higher than those of the Partners, but that the difference was rapidly narrowed in subsequent years. This is consistent with Partners having already made cost-effective reductions in earlier years that the GHGRP-only facilities implemented as they began reporting.

Given these atmospheric findings, the trends in emission reductions upon initial reporting, and because emissions from non-reporting electric power systems are a significant source of uncertainty in the current U.S. SF_6 inventory, EPA revised the methodology used to estimate non-reporter emissions. To recalculate non-Partner emissions from 1999 through 2010, an updated regression coefficient (emissions as a function of transmission miles) that includes outliers for 1999 was calculated to estimate non-reporter emissions for 1999. In addition, a new regression coefficient was calculated for 2011 that includes GHGRP-only Reporters. New emissions rates (SF_6 emissions/ Transmission Miles) were calculated for 1999 and 2011. The 1999 emissions rate was held constant to estimate non-Partner emissions from 2000-2008. Emissions from 2009 to 2010 were based on the interpolated emission rate between 2008 (still held at the 1999 emission rate) and the 2011 emission rate from the GHGRP-only reporters, as discussed above. The interpolated 2010 emission rate was used for estimating non-reporter emissions from 2010 through 2021. As a result of the revision to the methodology used to estimate non-reporter emissions in this inventory, non-reporter SF_6 emissions estimates increased by 94 percent at an average, for years 1999 to 2020, in comparison to the 1999 to 2020 inventory emissions estimates. Non-reporting facilities were assumed to have significantly lowered their emissions rates in anticipation of the GHGRP, but not to have made additional substantial improvements after determining that they were not subject to the rule. Of note, even though the emissions per transmission mile are being held constant for non-reporters, the implied emission rate in terms of emissions per nameplate capacity is still decreasing, although at a slower rate than for reporters, as the average nameplate capacity per transmission mile continues to increase.

As a result of the recalculations, SF_6 emissions from electrical transmission and distribution increased by 50 percent for 2020 relative to the previous report. On average, SF_6 emission estimates for 1999 through 2020 increased by approximately 23 percent per year.

Revision of Global Warming Potentials (GWPs)

In addition to methodological updates discussed above, for the current Inventory, calculated CO_2-equivalent estimates of SF_6 and CF_4 emissions from electrical transmission and distribution have been updated to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWP values have been applied across the entire time series for consistency. The GWP for SF_6 has increased from 22,800 to 23,500, leading to an overall increase in CO_2-equivalent SF_6 emissions and the GWP for CF_4 decreased from 7,390, to 6,630, leading to a decrease in CO_2-equivalent CF_4 emissions. The average annual change in CO_2 equivalent emissions of SF_6 was a 3.07 percent increase and the average annual change in CO_2-equivalent emissions of CF_4 was a 10.28 percent decrease for the time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA plans to revisit the methodology for determining emissions from the manufacture of electrical equipment, in particular, the assumption that emissions reported by OEMs account for a conservatively low estimate of 50 percent of the total emissions from all U.S. OEMs. Additional market research will be required to confirm or modify the assumptions regarding the portion of industry not reporting to the GHGRP program. See Annex 5 for more information on EPA's plans to review available data to reflect the emissions from the missing SF_6 production facility and allocate and report those emissions under the appropriate category (i.e., fluorochemical production category) in future Inventories.

4.26 Nitrous Oxide from Product Uses (CRF Source Category 2G3)

Nitrous oxide (N_2O) is a clear, colorless, oxidizing liquefied gas with a slightly sweet odor which is used in a wide variety of specialized product uses and applications. The amount of N_2O that is actually emitted depends upon the specific product use or application.

There are a total of three N_2O production facilities currently operating in the United States (Ottinger 2021). Nitrous oxide is primarily used in carrier gases with oxygen to administer more potent inhalation anesthetics for general anesthesia, and as an anesthetic in various dental and veterinary applications. The second main use of N_2O is as a propellant in pressure and aerosol products, the largest application being pressure-packaged whipped cream. Small quantities of N_2O also are used in the following applications:

- Oxidizing agent and etchant used in semiconductor manufacturing;
- Oxidizing agent used, with acetylene, in atomic absorption spectrometry;
- Production of sodium azide, which is used to inflate airbags;
- Fuel oxidant in auto racing; and
- Oxidizing agent in blowtorches used by jewelers and others (Heydorn 1997).

Production of N_2O in 2021 was approximately 15 kt (see Table 4-122).

Table 4-122: N_2O Production (kt)

Year	1990	2005	2017	2018	2019	2020	2021
Production (kt)	16	15	15	15	15	15	15

Nitrous oxide emissions were 3.8 MMT CO_2 Eq. (14 kt N_2O) in 2021 (see Table 4-123). Production of N_2O stabilized during the 1990s because medical markets had found other substitutes for anesthetics, and more medical procedures were being performed on an outpatient basis using local anesthetics that do not require N_2O. The use of N_2O as a propellant for whipped cream has also stabilized due to the increased popularity of cream products packaged in reusable plastic tubs (Heydorn 1997).

Table 4-123: N_2O Emissions from N_2O Product Usage (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
N_2O Product Usage	3.8	3.8	3.8	3.8	3.8	3.8	3.8

Table 4-124: N_2O Emissions from N_2O Product Usage (kt N_2O)

Year	1990	2005	2017	2018	2019	2020	2021
N_2O Product Usage	14	14	14	14	14	14	14

Methodology and Time-Series Consistency

Emissions from N_2O Product Uses were estimated using the following equation:

Equation 4-26: N_2O Emissions from Product Use

$$E_{pu} = \sum_{a} (P \times S_a \times ER_a)$$

where,

E_{pu} = N_2O emissions from product uses, metric tons

P = Total U.S. production of N_2O, metric tons

a = specific application

S_a = Share of N_2O usage by application *a*

ER_a = Emission rate for application *a*, percent

The share of total quantity of N_2O usage by end-use represents the share of national N_2O produced that is used by the specific subcategory (e.g., anesthesia, food processing). In 2020, the medical/dental industry used an estimated 89.5 percent of total N_2O produced, followed by food processing propellants at 6.5 percent. All other subcategories, including semiconductor manufacturing, atomic absorption spectrometry, sodium azide production, auto racing, and blowtorches, used the remainder of the N_2O produced. This subcategory breakdown changed slightly in the mid-1990s. For instance, the small share of N_2O usage in the production of sodium azide declined significantly during the 1990s. Due to the lack of information on the specific time period of the phase-out in this market subcategory, most of the N_2O usage for sodium azide production is assumed to have ceased after 1996, with the majority of its small share of the market assigned to the larger medical/dental consumption subcategory (Heydorn 1997). For 1990 through 1996, N_2O usage was allocated across the following subcategories: medical applications, food processing propellant, and sodium azide production. A usage emissions rate was then applied for each subcategory to estimate the amount of N_2O emitted.

Only the medical/dental and food propellant subcategories were assumed to release emissions into the atmosphere that are not captured under another source category, and therefore these subcategories were the only usage subcategories with emission rates. Emissions of N_2O from semiconductor manufacturing are described

in Section 4.23 Electronics Industry (CRF Source Category 2E) and reported under CRF Source Category 2H3. For the medical/dental subcategory, due to the poor solubility of N_2O in blood and other tissues, none of the N_2O is assumed to be metabolized during anesthesia and quickly leaves the body in exhaled breath. Therefore, an emission factor of 100 percent was used for this subcategory (IPCC 2006). For N_2O used as a propellant in pressurized and aerosol food products, none of the N_2O is reacted during the process and all of the N_2O is emitted to the atmosphere, resulting in an emission factor of 100 percent for this subcategory (IPCC 2006). For the remaining subcategories, all of the N_2O is consumed or reacted during the process, and therefore the emission rate was considered to be zero percent (Tupman 2002).

The 1990 through 1992 N_2O production data were obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997). Nitrous oxide production data for 1993 through 1995 were not available. Production data for 1996 was specified as a range in two data sources (Heydorn 1997; Tupman 2002). In particular, for 1996, Heydorn (1997) estimates N_2O production to range between 13.6 and 18.1 thousand metric tons. Tupman (2002) provided a narrower range (15.9 to 18.1 thousand metric tons) for 1996 that falls within the production bounds described by Heydorn (1997). Tupman (2002) data are considered more industry-specific and current; therefore, the midpoint of the narrower production range was used to estimate N_2O emissions for years 1993 through 2001 (Tupman 2002). The 2002 and 2003 N_2O production data were obtained from the Compressed Gas Association Nitrous Oxide Fact Sheet and Nitrous Oxide Abuse Hotline (CGA 2002, 2003). These data were also provided as a range. For example, in 2003, CGA (2003) estimates N_2O production to range between 13.6 and 15.9 thousand metric tons. Due to the lack of publicly available data, production estimates for years 2004 through 2021 were held constant at the 2003 value.

The 1996 share of the total quantity of N_2O used by each subcategory was obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997). The 1990 through 1995 share of total quantity of N_2O used by each subcategory was kept the same as the 1996 number provided by SRI Consulting. The 1997 through 2001 share of total quantity of N_2O usage by sector was obtained from communication with a N_2O industry expert (Tupman 2002). The 2002 and 2003 share of total quantity of N_2O usage by sector was obtained from CGA (2002, 2003). Due to the lack of publicly available data, the share of total quantity of N_2O usage data for years 2004 through 2021 was assumed to equal the 2003 value. The emission factor for the food processing propellant industry was obtained from SRI Consulting's *Nitrous Oxide, North America* (Heydorn 1997) and confirmed by a N_2O industry expert (Tupman 2002). The emission factor for all other subcategories was obtained from communication with a N_2O industry expert (Tupman 2002). The emission factor for the medical/dental subcategory was obtained from the *2006 IPCC Guidelines*.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021.

Uncertainty

The overall uncertainty associated with the 2021 N_2O emission estimate from N_2O product usage was calculated using the *2006 IPCC Guidelines* (2006) Approach 2 methodology. Uncertainty associated with the parameters used to estimate N_2O emissions include production data, total market share of each end use, and the emission factors applied to each end use, respectively. The uncertainty associated with N_2O production data is ±25 percent, based on expert judgment. The uncertainty associated with the market share for the medical/dental subcategory is ±0.56 percent, and uncertainty for the market share of food propellant subcategory is ±25 percent, both based on expert judgment. Uncertainty for emission factors was assumed to be zero, and using this suggested uncertainty provided in the *2006 IPCC Guidelines* is appropriate based on expert judgment (RTI 2023).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 4-125. Nitrous oxide emissions from N_2O product usage were estimated to be between 2.9 and 4.6 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of approximately 24 percent below to 24 percent above the emission estimate of 3.8 MMT CO_2 Eq.

Table 4-125: Approach 2 Quantitative Uncertainty Estimates for N_2O Emissions from N_2O Product Usage (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
N_2O from Product Uses	N_2O	3.8	2.9	4.6	-24%	+24%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

For more information on the general QA/QC process applied to this source category, consistent with Volume 1, Chapter 6 of the *2006 IPCC Guidelines*, see the QA/QC and Verification Procedures section in the introduction of the IPPU chapter.

Recalculations Discussion

For the current Inventory, CO_2-equivalent estimates of total N_2O emissions from N_2O Product Uses have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of N_2O decreased from 298 to 265, leading to an overall decrease in estimates for calculated CO_2-equivalent N_2O emissions. Compared to the previous Inventory, which applied 100-year GWP values from AR4, annual calculated CO_2-equivalent N_2O emissions decreased by 11 percent each year, ranging from a decrease of 430 kt CO_2 Eq. in 1992 to 519 kt CO_2 Eq. for 1997 through 2001. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA recently initiated an evaluation of alternative production statistics for cross-verification and updating time-series activity data, emission factors, assumptions, etc., and a reassessment of N_2O product use subcategories that accurately represent trends. This evaluation includes conducting a literature review of publications and research that may provide additional details on the industry. This work remains ongoing, and thus far no additional sources of data have been found to update this category.

Pending additional resources and planned improvement prioritization, EPA may also evaluate production and use cycles, and the potential need to incorporate a time lag between production and ultimate product use and resulting release of N_2O. Additionally, planned improvements include considering imports and exports of N_2O for product uses.

Finally, for future Inventories, EPA will examine data from EPA's GHGRP to improve the emission estimates for the N_2O product use subcategory. Particular attention will be made to ensure aggregated information can be published without disclosing CBI and time-series consistency, as the facility-level reporting data from EPA's GHGRP are not available for all inventory years as required in this Inventory. This is a lower priority improvement, and EPA is still assessing the possibility of incorporating aggregated GHGRP CBI data to estimate emissions; therefore, this planned improvement is still in development and not incorporated in the current Inventory report.

4.27 Industrial Processes and Product Use Sources of Precursor Gases

In addition to the main greenhouse gases addressed above, many industrial processes can result in emissions of various greenhouse gas precursors. The reporting requirements of the UNFCCC[118] request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO_2). These gases are not direct greenhouse gases, but indirectly impact Earth's radiative balance by altering the concentrations of greenhouse gases (e.g., ozone) and atmospheric aerosol (e.g., particulate sulfate). Combustion byproducts such as CO and NO_x are emitted from industrial applications that employ thermal incineration as a control technology. NMVOCs, commonly referred to as "hydrocarbons," are the primary gases emitted from most processes employing organic or petroleum-based products, and can also result from the product storage and handling.

Accidental releases of precursors associated with product use and handling can constitute major emissions in this category. In the United States, emissions from product use are primarily the result of solvent evaporation, whereby the lighter hydrocarbon molecules in the solvents escape into the atmosphere. The major categories of product uses include: degreasing, graphic arts, surface coating, other industrial uses of solvents (e.g., electronics), dry cleaning, and non-industrial uses (e.g., uses of paint thinner). Product usage in the United States also results in the emission of hydrofluorocarbons (HFCs) and small amounts of hydrofluoroethers (HFEs), which are included under Substitution of Ozone Depleting Substances and the Electronics Industry in this chapter.

Total emissions of NO_x, CO, NMVOCs, and SO_2 from non-energy industrial processes and product use from 1990 to 2021 are reported in Table 4-126.

Table 4-126: NO_x, CO, NMVOC, and SO_2 Emissions from Industrial Processes and Product Use (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
NO_x	**517**	**429**	**312**	**314**	**304**	**274**	**275**
Mineral Industry	160	200	114	118	114	101	101
Other Industrial Processes[a]	69	91	73	72	70	68	69
Metal Industry	96	58	66	63	60	52	52
Chemical Industry	192	80	60	61	59	54	54
CO	**3,783**	**1,417**	**854**	**876**	**864**	**739**	**739**
Metal Industry	2,261	707	432	447	448	340	340
Other Industrial Processes[a]	248	378	185	186	184	177	177
Mineral Industry	182	120	110	111	106	96	96
Chemical Industry	1,093	211	126	132	126	125	125
NMVOCs	**6,733**	**3,418**	**2,960**	**2,943**	**2,814**	**3,191**	**3,191**
Other Industrial Processes[a]	6,021	3,147	2,849	2,827	2,700	3,087	3,087
Chemical Industry	601	221	85	88	86	81	81
Mineral Industry	9	10	6	7	7	6	6
Metal Industry	102	40	20	21	20	17	17
SO_2	**1,112**	**577**	**228**	**213**	**195**	**164**	**164**
Other Industrial Processes[a]	97	57	23	23	19	19	19
Chemical Industry	283	242	111	106	97	83	83
Mineral Industry	166	138	24	25	25	26	26
Metal Industry	566	140	69	58	53	37	37

+ Does not exceed 0.5 kt.

[118] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

[a] Other Industrial Processes includes storage and transport, other industrial processes (manufacturing of agriculture, food, and kindred products; wood, pulp, paper, and publishing products; rubber and miscellaneous plastic products; machinery products; construction; transportation equipment; and textiles, leather, and apparel products), and miscellaneous sources (catastrophic/accidental release, other combustion (structural fires), health services, repair shops, and fugitive dust). It does not include agricultural fires or slash/prescribed burning, which are accounted for under the Field Burning of Agricultural Residues source.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2020 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 4-126, NEI reported emissions of CO, NO_x, SO_2, and NMVOCs were recategorized from NEI Emissions Inventory System (EIS) sectors to source categories more closely aligned with UNFCCC reporting sectors based on discussions between the EPA GHG Inventory and NEI staff (see crosswalk documented in Annex 6.3).[119] EIS sectors mapped to the IPPU sector categories in this report include: chemical and allied product manufacturing, metals processing, storage and transport, solvent utilization, other industrial processes, and miscellaneous sources. As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), NEI emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing.

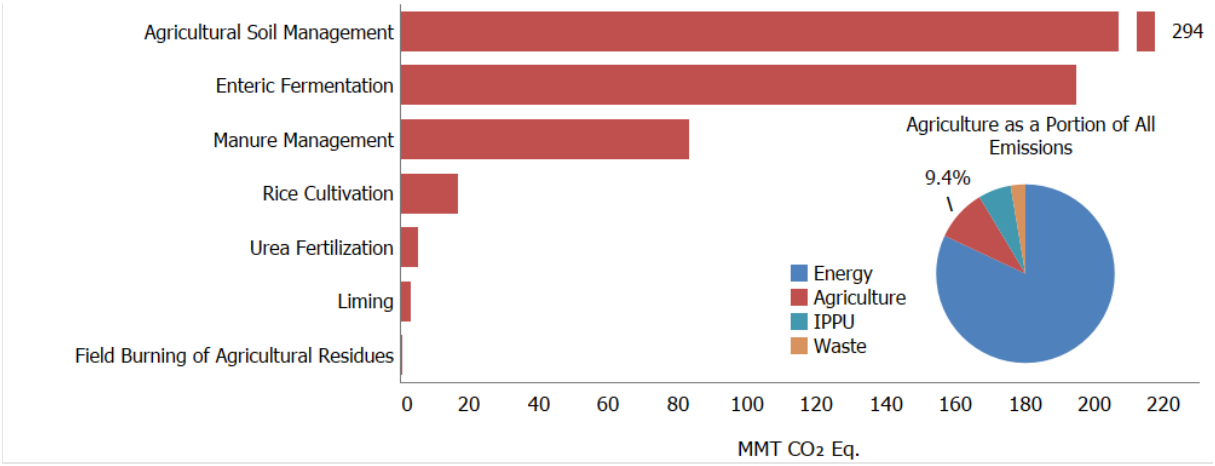
Methodological approaches were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD and on EPA's Air Pollutant Emission Trends web site (EPA 2023a; EPA 2023b). A quantitative uncertainty analysis was not performed.

[119] The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO, NO_x, SO_2, and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

5. Agriculture

Agricultural activities contribute directly to emissions of greenhouse gases through a variety of processes. This chapter provides an assessment of methane (CH_4) from enteric fermentation, livestock manure management, rice cultivation and field burning of agricultural residues; nitrous oxide (N_2O) emissions from agricultural soil management, livestock manure management, and field burning of agricultural residues; as well as carbon dioxide (CO_2) emissions from liming and urea fertilization (see Figure 5-1). Additional CO_2, CH_4 and N_2O fluxes from agriculture-related land-use and land-use conversion activities, such as cultivation of cropland, management on grasslands, grassland fires, aquaculture, and conversion of forest land to cropland, are presented in the Land Use, Land-Use Change, and Forestry (LULUCF) chapter. Carbon dioxide emissions from stationary and mobile on-farm energy use and CH_4 and N_2O emissions from stationary on-farm energy use are reported in the Energy chapter under the Industrial sector emissions. Methane and N_2O emissions from mobile on-farm energy use are reported in the Energy chapter under mobile fossil fuel combustion emissions.

Figure 5-1: 2021 Agriculture Sector Greenhouse Gas Emission Sources



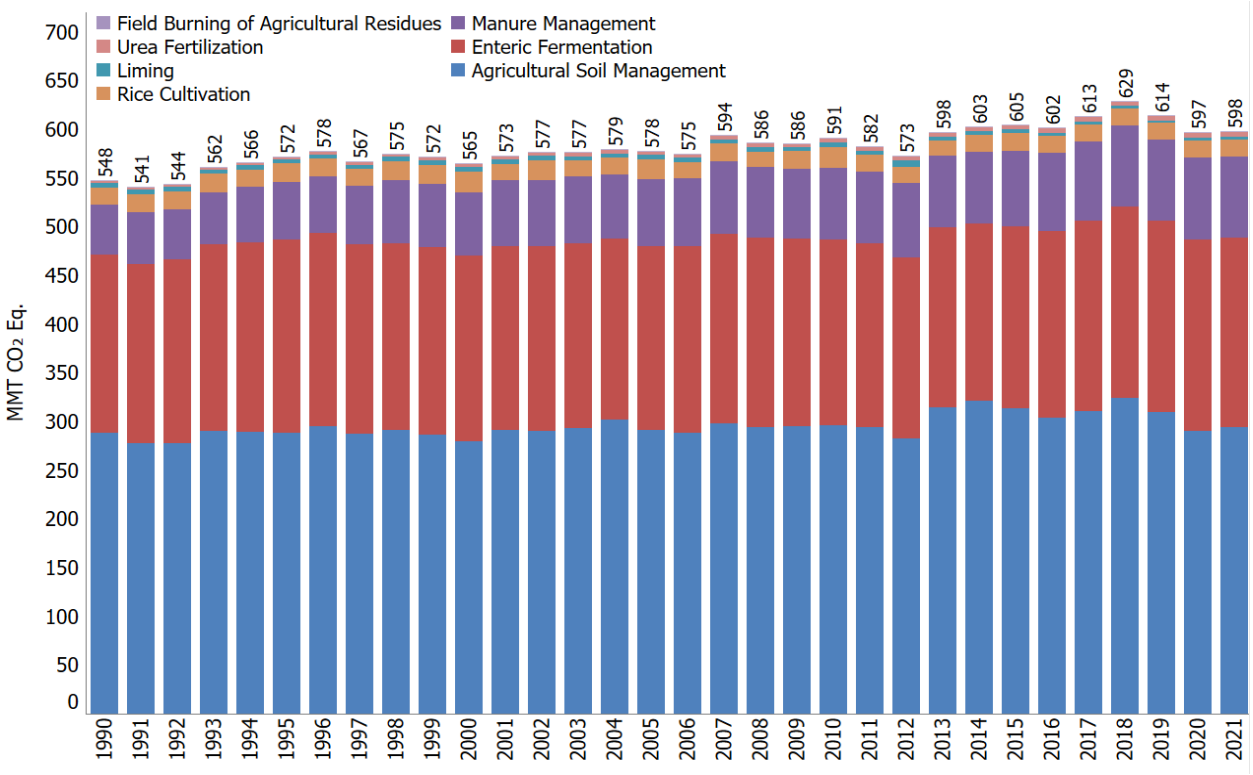
In 2021, the Agriculture sector was responsible for emissions of 598.1 MMT CO_2 Eq.,[1] or 9.4 percent of total U.S. greenhouse gas emissions. Emissions of N_2O by agricultural soil management through activities such as fertilizer application and other agricultural practices that increased nitrogen availability in the soil was the largest source of

[1] Following the current reporting requirements under the United Nations Framework Convention on Climate Change (UNFCCC), this Inventory report presents CO_2 equivalent values based on the IPCC *Fifth Assessment Report* (AR5) GWP values. See the Introduction chapter as well as Chapter 9 for more information.

U.S. N_2O emissions, accounting for 74.8 percent, and the largest source of emissions from the Agriculture sector, accounting for 49.2 percent of total sector emissions. Methane emissions from enteric fermentation and manure management represent 26.8 percent and 9.1 percent of total CH_4 emissions from anthropogenic activities, respectively, and 32.6 and 11.0 percent of Agriculture sector emissions, respectively. Of all domestic animal types, beef and dairy cattle were the largest emitters of CH_4. Rice cultivation and field burning of agricultural residues were minor sources of CH_4. Manure management and field burning of agricultural residues were also small sources of N_2O emissions. Urea fertilization and liming accounted for 0.1 percent and 0.06 percent of total CO_2 emissions from anthropogenic activities, respectively.

Table 5-1 and Table 5-2 present emission estimates for the Agriculture sector. Between 1990 and 2021, CO_2 and CH_4 emissions from agricultural activities increased by 16.2 percent and 15.7 percent, respectively, while N_2O emissions from agricultural activities fluctuated from year to year but increased by 3.7 percent overall. Trends in sources of agricultural emissions over the 1990 to 2021 time series are shown in Figure 5-2.

Figure 5-2: Trends in Agriculture Sector Greenhouse Gas Emission Sources



Each year, some emission estimates in the Agriculture sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 through 2020) to ensure that the trend is accurate. This year's notable updates include: Agricultural Soil Management: a) incorporating the most recently released cropping and land use history data from the National Resources Inventory (NRI), b) incorporating remote sensing data regarding tillage practices collected through OpTIS, c) incorporating updated cropland management data from the U.S. Department of Agriculture Conservation Effects and Assessment Project (USDA-CEAP2) into the DayCent model, d) modifying the statistical imputation method for the management activity data associated with tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network, e) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale, and f) re-calibrating the soil C module in the DayCent model using Bayesian method. For more

information on specific methodological updates, please see the Recalculations discussions within the respective source category sections of this chapter. In addition, for the current Inventory, CO_2-equivalent emissions totals of CH_4 and N_2O have been updated to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements. In total, the methodological and historic data improvements made to the Agriculture sector in this Inventory increased greenhouse gas emissions by an average of 10.9 MMT CO_2 Eq. (1.9 percent) across the time series excluding the impacts of the AR5 GWP change. When including the impacts of the change to AR5 GWP values, Agriculture sector emissions increased 1.9 MMT CO_2 Eq. (0.3 percent) across the time series.

Emissions reported in the Agriculture chapter include those from all states; however, for Hawaii and Alaska some agricultural practices that can increase nitrogen availability in the soil, and thus cause N_2O emissions, are not included (see chapter sections on "Uncertainty and Time-Series Consistency" and "Planned Improvements" for more details). Emissions from the Agriculture sector occurring in U.S. Territories and the District of Columbia are not estimated due to incomplete data, with the exception of urea fertilization in Puerto Rico. EPA continues to identify and review available data on an ongoing basis to include agriculture emissions from U.S. Territories, to the extent they are occurring, in future Inventories. Other minor outlying U.S. Territories in the Pacific Islands have no permanent populations (e.g., Baker Island) and therefore EPA assumes no agricultural activities are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Table 5-1: Emissions from Agriculture (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**7.1**	**7.9**	**7.9**	**7.2**	**7.2**	**8.0**	**8.3**
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2
Liming	4.7	4.4	3.1	2.2	2.2	2.9	3.0
CH_4	**240.4**	**263.7**	**277.5**	**281.2**	**280.4**	**281.0**	**278.2**
Enteric Fermentation	183.1	188.2	195.9	196.8	197.3	196.2	194.9
Manure Management	39.0	54.9	64.4	66.5	65.7	66.7	66.0
Rice Cultivation	17.9	20.2	16.7	17.4	16.9	17.6	16.8
Field Burning of Agricultural Residues	0.4	0.5	0.5	0.5	0.5	0.5	0.5
N_2O	**300.5**	**306.1**	**327.7**	**341.1**	**326.9**	**308.2**	**311.6**
Agricultural Soil Management	288.0	291.5	310.6	323.8	309.3	290.5	294.0
Manure Management	12.4	14.5	16.9	17.2	17.4	17.5	17.4
Field Burning of Agricultural Residues	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Total	**548.0**	**577.7**	**613.1**	**629.5**	**614.5**	**597.3**	**598.1**

Note: Totals may not sum due to independent rounding.

Table 5-2: Emissions from Agriculture (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CO_2	**7,106**	**7,856**	**7,931**	**7,178**	**7,234**	**8,037**	**8,260**
Urea Fertilization	2,417	3,504	4,862	4,939	5,030	5,122	5,214
Liming	4,690	4,351	3,069	2,240	2,203	2,915	3,047
CH_4	**8,587**	**9,419**	**9,911**	**10,043**	**10,013**	**10,036**	**9,937**
Enteric Fermentation	6,539	6,722	6,998	7,028	7,046	7,007	6,962
Manure Management	1,394	1,960	2,300	2,375	2,348	2,383	2,358
Rice Cultivation	640	720	596	623	602	630	600
Field Burning of Agricultural Residues	15	17	17	17	17	17	17
N_2O	**1,134**	**1,155**	**1,236**	**1,287**	**1,233**	**1,163**	**1,176**
Agricultural Soil Management	1,087	1,100	1,172	1,222	1,167	1,096	1,110
Manure Management	47	55	64	65	65	66	66
Field Burning of Agricultural Residues	1	1	1	1	1	1	1

Note: Totals by gas may not sum due to independent rounding.

Box 5-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)*. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions provided in the Agriculture chapter do not preclude alternative examinations, but rather, this chapter presents emissions in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follow this standardized format and provide an explanation of the application of methods used to calculate emissions from agricultural activities.

5.1 Enteric Fermentation (CRF Source Category 3A)

Methane is produced as part of normal digestive processes in animals. During digestion, microbes resident in an animal's digestive system ferment food consumed by the animal. This microbial fermentation process, referred to as enteric fermentation, produces CH_4 as a byproduct, which can be exhaled or eructated by the animal. The amount of CH_4 produced and emitted by an individual animal depends primarily upon the animal's digestive system, and the amount and type of feed it consumes.[2]

Ruminant animals (e.g., cattle, buffalo, sheep, goats, and camels) are the major emitters of CH_4 because of their unique digestive system. Ruminants possess a rumen, or large "fore-stomach," in which microbial fermentation breaks down the feed they consume into products that can be absorbed and metabolized. The microbial fermentation that occurs in the rumen enables them to digest coarse plant material that non-ruminant animals cannot. Ruminant animals, consequently, have the highest CH_4 emissions per unit of body mass among all animal types.

Non-ruminant animals (e.g., swine, horses, and mules and asses) also produce CH_4 emissions through enteric fermentation, although this microbial fermentation occurs in the large intestine. These non-ruminants emit significantly less CH_4 on a per-animal-mass basis than ruminants because the capacity of the large intestine to produce CH_4 is lower.

In addition to the type of digestive system, an animal's feed quality and feed intake also affect CH_4 emissions. In general, lower feed quality and/or higher feed intake leads to higher CH_4 emissions. Feed intake is positively correlated to animal size, growth rate, level of activity and production (e.g., milk production, wool growth, pregnancy, or work). Therefore, feed intake varies among animal types as well as among different management practices for individual animal types (e.g., animals in feedlots or grazing on pasture).

[2] CO_2 emissions from livestock are not estimated because annual net CO_2 emissions are assumed to be zero–the CO_2 photosynthesized by plants is returned to the atmosphere as respired CO_2 (IPCC 2006).

Methane emission estimates from enteric fermentation are provided in Table 5-3 and Table 5-4. Total livestock CH_4 emissions in 2021 were 194.9 MMT CO_2 Eq. (6,962 kt). Beef cattle remain the largest contributor of CH_4 emissions from enteric fermentation, accounting for 71 percent in 2021. Emissions from dairy cattle in 2021 accounted for 25 percent, and the remaining emissions were from swine, horses, sheep, goats, American bison, mules and asses.[3]

Table 5-3: CH_4 Emissions from Enteric Fermentation (MMT CO_2 Eq.)

Livestock Type	1990	2005	2017	2018	2019	2020	2021
Beef Cattle	132.8	139.6	140.9	141.2	141.7	140.4	139.1
Dairy Cattle	43.3	41.3	48.0	48.6	48.5	48.8	49.1
Swine	2.3	2.6	3.0	3.1	3.2	3.2	3.1
Horses	1.1	2.0	1.4	1.4	1.3	1.2	1.1
Sheep	2.9	1.5	1.3	1.3	1.3	1.3	1.3
Goats	0.6	0.7	0.7	0.7	0.7	0.7	0.7
American Bison	0.1	0.5	0.4	0.4	0.4	0.5	0.5
Mules and Asses	+	0.1	0.1	0.1	0.1	0.1	0.1
Total	**183.1**	**188.2**	**195.9**	**196.8**	**197.3**	**196.2**	**194.9**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 5-4: CH_4 Emissions from Enteric Fermentation (kt CH_4)

Livestock Type	1990	2005	2017	2018	2019	2020	2021
Beef Cattle	4,742	4,986	5,033	5,042	5,062	5,013	4,967
Dairy Cattle	1,547	1,473	1,715	1,737	1,732	1,744	1,754
Swine	81	92	108	110	115	116	111
Horses	40	70	51	48	46	43	40
Sheep	102	55	47	47	47	47	47
Goats	23	26	24	24	25	25	23
American Bison	4	17	15	15	16	16	17
Mules and Asses	1	2	3	3	3	3	3
Total	**6,539**	**6,722**	**6,998**	**7,028**	**7,046**	**7,007**	**6,962**

Note: Totals may not sum due to independent rounding.

From 1990 to 2021, emissions from enteric fermentation have increased by 6.5 percent. From 2020 to 2021, emissions decreased by 0.6 percent, largely driven by a decrease in beef cattle populations. While emissions generally follow trends in cattle populations, over the long term there are exceptions. For example, while dairy cattle emissions increased 13.4 percent over the entire time series, the population has declined by 3.5 percent, and milk production increased 62 percent (USDA 2021a; USDA 2022). These trends indicate that while emissions per head are increasing, emissions per unit of product (i.e., meat, milk) are decreasing.

Generally, from 1990 to 1995 emissions from beef cattle increased and then decreased from 1996 to 2004. These trends were mainly due to fluctuations in beef cattle populations and increased digestibility of feed for feedlot

[3] Enteric fermentation emissions from poultry are not estimated because no IPCC method has been developed for determining enteric fermentation CH_4 emissions from poultry; at this time, developing a country-specific method would require a disproportionate amount of resources given the small magnitude of this source category. Enteric fermentation emissions from camels are not estimated because there is no significant population of camels in the United States. Given the insignificance of estimated camel emissions in terms of the overall level and trend in national emissions, there are no immediate improvement plans to include this emissions category in the Inventory. See Annex 5 for more information on significance of estimated camel emissions.

cattle. Beef cattle emissions generally increased from 2004 to 2007, as beef cattle populations increased, and an extensive literature review indicated a trend toward a decrease in feed digestibility for those years. Beef cattle emissions decreased again from 2007 to 2014, as populations again decreased, but increased from 2015 to 2019, consistent with another increase in population over those same years. Emissions and populations slightly declined from 2019 to 2021.

Emissions from dairy cattle generally trended downward from 1990 to 2004, along with an overall dairy cattle population decline during the same period. Similar to beef cattle, dairy cattle emissions rose from 2004 to 2007 due to population increases and a decrease in feed digestibility (based on an analysis of more than 350 dairy cow diets used by producers across the United States). Dairy cattle emissions continued to trend upward from 2007 to 2019, generally in line with dairy cattle population changes.

Regarding trends in other animals, populations of sheep have steadily declined, with an overall decrease of 54 percent since 1990. Horse populations are 1 percent greater than they were in 1990, but their numbers have been declining by an average of 4 percent annually since 2007. Goat populations increased by about 20 percent through 2007 followed by a steady decrease through 2012. After a steady increase of 1 percent annually through 2020, goat populations dropped by 5 percent in 2021. Swine populations have trended upward through most of the time series, increasing 43 percent from 1990 to 2020. However, swine populations decreased by around 4 percent from 2020 to 2021. The population of American bison more than quadrupled over the 1990 to 2020 time period, while the population of mules and asses increased by a factor of five.

Methodology and Time-Series Consistency

Livestock enteric fermentation emission estimate methodologies fall into two categories: cattle and other domesticated animals. Cattle, due to their large population, large size, and particular digestive characteristics, account for the majority of enteric fermentation CH_4 emissions from livestock in the United States. A more detailed methodology (i.e., IPCC Tier 2) was therefore applied to estimate emissions for all cattle. Emission estimates for other domesticated animals (horses, sheep, swine, goats, American bison, and mules and asses) were estimated using the IPCC Tier 1 approach, as suggested by the *2006 IPCC Guidelines* (see the Planned Improvements section).

While the large diversity of animal management practices cannot be precisely characterized and evaluated, significant scientific literature exists that provides the necessary data to estimate cattle emissions using the IPCC Tier 2 approach. The Cattle Enteric Fermentation Model (CEFM), developed by EPA and used to estimate cattle CH_4 emissions from enteric fermentation using IPCC's Tier 2 method, incorporates this information and other analyses of livestock population, feeding practices, and production characteristics. For the current Inventory, CEFM results for 1990 through 2020 were carried over from the 1990 to 2020 Inventory (i.e., 2022 Inventory submission) to focus resources on CEFM improvements, and a simplified approach was used to estimate 2021 enteric emissions from cattle.

See Annex 3.10 for more detailed information on the methodology and data used to calculate CH_4 emissions from enteric fermentation. In addition, variables and the resulting emissions are also available at the state level in Annex 3.10.

1990-2020 Inventory Methodology for Cattle

National cattle population statistics were disaggregated into the following cattle sub-populations:

- Dairy Cattle
  - Calves
  - Heifer Replacements
  - Cows
- Beef Cattle
  - Calves
  - Heifer Replacements

- Heifer and Steer Stockers
- Animals in Feedlots (Heifers and Steer)
- Cows
- Bulls

Calf birth rates, end-of-year population statistics, detailed feedlot placement information, and slaughter weight data were used to create a transition matrix that models cohorts of individual animal types and their specific emission profiles. The key variables tracked for each of the cattle population categories are described in Annex 3.10. These variables include performance factors such as pregnancy and lactation as well as average weights and weight gain. Annual cattle population data were obtained from the U.S. Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS) *QuickStats* database (USDA 2021a).

Diet characteristics were estimated by region for dairy, grazing beef, and feedlot beef cattle. These diet characteristics were used to calculate digestible energy (DE) values (expressed as the percent of gross energy intake digested by the animal) and CH_4 conversion rates (Y_m) (expressed as the fraction of gross energy converted to CH_4) for each regional population category. The IPCC recommends Y_m ranges of 3.0±1.0 percent for feedlot cattle and 6.5±1.0 percent for other well-fed cattle consuming temperate-climate feed types (IPCC 2006). Given the availability of detailed diet information for different regions and animal types in the United States, DE and Y_m values unique to the United States were developed. The diet characterizations and estimation of DE and Y_m values were based on information from state agricultural extension specialists, a review of published forage quality studies and scientific literature, expert opinion, and modeling of animal physiology.

The diet characteristics for dairy cattle were based on Donovan (1999) and an extensive review of nearly 20 years of literature from 1990 through 2009. Estimates of DE were national averages based on the feed components of the diets observed in the literature for the following year groupings: 1990 through 1993, 1994 through 1998, 1999 through 2003, 2004 through 2006, 2007, and 2008 onward.[4] Base year Y_m values by region were estimated using Donovan (1999). As described in ERG (2016), a ruminant digestion model (COWPOLL, as selected in Kebreab et al. 2008) was used to evaluate Y_m for each diet evaluated from the literature, and a function was developed to adjust regional values over time based on the national trend. Dairy replacement heifer diet assumptions were based on the observed relationship in the literature between dairy cow and dairy heifer diet characteristics.

For feedlot animals, the DE and Y_m values used for 1990 were recommended by Johnson (1999). Values for DE and Y_m for 1991 through 1999 were linearly extrapolated based on the 1990 and 2000 data. DE and Y_m values for 2000 onwards were based on survey data in Galyean and Gleghorn (2001) and Vasconcelos and Galyean (2007).

For grazing beef cattle, Y_m values were based on Johnson (2002), DE values for 1990 through 2006 were based on specific diet components estimated from Donovan (1999), and DE values from 2007 onwards were developed from an analysis by Archibeque (2011), based on diet information in Preston (2010) and USDA-APHIS:VS (2010). Weight and weight gains for cattle were estimated from Holstein (2010), Doren et al. (1989), Enns (2008), Lippke et al. (2000), Pinchack et al. (2004), Platter et al. (2003), Skogerboe et al. (2000), and expert opinion. See Annex 3.10 for more details on the method used to characterize cattle diets and weights in the United States.

Calves younger than 4 months are not included in emission estimates because calves consume mainly milk and the IPCC recommends the use of a Y_m of zero for all juveniles consuming only milk. Diets for calves aged 4 to 6 months are assumed to go through a gradual weaning from milk decreasing to 75 percent at 4 months, 50 percent at age 5 months, and 25 percent at age 6 months. The portion of the diet made up with milk still results in zero emissions. For the remainder of the diet, beef calf DE and Y_m are set equivalent to those of beef replacement heifers, while dairy calf DE is set equal to that of dairy replacement heifers and dairy calf Y_m is provided at 4 and 7 months of age by Soliva (2006). Estimates of Y_m for 5- and 6-month-old dairy calves are linearly interpolated from the values provided for 4 and 7 months.

[4] Due to inconsistencies in the 2003 literature values, the 2002 values were used for 2003 as well.

To estimate CH_4 emissions, the population was divided into state, age, sub-type (i.e., dairy cows and replacements, beef cows and replacements, heifer and steer stockers, heifers and steers in feedlots, bulls, beef calves 4 to 6 months, and dairy calves 4 to 6 months), and production (i.e., pregnant, lactating) groupings to more fully capture differences in CH_4 emissions from these animal types. The transition matrix was used to simulate the age and weight structure of each sub-type on a monthly basis in order to more accurately reflect the fluctuations that occur throughout the year. Cattle diet characteristics were then used in conjunction with Tier 2 equations from IPCC (2006) to produce CH_4 emission factors for the following cattle types: dairy cows, beef cows, dairy replacements, beef replacements, steer stockers, heifer stockers, steer feedlot animals, heifer feedlot animals, bulls, and calves. To estimate emissions from cattle, monthly population data from the transition matrix were multiplied by the calculated emission factor for each cattle type. More details are provided in Annex 3.10.

2021 Inventory Methodology for Cattle

As noted above, a simplified approach for cattle enteric emissions was used in lieu of the CEFM for 2021 to focus resources on CEFM improvements. First, 2021 populations for each of the CEFM cattle subpopulations were estimated, then these populations were multiplied by the corresponding 2020 implied emission factors developed from the CEFM for the 1990 to 2020 Inventory. Dairy cow, beef cow, and bull populations for 2021 were based on data directly from the USDA-NASS QuickStats database (USDA 2021a, USDA 2022). Because the remaining CEFM cattle sub-population categories do not correspond exactly to the remaining QuickStats cattle categories, 2021 populations for these categories were estimated by extrapolating the 2020 populations based on percent changes from 2020 to 2021 in similar QuickStats categories, consistent with Volume 1, Chapter 5 of the *2006 IPCC Guidelines* on time-series consistency. Table 5-5 lists the *QuickStats* categories used to estimate the percent change in population for each of the CEFM categories.

Table 5-5: Cattle Sub-Population Categories for 2021 Population Estimates

CEFM Cattle Category	USDA-NASS *QuickStats* Cattle Category
Dairy Calves	Cattle, Calves
Dairy Cows	Cattle, Cows, Milk
Dairy Replacements 7-11 months	Cattle, Heifers, GE 500 lbs, Milk Replacement
Dairy Replacements 12-23 months	Cattle, Heifers, GE 500 lbs, Milk Replacement
Bulls	Cattle, Bulls, GE 500 lbs
Beef Calves	Cattle, Calves
Beef Cows	Cattle, Cows, Beef
Beef Replacements 7-11 months	Cattle, Heifers, GE 500 lbs, Beef Replacement
Beef Replacements 12-23 months	Cattle, Heifers, GE 500 lbs, Beef Replacement
Steer Stockers	Cattle, Steers, GE 500 lbs
Heifer Stockers	Cattle, Heifers, GE 500 lbs, (Excl. Replacement)
Steer Feedlot	Cattle, On Feed
Heifer Feedlot	Cattle, On Feed

Non-Cattle Livestock

Emission estimates for other animal types were based on average emission factors (Tier 1 default IPCC emission factors) representative of entire populations of each animal type. Methane emissions from these animals accounted for a minor portion of total CH_4 emissions from livestock in the United States from 1990 through 2021. Additionally, the variability in emission factors for each of these other animal types (e.g., variability by age, production system, and feeding practice within each animal type) is less than that for cattle.

Annual livestock population data for 1990 to 2021 for sheep; swine; goats; horses; mules and asses; and American bison were obtained for available years from USDA-NASS (USDA 2022; USDA 2019). Horse, goat, and mule and ass

population data were available for 1987, 1992, 1997, 2002, 2007, 2012, and 2017 (USDA 2019); the remaining years between 1990 and 2021 were interpolated and extrapolated from the available estimates (with the exception of goat populations being held constant between 1990 and 1992). American bison population estimates were available from USDA for 2002, 2007, 2012, and 2017 (USDA 2019) and from the National Bison Association (1999) for 1990 through 1999. Additional years were based on observed trends from the National Bison Association (1999), interpolation between known data points, and extrapolation beyond 2012, as described in more detail in Annex 3.10.

Methane emissions from sheep, goats, swine, horses, American bison, and mules and asses were estimated by using emission factors utilized in Crutzen et al. (1986, cited in IPCC 2006; IPCC 2019). These emission factors are representative of typical animal sizes, feed intakes, and feed characteristics in developed countries. For American bison, the emission factor for buffalo was used and adjusted based on the ratio of live weights to the 0.75 power. The methodology is the same as that recommended by IPCC (2006).

Uncertainty

A quantitative uncertainty analysis for this source category was performed using the IPCC-recommended Approach 2 uncertainty estimation methodology based on a Monte Carlo Stochastic Simulation technique as described in ICF (2003). These uncertainty estimates were developed for the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC). While there are plans to update the uncertainty to reflect recent methodological updates and forthcoming changes (see Planned Improvements, below), at this time the uncertainty estimates were directly applied to the 2021 emission estimates in this Inventory.

A total of 185 primary input variables (177 for cattle and 8 for non-cattle) were identified as key input variables for the uncertainty analysis. A normal distribution was assumed for almost all activity- and emission factor-related input variables. Triangular distributions were assigned to three input variables (specifically, cow-birth ratios for the three most recent years included in the 2001 model run) to ensure only positive values would be simulated. For some key input variables, the uncertainty ranges around their estimates (used for inventory estimation) were collected from published documents and other public sources; others were based on expert opinion and best estimates. In addition, both endogenous and exogenous correlations between selected primary input variables were modeled. The exogenous correlation coefficients between the probability distributions of selected activity-related variables were developed through expert judgment.

Among the individual cattle sub-source categories, beef cattle account for the largest amount of CH_4 emissions, as well as the largest degree of uncertainty in the emission estimates—due mainly to the difficulty in estimating the diet characteristics for grazing members of this animal group. Among non-cattle, horses represent the largest percent of uncertainty in the previous uncertainty analysis because the Food and Agricultural Organization (FAO) of the United Nations population estimates used for horses at that time had a higher degree of uncertainty than for the USDA population estimates used for swine, goats, and sheep. The horse populations are drawn from the same USDA source as the other animal types, and therefore the uncertainty range around horses is likely overestimated. Cattle calves, American bison, mules and asses were excluded from the initial uncertainty estimate because they were not included in emission estimates at that time.

The uncertainty ranges associated with the activity data-related input variables were plus or minus 10 percent or lower. However, for many emission factor-related input variables, the lower- and/or the upper-bound uncertainty estimates were over 20 percent. The results of the quantitative uncertainty analysis are summarized in Table 5-6. Based on this analysis, enteric fermentation CH_4 emissions in 2021 were estimated to be between 173.5 and 230.0 MMT CO_2 Eq. at a 95 percent confidence level, which indicates a range of 11 percent below to 18 percent above the 2021 emission estimate of 194.9 MMT CO_2 Eq.

Table 5-6: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Enteric Fermentation (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a, b, c] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Enteric Fermentation	CH_4	194.9	173.5	230.0	-11%	+18%

[a] Range of emissions estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

[b] Note that the relative uncertainty range was estimated with respect to the 2001 emission estimates from the 2003 submission and applied to the 2021 estimates.

[c] The overall uncertainty calculated in 2003, and applied to the 2021 emission estimate, did not include uncertainty estimates for calves, American bison, and mules and asses. Additionally, for bulls the emissions estimate was based on the Tier 1 methodology. Since bull emissions are now estimated using the Tier 2 method, the uncertainty surrounding their estimates is likely lower than indicated by the previous uncertainty analysis.

QA/QC and Verification

In order to ensure the quality of the emission estimates from enteric fermentation, the General (IPCC Tier 1) and category-specific (Tier 2) Quality Assurance/Quality Control (QA/QC) procedures were implemented consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Category-specific or Tier 2 QA procedures included independent review of emission estimate methodologies from previous inventories.

As part of the quality assurance process, average implied emissions factors for U.S. dairy and beef cattle were developed based on CEFM output and compared to emission factors for other countries provided by IPCC (2006). This comparison is discussed in further detail in Annex 3.10.

Over the past few years, particular importance has been placed on harmonizing the data exchange between the enteric fermentation and manure management source categories. The current Inventory now utilizes the transition matrix from the CEFM for estimating cattle populations and weights for both source categories, and the CEFM is used to output volatile solids and nitrogen excretion estimates using the diet assumptions in the model in conjunction with the energy balance equations from the IPCC (2006). This approach facilitates the QA/QC process for both of these source categories. As noted in the Methodology discussion above, a simplified approach for cattle enteric emissions was used in lieu of the CEFM for 2021.

Recalculations Discussion

EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). The AR5 GWPs have been applied across the entire time series for consistency. This update resulted in an average annual increase of 12 percent for CO_2-equivalent CH_4 emissions for the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Regular annual data reviews and updates are necessary to maintain an emissions inventory that reflects the current base of knowledge. In addition to the documented approaches currently used to address data availability,

EPA conducts the following annual assessments to identify and determine the applicability of newer data when updating the estimates to extend time series each year:

- Further research to improve the estimation of dry matter intake (as gross energy intake) using data from appropriate production systems;
- Updating input variables that are from older data sources, such as beef births by month, beef and dairy annual calving rates, and beef cow lactation rates;
- Investigating the availability of data for dairy births by month, to replace the current assumption that births are evenly distributed throughout the year;
- Investigating the availability of annual data for the DE, Y_m, and crude protein values of specific diet and feed components for grazing and feedlot animals;
- Further investigation on additional sources or methodologies for estimating DE for dairy cattle, given the many challenges in characterizing dairy cattle diets;
- Further evaluation of the assumptions about weights and weight gains for beef cows, such that trends beyond 2007 are updated, rather than held constant; and
- Further evaluation of the estimated weight for dairy cows (i.e., 1,500 lbs) that is based solely on Holstein cows as mature dairy cow weight is likely slightly overestimated, based on knowledge of the breeds of dairy cows in the United States.

Depending upon the outcome of ongoing investigations, future improvement efforts for enteric fermentation could include some of the following options which are additional to the regular updates, and may or may not have implications for regular updates once addressed:

- Potentially updating to a Tier 2 methodology for other animal types (i.e., sheep, swine, goats, horses); efforts to move to Tier 2 will consider the emissions significance of livestock types;
- Investigation of methodologies and emission factors for including enteric fermentation emission estimates from poultry;
- Comparison of the current CEFM with other models that estimate enteric fermentation emissions for quality assurance and verification;
- Investigation of recent research implications suggesting that certain parameters in enteric models may be simplified without significantly diminishing model accuracy; and
- Recent changes that have been implemented to the CEFM warrant an assessment of the current uncertainty analysis; therefore, a revision of the quantitative uncertainty surrounding emission estimates from this source category will be initiated. EPA plans to perform this uncertainty analysis following the completed updates to the CEFM.

EPA is continuously investigating these recommendations and potential improvements and working with USDA and other experts to utilize the best available data and methods for estimating emissions. Many of these improvements are major updates and may take multiple years to implement in full.

5.2 Manure Management (CRF Source Category 3B)

The treatment, storage, and transportation of livestock manure can produce anthropogenic CH_4 and N_2O emissions.[5] Methane is produced by the anaerobic decomposition of manure and nitrous oxide is produced from direct and indirect pathways through the processes of nitrification and denitrification; in addition, there are many underlying factors that can affect these resulting emissions from manure management, as described below.

When livestock manure is stored or treated in systems that promote anaerobic conditions (e.g., as a liquid/slurry in lagoons, ponds, tanks, or pits), the decomposition of the volatile solids component in the manure tends to produce CH_4. When manure is handled as a solid (e.g., in stacks or drylots) or deposited on pasture, range, or paddock lands, it tends to decompose aerobically and produce CO_2 and little or no CH_4. Ambient temperature, moisture, and manure storage or residency time affect the amount of CH_4 produced because they influence the growth of the bacteria responsible for CH_4 formation. For non-liquid-based manure systems, moist conditions (which are a function of rainfall and humidity) can promote CH_4 production. Manure composition, which varies by animal diet, growth rate, and animal type (particularly the different animal digestive systems), also affects the amount of CH_4 produced. In general, the greater the energy content of the feed, the greater the potential for CH_4 emissions. However, some higher-energy feeds also are more digestible than lower quality forages, which can result in less overall waste excreted from the animal.

As previously stated, N_2O emissions are produced through both direct and indirect pathways. Direct N_2O emissions are produced as part of the nitrogen (N) cycle through the nitrification and denitrification of the N in livestock dung and urine.[6] There are two pathways for indirect N_2O emissions. The first is the result of the volatilization of N in manure (as NH_3 and NO_x) and the subsequent deposition of these gases and their products (NH_4^+ and NO_3^-) onto soils and the surface of lakes and other waters. The second pathway is the runoff and leaching of N from manure into the groundwater below, into riparian zones receiving drain or runoff water, or into the ditches, streams, rivers, and estuaries into which the land drainage water eventually flows.

The production of direct N_2O emissions from livestock manure depends on the composition of the manure (manure includes both feces and urine), the type of bacteria involved in the process, and the amount of oxygen and liquid in the manure system. For direct N_2O emissions to occur, the manure must first be handled aerobically where organic N is mineralized or decomposed to NH_4 which is then nitrified to NO_3 (producing some N_2O as a byproduct) (nitrification). Next, the manure must be handled anaerobically where the nitrate is then denitrified to N_2O and N_2 (denitrification). NO_x can also be produced during denitrification (Groffman et al. 2000; Robertson and Groffman 2015). These emissions are most likely to occur in dry manure handling systems that have aerobic conditions, but that also contain pockets of anaerobic conditions due to saturation. A very small portion of the total N excreted is expected to convert to N_2O in the waste management system (WMS).

Indirect N_2O emissions are produced when nitrogen is lost from the system through volatilization (as NH_3 or NO_x) or through runoff and leaching. The vast majority of volatilization losses from these operations are NH_3. Although there are also some small losses of NO_x, there are no quantified estimates available for use, so losses due to volatilization are only based on NH_3 loss factors. Runoff losses would be expected from operations that house

[5] CO_2 emissions from livestock are not estimated because annual net CO_2 emissions are assumed to be zero – the CO_2 photosynthesized by plants is returned to the atmosphere as respired CO_2 (IPCC 2006).

[6] Direct and indirect N_2O emissions from dung and urine spread onto fields either directly as daily spread or after it is removed from manure management systems (i.e., lagoon, pit, etc.) and from livestock dung and urine deposited on pasture, range, or paddock lands are accounted for and discussed in the Agricultural Soil Management source category within the Agriculture sector.

animals or store manure in a manner that is exposed to weather. Runoff losses are also specific to the type of animal housed on the operation due to differences in manure characteristics. Little information is known about leaching from manure management systems as most research focuses on leaching from land application systems. However, storage systems are often designed to minimize leaching (e.g., clay soil or synthetic liners in lagoons). Since leaching losses are expected to be minimal, leaching losses are coupled with runoff losses and the runoff/leaching estimate provided in this chapter does not account for any leaching losses.

Estimates of CH_4 emissions from manure management in 2021 were 66.0 MMT CO_2 Eq. (2,358 kt); in 1990, emissions were 39.0 MMT CO_2 Eq. (1,394 kt). This represents a 69 percent increase in emissions from 1990. Emissions increased on average by 0.8 MMT CO_2 Eq. (2 percent) annually over this period. The majority of this increase is due to swine and dairy cow manure, where emissions increased 38 and 124 percent, respectively. From 2020 to 2021, there was a 1 percent decrease in total CH_4 emissions from manure management, mainly due to a decrease in swine and poultry populations.

Although a large quantity of managed manure in the United States is handled as a solid, producing little CH_4, the general trend in manure management, particularly for dairy cattle and swine (which are both shifting towards larger facilities), is one of increasing use of liquid systems. Also, new regulations controlling the application of manure nutrients to land have shifted manure management practices at smaller dairies from daily spread systems to storage and management of the manure on site. In many cases, manure management systems with the most substantial methane emissions are those associated with confined animal management operations where manure is handled in liquid-based systems. Nitrous oxide emissions from manure management vary significantly between the types of management system used and can also result in indirect emissions due to other forms of nitrogen loss from the system (IPCC 2006).

While national dairy animal populations have decreased since 1990, some states have seen increases in their dairy cattle populations as the industry becomes more concentrated in certain areas of the country and the number of animals contained on each facility increases. These areas of concentration, such as California, New Mexico, and Idaho, tend to utilize more liquid-based systems to manage (flush or scrape) and store manure. Thus, the shift toward larger dairy cattle and swine facilities since 1990 has translated into an increasing use of liquid manure management systems, which have higher potential CH_4 emissions than dry systems. This significant shift in both the dairy cattle and swine industries was accounted for by incorporating state and WMS-specific CH_4 conversion factor (MCF) values in combination with the 1992, 1997, 2002, 2007, 2012, and 2017 farm-size distribution data reported in the U.S. Department of Agriculture (USDA) *Census of Agriculture* (USDA 2019d).

In 2021, total N_2O emissions from manure management were estimated to be 17.4 MMT CO_2 Eq. (66 kt); in 1990, emissions were 12.4 MMT CO_2 Eq. (47 kt). These values include both direct and indirect N_2O emissions from manure management. Nitrous oxide emissions have increased since 1990. Multiple drivers increase N_2O emissions, such as increasing nitrogen excretion rates for some animal types (see Annex, Table A-165) and increasing numbers of animals on feedlots versus other dry systems (e.g., pasture). Across the entire time series, the overall net effect is that N_2O emissions showed a 40 percent increase from 1990 to 2021, but recent declines in a few animal populations (e.g., swine and calves) resulted in a 0.5 percent decrease from 2020 to 2021.

Table 5-7 and Table 5-8 provide estimates of CH_4 and N_2O emissions from manure management by animal category.[7]

[7] Manure management emissions from camels are not estimated because there is no significant population of camels in the United States. Given the insignificance of estimated camel emissions in terms of the overall level and trend in national emissions, there are no immediate improvement plans to include this emissions category in the Inventory. See Annex 5 for more information on significance of estimated camel emissions.

Table 5-7: CH_4 and N_2O Emissions from Manure Management (MMT CO_2 Eq.)

Gas/Animal Type	1990	2005	2017	2018	2019	2020	2021
CH_4[a]	**39.0**	**54.9**	**64.4**	**66.5**	**65.7**	**66.7**	**66.0**
Dairy Cattle	16.0	26.4	35.0	35.8	34.6	35.5	35.9
Swine	17.4	23.5	23.5	24.7	25.0	25.1	24.0
Poultry	3.7	3.6	3.8	3.9	4.0	4.0	3.9
Beef Cattle	1.8	1.9	2.0	2.0	2.0	2.0	2.0
Horses	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Sheep	0.1	0.1	0.06	0.06	0.05	0.05	0.05
Goats	+	+	+	+	+	+	+
American Bison	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
N_2O[b]	**12.4**	**14.5**	**16.9**	**17.2**	**17.4**	**17.5**	**17.4**
Beef Cattle	5.2	6.4	7.9	8.1	8.2	8.3	8.3
Dairy Cattle	4.6	4.8	5.4	5.4	5.4	5.5	5.5
Swine	1.1	1.4	1.7	1.8	1.9	1.9	1.8
Poultry	1.2	1.4	1.5	1.5	1.5	1.5	1.5
Sheep	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Horses	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Goats	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
American Bison[c]	NA	NA	NA	NA	NA	NA	NA
Total	**51.4**	**69.4**	**81.3**	**83.7**	**83.1**	**84.2**	**83.4**

+ Does not exceed 0.05 MMT CO_2 Eq.

NA (Not Available)

[a] Accounts for CH_4 reductions due to capture and destruction of CH_4 at facilities using anaerobic digesters.

[b] Includes both direct and indirect N_2O emissions.

[c] There are no American bison N_2O emissions from managed systems; American bison are maintained entirely on pasture, range, and paddock.

Notes: N_2O emissions from manure deposited on pasture, range and paddock are included in the Agricultural Soils Management sector. Totals may not sum due to independent rounding.

Table 5-8: CH_4 and N_2O Emissions from Manure Management (kt)

Gas/Animal Type	1990	2005	2017	2018	2019	2020	2021
CH_4[a]	**1,394**	**1,960**	**2,300**	**2,375**	**2,348**	**2,383**	**2,358**
Dairy Cattle	572	943	1,248	1,278	1,237	1,269	1,283
Swine	621	812	840	882	891	895	858
Poultry	131	130	136	139	144	142	141
Beef Cattle	63	67	70	70	71	71	71
Horses	4	5	3	3	3	3	3
Sheep	3	2	2	2	2	2	2
Goats	+	+	+	+	+	+	+
American Bison	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
N_2O[b]	**47**	**55**	**64**	**65**	**65**	**66**	**66**
Beef Cattle	20	24	30	30	31	31	31
Dairy Cattle	17	18	20	21	20	21	21
Swine	4	5	7	7	7	7	7
Poultry	5	5	5	6	6	6	6
Sheep	+	1	1	1	1	1	1

Horses	+	+	+	+	+	+	+
Goats	+	+	+	+	+	+	+
Mules and Asses	+	+	+	+	+	+	+
American Bison[c]	NA	NA	NA	NA	NA	NA	NA

+ Does not exceed 0.5 kt.

NA (Not Available)

[a] Accounts for CH_4 reductions due to capture and destruction of CH_4 at facilities using anaerobic digesters.

[b] Includes both direct and indirect N_2O emissions.

[c] There are no American bison N_2O emissions from managed systems; American bison are maintained entirely on pasture, range, and paddock.

Notes: N_2O emissions from manure deposited on pasture, range and paddock are included in the Agricultural Soils Management sector. Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

The methodologies presented in IPCC (2006) form the basis of the CH_4 and N_2O emission estimates for each animal type, including Tier 1, Tier 2, and use of the CEFM previously described for enteric fermentation. These methodologies use:

- IPCC (2006; 2019) Tier 1 default N_2O emission factors and MCFs for dry systems
- U.S. specific MCFs for liquid systems (ERG 2001)
- U.S. specific values for volatile solids (VS) production rate and nitrogen excretion rate for some animal types, including cattle values from the CEFM

This combination of Tier 1 and Tier 2 methods was applied to all livestock animal types. This section presents a summary of the methodologies used to estimate CH_4 and N_2O emissions from manure management. For the current Inventory, time-series results were carried over from the 1990 to 2020 Inventory (i.e., 2022 submission) and a simplified approach was used to estimate manure management emissions for 2021.

See Annex 3.11 for more detailed information on the methodologies (including detailed formulas and emission factors), data used to calculate CH_4 and N_2O emissions, and emission results (including input variables and results at the state-level) from manure management.

Methane Calculation Methods

The following inputs were used in the calculation of manure management CH_4 emissions for 1990 through 2020:

- Animal population data (by animal type and state);
- Typical animal mass (TAM) data (by animal type);
- Portion of manure managed in each WMS, by state and animal type;
- VS production rate (by animal type and state or United States);
- Methane producing potential (B_0) of the volatile solids (by animal type); and
- Methane conversion factors (MCF), the extent to which the CH_4 producing potential is realized for each type of WMS (by state and manure management system, including the impacts of any biogas collection efforts).

Methane emissions were estimated by first determining activity data, including animal population, TAM, WMS usage, and waste characteristics. The activity data sources are described below:

- Annual animal population data for 1990 through 2020 for all livestock types, except goats, horses, mules and asses, and American bison were obtained from the USDA-NASS. For cattle, the USDA populations were utilized in conjunction with birth rates, detailed feedlot placement information, and slaughter

weight data to create the transition matrix in the Cattle Enteric Fermentation Model (CEFM) that models cohorts of individual animal types and their specific emission profiles. The key variables tracked for each of the cattle population categories are described in Section 5.1 and in more detail in Annex 3.10. Goat population data for 1992, 1997, 2002, 2007, 2012, and 2017; horse and mule and ass population data for 1987, 1992, 1997, 2002, 2007, 2012, and 2017; and American bison population for 2002, 2007, 2012, and 2017 were obtained from the *Census of Agriculture* (USDA 2019d). American bison population data for 1990 through 1999 were obtained from the National Bison Association (1999).

- The TAM is an annual average weight that was obtained for animal types other than cattle from information in USDA's *Agricultural Waste Management Field Handbook* (USDA 1996), the American Society of Agricultural Engineers, Standard D384.1 (ASAE 1998) and others (Meagher 1986; EPA 1992; Safley 2000; ERG 2003b; IPCC 2006; ERG 2010a). For a description of the TAM data used for cattle, see Annex 3.10.
- WMS usage was estimated for swine and dairy cattle for different farm size categories using state and regional data from USDA (USDA APHIS 1996; Bush 1998; Ott 2000; USDA 2016c) and EPA (ERG 2000a; EPA 2002a and 2002b; ERG 2018, ERG 2019). For beef cattle and poultry, manure management system usage data were not tied to farm size but were based on other data sources (ERG 2000a; USDA APHIS 2000; UEP 1999). For other animal types, manure management system usage was based on previous estimates (EPA 1992). American bison WMS usage was assumed to be the same as not on feed (NOF) cattle, while mules and asses were assumed to be the same as horses.
- VS production rates for all cattle except for calves were calculated by head for each state and animal type in the CEFM. VS production rates by animal mass for all other animals were determined using data from USDA's *Agricultural Waste Management Field Handbook* (USDA 1996 and 2008; ERG 2010b and 2010c) and data that was not available in the most recent *Handbook* were obtained from the American Society of Agricultural Engineers, Standard D384.1 (ASAE 1998) or the *2006 IPCC Guidelines* (IPCC 2006). American bison VS production was assumed to be the same as NOF bulls.
- B_0 was determined for each animal type based on literature values (Morris 1976; Bryant et al. 1976; Hashimoto 1981; Hashimoto 1984; EPA 1992; Hill 1982; Hill 1984).
- MCFs for dry systems were set equal to default IPCC factors based on state climate for each year (IPCC 2006; IPCC 2019). MCFs for liquid/slurry, anaerobic lagoon, and deep pit systems were calculated based on the forecast performance of biological systems relative to temperature changes as predicted in the van't Hoff-Arrhenius equation which is consistent with IPCC (2006) Tier 2 methodology.
- Data from anaerobic digestion systems with CH_4 capture and combustion were obtained from the EPA AgSTAR Program, including information available in the AgSTAR project database (EPA 2021). Anaerobic digester emissions were calculated based on estimated methane production and collection and destruction efficiency assumptions (ERG 2008).
- For all cattle except for calves, the estimated amount of VS (kg per animal-year) managed in each WMS for each animal type, state, and year were taken from the CEFM, assuming American bison VS production to be the same as NOF bulls. For animals other than cattle, the annual amount of VS (kg per year) from manure excreted in each WMS was calculated for each animal type, state, and year. This calculation multiplied the animal population (head) by the VS excretion rate (kg VS per 1,000 kg animal mass per day), the TAM (kg animal mass per head) divided by 1,000, the WMS distribution (percent), and the number of days per year (365.25).

The estimated amount of VS managed in each WMS was used to estimate the CH_4 emissions (kg CH_4 per year) from each WMS. The amount of VS (kg per year) was multiplied by the B_0 (m^3 CH_4 per kg VS), the MCF for that WMS (percent), and the density of CH_4 (kg CH_4 per m^3 CH_4). The CH_4 emissions for each WMS, state, and animal type were summed to determine the total U.S. CH_4 emissions. See details in Step 5 of Annex 3.11.

The following approach was used in the calculation of manure management CH_4 emissions for 2021:

- Obtain 2021 national-level animal population data: Sheep, poultry, and swine data were downloaded from USDA-NASS Quickstats (USDA 2022). Cattle populations were obtained from the CEFM (see NIR Section 5.1and Annex 3.10). Data for goats, horses, bison, mules, and asses were extrapolated based on the 2011 through 2020 population values to reflect recent trends in animal populations.
- Multiply the national populations by the animal-specific 2020 implied emission factors[8] for CH_4 to calculate national-level 2021 CH_4 emissions estimates by animal type. These methods were utilized in order to maintain time-series consistency as referenced in Volume 1, Chapter 5 of the *2006 IPCC Guidelines*.

Nitrous Oxide Calculation Methods

The following inputs were used in the calculation of direct and indirect manure management N_2O emissions for 1990 through 2020:

- Animal population data (by animal type and state);
- TAM data (by animal type);
- Portion of manure managed in each WMS (by state and animal type);
- Total Kjeldahl N excretion rate (Nex);
- Direct N_2O emission factor (EF_{WMS});
- Indirect N_2O emission factor for volatilization ($EF_{volatilization}$);
- Indirect N_2O emission factor for runoff and leaching ($EF_{runoff/leach}$);
- Fraction of N loss from volatilization of NH_3 and NO_x ($Frac_{gas}$); and
- Fraction of N loss from runoff and leaching ($Frac_{runoff/leach}$).

Nitrous oxide emissions were estimated by first determining activity data, including animal population, TAM, WMS usage, and waste characteristics. The activity data sources (except for population, TAM, and WMS, which were described above) are described below:

- Nex for all cattle except for calves were calculated by head for each state and animal type in the CEFM. Nex rates by animal mass for all other animals were determined using data from USDA's *Agricultural Waste Management Field Handbook* (USDA 1996 and 2008; ERG 2010b and 2010c) and data from the American Society of Agricultural Engineers, Standard D384.1 (ASAE 1998) and IPCC (2006). American bison Nex were assumed to be the same as NOF bulls.[9]
- All N_2O emission factors (direct and indirect) were taken from IPCC (2006).
- Country-specific estimates for the fraction of N loss from volatilization ($Frac_{gas}$) and runoff and leaching ($Frac_{runoff/leach}$) were developed. $Frac_{gas}$ values were based on WMS-specific volatilization values as estimated from EPA's *National Emission Inventory - Ammonia Emissions from Animal Agriculture Operations* (EPA 2005). $Frac_{runoff/leaching}$ values were based on regional cattle runoff data from EPA's Office of Water (EPA 2002b; see Annex 3.11).

[8] An implied emission factor is defined as emissions divided by the relevant measure of activity; the implied emission factor is equal to emissions per activity data unit. For source/sink categories that are composed of several subcategories, the emissions and activity data are summed up across all subcategories. Hence, the implied emission factors are generally not equivalent to the emission factors used to calculate emission estimates, but are average values that could be used, with caution, in data comparisons (UNFCCC 2017).

[9] Nex of American bison on grazing lands are accounted for and discussed in the Agricultural Soil Management source category and included under pasture, range and paddock (PRP) emissions. Because American bison are maintained entirely on unmanaged WMS and N_2O emissions from unmanaged WMS are not included in the Manure Management source category, there are no N_2O emissions from American bison included in the Manure Management source category.

To estimate N_2O emissions for cattle (except for calves), the estimated amount of N excreted (kg per animal-year) that is managed in each WMS for each animal type, state, and year were taken from the CEFM. For calves and other animals, the amount of N excreted (kg per year) in manure in each WMS for each animal type, state, and year was calculated. The population (head) for each state and animal was multiplied by TAM (kg animal mass per head) divided by 1,000, the nitrogen excretion rate (Nex, in kg N per 1,000 kg animal mass per day), WMS distribution (percent), and the number of days per year.

Direct N_2O emissions were calculated by multiplying the amount of N excreted (kg per year) in each WMS by the N_2O direct emission factor for that WMS (EF_{WMS}, in kg N_2O-N per kg N) and the conversion factor of N_2O-N to N_2O. These emissions were summed over state, animal, and WMS to determine the total direct N_2O emissions (kg of N_2O per year). See details in Step 6 of Annex 3.11.

Indirect N_2O emissions from volatilization (kg N_2O per year) were then calculated by multiplying the amount of N excreted (kg per year) in each WMS by the fraction of N lost through volatilization ($Frac_{gas}$) divided by 100, the emission factor for volatilization ($EF_{volatilization}$, in kg N_2O per kg N), and the conversion factor of N_2O-N to N_2O. Indirect N_2O emissions from runoff and leaching (kg N_2O per year) were then calculated by multiplying the amount of N excreted (kg per year) in each WMS by the fraction of N lost through runoff and leaching ($Frac_{runoff/leach}$) divided by 100, the emission factor for runoff and leaching ($EF_{runoff/leach}$, in kg N_2O per kg N), and the conversion factor of N_2O-N to N_2O. The indirect N_2O emissions from volatilization and runoff and leaching were summed to determine the total indirect N_2O emissions. See details in Step 6 of Annex 3.11.

Following these steps, direct and indirect N_2O emissions were summed to determine total N_2O emissions (kg N_2O per year) for the years 1990 to 2020.

Methodological approaches, changes to historic data, and other parameters were applied to the entire time series to ensure consistency in emissions estimates from 1990 through 2020. In some cases, the activity data source changed over the time series. For example, updated WMS distribution data were applied to 2016 for dairy cows and 2009 for swine. While previous WMS distribution data were from another data source, EPA integrated the more recent data source to reflect the best available current WMS distribution data for these animals. EPA assumed a linear interpolation distribution for years between the two data sources. Refer to Annex 3.11 for more details on data sources and methodology.

The following approach was used in the calculation of manure management N_2O emissions for 2021:

- Obtain 2021 national-level animal population data: Sheep, poultry, and swine data were downloaded from USDA-NASS Quickstats (USDA 2022). Cattle populations were obtained from the CEFM, see Section 5.1 and Annex 3.10 (Enteric Fermentation). Data for goats, horses, bison, mules, and asses were extrapolated based on the 2011 through 2020 population values to reflect recent trends in animal populations.
- The national populations were multiplied by the animal-specific 2020 implied emission factors for N_2O (which combines both direct and indirect N_2O) to calculate national-level 2021 N_2O emissions estimates by animal type. These methods were utilized in order to maintain time-series consistency as referenced in Volume 1, Chapter 5 of the *2006 IPCC Guidelines*.

Uncertainty

An analysis (ERG 2003a) was conducted for the manure management emission estimates presented in the 1990 through 2001 Inventory (i.e., 2003 submission to the UNFCCC) to determine the uncertainty associated with estimating CH_4 and N_2O emissions from livestock manure management. The quantitative uncertainty analysis for this source category was performed in 2002 through the IPCC-recommended Approach 2 uncertainty estimation methodology, the Monte Carlo Stochastic Simulation technique. The uncertainty analysis was developed based on the methods used to estimate CH_4 and N_2O emissions from manure management systems. A normal probability distribution was assumed for each source data category. The series of equations used were condensed into a single equation for each animal type and state. The equations for each animal group contained four to five variables

around which the uncertainty analysis was performed for each state. While there are plans to update the uncertainty to reflect recent manure management updates and forthcoming changes (see Planned Improvements, below), at this time the uncertainty estimates were directly applied to the 2021 emission estimates.

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 5-9. Manure management CH_4 emissions in 2021 were estimated to be between 54.1 and 79.2 MMT CO_2 Eq. at a 95 percent confidence level, which indicates a range of 18 percent below to 20 percent above the actual 2021 emission estimate of 66.0 MMT CO_2 Eq. At the 95 percent confidence level, N_2O emissions were estimated to be between 14.6 and 21.6 MMT CO_2 Eq. (or approximately 16 percent below and 24 percent above the actual 2021 emission estimate of 17.4 MMT CO_2 Eq.).

Table 5-9: Approach 2 Quantitative Uncertainty Estimates for CH_4 and N_2O (Direct and Indirect) Emissions from Manure Management (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Manure Management	CH_4	66.0	54.1	79.2	-18%	+20%
Manure Management	N_2O	17.4	14.6	21.6	-16%	+24%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Tier 2 activities focused on comparing estimates for the previous and current Inventories for N_2O emissions from managed systems and CH_4 emissions from livestock manure. All errors identified were corrected. Order of magnitude checks were also conducted, and corrections made where needed. In addition, manure N data were checked by comparing state-level data with bottom-up estimates derived at the county level and summed to the state level. Similarly, a comparison was made by animal and WMS type for the full time series, between national level estimates for N excreted, both for pasture and managed systems, and the sum of county estimates for the full time series. This was done to ensure consistency between excreted N within the manure management sector and those data provided to the managed soils sector. All errors identified were corrected.

Time-series data, including population, are validated by experts to ensure they are representative of the best available U.S.-specific data. The U.S.-specific values for TAM, Nex, VS, B_0, and MCF were also compared to the IPCC default values and validated by experts. Although significant differences exist in some instances, these differences are due to the use of U.S.-specific data and the differences in U.S. agriculture as compared to other countries. The U.S. manure management emission estimates use the most reliable country-specific data, which are more representative of U.S. animals and systems than the IPCC (2006) default values.

For additional verification of the 1990 to 2020 estimates, the implied CH_4 emission factors for manure management (kg of CH_4 per head per year) were compared against the default IPCC (2006) values. Table 5-10 presents the implied emission factors of kg of CH_4 per head per year used for the manure management emission estimates as well as the IPCC (2006) default emission factors. The U.S. implied emission factors fall within the range of the IPCC (2006) default values, except in the case of sheep, goats, and some years for horses and dairy cattle. The U.S. implied emission factors are greater than the IPCC (2006) default value for those animals due to the use of U.S.-specific data for typical animal mass and VS excretion. There is an increase in implied emission factors for dairy cattle and swine across the time series. This increase reflects the dairy cattle and swine industry

trend towards larger farm sizes; large farms are more likely to manage manure as a liquid and therefore produce more CH_4 emissions.

Table 5-10: IPCC (2006) Implied Emission Factor Default Values Compared with Calculated Values for CH_4 from Manure Management (kg/head/year)

Animal Type	IPCC Default CH_4 Emission Factors (kg/head/year)[a]	Implied CH_4 Emission Factors (kg/head/year)						
		1990	2005	2017	2018	2019	2020	2021
Dairy Cattle	48-112	29.3	53.0	66.0	67.3	65.6	67.5	67.5
Beef Cattle	1-2	0.8	0.8	0.9	0.9	0.9	0.9	0.9
Swine	10-45	11.5	13.3	11.6	12.0	11.6	11.6	11.6
Sheep	0.19-0.37	0.3	0.4	0.4	0.4	0.4	0.4	0.4
Goats	0.13-0.26	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Poultry	0.02-1.4	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Horses	1.56-3.13	1.9	1.4	1.2	1.2	1.2	1.2	1.2
American Bison	NA	0.8	0.9	0.9	0.9	0.9	0.9	0.9
Mules and Asses	0.76-1.14	0.4	0.4	0.4	0.4	0.4	0.4	0.4

Note: CH_4 implied emission factors were not calculated for 2021 due to the simplified emissions estimation approach used to estimate emissions for that year. 2020 values were used for 2021.

NA (Not Applicable)

[a] Ranges reflect *2006 IPCC Guidelines* (Volume 4, Table 10.14) default emission factors for North America across different climate zones.

In addition, default IPCC (2006) emission factors for N_2O were compared to the U.S. Inventory implied N_2O emission factors. Default N_2O emission factors from the *2006 IPCC Guidelines* were used to estimate N_2O emission from each WMS in conjunction with U.S.-specific Nex values. The implied emission factors differed from the U.S. Inventory values due to the use of U.S.-specific Nex values and differences in populations present in each WMS throughout the time series.

Recalculations Discussion

EPA updated global warming potentials (GWP) for calculating CO_2-equivalent emissions of CH_4 and N_2O to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an increase in the calculated CO_2-equivalent emissions of CH_4, while the GWP of N_2O has decreased from 298 to 265, leading to a decrease in the calculated CO_2-equivalent emissions of N_2O. The cumulative effect of these recalculations had a low impact on the overall manure management emission estimates.

On average, CO_2-equivalent total emissions increased by 5.7 percent for each year of the time series compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Regular annual data reviews and updates are necessary to maintain an emissions inventory that reflects the current base of knowledge. In addition to the documented approaches currently used to address data availability, EPA conducts data assessments and is actively pursuing the following investigations for the 2024 Inventory submission:

- Continuing to investigate new sources of WMS data. EPA is working with the USDA Natural Resources Conservation Service to collect data for potential improvements to the Inventory.

- Determining appropriate updates to other default N_2O emission factors to reflect IPCC (2019). Many of the improvements identified below are major updates and may take multiple years to fully implement. Potential improvements (long-term improvements) for future Inventory years include:
- Revising the anaerobic digestion estimates to estimate CH_4 emissions *reductions* due to the use of anaerobic digesters (the Inventory currently estimates only emissions from anaerobic digestion systems).
- Investigating the updated IPCC *2019 Refinement* default N_2O emissions factor for anaerobic digesters. Historically, EPA has not estimated N_2O emissions from digesters as the default guidance was no emissions. Incorporating AgSTAR data for N_2O emissions, like CH_4 emissions, is a longer-term goal for EPA.
- Investigating updates to the current anaerobic digester MCFs based on IPCC (2019).
- Investigating the typical animal masses used in each the Enteric Fermentation and Manure Management inventories and confirm they align.

EPA is aware of the following potential updates or improvements but notes that implementation will be based on available resources and data availability:

- Updating the B_0 data used in the Inventory, as data become available. EPA is conducting outreach with counterparts from USDA as to available data and research on B_0.
- Comparing CH_4 and N_2O emission estimates with estimates from other models and more recent studies and compare the results to the Inventory.
- Comparing manure management emission estimates with on-farm measurement data to identify opportunities for improved estimates.
- Comparing VS and Nex data to literature data to identify opportunities for improved estimates.
- Determining if there are revisions to the U.S.-specific method for calculating liquid systems for MCFs based on updated guidance from the IPCC *2019 Refinement*.
- Investigating improved emissions estimate methodologies for swine pit systems with less than one month of storage (the recently updated swine WMS data included this WMS category).
- Improving the linkages with the Enteric Fermentation source category estimates. For future Inventories, it may be beneficial to have the CEFM and Manure Management calculations in the same model, as they rely on much of the same activity data and on each other's outputs to properly calculate emissions.
- Revising the uncertainty analysis to address changes that have been implemented to the CH_4 and N_2O estimates. The plan is to align the timing of the updated Manure Management uncertainty analysis with the uncertainty analysis for Enteric Fermentation.

5.3 Rice Cultivation (CRF Source Category 3C)

Most of the world's rice is grown on flooded fields (Baicich 2013) that create anaerobic conditions leading to CH_4 production through a process known as methanogenesis. Approximately 60 to 90 percent of the CH_4 produced by methanogenic bacteria in flooded rice fields is oxidized in the soil and converted to CO_2 by methanotrophic bacteria. The remainder is emitted to the atmosphere (Holzapfel-Pschorn et al. 1985; Sass et al. 1990) or transported as dissolved CH_4 into groundwater and waterways (Neue et al. 1997). Methane is transported to the atmosphere primarily through the rice plants, but some CH_4 also escapes via ebullition (i.e., bubbling through the water) and to a much lesser extent by diffusion through the water (van Bodegom et al. 2001).

Water management is arguably the most important factor affecting CH_4 emissions in rice cultivation, and improved water management has the largest potential to mitigate emissions (Yan et al. 2009). Upland rice fields are not flooded, and therefore do not produce CH_4, but large amounts of CH_4 can be emitted in continuously irrigated fields, which is the most common practice in the United States (USDA 2012). Single or multiple aeration events with drainage of a field during the growing season can significantly reduce these emissions (Wassmann et al. 2000a), but drainage may also increase N_2O emissions. Deepwater rice fields (i.e., fields with flooding depths greater than one meter, such as natural wetlands) tend to have fewer living stems reaching the soil, thus reducing the amount of CH_4 transport to the atmosphere through the plant compared to shallow-flooded systems (Sass 2001).

Other management practices also influence CH_4 emissions from flooded rice fields including rice residue straw management and application of organic amendments, in addition to cultivar selection due to differences in the amount of root exudates[10] among rice varieties (Neue et al. 1997). These practices influence the amount of organic matter available for methanogenesis, and some practices, such as mulching rice straw or composting organic amendments, can reduce the amount of labile carbon and limit CH_4 emissions (Wassmann et al. 2000b). Fertilization practices also influence CH_4 emissions, particularly the use of fertilizers with sulfate, which can reduce CH_4 emissions (Wassmann et al. 2000b; Linquist et al. 2012). Other environmental variables also impact the methanogenesis process such as soil temperature and soil type. Soil temperature regulates the activity of methanogenic bacteria, which in turn affects the rate of CH_4 production. Soil texture influences decomposition of soil organic matter, but is also thought to have an impact on oxidation of CH_4 in the soil (Sass et al. 1994).

Rice is currently cultivated in thirteen states, including Arkansas, California, Florida, Illinois, Kentucky, Louisiana, Minnesota, Mississippi, Missouri, New York, South Carolina, Tennessee and Texas. Soil types, rice varieties, and cultivation practices vary across the United States, but most farmers apply fertilizers and do not harvest crop residues. In addition, a second, ratoon rice crop is sometimes grown in the Southeastern region of the country. Ratoon crops are produced from regrowth of the stubble remaining after the harvest of the first rice crop. Methane emissions from ratoon crops are higher than those from the primary crops due to the increased amount of labile organic matter available for anaerobic decomposition in the form of relatively fresh crop residue straw. Emissions tend to be higher in rice fields if the residues have been in the field for less than 30 days before planting the next rice crop (Lindau and Bollich 1993; IPCC 2006; Wang et al. 2013).

A combination of Tier 1 and 3 methods are used to estimate CH_4 emissions from rice cultivation across most of the time series, while a surrogate data method has been applied to estimate national emissions for 2016 to 2021 in this Inventory due to lack of data in the later years of the time series. National emission estimates based on surrogate data will be recalculated in a future Inventory with the Tier 1 and 3 methods as data becomes available.

Overall, rice cultivation is a minor source of CH_4 emissions in the United States relative to other source categories (see Table 5-11, Table 5-12, and Figure 5-3). Most emissions occur in Arkansas, California, Louisiana, Mississippi, Missouri and Texas. In 2021, CH_4 emissions from rice cultivation were 16.8 MMT CO_2 Eq. (600 kt). Annual emissions fluctuate between 1990 and 2021, which is largely due to differences in the amount of rice harvested areas over time, which has been decreasing over the past two decades. Consequently, emissions in 2021 are 6 percent lower than emissions in 1990.

Table 5-11: CH_4 Emissions from Rice Cultivation (MMT CO_2 Eq.)

State	1990	2005	2017	2018	2019	2020	2021
Arkansas	6.0	8.8	NE	NE	NE	NE	NE
California	3.7	3.8	NE	NE	NE	NE	NE
Florida	+	+	NE	NE	NE	NE	NE

[10] The roots of rice plants add organic material to the soil through a process called “root exudation.” Root exudation is thought to enhance decomposition of the soil organic matter and release nutrients that the plant can absorb for production. The amount of root exudate produced by a rice plant over a growing season varies among rice varieties.

Illinois	+	+	NE	NE	NE	NE	NE
Kentucky	+	+	NE	NE	NE	NE	NE
Louisiana	2.9	3.2	NE	NE	NE	NE	NE
Minnesota	+	0.1	NE	NE	NE	NE	NE
Mississippi	1.3	1.5	NE	NE	NE	NE	NE
Missouri	0.6	1.3	NE	NE	NE	NE	NE
New York	+	+	NE	NE	NE	NE	NE
South Carolina	+	+	NE	NE	NE	NE	NE
Tennessee	+	+	NE	NE	NE	NE	NE
Texas	3.4	1.5	NE	NE	NE	NE	NE
Total	**17.9**	**20.2**	**16.7**	**17.4**	**16.9**	**17.6**	**16.8**

+ Does not exceed 0.05 MMT CO_2 Eq.

NE (Not Estimated). State-level emissions are not estimated for 2016 through 2021 in this Inventory. A surrogate data method is used to estimate emissions for these years and are produced only at the national scale.

Note: Totals may not sum due to independent rounding.

Table 5-12: CH_4 Emissions from Rice Cultivation (kt)

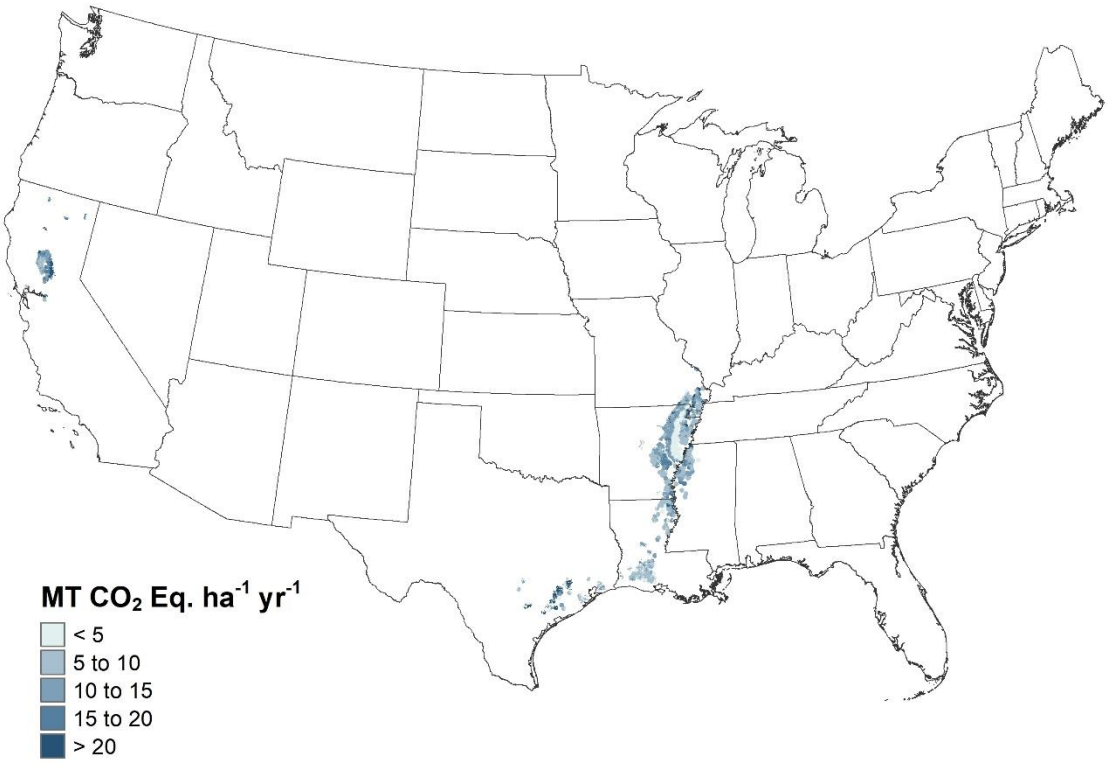
State	1990	2005	2017	2018	2019	2020	2021
Arkansas	216	315	NE	NE	NE	NE	NE
California	131	134	NE	NE	NE	NE	NE
Florida	+	1	NE	NE	NE	NE	NE
Illinois	+	+	NE	NE	NE	NE	NE
Kentucky	+	+	NE	NE	NE	NE	NE
Louisiana	103	113	NE	NE	NE	NE	NE
Minnesota	1	2	NE	NE	NE	NE	NE
Mississippi	45	55	NE	NE	NE	NE	NE
Missouri	22	45	NE	NE	NE	NE	NE
New York	+	+	NE	NE	NE	NE	NE
South Carolina	+	+	NE	NE	NE	NE	NE
Tennessee	+	+	NE	NE	NE	NE	NE
Texas	122	54	NE	NE	NE	NE	NE
Total	**640**	**720**	**596**	**623**	**602**	**630**	**600**

+ Does not exceed 0.5 kt.

NE (Not Estimated). State-level emissions are not estimated for 2016 through 2021 in this Inventory. A surrogate data method is used to estimate emissions for these years and are produced only at the national scale.

Note: Totals may not sum due to independent rounding.

Figure 5-3: Annual CH_4 Emissions from Rice Cultivation, 2015



Note: Only national-scale emissions are estimated for 2016 through 2021 in this Inventory using the surrogate data method described in the Methodology section; therefore, the fine-scale emission patterns in this map are based on the estimates for 2015.

Methodology and Time-Series Consistency

The methodology used to estimate CH_4 emissions from rice cultivation is based on a combination of IPCC Tier 1 and 3 approaches. The Tier 3 method utilizes the DayCent process-based model to estimate CH_4 emissions from rice cultivation (Cheng et al. 2013), and has been tested in the United States (see Annex 3.12) and Asia (Cheng et al. 2013, 2014). The model simulates hydrological conditions and thermal regimes, organic matter decomposition, root exudation, rice plant growth and its influence on oxidation of CH_4, as well as CH_4 transport through the plant and via ebullition (Cheng et al. 2013). The method captures the influence of organic amendments and rice straw management on methanogenesis in the flooded soils, and ratooning of rice crops with a second harvest during the growing season. In addition to CH_4 emissions, DayCent simulates soil C stock changes and N_2O emissions (Parton et al. 1987 and 1998; Del Grosso et al. 2010), and allows for a seamless set of simulations for crop rotations that include both rice and non-rice crops.

The Tier 1 method is applied to estimate CH_4 emissions from rice when grown in rotation with crops that are not simulated by DayCent, such as vegetable crops. The Tier 1 method is also used for areas converted between agriculture (i.e., cropland and grassland) and other land uses, such as forest land, wetland, and settlements. In addition, the Tier 1 method is used to estimate CH_4 emissions from organic soils (i.e., Histosols) and from areas with very gravelly, cobbly, or shaley soils (greater than 35 percent by volume). The Tier 3 method using DayCent has not been fully tested for estimating emissions associated with these conditions.

The Tier 1 method for estimating CH_4 emissions from rice production utilizes a default base emission rate and scaling factors (IPCC 2006). The base emission rate represents emissions for continuously flooded fields with no

organic amendments. Scaling factors are used to adjust the base emission rate for water management and organic amendments that differ from continuous flooding with no organic amendments. The method accounts for pre-season and growing season flooding; types and amounts of organic amendments; and the number of rice production seasons within a single year (i.e., single cropping, ratooning, etc.). The Tier 1 analysis is implemented in the Agriculture and Land Use National Greenhouse Gas Inventory (ALU) software (Ogle et al. 2016).[11]

Rice cultivation areas are based on crop and land use histories recorded in the USDA National Resources Inventory (NRI) survey (USDA-NRCS 2018). The NRI is a statistically-based sample of all non-federal land, and includes 489,178 survey locations in agricultural land for the conterminous United States and Hawaii of which 1,960 include one or more years of rice cultivation. The Tier 3 method is used to estimate CH_4 emissions from 1,655 of the NRI survey locations, and the remaining 305 survey locations are estimated with the Tier 1 method. Each NRI survey location is associated with an "expansion factor" that allows scaling of CH_4 emission to the entire land base with rice cultivation (i.e., each expansion factor represents the amount of area with the same land-use/management history as the survey location). Land-use and some management information in the NRI (e.g., crop type, soil attributes, and irrigation) were collected on a 5-year cycle beginning in 1982, along with cropping rotation data in 4 out of 5 years for each 5-year time period (i.e., 1979 to 1982, 1984 to 1987, 1989 to 1992, and 1994 to 1997). The NRI program began collecting annual data in 1998, with data through 2015 (USDA-NRCS 2018). The current Inventory only uses NRI data through 2015, and the harvested rice areas in each state are presented in Table 5-13.

Table 5-13: Rice Area Harvested (1,000 Hectares)

State/Crop	1990	2005	2017	2018	2019	2020	2021
Arkansas	600	784	NE	NE	NE	NE	NE
California	249	236	NE	NE	NE	NE	NE
Florida	0	4	NE	NE	NE	NE	NE
Illinois	0	0	NE	NE	NE	NE	NE
Kentucky	0	0	NE	NE	NE	NE	NE
Louisiana	381	402	NE	NE	NE	NE	NE
Minnesota	4	9	NE	NE	NE	NE	NE
Mississippi	123	138	NE	NE	NE	NE	NE
Missouri	48	94	NE	NE	NE	NE	NE
New York	1	0	NE	NE	NE	NE	NE
South Carolina	0	0	NE	NE	NE	NE	NE
Tennessee	0	1	NE	NE	NE	NE	NE
Texas	302	118	NE	NE	NE	NE	NE
Total	**1,707**	**1,788**	**NE**	**NE**	**NE**	**NE**	**NE**

NE (Not Estimated). Area data will be updated in the next Inventory.
Note: Totals may not sum due to independent rounding.

The Southeastern states have sufficient growing periods for a ratoon crop in some years (Table 5-14). For example, the growing season length is occasionally sufficient for ratoon crops to be grown on about 1 percent of the rice fields in Arkansas. No data are available about ratoon crops in Missouri or Mississippi, and the average amount of ratooning in Arkansas was assigned to these states. Ratoon cropping occurs much more frequently in Louisiana (LSU 2015 for years 2000 through 2013, 2015) and Texas (TAMU 2015 for years 1993 through 2015), averaging 32 percent and 45 percent of rice acres planted, respectively. Florida also has a large fraction of area with a ratoon crop (49 percent). Ratoon rice crops are not grown in California.

[11] See http://www.nrel.colostate.edu/projects/ALUsoftware/.

Table 5-14: Average Ratooned Area as Percent of Primary Growth Area (Percent)

State	1990-2015
Arkansas[a]	1%
California	0%
Florida[b]	49%
Louisiana[c]	32%
Mississippi[a]	1%
Missouri[a]	1%
Texas[d]	45%

[a] Arkansas: *1990–2000* (Slaton 1999 through 2001); *2001–2011* (Wilson 2002 through 2007, 2009 through 2012); *2012–2013* (Hardke 2013, 2014). Estimates of ratooning for Missouri and Mississippi are based on the data from Arkansas.

[b] Florida - Ratoon: *1990–2000* (Schueneman 1997, 1999 through 2001); *2001* (Deren 2002); *2002–2003* (Kirstein 2003 through 2004, 2006); *2004* (Cantens 2004 through 2005); *2005–2013* (Gonzalez 2007 through 2014).

[c] Louisiana: *1990–2013* (Linscombe 1999, 2001 through 2014).

[d] Texas: *1990–2002* (Klosterboer 1997, 1999 through 2003); *2003–2004* (Stansel 2004 through 2005); *2005* (Texas Agricultural Experiment Station 2006); *2006–2013* (Texas Agricultural Experiment Station 2007 through 2014).

While rice crop production in the United States includes a minor amount of land with mid-season drainage or alternate wet-dry periods, the majority of rice growers use continuously flooded water management systems (Hardke 2015; UCCE 2015; Hollier 1999; Way et al. 2014). Therefore, continuous flooding was assumed in the DayCent simulations and the Tier 1 method. Variation in flooding can be incorporated in future Inventories if water management data are collected.

Winter flooding is another key practice associated with water management in rice fields, and the impact of winter flooding on CH_4 emissions is addressed in the Tier 3 and Tier 1 analyses. Flooding is used to prepare fields for the next growing season, and to create waterfowl habitat (Young 2013; Miller et al. 2010; Fleskes et al. 2005). Fitzgerald et al. (2000) suggests that as much as 50 percent of the annual emissions may occur during winter flooding. Winter flooding is a common practice with an average of 34 percent of fields managed with winter flooding in California (Miller et al. 2010; Fleskes et al. 2005), and approximately 21 percent of the fields managed with winter flooding in Arkansas (Wilson and Branson 2005 and 2006; Wilson and Runsick 2007 and 2008; Wilson et al. 2009 and 2010; Hardke and Wilson 2013 and 2014; Hardke 2015). No data are available on winter flooding for Texas, Louisiana, Florida, Missouri, or Mississippi. For these states, the average amount of flooding is assumed to be similar to Arkansas. In addition, the amount of flooding is assumed to be relatively constant over the Inventory time series.

A surrogate data method is used to estimate emissions from 2016 to 2021 associated with the rice CH_4 emissions for Tier 1 and 3 methods. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors was used to estimate the relationship between the surrogate data and emissions data from 1990 through 2015, which were derived using the Tier 1 and 3 methods (Brockwell and Davis 2016). Surrogate data are based on rice commodity statistics from USDA-NASS.[12] See Box 5-2 for more information about the surrogate data method.

Box 5-2: Surrogate Data Method

An approach to extend the time series is needed to estimate emissions from rice cultivation because there are gaps in activity data at the end of the time series. This is mainly due to the fact that the National Resources Inventory (NRI) does not release data every year, and the NRI is a key data source for estimating greenhouse gas emissions.

A surrogate data method has been selected to impute missing emissions at the end of the time series. A linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate the relationship between the surrogate data and the observed 1990 to 2015 emissions data that has

[12] See https://quickstats.nass.usda.gov/.

been compiled using the inventory methods described in this section. The model to extend the time series is given by

$$Y = X\beta + \varepsilon,$$

where Y is the response variable (e.g., CH_4 emissions), Xβ is the surrogate data that is used to predict the missing emissions data, and ε is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. Parameters are estimated from the observed data for 1990 to 2015 using standard statistical techniques, and these estimates are used to predict the missing emissions data for 2016 to 2021.

A critical issue in using splicing methods is to adequately account for the additional uncertainty introduced by predicting emissions with related information without compiling the full inventory. For example, predicting CH_4 emissions will increase the total variation in the emission estimates for these specific years, compared to those years in which the full inventory is compiled. This added uncertainty is quantified within the model framework using a Monte Carlo approach. The approach requires estimating parameters for results in each Monte Carlo simulation for the full inventory (i.e., the surrogate data model is refit with the emissions estimated in each Monte Carlo iteration from the full inventory analysis with data from 1990 to 2015).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a surrogate data method is used to approximate emissions for the remainder of the 2016 to 2021 time series based on the emissions data from 1990 to 2015. This surrogate data method is consistent with data splicing methods in IPCC (2006).

Uncertainty

Sources of uncertainty in the Tier 3 method include management practices, uncertainties in model structure (i.e., algorithms and parameterization), and variance associated with the NRI sample. Sources of uncertainty in the IPCC (2006) Tier 1 method include the emission factors, management practices, and variance associated with the NRI sample. A Monte Carlo analysis was used to propagate uncertainties in the Tier 1 and 3 methods. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo analysis associated with the surrogate data method (See Box 5-2 for information about propagating uncertainty with the surrogate data method). The uncertainties from the Tier 1 and 3 approaches are combined to produce the final CH_4 emissions estimate using simple error propagation (IPCC 2006). Additional details on the uncertainty methods are provided in Annex 3.12.

Rice cultivation CH_4 emissions in 2021 were estimated to be between 4.2 and 29.4 MMT CO_2 Eq. at a 95 percent confidence level, which indicates a range of 75 percent below to 75 percent above the 2021 emission estimate of 16.8 MMT CO_2 Eq. (see Table 5-15).

Table 5-15: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Rice Cultivation (MMT CO_2 Eq. and Percent)

Source	Inventory Method	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
				Lower Bound	Upper Bound	Lower Bound	Upper Bound
Rice Cultivation	Tier 3	CH_4	14.0	1.4	26.6	-90%	+90%
Rice Cultivation	Tier 1	CH_4	2.8	1.5	4.1	-48%	+48%
Rice Cultivation	**Total**	**CH_4**	**16.8**	**4.2**	**29.4**	**-75%**	**+75%**

[a] Range of emission estimates is the 95 percent confidence interval.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Quality control measures include checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors.

Model results are compared to field measurements to verify if results adequately represent CH_4 emissions. The comparisons included over 17 long-term experiments, representing about 238 combinations of management treatments across all the sites. A statistical relationship was developed to assess uncertainties in the model structure, adjusting the estimates for model bias and assessing precision in the resulting estimates (methods are described in Ogle et al. 2007). See Annex 3.12 for more information.

Recalculations Discussion

EPA updated global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series for consistency. As a result of this change, CO_2-equivalent emissions increased by an annual average of 1.9 MMT CO_2 Eq., or 12 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A key planned improvement for rice cultivation is to fill several gaps in the management activity including compiling new data on water management, organic amendments and ratooning practices in rice cultivation systems. This improvement is expected to be completed for the next Inventory, but may not be prioritized depending on the needs for other inventory improvements in the Agriculture sector.

5.4 Agricultural Soil Management (CRF Source Category 3D)

Nitrous oxide is naturally produced in soils through the microbial processes of nitrification and denitrification that is driven by the availability of mineral nitrogen (N) (Firestone and Davidson 1989).[13] Mineral N is made available in soils through decomposition of soil organic matter and plant litter, as well as asymbiotic fixation of N from the atmosphere.[14] Several agricultural activities increase mineral N availability in soils that lead to direct N_2O emissions at the site of a management activity (see Figure 5-4) (Mosier et al. 1998). These activities include synthetic N fertilization; application of managed livestock manure; application of other organic materials such as biosolids (i.e., treated sewage sludge); deposition of manure on soils by domesticated animals in pastures, range,

[13] Nitrification and denitrification are driven by the activity of microorganisms in soils. Nitrification is the aerobic microbial oxidation of ammonium (NH_4^+) to nitrate (NO_3^-), and denitrification is the anaerobic microbial reduction of nitrate to N_2. Nitrous oxide is a gaseous intermediate product in the reaction sequence of nitrification and denitrification.

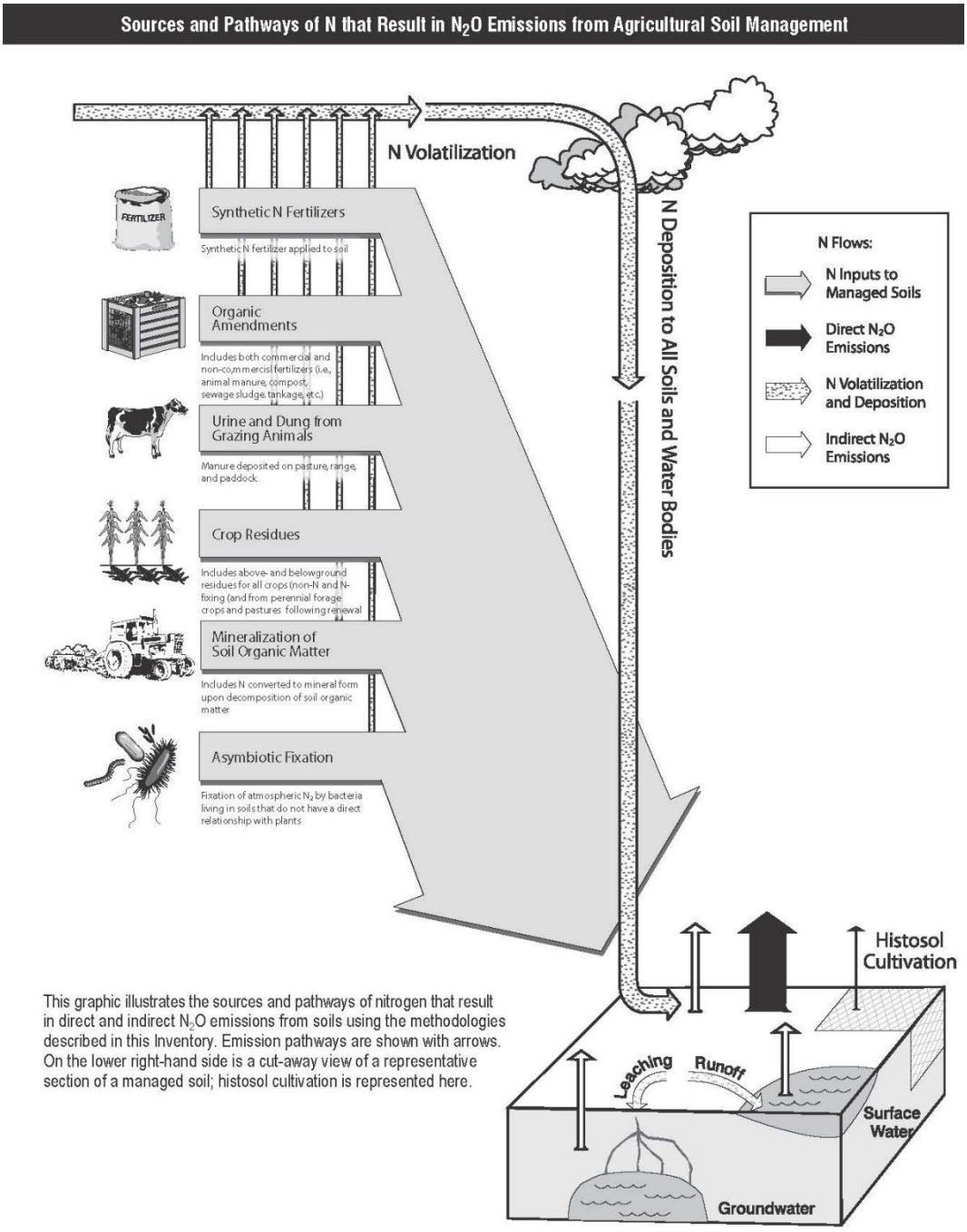
[14] Asymbiotic N fixation is the fixation of atmospheric N_2 by bacteria living in soils that do not have a direct relationship with plants.

and paddocks (PRP) (i.e., unmanaged manure); retention of crop residues (N-fixing legumes and non-legume crops and forages); and drainage of organic soils[15] (i.e., Histosols) (IPCC 2006). Additionally, agricultural soil management activities, including irrigation, drainage, tillage practices, cover crops, and fallowing of land, can influence N mineralization from soil organic matter and levels of asymbiotic N fixation. Indirect emissions of N_2O occur when N is transported from a site and is subsequently converted to N_2O; there are two pathways for indirect emissions: (1) volatilization and subsequent atmospheric deposition of applied/mineralized N, and (2) surface runoff and leaching of applied/mineralized N into groundwater and surface water.[16] Direct and indirect emissions from agricultural lands are included in this section (i.e., cropland and grassland as defined in Section 6.1 Representation of the U.S. Land Base). Nitrous oxide emissions from forest land and settlements soils are found in Sections 6.2 and 6.10, respectively.

[15] Drainage of organic soils in former wetlands enhances mineralization of N-rich organic matter, thereby increasing N_2O emissions from these soils.

[16] These processes entail volatilization of applied or mineralized N as NH_3 and NO_x, transformation of these gases in the atmosphere (or upon deposition), and deposition of the N primarily in the form of particulate NH_4^+, nitric acid (HNO_3), and NO_x. In addition, hydrological processes lead to leaching and runoff of NO_3^- that is converted to N_2O in aquatic systems, e.g., wetlands, rivers, streams and lakes. Note: N_2O emissions are not estimated for aquatic systems associated with N inputs from terrestrial systems in order to avoid double-counting.

Figure 5-4: Sources and Pathways of N that Result in N_2O Emissions from Agricultural Soil Management



Agricultural soils produce the majority of N_2O emissions in the United States. Estimated emissions in 2021 are 294.0 MMT CO_2 Eq. (1,110 kt) (see Table 5-16 and Table 5-17). Annual N_2O emissions from agricultural soils are 2.1 percent greater in 2021 compared to 1990, but emissions fluctuated between 1990 and 2021 due to inter-annual variability largely associated with weather patterns, synthetic fertilizer use, and crop production. From 1990 to 2021, cropland accounted for 68 percent of total direct emissions on average from agricultural soil management, while grassland accounted for 32 percent. On average, 77 percent of indirect emissions are from croplands and 23

percent from grasslands. Estimated direct and indirect N_2O emissions by sub-source category are shown in Table 5-18 and Table 5-19.

Table 5-16: N_2O Emissions from Agricultural Soils (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Direct	**259.5**	**263.8**	**279.2**	**290.5**	**276.6**	**261.9**	**264.7**
Cropland	176.1	180.0	193.4	200.4	189.2	181.8	181.5
Grassland	83.4	83.9	85.9	90.1	87.4	80.1	83.2
Indirect	**28.5**	**27.7**	**31.4**	**33.2**	**32.7**	**28.7**	**29.3**
Cropland	21.8	21.1	24.7	26.0	25.6	22.3	22.8
Grassland	6.7	6.6	6.6	7.2	7.1	6.4	6.5
Total	**288.0**	**291.5**	**310.6**	**323.8**	**309.3**	**290.5**	**294.0**

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-17: N_2O Emissions from Agricultural Soils (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Direct	**979**	**996**	**1,054**	**1,096**	**1,044**	**988**	**999**
Cropland	664	679	730	756	714	686	685
Grassland	315	317	324	340	330	302	314
Indirect	**107**	**104**	**118**	**125**	**124**	**108**	**111**
Cropland	82	80	93	98	97	84	86
Grassland	25	25	25	27	27	24	25
Total	**1,087**	**1,100**	**1,172**	**1,222**	**1,167**	**1,096**	**1,110**

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-18: Direct N_2O Emissions from Agricultural Soils by Land Use Type and N Input Type (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Cropland	**176.1**	**180.0**	**193.4**	**200.4**	**189.2**	**181.8**	**181.4**
Mineral Soils[e]	**172.6**	**176.6**	**190.1**	**197.5**	**186.2**	**178.9**	**178.5**
Synthetic Fertilizer	61.0	65.3	69.8	68.8	65.6	64.3	62.7
Organic Amendment[a]	11.5	12.7	14.4	14.5	14.3	14.5	14.7
Residue N[b]	26.4	26.2	26.2	28.5	25.3	28.8	24.4
Mineralization and Asymbiotic Fixation	73.6	72.5	79.7	85.6	81.0	71.3	76.8
Drained Organic Soils	3.4	3.2	3.0	3.0	2.9	2.9	2.9
Grassland	**83.4**	**83.9**	**86.1**	**90.1**	**87.4**	**80.1**	**83.2**
Mineral Soils	**81.2**	**81.7**	**83.8**	**87.9**	**85.2**	**77.8**	**81.0**
Synthetic Fertilizer	+	+	+	+	+	+	+
PRP Manure	15.8	14.6	13.9	14.5	13.8	13.5	14.0
Managed Manure[c]	+	+	+	+	+	+	+
Biosolids (i.e., treated Sewage Sludge)	0.2	0.4	0.6	0.6	0.6	0.6	0.6
Residue N[d]	21.4	22.4	22.7	22.3	22.5	22.7	20.9
Mineralization and Asymbiotic Fixation	43.8	44.3	46.6	50.5	48.3	41.0	45.4
Drained Organic Soils	2.3	2.2	2.3	2.2	2.2	2.3	2.3
Total	**259.5**	**263.8**	**279.2**	**290.5**	**276.6**	**261.9**	**264.7**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Organic amendment inputs include managed manure, daily spread manure, and commercial organic fertilizers (i.e., dried blood, dried manure, tankage, compost, and other).

[b] Cropland residue N inputs include N in unharvested cover crops as well as harvested crops.

[c] Managed manure inputs include managed manure and daily spread manure amendments that are applied to grassland soils.

[d] Grassland residue N inputs include residual biomass, both legumes and grasses, that is ungrazed and becomes dead organic matter.

[e] Cropland Mineral Soils totals also include a small amount of PRP manure.

Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Table 5-19: Indirect N_2O Emissions from Agricultural Soils (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
Cropland	**21.8**	**21.1**	**24.7**	**26.0**	**25.6**	**22.3**	**22.8**
Volatilization & Atm. Deposition	6.7	7.1	7.7	8.2	7.3	7.7	7.6
Surface Leaching & Run-Off	15.1	14.0	17.0	17.9	18.4	14.6	15.2
Grassland	**6.7**	**6.6**	**6.6**	**7.2**	**7.1**	**6.4**	**6.5**
Volatilization & Atm. Deposition	3.9	3.9	3.8	3.9	3.7	3.5	3.6
Surface Leaching & Run-Off	2.8	2.6	2.8	3.4	3.4	2.9	2.9
Total	**28.5**	**27.7**	**31.4**	**33.2**	**32.7**	**28.7**	**29.3**

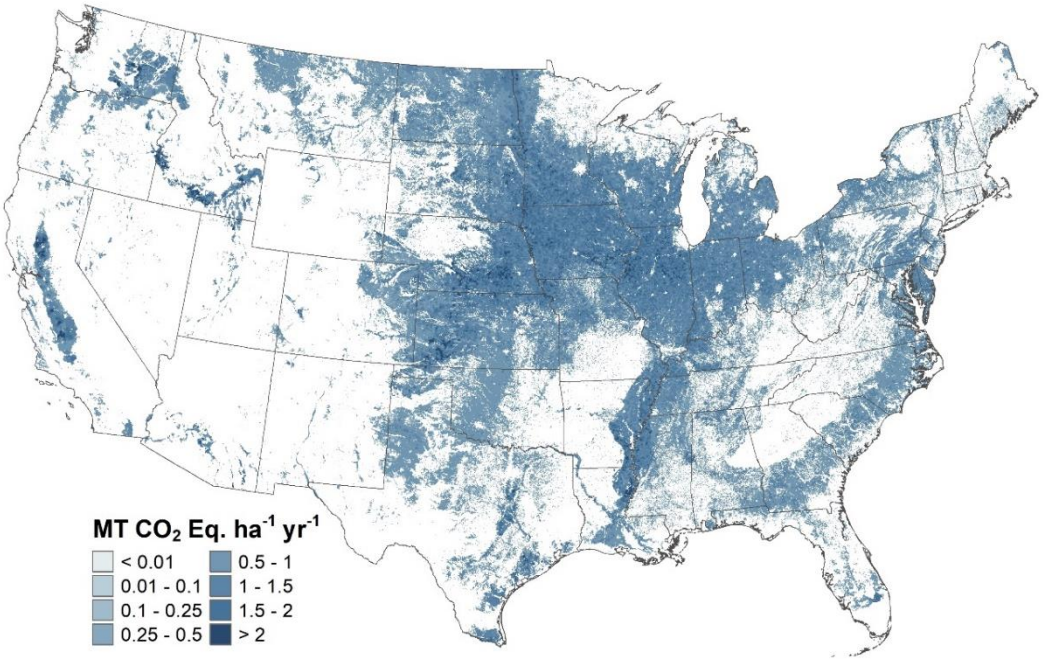
Notes: Estimates for 2021 are based on a data splicing method, except for other organic N amendments that are based on a data splicing method for 2018 to 2021 (See Methodology section). Totals may not sum due to independent rounding.

Figure 5-5 and Figure 5-6 show regional patterns for direct N_2O emissions. Figure 5-7 and Figure 5-8 show indirect N_2O emissions from volatilization, and Figure 5-9 and Figure 5-10 show the indirect N_2O emissions from leaching and runoff in croplands and grasslands, respectively.

Direct N_2O emissions from croplands occur throughout all of the cropland regions but tend to be high in the Midwestern Corn Belt Region (particularly, Illinois, Iowa, Kansas, Minnesota, Nebraska), where a large portion of the land is used for growing highly fertilized corn and N-fixing soybean crops (see Figure 5-5). There are high emissions from the Southeastern region, and portions of the Great Plains, such as North Dakota and Montana. Emissions are also high in the Lower Mississippi River Basin from Missouri to Louisiana, and highly productive irrigated areas, such as Platte River, which flows from Colorado and Wyoming through Nebraska, Snake River Valley in Idaho, and the Central Valley in California. Direct emissions are low in mountainous regions of the Eastern United States because only a small portion of land is cultivated, and in much of the Western United States where rainfall and access to irrigation water are limited, in addition to mountainous, which are generally not suitable for crop production.

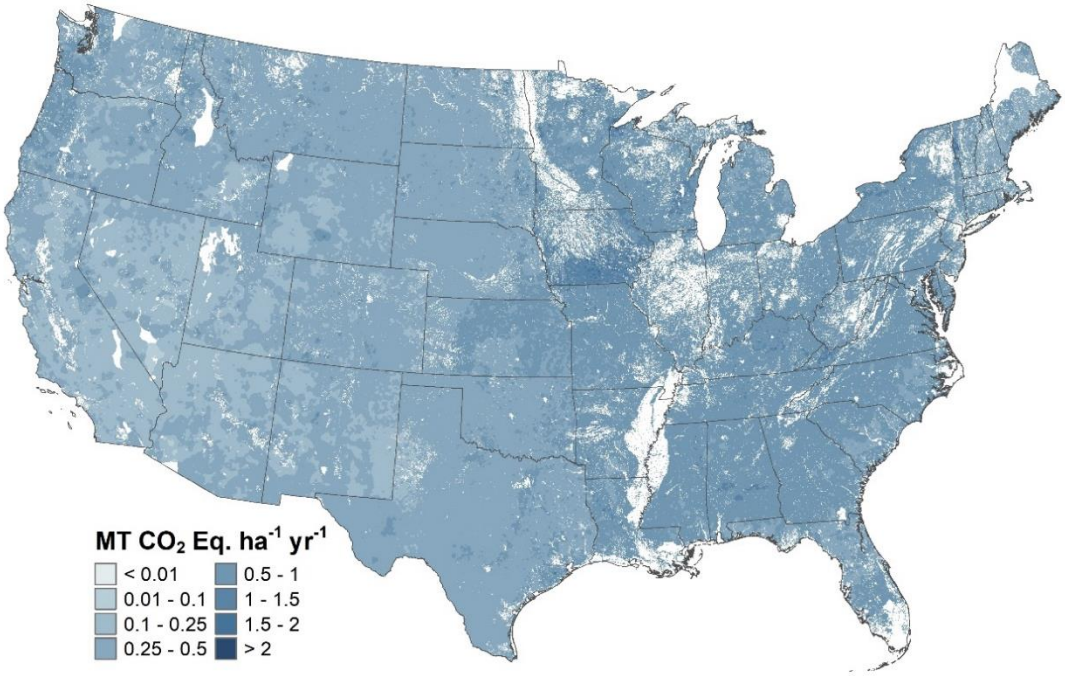
Direct N_2O emissions from grasslands are more evenly distributed throughout the United States compared to emissions from cropland due to suitable areas for grazing in most regions (see Figure 5-6). Total emissions tend be highest in the Great Plains and western United States where a large proportion of the land is dominated by grasslands with cattle and sheep grazing (particularly Texas, Montana, New Mexico, Oklahoma, and South Dakota).

Figure 5-5: Croplands, 2020 Annual Direct N_2O Emissions Estimated Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-6: Grasslands, 2020 Annual Direct N_2O Emissions Estimated Using the Tier 3 DayCent Model

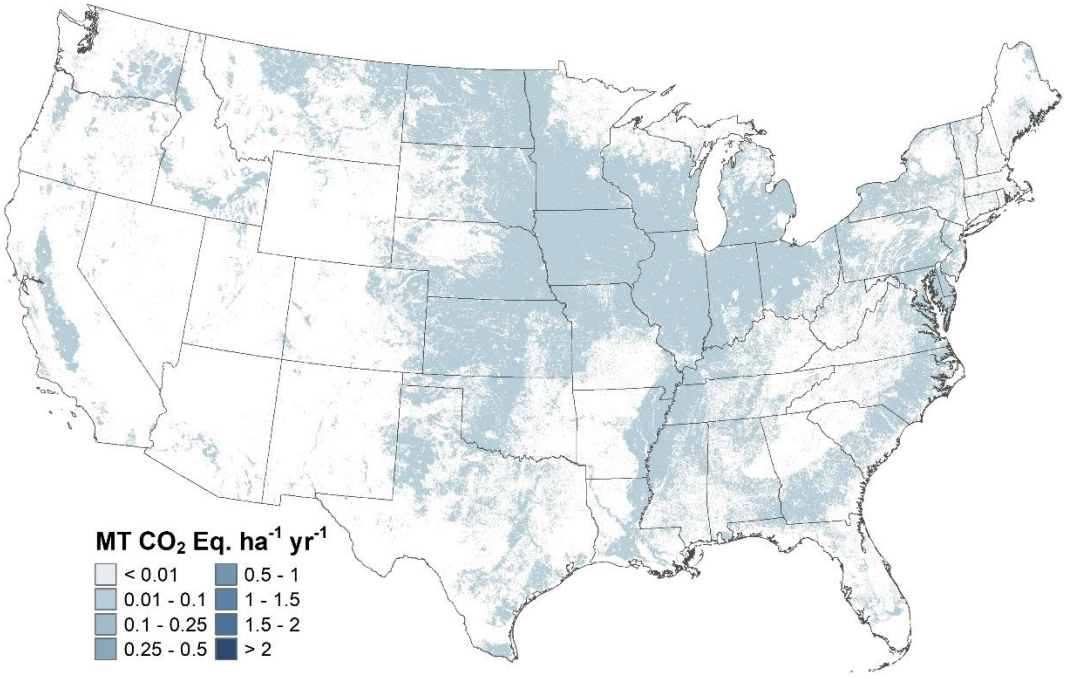


Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Indirect N_2O emissions from volatilization in croplands have a similar pattern as the direct N_2O emissions with higher emissions in the Midwestern Corn Belt, Lower Mississippi River Basin, Southeastern region, and parts of the Great Plains and irrigated areas of the Western United States. Indirect N_2O emissions from volatilization in grasslands are higher in the Eastern and Central United States, along with relatively small areas scattered around the Western United States. The higher emissions are partly due to large additions of PRP manure N, which in turn, stimulates NH_3 volatilization.

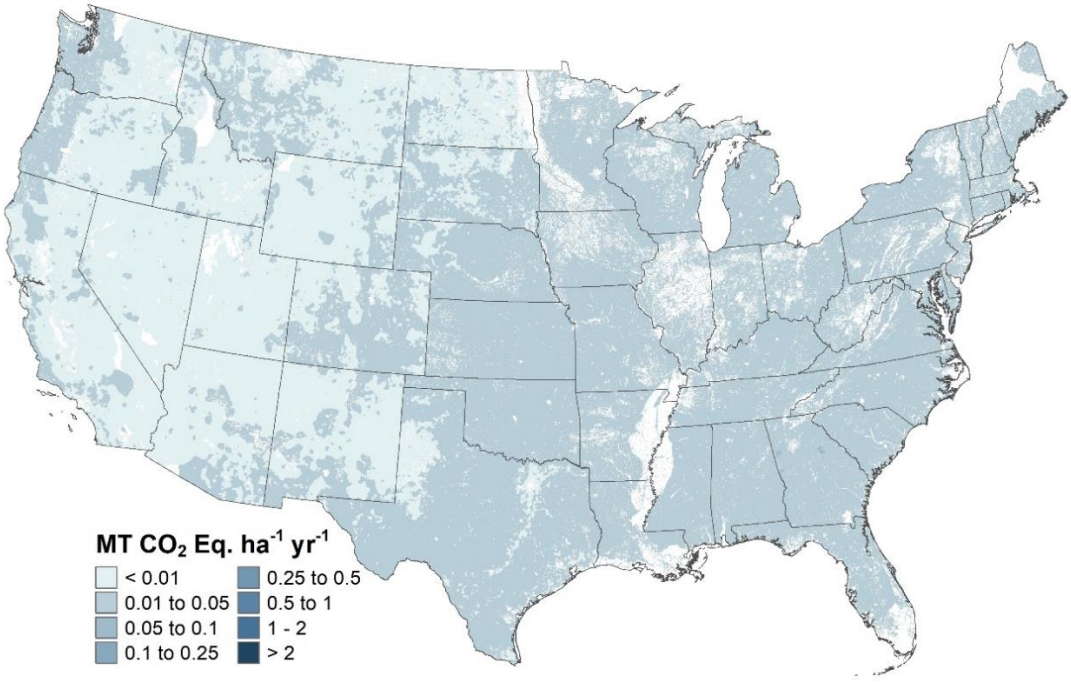
Indirect N_2O emissions from surface runoff and leaching of applied/mineralized N in croplands is highest in the Midwestern Corn Belt. There are also relatively high emissions associated with N management in the Lower Mississippi River Basin, Piedmont region of the Southeastern United States and the Mid-Atlantic states. In addition, areas of high emissions occur in portions of the Great Plains that have relatively large areas of irrigated croplands with high leaching rates of applied/mineralized N. Indirect N_2O emissions from surface runoff and leaching of applied/mineralized N in grasslands are higher in the eastern United States and coastal Northwest region. These regions have greater precipitation and higher levels of leaching and runoff compared to arid to semi-arid regions in the Western United States.

Figure 5-7: Croplands, 2020 Annual Indirect N_2O Emissions from Volatilization Using the Tier 3 DayCent Model



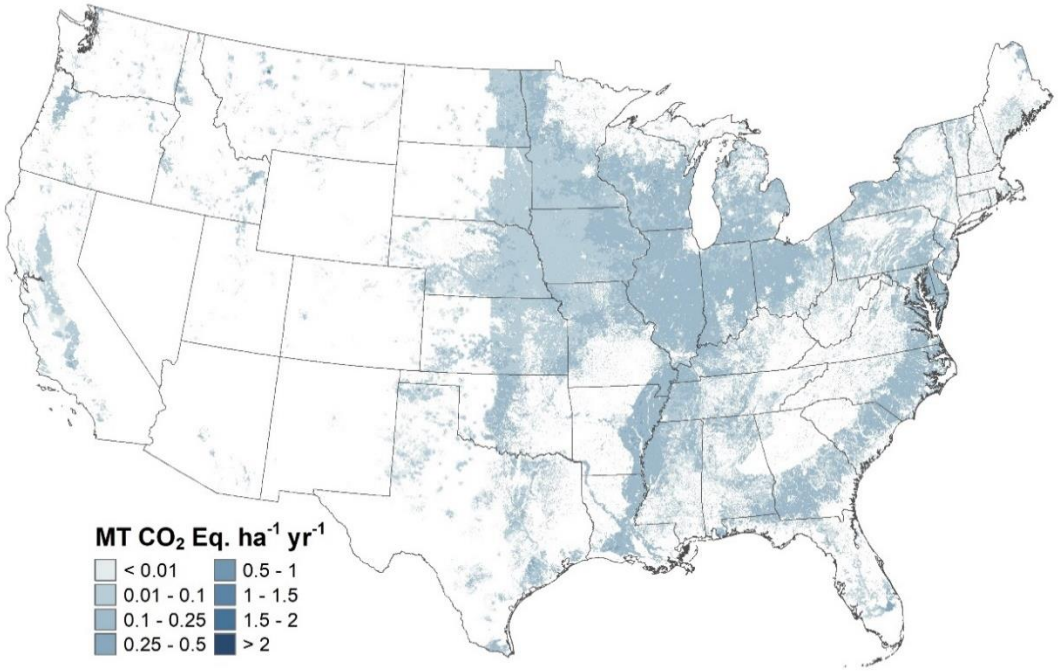
Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-8: Grasslands, 2020 Annual Indirect N_2O Emissions from Volatilization Using the Tier 3 DayCent Model



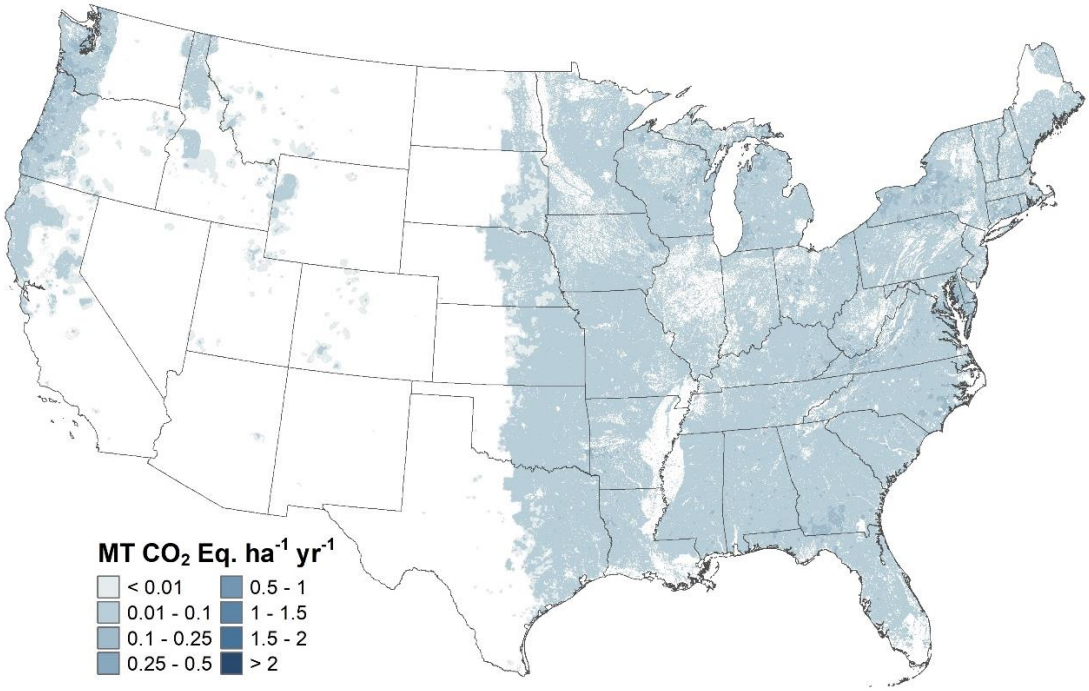
Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-9: Croplands, 2020 Annual Indirect N_2O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Figure 5-10: Grasslands, 2020 Annual Indirect N_2O Emissions from Leaching and Runoff Using the Tier 3 DayCent Model



Note: Only national-scale emissions are estimated for 2021 using a splicing method, and therefore the fine-scale emission patterns in this map are based on Inventory data from 2020.

Methodology and Time-Series Consistency

The *2006 IPCC Guidelines* (IPCC 2006) divide emissions from the agricultural soil management source category into five components, including (1) direct emissions from N additions to cropland and grassland mineral soils from synthetic fertilizers, biosolids (i.e., treated sewage sludge), crop residues (legume N-fixing and non-legume crops), and organic amendments; (2) direct emissions from soil organic matter mineralization due to land use and management change; (3) direct emissions from drainage of organic soils in croplands and grasslands; (4) direct emissions from soils due to manure deposited by livestock on PRP grasslands; and (5) indirect emissions from soils and water from N additions and manure deposition to soils that lead to volatilization, leaching, or runoff of N and subsequent conversion to N_2O.

In this source category, the United States reports on all croplands, as well as all managed grasslands, whereby anthropogenic greenhouse gas emissions are estimated in a manner consistent with the managed land concept (IPCC 2006), including direct and indirect N_2O emissions from asymbiotic fixation[17] and mineralization of N associated with decomposition of soil organic matter and residues. One recommendation from IPCC (2006) that has not been completely adopted is the estimation of emissions from grassland pasture renewal, which involves occasional plowing to improve forage production in pastures. Currently no data are available to address pasture renewal. In addition, estimates of N_2O emissions from managed croplands and grasslands are not available for Alaska and Hawaii except for managed manure and PRP N, and biosolid additions for Alaska, and managed manure

[17] N inputs from asymbiotic N fixation are not directly addressed in *2006 IPCC Guidelines*, but are a component of the N inputs and total emissions from managed lands and are included in the Tier 3 approach developed for this source.

and PRP N, biosolid additions, and crop residue for Hawaii. There is a planned improvement to include the additional sources of emissions in a future Inventory.

Direct N_2O Emissions

The methodology used to estimate direct N_2O emissions from agricultural soil management in the United States is based on a combination of IPCC Tier 1 and 3 approaches, along with application of a splicing method for latter years in the Inventory time series (IPCC 2006; Del Grosso et al. 2010). A Tier 3 process-based model (DayCent) is used to estimate direct emissions from a variety of crops that are grown on mineral (i.e., non-organic) soils, as well as the direct emissions from non-federal grasslands except for applications of biosolids (i.e., treated sewage sludge) (Del Grosso et al. 2010). The Tier 3 approach has been specifically designed and tested to estimate N_2O emissions in the United States, accounting for more of the environmental and management influences on soil N_2O emissions than the IPCC Tier 1 method (see Box 5-3 for further elaboration). Moreover, the Tier 3 approach addresses direct N_2O emissions and soil C stock changes from mineral cropland soils in a single analysis. Carbon and N dynamics are linked in plant-soil systems through biogeochemical processes of microbial decomposition and plant production (McGill and Cole 1981). Coupling the two source categories (i.e., agricultural soil C and N_2O) in a single inventory analysis ensures that there is consistent activity data and treatment of the processes, and interactions are considered between C and N cycling in soils.

Crop and land use histories are based on the USDA National Resources Inventory (NRI) (USDA-NRCS 2020), and extended through 2020 using the USDA-NASS Crop Data Layer Product (USDA-NASS 2021; Johnson and Mueller 2010). The areas have been modified in the original NRI survey through a process in which the Forest Inventory and Analysis (FIA) survey data and the National Land Cover Dataset (Yang et al. 2018) are harmonized with the NRI data. This process ensures that the land use areas are consistent across all land use categories (See Section 6.1, Representation of the U.S. Land Base for more information).

The NRI is a statistically-based sample of all non-federal land,[18] and includes 364,334 survey locations on agricultural land for the conterminous United States that are included in the Tier 3 method. The Tier 1 approach is used to estimate the emissions from 161,161 locations in the NRI survey across the time series, which are designated as cropland or grassland (discussed later in this section). Each survey location is associated with an "expansion factor" that allows scaling of N_2O emissions from NRI survey locations to the entire country (i.e., each expansion factor represents the amount of area with the same land-use/management history as the survey location). Each NRI survey location was sampled on a 5-year cycle from 1982 until 1997. For cropland, data were collected in 4 out of 5 years in the cycle (i.e., 1979 through 1982, 1984 through 1987, 1989 through 1992, and 1994 through 1997). In 1998, the NRI program began collecting annual data, which are currently available through 2017 (USDA-NRCS 2020). For 2018 through 2020, the time series is extended with the crop data provided in USDA-NASS CDL (USDA-NASS 2021). CDL data have a 30 to 58 m spatial resolution, depending on the year. NRI survey locations are overlaid on the CDL in a geographic information system, and the crop types are extracted to extend the cropping histories for the inventory analysis.

Box 5-3: Tier 1 vs. Tier 3 Approach for Estimating N_2O Emissions

The IPCC (2006) Tier 1 approach is based on multiplying activity data on different N inputs (i.e., synthetic fertilizer, manure, N fixation, etc.) by the appropriate default IPCC emission factors to estimate N_2O emissions on an input-by-input basis. The Tier 1 approach requires a minimal amount of activity data, readily available in most countries (e.g., total N applied to crops); calculations are simple; and the methodology is highly transparent. In contrast, the Tier 3 approach developed for this Inventory is based on application of a process-based model (i.e., DayCent) that represents the interaction of N inputs, land use and management, as well as environmental conditions at specific locations, such as freeze-thaw effects that generate pulses of N_2O

[18] The NRI survey does include sample points on federal lands, but the program does not collect data from those sample locations.

emissions (Wagner-Riddle et al. 2017, Del Grosso et al. 2022). Consequently, the Tier 3 approach accounts for land-use and management impacts and their interaction with environmental factors, such as weather patterns and soil characteristics, in a more comprehensive manner, which will enhance or dampen anthropogenic influences. However, the Tier 3 approach requires more detailed activity data (e.g., crop-specific N fertilization rates), additional data inputs (e.g., daily weather, soil types), and considerable computational resources and programming expertise. The Tier 3 methodology is less transparent, and thus it is critical to evaluate the output of Tier 3 methods against measured data in order to demonstrate that the method is an improvement over lower tier methods for estimating emissions (IPCC 2006). Another important difference between the Tier 1 and Tier 3 approaches relates to assumptions regarding N cycling. Tier 1 assumes that N added to a system is subject to N_2O emissions only during that year and cannot be stored in soils and contribute to N_2O emissions in subsequent years. This is a simplifying assumption that may create bias in estimated N_2O emissions for a specific year. In contrast, the process-based model in the Tier 3 approach includes the legacy effect of N added to soils in previous years that is re-mineralized from soil organic matter and emitted as N_2O during subsequent years.

DayCent is used to estimate N_2O emissions associated with production of alfalfa hay, barley, corn, cotton, dry beans, grass hay, grass-clover hay, lentils, oats, onions, peanuts, peas, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, sweet potatoes, tobacco, tomatoes, and wheat, but is not applied to estimate N_2O emissions from other crops or rotations with other crops,[19] such as sugarcane, some vegetables, and perennial/horticultural crops. Areas that are converted between agriculture (i.e., cropland and grassland) and other land uses, such as forest land, wetland and settlements, are not simulated with DayCent. DayCent is also not used to estimate emissions from land areas with very gravelly, cobbly, or shaley soils in the topsoil (greater than 35 percent by volume in the top 30 cm of the soil profile), or to estimate emissions from drained organic soils (*Histosols*). The Tier 3 method has not been fully tested for estimating N_2O emissions associated with these crops and rotations, land uses, as well as organic soils or cobbly, gravelly, and shaley mineral soils. In addition, federal grassland areas are not simulated with DayCent due to limited activity data on land use histories. For areas that are not included in the DayCent simulations, Tier 1 methods are used to estimate emissions, including (1) direct emissions from N inputs for crops on mineral soils that are not simulated by DayCent; (2) direct emissions from PRP N additions on federal grasslands; (3) direct emissions for land application of biosolids (i.e., treated sewage sludge) to soils; and (4) direct emissions from drained organic soils in croplands and grasslands.

A splicing method is used to estimate soil N_2O emissions for 2021 at the national scale because new NRI activity data have not been incorporated into the analysis for those years. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2020 emissions that are derived using the Tier 3 method. Surrogate data for these regression models includes corn and soybean yields from USDA-NASS statistics,[20] and weather data from the PRISM Climate Group (PRISM 2022). For the Tier 1 method, a linear-time series model is used to estimate emissions for 2021 without surrogate data. In addition, the linear time series model is used to estimate emissions data for 2018 to 2021 for other organic N amendments (i.e., commercial organic fertilizer) due to a gap in the activity data during the latter part of the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). See Box 5-4 for more information about the splicing method. Emission estimates for years with imputed data will be recalculated in future Inventory reports when new NRI data and other organic amendment N data are available.

[19] A small proportion of the major commodity crop production, such as corn and wheat, is included in the Tier 1 analysis because these crops are rotated with other crops or land uses (e.g., forest lands) that are not simulated by DayCent.

[20] See https://quickstats.nass.usda.gov/.

Box 5-4: Data Splicing Method

An approach to extend the time series is needed for Agricultural Soil Management because there are typically activity data gaps at the end of the time series. This is mainly because the NRI survey program, which provides critical information for estimating greenhouse gas emissions and removals, does not release data every year.

Splicing methods have been used to impute missing data at the end of the emission time series for both the Tier 1 and 3 methods. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate emissions based on the emissions data that has been compiled using the inventory methods described in this section. The model to extend the time series is given by the equation:

$$Y = X\beta + \varepsilon,$$

where Y is the response variable (e.g., soil nitrous oxide), Xβ for the Tier 3 method contains specific surrogate data depending on the response variable, and ε is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. The term Xβ for the Tier 1 method only contains year as a predictor of emission patterns over the time series (change in emissions per year), and therefore, is a linear time series model with no surrogate data. Parameters are estimated using standard statistical techniques, and used in the model described above to predict the missing emissions data.

A critical issue with splicing methods is to account for the additional uncertainty introduced by predicting emissions without compiling the full inventory. Specifically, uncertainty will increase for years with imputed estimates based on the splicing methods, compared to those years in which the full inventory is compiled. This additional uncertainty is quantified within the model framework using a Monte Carlo approach. Consequently, the uncertainty from the original inventory data is combined with the uncertainty in the data splicing model. The approach requires estimating parameters in the data splicing models in each Monte Carlo simulation for the full inventory (i.e., the surrogate data model is refit with the draws of parameters values that are selected in each Monte Carlo iteration, and used to produce estimates with inventory data). Therefore, the data splicing method generates emissions estimates from each surrogate data model in the Monte Carlo analysis, which are used to derive confidence intervals in the estimates for the missing emissions data. Furthermore, the 95 percent confidence intervals are estimated using the 3 sigma rules assuming a unimodal density (Pukelsheim 1994).

Tier 3 Approach for Mineral Cropland Soils

The DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001 and 2011) is used to estimate direct N_2O emissions from mineral cropland soils that are managed for production of a wide variety of crops (see list in previous section) based on the crop histories in the 2017 NRI (USDA-NRCS 2020), and extended through 2020 using CDL (USDA-NASS 2021). Crops simulated by DayCent are grown on approximately 85 percent of total cropland area in the United States. The model simulates net primary productivity (NPP) using the NASA-CASA production algorithm MODIS Enhanced Vegetation Index (EVI) products, MOD13Q1 and MYD13Q1[21] (Potter et al. 1993, 2007). The model simulates soil temperature and water dynamics, using daily weather data from a 4-kilometer gridded product developed by the PRISM Climate Group (2022), and soil attributes from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2020). DayCent is used to estimate direct N_2O emissions due to mineral N available from the following sources: (1) application of synthetic fertilizers; (2) application of livestock manure; (3)

[21] NPP is estimated with the NASA-CASA algorithm for most of the cropland that is used to produce major commodity crops in the central United States from 2000 to 2020. Other regions and years prior to 2000 are simulated with a method that incorporates water, temperature, and moisture stress on crop production (see Metherell et al. 1993), but does not incorporate the additional information about crop condition provided with remote sensing data.

retention of crop residues in the field for N-fixing legumes and non-legume crops and subsequent mineralization of N during microbial decomposition (i.e., leaving residues in the field after harvest instead of burning or collecting residues); (4) mineralization of N from decomposition of soil organic matter; and (5) asymbiotic fixation.

Management activity data from several sources supplement the activity data from the NRI. The USDA-NRCS Conservation Effects and Assessment Project (CEAP) provides data on a variety of cropland management activities, and is used to inform the inventory analysis about tillage practices, mineral fertilization, manure amendments, cover crop management, as well as planting and harvest dates (USDA-NRCS 2022; USDA-NRCS 2018; USDA-NRCS 2012). CEAP data are collected at a subset of NRI survey locations, and currently provide management information from approximately 2002 to 2006 and 2013 to 2016. These data are combined with other datasets in an imputation analysis. This imputation analysis is comprised of three steps: a) determine the trends in management activity across the time series by combining information from several datasets (discussed below); b) use Gradient Boosting (Friedman 2001) to determine the likely management practice at a given NRI survey location; and c) assign management practices from the CEAP survey to the specific NRI locations using a predictive mean matching method for certain variables that are adapted to reflect the trending information (Little 1988; van Buuren 2012). Gradient boosting is a machine learning technique used in regression and classification tasks, among others. It combines predictions from multiple weak prediction models and outperforms many complicated machine learning algorithms. It makes the best predictions at specific NRI survey locations or at state or region level models. The predictive mean matching method identifies the most similar management activity recorded in the CEAP surveys that match the prediction from the gradient boosting algorithm. The matching ensures that imputed management activities are realistic for each NRI survey location, and not odd or physically unrealizable results that could be generated by the gradient boosting. There are six complete imputations of the management activity data using these methods.

To determine trends in mineral fertilization and manure amendments, CEAP data are combined with information on fertilizer use and rates by crop type for different regions of the United States from the USDA Economic Research Service. The data collection program was known as the Cropping Practices Surveys through 1995 (USDA-ERS 1997), and is now part of data collection known as the Agricultural Resource Management Surveys (ARMS) (USDA-ERS 2020). Additional data on fertilization practices are compiled through other sources particularly the National Agricultural Statistics Service (USDA-NASS 1992, 1999, 2004). To determine the trends in tillage management, CEAP data are combined with Conservation Technology Information Center data between 1989 and 2004 (CTIC 2004) and OpTIS Data Product[22] for 2008 to 2020 (Hagen et al. 2020). The CTIC data are adjusted for long-term adoption of no-till agriculture (Towery 2001). For cover crops, CEAP data are combined with information from USDA Census of Agriculture (USDA-NASS 2012, 2017) and the OpTIS data product[23] (Hagen et al. 2020). It is assumed that cover crop management was minimal prior to 1990 and the rates increased linearly over the decade to the levels of cover crop management in the CEAP survey.

The IPCC method considers crop residue N and N mineralized from soil organic matter as activity data. However, they are not treated as activity data in DayCent simulations because residue production, symbiotic N fixation (e.g., legumes), mineralization of N from soil organic matter, and asymbiotic N fixation are internally generated by the model as part of the simulation. In other words, DayCent accounts for the influence of symbiotic N fixation, mineralization of N from soil organic matter and crop residue retained in the field, and asymbiotic N fixation on N_2O emissions, but these are not model inputs.

The N_2O emissions from crop residues are reduced by approximately 3 percent (the assumed average burned portion for crop residues in the United States) to avoid double counting associated with non-CO_2 greenhouse gas emissions from agricultural residue burning. Estimated levels of residue burning are based on state inventory data (ILENR 1993; Oregon Department of Energy 1995; Noller 1996; Wisconsin Department of Natural Resources 1993; Cibrowski 1996).

[22] OpTIS data on tillage practices provided by Regrow Agriculture, Inc.

[23] OpTIS data on cover crop management provided by Regrow Agriculture, Inc.

Uncertainty in the emission estimates from DayCent is associated with input uncertainty due to missing management data in the NRI survey that is imputed from other sources; model uncertainty due to incomplete specification of C and N dynamics in the DayCent model parameters and algorithms; and sampling uncertainty associated with the statistical design of the NRI survey. To assess input uncertainty, C and N dynamics at each NRI survey location are simulated six times using the imputation product and other model driver data. Uncertainty in parameterization and model algorithms are determined using a structural uncertainty estimator derived from fitting a linear mixed-effect model (Ogle et al. 2007; Del Grosso et al. 2010). Sampling uncertainty is assessed using NRI replicate sampling weights. These data are combined in a Monte Carlo stochastic simulation with 1,000 iterations for 1990 through 2020. For each iteration, there is a random selection of management data from the imputation product (select one of the six imputations), random selection of parameter values and random effects for the linear mixed-effect model (i.e., structural uncertainty estimator), and random selection of a set of survey weights from the replicates associated with the NRI survey design.

In order to ensure time-series consistency, the DayCent model is applied from 1990 to 2020, and a linear extrapolation method is used to approximate emissions for 2021 based on the pattern in emissions data from 1990 to 2020 (See Box 5-4). The pattern is determined using a linear regression model with moving-average (ARMA) errors. Linear extrapolation is a standard data splicing method for approximating missing values at the end of an inventory time series (IPCC 2006). The time series will be updated with the Tier 3 method in the future as new activity data are incorporated into the analysis.

Nitrous oxide emissions from managed agricultural lands are the result of interactions among anthropogenic activities (e.g., N fertilization, manure application, tillage) and other driving variables, such as weather and soil characteristics. These factors influence key processes associated with N dynamics in the soil profile, including immobilization of N by soil microbial organisms, decomposition of organic matter, plant uptake, leaching, runoff, and volatilization, as well as the processes leading to N_2O production (nitrification and denitrification). It is not possible to partition N_2O emissions into each anthropogenic activity directly from model outputs due to the complexity of the interactions (e.g., N_2O emissions from synthetic fertilizer applications cannot be distinguished from those resulting from manure applications). To approximate emissions by activity, the amount of synthetic N fertilizer added to the soil, or mineral N made available through decomposition of soil organic matter and plant litter, as well as asymbiotic fixation of N from the atmosphere, is determined for each N source and then divided by the total amount of mineral N in the soil according to the DayCent model simulation. For 2021, the contribution of each N source is based on the average of values that are estimated for 2018 to 2020. The percentages are then multiplied by the total of direct N_2O emissions in order to approximate the portion attributed to N management practices. This approach is only an approximation because it assumes that all N made available in soil has an equal probability of being released as N_2O, regardless of its source, which is unlikely to be the case (Delgado et al. 2009). However, this approach allows for further disaggregation of emissions by source of N, which is valuable for reporting purposes and is analogous to the reporting associated with the IPCC (2006) Tier 1 method, in that it associates portions of the total soil N_2O emissions with individual sources of N.

Tier 1 Approach for Mineral Cropland Soils

The IPCC (2006) Tier 1 methodology is used to estimate direct N_2O emissions for mineral cropland soils that are not simulated by DayCent (e.g., DayCent has not been parametrized to simulate all crop types and some soil types such as *Histosols*). For the Tier 1 method, estimates of direct N_2O emissions from N applications are based on mineral soil N that is made available from the following practices: (1) the application of synthetic commercial fertilizers; (2) application of managed manure and non-manure commercial organic fertilizers; and (3) decomposition and mineralization of nitrogen from above- and below-ground crop residues in agricultural fields (i.e., crop biomass that is not harvested). Non-manure commercial organic amendments are only included in the Tier 1 analysis because these data are not available at the county-level, which is necessary for the DayCent simulations. Consequently, all commercial organic fertilizer, as well as manure that is not added to crops in the DayCent simulations, are included in the Tier 1 analysis. The following sources are used to derive activity data:

- A process-of-elimination approach is used to estimate synthetic N fertilizer additions for crop areas that are not simulated by DayCent. The total amount of fertilizer used on farms has been estimated at the county-level by the USGS using sales records from 1990 to 2012 (Brakebill and Gronberg 2017). For 2013 through 2017, fertilizer sales data from AAPFCO (AAPFCO 2013 through 2022) [24] after adjusting for the proportion of on-farm application to determine the amount applied to crops. The amount of fertilizer applied after 2017 is estimated using the data splicing method described in Box 5-4 for the linear time series model. Then the portion of fertilizer applied to crops and grasslands simulated by DayCent is subtracted from the on-farm sales data (see Tier 3 Approach for Mineral Cropland Soils and Direct N_2O Emissions from Grassland Soils sections for information on data sources), and the remainder of the total fertilizer used on farms is assumed to be applied to crops that are not simulated by DayCent. At a minimum, 3 percent of state-level on-farm fertilizer sales are assumed to be applied to cropland in the Tier 1 method.
- Similarly, a process-of-elimination approach is used to estimate manure N additions for crops that are not simulated by DayCent. The total amount of manure available for land application to soils has been estimated with methods described in the Manure Management section (Section 5.2) and annex (Annex 3.11). The amount of manure N applied in the Tier 3 approach to crops and grasslands is subtracted from total annual manure N available for land application (see Tier 3 Approach for Mineral Cropland Soils and Direct N_2O Emissions from Grassland Soils sections for information on data sources). This difference is assumed to be applied to crops that are not simulated by DayCent.
- Commercial organic fertilizer additions are based on organic fertilizer consumption statistics through 2017[25], which are converted from mass of fertilizer to units of N using average organic fertilizer N content, ranging between 2.3 to 4.2 percent across the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). Commercial fertilizers include dried manure and biosolids (i.e., treated sewage sludge), but the amounts are removed from the commercial fertilizer data to avoid double counting[26] with the manure N dataset described above and the biosolids (i.e., treated sewage sludge) amendment data discussed later in this section.
- Crop residue N is derived by combining amounts of above- and below-ground biomass, which are determined based on NRI crop area data (USDA-NRCS 2020), as extended using the CDL data (USDA-NASS 2021), crop production yield statistics (USDA-NASS 2022), dry matter fractions (IPCC 2006), linear equations to estimate above-ground biomass given dry matter crop yields from harvest (IPCC 2006), ratios of below-to-above-ground biomass (IPCC 2006), and N contents of the residues (IPCC 2006). N inputs from residue were reduced by 3 percent to account for average residue burning portions in the United States.

The total amounts of soil mineral N from applied synthetic and organic fertilizers, manure N additions and crop residues are multiplied by the IPCC (2006) default emission factor to derive an estimate of direct N_2O emissions using the Tier 1 method. Further elaboration on the methodology and data used to estimate N_2O emissions from mineral soils are described in Annex 3.12.

In order to ensure time-series consistency, the Tier 1 methods are applied from 1990 to 2020, and a linear extrapolation method is used to approximate emissions for 2021 based on the emission patterns between 1990 and 2020 (See Box 5-4). The exceptions include crop residue N which is estimated using the Tier 1 method for 1990 to 2021 with no linear extrapolation, and other organic N fertilizers (i.e., commercial fertilizers), which are

[24] The fertilizer consumption data in AAPFCO are recorded in "fertilizer year" totals, (i.e., July to June), but are converted to calendar year totals. This is done by assuming that approximately 35 percent of fertilizer usage occurred from July to December and 65 percent from January to June (TVA 1992b).

[25] Soil N_2O emissions are imputed using data splicing methods for commercial fertilizers, i.e., other organic fertilizers, after 2017 because the activity data are not available.

[26] Commercial organic fertilizers include dried blood, tankage, compost, and other, but the dried manure and biosolids (i.e., treated sewage sludge) are also included in other datasets in this Inventory. Consequently, the proportions of dried manure and biosolids, which are provided in the reports (TVA 1991 through 1994; AAPFCO 1995 through 2022), are used to estimate the N amounts in dried manure and biosolids. To avoid double counting, the resulting N amounts for dried manure and biosolids are subtracted from the total N in commercial organic fertilizers before estimating emissions using the Tier 1 method.

estimated with linear time series model for 2018 to 2021 due to a gap in the activity data during the latter part of the time series (TVA 1991 through 1994; AAPFCO 1995 through 2022). For the extrapolation, the emission pattern is determined using a linear regression model with moving-average (ARMA) errors. Linear extrapolation is a standard data splicing method for approximating missing values at the end of an inventory time series (IPCC 2006). As with the Tier 3 method, the time series that is based on the splicing methods will be recalculated in a future Inventory report with updated activity data.

Tier 1 and 3 Approaches from Mineral Grassland Soils

As with N_2O emissions from croplands, the Tier 3 process-based approaching with application of the DayCent model and Tier 1 method described in IPCC (2006) are combined to estimate emissions from non-federal grasslands and PRP manure N additions for federal grasslands, respectively. Grassland includes pasture and rangeland that produce grass or mixed grass/legume forage primarily for livestock grazing. Rangelands are extensive areas of native grassland that are not intensively managed, while pastures are seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation, fertilization, or inter-seeding legumes. DayCent is used to simulate N_2O emissions from NRI survey locations (USDA-NRCS 2020) on non-federal grasslands resulting from manure deposited by livestock directly onto pastures and rangelands (i.e., PRP manure), N fixation from legume seeding, managed manure amendments (i.e., manure other than PRP manure such as daily spread or manure collected from other animal waste management systems such as lagoons and digesters), and synthetic fertilizer application. Other N inputs are simulated within the DayCent framework, including N input from mineralization due to decomposition of soil organic matter and N inputs from senesced grass litter, as well as asymbiotic fixation of N from the atmosphere. The simulations used the same weather, soil, and synthetic N fertilizer data as discussed under the Tier 3 Approach in the Mineral Cropland Soils section. Synthetic N fertilization rates are based on data from the Carbon Sequestration Rural Appraisals (CSRA) conducted by the USDA-NRCS (USDA-NRCS, unpublished data). The CSRA was a solicitation of expert knowledge from USDA-NRCS staff throughout the United States to support the Inventory. Biological N fixation is simulated within DayCent, and therefore is not an input to the model.

Manure N deposition from grazing animals in PRP systems (i.e., PRP manure N) is a key input of N to grasslands. The amounts of PRP manure N applied on non-federal grasslands for each NRI survey location are based on the amount of N excreted by livestock in PRP systems that is estimated in the Manure Management section (See Section 5.2 and Annex 3.11). The total amount of N excreted in each county is divided by the grassland area to estimate the N input rate associated with PRP manure. The resulting rates are a direct input into the DayCent simulations. The N input is subdivided between urine and dung based on a 50:50 split. DayCent simulations of non-federal grasslands accounted for approximately 71 percent of total PRP manure N in aggregate across the country.[27] The remainder of the PRP manure N in each state is assumed to be excreted on federal grasslands, and the N_2O emissions are estimated using the IPCC (2006) Tier 1 method.

Biosolids (i.e., treated sewage sludge) are assumed to be applied on grasslands.[28] Application of biosolids is estimated from data compiled by EPA (1993, 1999, 2003), McFarland (2001), and NEBRA (2007) (see Section 7.2 Wastewater Treatment for a detailed discussion of the methodology for estimating treated sewage sludge available for land application application). Biosolids data are only available at the national scale, and it is not possible to associate application with specific soil conditions and weather at NRI survey locations. Therefore, DayCent could not be used to simulate the influence of biosolids on N_2O emissions from grassland soils, and consequently, emissions from biosolids are estimated using the IPCC (2006) Tier 1 method.

[27] A small amount of PRP N (less than 1 percent) is deposited in grazed pasture that is in rotation with annual crops, and is reported in the grassland N_2O emissions.

[28] A portion of biosolids may be applied to croplands, but there is no national dataset to disaggregate the amounts between cropland and grassland.

Soil N_2O emission estimates from DayCent are adjusted using a structural uncertainty estimator accounting for uncertainty in model algorithms and parameter values (Del Grosso et al. 2010). There is also sampling uncertainty for the NRI survey that is propagated with replicate sampling weights associated with the survey. N_2O emissions for the PRP manure N deposited on federal grasslands and applied biosolids N are estimated using the Tier 1 method by multiplying the N input by the default emission factor. Emissions from manure N are estimated at the state level and aggregated to the entire country, but emissions from biosolids N are calculated exclusively at the national scale. Further elaboration on the methodology and data used to estimate N_2O emissions from mineral soils are described in Annex 3.12.

Soil N_2O emissions and 95 percent confidence intervals are estimated for each year between 1990 and 2020 based on the Tier 1 and 3 methods, except for biosolids (discussed below). In order to ensure time-series consistency, emissions from 2021 are estimated using a splicing method as described in Box 5-4, with a linear extrapolation based on the emission patterns in the 1990 to 2020 data. Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). As with croplands, estimates for 2021 will be recalculated in a future Inventory when the activity data are updated. Biosolids application data are compiled through 2021 in this Inventory, and therefore soil N_2O emissions and confidence intervals are estimated using the Tier 1 method for all years without application of the splicing method.

Tier 1 Approach for Drainage of Organic Soils in Croplands and Grasslands

The IPCC (2006) Tier 1 method is used to estimate direct N_2O emissions due to drainage of organic soils in croplands and grasslands at a state scale. State-scale estimates of the total area of drained organic soils are obtained from the 2017 NRI (USDA-NRCS 2020) using soils data from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2020). Temperature data from the PRISM Climate Group (PRISM 2022) are used to subdivide areas into temperate and tropical climates according to the climate classification from IPCC (2006). To estimate annual emissions, the total temperate area is multiplied by the IPCC default emission factor for temperate regions, and the total tropical area is multiplied by the IPCC default emission factor for tropical regions (IPCC 2006).

Total Direct N_2O Emissions from Cropland and Grassland Soils

Annual direct emissions from the Tier 1 and 3 approaches for mineral and drained organic soils occurring in both croplands and grasslands are summed to obtain the total direct N_2O emissions from agricultural soil management (see Table 5-16 and Table 5-17). Further elaboration on the methodology and data used to estimate soil N_2O emissions are described in Annex 3.12.

Indirect N_2O Emissions Associated with Nitrogen Management in Cropland and Grasslands

Indirect N_2O emissions occur when synthetic N applied or made available through anthropogenic activity is transported from the soil either in gaseous or aqueous forms and later converted into N_2O. There are two pathways leading to indirect emissions. The first pathway results from volatilization of N as NO_x and NH_3 following application of synthetic fertilizer, organic amendments (e.g., manure, biosolids), and deposition of PRP manure. Nitrogen made available from mineralization of soil organic matter and residue, including N incorporated into crops and forage from symbiotic N fixation, and input of N from asymbiotic fixation also contributes to volatilized N emissions. Volatilized N can be returned to soils through atmospheric deposition, and a portion of the deposited N is emitted to the atmosphere as N_2O. The second pathway occurs via leaching and runoff of soil N (primarily in the form of NO_3^-) that is made available through anthropogenic activity on managed lands, including organic and synthetic fertilization, organic amendments, mineralization of soil organic matter and residue, and inputs of N into the soil from asymbiotic fixation. The NO_3^- is subject to denitrification in water bodies, which leads to N_2O emissions. Regardless of the eventual location of the indirect N_2O emissions, the emissions are assigned to the original source of the N for reporting purposes, which here includes croplands and grasslands.

Tier 1 and 3 Approaches for Indirect N_2O Emissions from Atmospheric Deposition of Volatilized N

The Tier 3 DayCent model and IPCC (2006) Tier 1 methods are combined to estimate the amount of N that is volatilized and eventually emitted as N_2O. DayCent is used to estimate N volatilization for land areas whose direct emissions are simulated with DayCent (i.e., most commodity and some specialty crops and most grasslands). The N inputs included are the same as described for direct N_2O emissions in the Tier 3 Approach for Mineral Cropland and Grassland Soils sections. Nitrogen volatilization from all other areas is estimated using the Tier 1 method with default IPCC fractions for N subject to volatilization (i.e., synthetic and manure N on croplands not simulated by DayCent, other organic N inputs (i.e., commercial fertilizers), PRP manure N excreted on federal grasslands, and biosolids [i.e., treated sewage sludge] application on grasslands).

The IPCC (2006) default emission factor is multiplied by the amount of volatilized N generated from DayCent and Tier 1 methods to estimate indirect N_2O emissions occurring with re-deposition of the volatilized N from 1990 to 2020 (see Table 5-19). A linear extrapolation data splicing method, described in Box 5-4, is applied to estimate emissions from 2021 based on the emission patterns from 1990 to 2020. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Further elaboration on the methodology and data used to estimate indirect N_2O emissions are described in Annex 3.12.

Tier 1 and 3 Approaches for Indirect N_2O Emissions from Leaching/Runoff

As with the calculations of indirect emissions from volatilized N, the Tier 3 DayCent model and IPCC (2006) Tier 1 method are combined to estimate the amount of N that is subject to leaching and surface runoff into water bodies, and eventually emitted as N_2O. DayCent is used to simulate the amount of N transported from lands in the Tier 3 Approach. Nitrogen transport from all other areas is estimated using the Tier 1 method and the IPCC (2006) default factor for the proportion of N subject to leaching and runoff associated with N applications on croplands that are not simulated by DayCent, applications of biosolids on grasslands, other organic N fertilizer applications, crop residue N inputs, and PRP manure N excreted on federal grasslands.

For both the DayCent Tier 3 and IPCC (2006) Tier 1 methods, nitrate leaching is assumed to be an insignificant source of indirect N_2O in cropland and grassland systems in arid regions, as discussed in IPCC (2006). In the United States, the threshold for significant nitrate leaching is based on the potential evapotranspiration (PET) and rainfall amount, similar to IPCC (2006), and is assumed to be negligible in regions where the amount of precipitation does not exceed 80 percent of PET (Note: All irrigated systems are assumed to have significant amounts of leaching of N even in drier climates).

For leaching and runoff data estimated by the Tier 3 and Tier 1 approaches, the IPCC (2006) default emission factor is used to estimate indirect N_2O emissions that occur in groundwater and waterways (see Table 5-19). Further elaboration on the methodology and data used to estimate indirect N_2O emissions are described in Annex 3.12.

In order to ensure time-series consistency, indirect soil N_2O emissions are estimated using the Tier 1 and 3 approaches from 1990 to 2020 and then a linear extrapolation data splicing method, described in Box 5-4, is applied to estimate emissions from 2021 based on the emission patterns from 1990 to 2020. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the direct N_2O emissions, the time series will be recalculated in a future Inventory when new activity data are incorporated into the analysis.

Uncertainty

Uncertainty is estimated for each of the following five components of N_2O emissions from agricultural soil management: (1) direct emissions simulated by DayCent; (2) the components of indirect emissions (N volatilized and leached or runoff) simulated by DayCent; (3) direct emissions estimated with the IPCC (2006) Tier 1 method; (4) the components of indirect emissions (N volatilized and leached or runoff) estimated with the IPCC (2006) Tier 1 method; and (5) indirect emissions estimated with the IPCC (2006) Tier 1 method. Uncertainty in direct emissions as well as the components of indirect emissions that are estimated from DayCent are derived from a Monte Carlo

Analysis (consistent with IPCC Approach 2), addressing uncertainties in model inputs and structure (i.e., algorithms and parameterization) (Del Grosso et al. 2010). For 2021 (and 2018 to 2021 for other organic N fertilizers), there is additional uncertainty propagated through the Monte Carlo Analysis associated with the splicing method (See Box 5-4) except for the Tier 1 method for biosolids and crop residue N inputs, which do not use the data splicing method for 2021.

Simple error propagation methods (IPCC 2006) are used to derive confidence intervals for direct emissions estimated with the IPCC (2006) Tier 1 method, the proportion of volatilization and leaching or runoff estimated with the IPCC (2006) Tier 1 method, and indirect N_2O emissions. Uncertainty in the splicing method is also included in the error propagation for 2021 (see Box 5-4). Additional details on the uncertainty methods are provided in Annex 3.12.

Table 5-20 shows the combined uncertainty for soil N_2O emissions. The estimated direct soil N_2O emissions range from 35 percent below to 72 percent above the 2021 emission estimate of 264.7 MMT CO_2 Eq. The combined uncertainty for indirect soil N_2O emissions ranges from 60 percent below to 131 percent above the 2021 estimate of 29.3 MMT CO_2 Eq.

Table 5-20: Quantitative Uncertainty Estimates of N_2O Emissions from Agricultural Soil Management in 2021 (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Direct Soil N_2O Emissions	N_2O	264.7	173.2	456.4	-35%	72%
Indirect Soil N_2O Emissions	N_2O	29.3	11.9	67.7	-60%	131%

Note: Due to lack of data, uncertainties in PRP manure N production, other organic N fertilizer amendments, and biosolids (i.e., treated sewage sludge) amendments to soils are currently treated as certain. These sources of uncertainty will be included in a future Inventory (IPCC 2006).

Additional uncertainty is associated with an incomplete estimation of N_2O emissions from managed croplands and grasslands in Hawaii and Alaska. The Inventory currently includes the N_2O emissions from managed manure and PRP N, and biosolid additions for Alaska and managed manure and PRP N, biosolid additions, and crop residue for Hawaii. Land areas used for agriculture in Alaska and Hawaii are small relative to major crop commodity states in the conterminous United States, so the emissions are likely to be minor for the other sources of N (e.g., synthetic fertilizer and crop residue inputs). Regardless, there is a planned improvement to include the additional sources of emissions in a future inventory.

QA/QC and Verification

General (Tier 1) and category-specific (Tier 2) QA/QC activities were conducted consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. DayCent results for N_2O emissions and NO_3^- leaching are compared with field data representing various cropland and grassland systems, soil types, and climate patterns (Del Grosso et al. 2005; Del Grosso et al. 2008), and further evaluated by comparing the model results to emission estimates produced using the IPCC (2006) Tier 1 method for the same sites. Nitrous oxide measurement data for cropland are available for 79 sites with 829 observations of management practice effects, and measurement data for grassland are available for 11 sites with 17 observations of management practice effects. Nitrate leaching data are available for 9 sites, representing 230 observations of management practice effects. In general, DayCent predicted N_2O emission and nitrate leaching for these sites reasonably well. See Annex 3.12 for more detailed information about the comparisons.

Databases containing input data and probability distribution functions required for DayCent simulations of croplands and grasslands and unit conversion factors have been checked, in addition to the program scripts that are used to run the Monte Carlo uncertainty analysis. Major errors were found in the synthetic N application rates for the Tier 3 method, with overapplication based on comparisons to the synthetic fertilizer sales data. Moreover, there was a miscalculation of the synthetic fertilizer additions for the Tier 1 method, leading to negative emission estimates. An error was also corrected in the uncertainty analysis for the Tier 1 method in which the distribution for the default emission factors had been truncated. Other errors were identified in the application of the structural uncertainty estimator for direct and indirect soil N_2O emissions. All of these errors were corrected. Links between spreadsheets have also been checked, updated, and corrected as needed.

Recalculations Discussion

Several improvements have been implemented in this Inventory leading to the need for recalculations. These improvements included a) incorporating new USDA-NRCS NRI data through 2017; b) extending the time series for crop histories through 2020 using USDA-NASS CDL data; c) incorporating USDA-NRCS CEAP survey data for 2013 to 2016; d) incorporating cover crop and tillage management information from the OpTIS remote-sensing data product from 2008 to 2020; e) modifying the statistical imputation method for the management activity data associated with about tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network; f) updating time series of synthetic N fertilizer sales data, PRP N and manure N available for application to soils; g) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale; h) re-calibrating the soil C module in the DayCent model using Bayesian methods; and i) application of global warming potential values from the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The updated global warming potential (GWP) for calculating CO_2-equivalent emissions N_2O (updated from 298 to 265) reflects the 100-year GWPs provided in the IPCC AR5. The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

These combined impact from these changes resulted in an average decrease in emissions of 24.5 MMT CO_2 Eq., or 8 percent, from 1990 to 2020 relative to the previous Inventory.

Planned Improvements

Several planned improvements are underway associated with improving the DayCent biogeochemical model. These improvements include a better representation of plant phenology, particularly senescence events following grain filling in crops. In addition, crop parameters associated with temperature and water stress effects on plant production will be improved in DayCent with additional model calibration. In addition, there is an improvement underway to calibrate the N submodule in order to more accurately predict N-gas losses and nitrate leaching rates. Experimental study sites will continue to be added for quantifying model structural uncertainty, with priority given to studies that have continuous (daily) measurements of N_2O (e.g., Scheer et al. 2013). In addition, improvements are underway to simulate crop residue burning in the DayCent model based on the amount of crop residues burned according to the data that is used in the Field Burning of Agricultural Residues source category (see section 5.7).

For Tier 1, there is a planned improvement to include all sources of N for Alaska and Hawaii in the Inventory for agricultural soil management, which currently only addresses managed manure N and PRP N, and biosolid additions for grasslands in both states, in addition to crop residue N inputs for Hawaii. There is also an improvement to incorporate the Tier 1 emission factor for N_2O emissions from drained organic soils by using the revised factors in the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* (IPCC 2013). There is a planned improvement for the Tier 1 method associated with estimating soil N_2O emissions from N mineralization due to soil organic matter decomposition that is accelerated with land use

conversions to cropland and grassland. Lastly, a review of available data on biosolids (i.e., treated sewage sludge) application will also be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements.

Other suggested improvements identified through public review are being evaluated for future Inventory submissions. Improvements are expected to be completed for the next Inventory (i.e., 2024 submission to the UNFCCC, 1990 through 2022 Inventory). However, the timeline may be extended if there are insufficient resources to fund all or part of these planned improvements

5.5 Liming (CRF Source Category 3G)

Crushed limestone ($CaCO_3$) and dolomite ($CaMg(CO_3)_2$) are added to soils by land managers to increase soil pH (i.e., to reduce acidification). Carbon dioxide emissions occur as these compounds react with hydrogen ions in soils. The rate of degradation of applied limestone and dolomite depends on the soil conditions, soil type, climate regime, and whether limestone or dolomite is applied. Emissions from limestone and dolomite that are used in industrial processes (e.g., cement production, glass production, etc.) are reported in the IPPU chapter. Emissions from liming of soils have fluctuated between 1990 and 2021 in the United States, ranging from 2.2 MMT CO_2 Eq. to 6.0 MMT CO_2 Eq. across the entire time series. In 2021, liming of soils in the United States resulted in emissions of 3.0 MMT CO_2 Eq. (0.8 MMT C), representing a 35 percent decrease in emissions since 1990 (see Table 5-21 and Table 5-22). The trend is driven by variation in the amount of limestone and dolomite applied to soils over the time period.

Table 5-21: Emissions from Liming (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Limestone	4.1	3.9	2.9	2.0	1.9	2.5	2.6
Dolomite	0.6	0.4	0.2	0.2	0.3	0.4	0.4
Total	**4.7**	**4.4**	**3.1**	**2.2**	**2.2**	**2.9**	**3.0**

Note: Totals may not sum due to independent rounding.

Table 5-22: Emissions from Liming (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Limestone	1.1	1.1	0.8	0.6	0.5	0.7	0.7
Dolomite	0.2	0.1	+	0.1	0.1	0.1	0.1
Total	**1.3**	**1.2**	**0.8**	**0.6**	**0.6**	**0.8**	**0.8**

+ Does not exceed 0.05 MMT C

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

Carbon dioxide emissions from application of limestone and dolomite to soils were estimated using a Tier 2 methodology consistent with IPCC (2006). The annual amounts of limestone and dolomite, which are applied to soils (see Table 5-23), were multiplied by CO_2 emission factors from West and McBride (2005). These country-specific emission factors (0.059 metric ton C/metric ton limestone, 0.064 metric ton C/metric ton dolomite) are lower than the IPCC default emission factors because they account for the portion of carbonates that are transported from soils through hydrological processes and eventually deposited in ocean basins (West and McBride 2005). This analysis of lime dissolution is based on studies in the Mississippi River basin, where the vast majority of lime application occurs in the United States (West 2008). Moreover, much of the remaining lime

application is occurring under similar precipitation regimes, and so the emission factors are considered a reasonable approximation for all lime application in the United States (West 2008) (See Box 5-5).

The annual application rates of limestone and dolomite were derived from estimates and industry statistics provided in the U.S. Geological Survey (USGS) *Minerals Yearbook* (Tepordei 1993 through 2006; Willett 2007a, 2007b, 2009, 2010, 2011a, 2011b, 2013a, 2014, 2015, 2016, 2017, 2020a, 2022a, 2022b, 2022c), as well as preliminary data that will eventually be published in the *Minerals Yearbook* for the latter part of the time series (Willett 2022d). Data for the final year of the inventory is based on the *Mineral Industry Surveys*, as discussed below (USGS 2022). The U.S. Geological Survey (USGS; U.S. Bureau of Mines prior to 1997) compiled production and use information through surveys of crushed stone manufacturers. However, manufacturers provided different levels of detail in survey responses so the estimates of total crushed limestone and dolomite production and use were divided into three components: (1) production by end-use, as reported by manufacturers (i.e., "specified" production); (2) production reported by manufacturers without end-uses specified (i.e., "unspecified" production); and (3) estimated additional production by manufacturers who did not respond to the survey (i.e., "estimated" production).

Box 5-5: Comparison of the Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach

Emissions from liming of soils were estimated using a Tier 2 methodology based on emission factors specific to the United States that are lower than the IPCC (2006) default emission factors. Most lime application in the United States occurs in the Mississippi River basin, or in areas that have similar soil and rainfall regimes as the Mississippi River basin. Under these conditions, a significant portion of dissolved agricultural lime leaches through the soil into groundwater. Groundwater moves into channels and is transported to larger rives and eventually the ocean where $CaCO_3$ precipitates to the ocean floor (West and McBride 2005). The U.S.-specific emission factors (0.059 metric ton C/metric ton limestone and 0.064 metric ton C/metric ton dolomite) are about half of the IPCC (2006) emission factors (0.12 metric ton C/metric ton limestone and 0.13 metric ton C/metric ton dolomite). For comparison, the 2021 U.S. emission estimate from liming of soils is 3.0 MMT CO_2 Eq. using the country-specific factors. In contrast, emissions would be estimated at 6.2 MMT CO_2 Eq. using the IPCC (2006) default emission factors.

Data on "specified" limestone and dolomite amounts were used directly in the emission calculation because the end use is provided by the manufacturers and can be used to directly determine the amount applied to soils. However, it is not possible to determine directly how much of the limestone and dolomite is applied to soils for manufacturer surveys in the "unspecified" and "estimated" categories. For these categories, the amounts of crushed limestone and dolomite applied to soils were determined by multiplying the percentage of total "specified" limestone and dolomite production that is applied to soils, by the total amounts of "unspecified" and "estimated" limestone and dolomite production. In other words, the proportion of total "unspecified" and "estimated" crushed limestone and dolomite that was applied to soils is proportional to the amount of total "specified" crushed limestone and dolomite that was applied to soils.

In addition, data were not available for 1990, 1992, and 2021 on the fractions of total crushed stone production that were limestone and dolomite, and on the fractions of limestone and dolomite production that were applied to soils. To estimate the 1990 and 1992 data, a set of average fractions were calculated using the 1991 and 1993 data. These average fractions were applied to the quantity of "total crushed stone produced or used" reported for 1990 and 1992 in the 1994 *Minerals Yearbook* (Tepordei 1996). To estimate 2021 data, 2020 fractions were applied to the 2021 estimates of total crushed stone. The basis for these estimates is from the USGS *Mineral Industry Surveys: Crushed Stone and Sand and Gravel in the First Quarter of 2022* (USGS 2022).

The primary source for limestone and dolomite activity data is the *Minerals Yearbook*, published by the Bureau of Mines through 1996 and by the USGS from 1997 to the present. In 1994, the "Crushed Stone" chapter in the *Minerals Yearbook* began rounding (to the nearest thousand metric tons) quantities for total crushed stone produced or used. It then reported revised (rounded) quantities for each of the years from 1990 to 1993. In order

to minimize the inconsistencies in the activity data, these revised production numbers have been used in all of the subsequent calculations.

Table 5-23: Applied Minerals (MMT)

Mineral	1990	2005	2017	2018	2019	2020	2021
Limestone	19.0	18.1	13.4	9.4	8.9	11.7	12.2
Dolomite	2.4	1.9	0.7	0.9	1.2	1.6	1.7

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. In addition, the same methods are applied throughout the time series, and the activity data are extended in the last two years of the time series based on proportions of specified, unspecified and estimated agricultural limestone and dolomite so that estimates are consistent with the previous year's data. These years will be recalculated when additional data are available on the amounts of limestone and dolomite that are used for agricultural purposes.

Uncertainty

Uncertainty regarding the amount of limestone and dolomite applied to soils was estimated at ±15 percent with normal densities (Tepordei 2003; Willett 2013b). Analysis of the uncertainty associated with the emission factors included the fraction of lime dissolved by nitric acid versus the fraction that reacts with carbonic acid, and the portion of bicarbonate that leaches through the soil and is transported to the ocean. Uncertainty regarding the time associated with leaching and transport was not addressed in this analysis, but is assumed to be a relatively small contributor to the overall uncertainty (West 2005). The probability distribution functions for the fraction of lime dissolved by nitric acid and the portion of bicarbonate that leaches through the soil were represented as triangular distributions between ranges of zero and 100 percent of the estimates. The uncertainty surrounding these two components largely drives the overall uncertainty. The emission factor distributions were truncated at 0 so that emissions were not less than 0.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the uncertainty in CO_2 emissions from liming. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 5-24. Carbon dioxide emissions from carbonate lime application to soils in 2021 were estimated to be between 0.46 and 5.88 MMT CO_2 Eq. at the 95 percent confidence level. This confidence interval represents a range of 85 percent below to 94 percent above the 2021 emission estimate of 3.0 MMT CO_2 Eq. All of the carbon in the carbonate lime applied to agricultural soils is not emitted to the atmosphere due to the dominance of the carbonate lime dissolving in carbonic acid rather than nitric acid (West and McBride 2005).

Table 5-24: Approach 2 Quantitative Uncertainty Estimates for CO_2 Emissions from Liming (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Liming	CO_2	3.0	0.5	5.9	-85%	94%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

A source-specific QA/QC plan for liming has been developed and implemented, consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. The quality control effort focused on the Tier 1 procedures for this Inventory.

Quality control uncovered small errors in the national data estimates of total stone sold or used for most years in the inventory time series. These errors were due to changes in the estimates from the original values, which were recalculated and published by USGS in subsequent reports. No other errors were found.

Recalculations Discussion

Limestone and dolomite application data for 2018, 2019, 2020 were updated with the recently acquired data from Willett, J.C. (2022a, 2022b, 2022c), rather than approximated by a ratio method, which was used in the previous Inventory. There were also corrections to the national data estimates of total stone sold or used (both limestone and dolomite) based on quality control. With these revisions, the emissions decreased by an average of 0.5 percent for inventory time series from 1990 to 2020 relative to the previous Inventory.

5.6 Urea Fertilization (CRF Source Category 3H)

The use of urea ($CO(NH_2)_2$) as a fertilizer leads to greenhouse gas emissions through the release of CO_2 that was fixed during the production of urea. In the presence of water and urease enzymes, urea that is applied to soils as fertilizer is converted into ammonium (NH_4^+), hydroxyl ion (OH), and bicarbonate (HCO_3^-). The bicarbonate then evolves into CO_2 and water. Emissions from urea fertilization in the United States were 5.2 MMT CO_2 Eq. (1.4 MMT C) in 2021 (Table 5-25 and Table 5-26). Carbon dioxide emissions have increased by 116 percent between 1990 and 2021 due to an increasing amount of urea that is applied to soils. The variation in emissions across the time series is driven by differences in the amounts of fertilizer applied to soils each year. Carbon dioxide emissions associated with urea that is used for non-agricultural purposes are reported in the IPPU chapter (Section 4.6).

Table 5-25: CO_2 Emissions from Urea Fertilization (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Fertilization	2.4	3.5	4.9	4.9	5.0	5.1	5.2

Table 5-26: CO_2 Emissions from Urea Fertilization (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Urea Fertilization	0.7	1.0	1.3	1.3	1.4	1.4	1.4

Methodology and Time-Series Consistency

Carbon dioxide emissions from the application of urea to agricultural soils were estimated using the IPCC (2006) Tier 1 methodology. The method assumes that C in the urea is released after application to soils and converted to CO_2. The annual amounts of urea applied to croplands (see Table 5-27) were derived from the state-level fertilizer sales data provided in *Commercial Fertilizer* reports (TVA 1991, 1992, 1993, 1994; AAPFCO 1995 through 2022).[29] These amounts were multiplied by the default IPCC (2006) emission factor (0.20 metric tons of C per metric ton of

[29] The amount of urea consumed for non-agricultural purposes in the United States is reported in the Industrial Processes and Product Use chapter, Section 4.6 Urea Consumption for Non-Agricultural Purposes.

urea), which is equal to the C content of urea on an atomic weight basis. National estimates from Urea Fertilization also include emissions from Puerto Rico.

Fertilizer sales data are reported in fertilizer years (July previous year through June current year), so a calculation was performed to convert the data to calendar years (January through December). According to monthly fertilizer use data (TVA 1992b), 35 percent of total fertilizer used in any fertilizer year is applied between July and December of the previous calendar year, and 65 percent is applied between January and June of the current calendar year.

Fertilizer sales data for the 2018 through 2021 fertilizer years were not available for this Inventory. Therefore, urea application in the 2018 through 2021 fertilizer years were estimated using a linear, least squares trend of consumption over the data from the previous five years (2013 through 2017) at the state scale. A trend of five years was chosen as opposed to a longer trend as it best captures the current inter-annual variability in consumption. State-level estimates of CO_2 emissions from the application of urea to agricultural soils were summed to estimate total emissions for the entire United States. The fertilizer year data is then converted into calendar year (Table 5-27) data using the method described above.

Table 5-27: Applied Urea (MMT)

	1990	2005	2017	2018	2019	2020	2021
Urea Fertilizer[a]	3.3	4.8	6.6	6.7	6.9	7.0	7.1

[a] These numbers represent amounts applied to all agricultural land, including Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Settlements Remaining Settlements, Land Converted to Settlements, Forest Land Remaining Forest Land and Land Converted to Forest Land, as it is not currently possible to apportion the data by land-use/conversion category.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. In addition, the same methods are applied in all years and the activity data are extended using a data splicing method with a linear extrapolation based on the last four years of urea fertilization data to ensure consistency in the time series. These years will be recalculated when additional data are available on urea fertilization.

Uncertainty

An Approach 2 Monte Carlo analysis is conducted as described by the IPCC (2006). The largest source of uncertainty is the default emission factor, which assumes that 100 percent of the C in $CO(NH_2)_2$ applied to soils is emitted as CO_2. The uncertainty surrounding this factor incorporates the possibility that some of the C may not be emitted to the atmosphere, and therefore the uncertainty range is set from 50 percent emissions to the maximum emission value of 100 percent using a triangular distribution. In addition, urea consumption data have uncertainty that is represented as a normal density. Due to the highly skewed distribution of the resulting emissions from the Monte Carlo uncertainty analysis, the estimated emissions are based on the analytical solution to the equation, and the confidence interval is approximated based on the values at 2.5 and 97.5 percentiles.

Carbon dioxide emissions from urea fertilization of agricultural soils in 2021 are estimated to be between 2.99 and 5.39 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of 43 percent below to 3 percent above the 2021 emission estimate of 5.2 MMT CO_2 Eq. (Table 5-28).

Table 5-28: Quantitative Uncertainty Estimates for CO_2 Emissions from Urea Fertilization (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound

Urea Fertilization	CO_2	5.2	3.0	5.4	-43%	+3%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

There are additional uncertainties that are not quantified in this analysis. There is uncertainty surrounding the assumptions underlying conversion of fertilizer years to calendar years. These uncertainties are negligible over multiple years because an over- or under-estimated value in one calendar year is addressed with a corresponding increase or decrease in the value for the subsequent year. In addition, there is uncertainty regarding the fate of C in urea that is incorporated into solutions of urea ammonium nitrate (UAN) fertilizer. Emissions of CO_2 from UAN applications to soils are not estimated in the current Inventory (see Planned Improvements).

QA/QC and Verification

A source-specific QA/QC plan for Urea Fertilization has been developed and implemented, consistent with the U.S. Inventory QA/QC plan.

Recalculations Discussion

The new AAPFCO report on urea consumption (2022) provided revisions to previous estimates of urea fertilization for Idaho and Oklahoma in addition to data for all states in 2017. With the new year of data, data splicing methods were used to adjust the fertilization values for 2018 to 2020 based on the most recent 5 years of data (2013 to 2017). These modifications resulted in an average reduction in emissions of 1 percent for 2015 to 2020.

Planned Improvements

A key planned improvement is to incorporate Urea Ammonium Nitrate (UAN) in the estimation of Urea CO_2 emissions. Activity data for UAN have been identified, but additional information is needed to fully incorporate this type of fertilizer into the analysis, which will be completed in a future Inventory.

5.7 Field Burning of Agricultural Residues (CRF Source Category 3F)

Crop production creates large quantities of agricultural crop residues, which farmers manage in a variety of ways. For example, crop residues can be left in the field and possibly incorporated into the soil with tillage; collected and used as fuel, animal bedding material, supplemental animal feed, or construction material; composted and applied to soils; transported to landfills; or burned in the field. The *2006 IPCC Guidelines* does not consider field burning of crop residues to be a net source of CO_2 emissions because it is assumed the C released to the atmosphere as CO_2 during burning is reabsorbed during the next growing season by the crop (IPCC 2006). However, crop residue burning is a net source of CH_4, N_2O, CO, and NO_x, which are released during combustion.

In the United States, field burning of agricultural residues occurs in southeastern states, the Great Plains, and the Pacific Northwest (McCarty 2011). The primary crops that are managed with residue burning include corn, cotton, lentils, rice, soybeans, sugarcane and wheat (McCarty 2009). In 2021, CH_4 and N_2O emissions from field burning of agricultural residues were 0.5 MMT CO_2 Eq. (17 kt) and 0.2 MMT CO_2 Eq. (1 kt), respectively (Table 5-29 and Table 5-30). Annual emissions of CH_4 and N_2O have increased from 1990 to 2021 by 14 percent and 16 percent, respectively. The increase in emissions over time is partly due to higher yielding crop varieties with larger amounts

of residue production and fuel loads, but also linked with an increase in the area burned for some of the crop types.

Table 5-29: CH_4 and N_2O Emissions from Field Burning of Agricultural Residues (MMT CO_2 Eq.)

Gas/Crop Type	1990	2005	2017	2018	2019	2020	2021
CH_4	**0.4**	**0.5**	**0.5**	**0.5**	**0.5**	**0.5**	**0.5**
Maize	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Rice	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Wheat	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	+	+	+	+	+	+	+
Potatoes	+	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+	+
N_2O	**0.1**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**
Maize	+	+	+	+	+	+	+
Rice	+	+	+	+	+	+	+
Wheat	0.1	0.1	+	+	+	+	+
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	+	+	+	+	+	+	+
Potatoes	+	+	+	+	+	+	+

Sugarbeets	+	+	+	+	+	+	+
Total	**0.6**	**0.7**	**0.7**	**0.6**	**0.6**	**0.6**	**0.6**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 5-30: CH_4, N_2O, CO, and NO_x Emissions from Field Burning of Agricultural Residues (kt)

Gas/Crop Type	1990	2005	2017	2018	2019	2020	2021
CH_4	**15**	**17**	**17**	**17**	**17**	**17**	**17**
Maize	2	4	5	5	5	5	5
Rice	3	3	3	2	3	2	3
Wheat	6	6	5	5	5	5	5
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	1	2	1	1	1	1	1
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+
Soybeans	1	2	2	2	2	2	2
Potatoes	+	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+	+
N_2O	**1**	**1**	**1**	**1**	**1**	**1**	**1**
Maize	+	+	+	+	+	+	+
Rice	+	+	+	+	+	+	+
Wheat	+	+	+	+	+	+	+
Barley	+	+	+	+	+	+	+
Oats	+	+	+	+	+	+	+
Other Small Grains	+	+	+	+	+	+	+
Sorghum	+	+	+	+	+	+	+
Cotton	+	+	+	+	+	+	+
Grass Hay	+	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+	+
Peas	+	+	+	+	+	+	+
Sunflower	+	+	+	+	+	+	+
Tobacco	+	+	+	+	+	+	+
Vegetables	+	+	+	+	+	+	+
Chickpeas	+	+	+	+	+	+	+
Dry Beans	+	+	+	+	+	+	+
Lentils	+	+	+	+	+	+	+
Peanuts	+	+	+	+	+	+	+

Soybeans	+	+	+	+	+	+	+
Potatoes	+	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+	+
CO	**315**	**363**	**339**	**338**	**337**	**336**	**336**
NO_x	**13**	**15**	**14**	**14**	**14**	**14**	**14**

+ Does not exceed 0.5 kt.
Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

A country-specific Tier 2 method is used to estimate greenhouse gas emissions from field burning of agricultural residues from 1990 to 2014 (for more details comparing the country-specific approach to the IPCC (2006) default approach, see Box 5-6), and a data splicing method with a linear extrapolation is applied to complete the emissions time series from 2015 to 2021. The following equation is used to estimate the amounts of C and N released (R_i, where *i* is *C* or *N*) from burning.

Equation 5-1: Elemental C or N Released through Oxidation of Crop Residues

$$R_i = CP \times RCR \times DMF \times F_i \times FB \times CE$$

$$FB = \frac{AB}{CAH}$$

where,

Crop Production (CP)	=	Annual production of crop, by state, kt crop production
Residue: Crop Ratio (RCR)	=	Amount of residue produced per unit of crop production, kt residue/kt crop production
Dry Matter Fraction (DMF)	=	Amount of dry matter per unit of residue biomass for a crop, kt residue dry matter/ kt residue biomass
Fraction C or N (F_i)	=	Fraction of C or N per unit of dry matter for a crop, kt C or N /kt residue dry matter
Fraction Burned (FB)	=	Proportion of residue biomass consumed, unitless
Combustion Efficiency (CE)	=	Proportion of residue actually burned, unitless
Area Burned (AB)	=	Total area of crop burned, by state, ha
Crop Area Harvested (CAH)	=	Total area of crop harvested, by state, ha

Crop production data are available by state and year from USDA (2019) for twenty-one crops that are burned in the conterminous United States, including maize, rice, wheat, barley, oats, other small grains, sorghum, cotton, grass hay, legume hay, peas, sunflower, tobacco, vegetables, chickpeas, dry beans, lentils, peanuts, soybeans, potatoes, and sugarbeets.[30] Crop area data are based on the 2015 National Resources Inventory (NRI) (USDA-NRCS 2018). In order to estimate total crop production, the crop yield data from USDA Quick Stats crop yields is multiplied by the NRI crop areas. The production data for the crop types are presented in Table 5-31. Alaska and Hawaii are not included in the current analysis, but there is a planned improvement to estimate residue burning emissions for these two states in a future Inventory.

[30] Sugarcane and Kentucky bluegrass (produced on farms for turf grass installations) may have small areas of burning that are not captured in the sample of locations that were used in the remote sensing analysis (see Planned Improvements).

The amount of elemental C or N released through oxidation of the crop residues is used in the following equation to estimate the amount of CH_4, CO, N_2O, and NO_x emissions (E_g, where g is the specific gas, i.e., CH_4, CO, N_2O, and NO_x) from the field burning of agricultural residues:

Equation 5-2: Emissions from Crop Residue Burning

$$E_g = R_i \times EF_g \times CF$$

where,

Emission ratio (EF_g) = emission ratio by gas, g CH_4-C or CO-C/g C released, or g N_2O-N or NO_x-N/g N released

Conversion Factor (CF) = conversion by molecular weight ratio of CH_4-C to C (16/12), CO-C to C (28/12), N_2O-N to N (44/28), or NO_x-N to N (30/14)

Box 5-6: Comparison of Tier 2 U.S. Inventory Approach and IPCC (2006) Default Approach

Emissions from field burning of agricultural residues are calculated using a Tier 2 methodology that is based on the method developed by the IPCC/UNEP/OECD/IEA (1997). The rationale for using the IPCC/UNEP/OECD/IEA (1997) approach rather than the method provided in the *2006 IPCC Guidelines* is as follows: (1) the equations from both guidelines rely on the same underlying variables (though the formats differ); (2) the IPCC (2006) equation was developed to be broadly applicable to all types of biomass burning, and, thus, is not specific to agricultural residues; (3) the IPCC (2006) method provides emission factors based on the dry matter content rather than emission rates related to the amount of C and N in the residues; and (4) the IPCC (2006) default factors are provided only for four crops (corn, rice, sugarcane, and wheat) while this Inventory includes emissions from twenty-one crops.

A comparison of the methods in the current Inventory and the default IPCC (2006) approach was undertaken for 2014 to determine the difference in estimates between the two approaches. To estimate greenhouse gas emissions from field burning of agricultural residues using the IPCC (2006) methodology, the following equation—cf. IPCC (2006) Equation 2.27—was used with default factors and country-specific values for mass of fuel.

Equation 5-3: Estimation of Greenhouse Gas Emissions from Fire

$$Emissions\ (kt) = AB \times M_B \times C_f \times G_{ef} \times 10^{-6}$$

where,

Area Burned (AB) = Total area of crop burned (ha)

Mass of Fuel (M_B) = U.S.- Specific Values using NASS Statistics[31] (metric tons dry matter)

Combustion Factor (C_f) = IPCC (2006) default combustion factor with fuel biomass consumption (metric tons dry matter ha^{-1})

Emission Factor (G_{ef}) = IPCC (2006) emission factor (g kg^{-1} dry matter burnt)

The IPCC (2006) Tier 1 method approach resulted in 21 percent lower emissions of CH_4 and 44 percent lower emissions of N_2O compared to this Inventory. In summary, the IPCC/UNEP/OECD/IEA (1997) method is considered more appropriate for U.S. conditions because it is more flexible for incorporating country-specific

[31] NASS yields are used to derive mass of fuel values because IPCC (2006) only provides default values for 4 of the 21 crops included in the Inventory.

data. Emissions are estimated based on specific C and N content of the fuel, which is converted into CH_4, CO, N_2O and NO_x, compared to IPCC (2006) approach that is based on dry matter rather than elemental composition.

Table 5-31: Agricultural Crop Production (kt of Product)

Crop	1990	2005	2011	2012	2013	2014
Maize	296,065	371,256	399,531	349,739	436,565	453,524
Rice	9,543	11,751	9,890	10,445	10,894	12,380
Wheat	79,805	68,077	61,082	69,388	67,388	62,602
Barley	9,281	5,161	3,891	5,382	4,931	5,020
Oats	5,969	2,646	1,661	1,743	1,806	2,042
Other Small Grains	2,651	2,051	1,259	1,657	1,902	2,492
Sorghum	23,687	14,382	9,196	11,288	18,680	18,436
Cotton	4,605	6,106	5,200	5,357	3,982	4,396
Grass Hay	44,150	49,880	44,670	40,821	45,588	46,852
Legume Hay	90,360	91,819	82,440	71,435	79,669	82,844
Peas	51	660	206	488	599	447
Sunflower	1,015	1,448	820	1,274	987	907
Tobacco	1,154	337	286	466	481	542
Vegetables	0	1,187	1,201	1,973	1,844	2,107
Chickpeas	0	5	+	1	+	+
Dry Beans	467	1,143	1,024	1,260	1,110	1,087
Lentils	0	101	46	95	72	76
Peanuts	1,856	2,176	1,982	2,854	2,072	2,735
Soybeans	56,612	86,980	87,556	85,843	94,756	110,560
Potatoes	18,924	20,026	19,800	19,776	20,234	19,175
Sugarbeets	24,951	25,635	27,345	32,791	31,890	31,737

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Note: The amount of crop production has not been compiled for 2015 to 2021 so a data splicing method is used to estimate emissions for this portion of the time series.

The area burned is determined based on an analysis of remote sensing products (McCarty et al. 2009, 2010, 2011). The presence of fires has been analyzed at 3,600 survey locations in the NRI from 1990 to 2002 with LANDFIRE data products developed from 30 m Landsat imagery (LANDFIRE 2008), and from 2003 through 2014 using 1 km Moderate Resolution Imaging Spectroradiometer imagery (MODIS) Global Fire Location Product (MCD14ML) using combined observations from Terra and Aqua satellites (Giglio et al. 2006). A sample of states are included in the analysis with high, medium and low burning rates for agricultural residues, including Arkansas, California, Florida, Indiana, Iowa and Washington. The area burned is determined directly from the analysis for these states.

For other states within the conterminous United States, the area burned for the 1990 through 2014 portion of the time series is estimated from a logistical regression model that has been developed from the data collected from the remote sensing products for the six states. The logistical regression model is used to predict occurrence of fire events. Several variables are tested in the logistical regression including a) the historical level of burning in each state (high, medium or low levels of burning) based on an analysis by McCarty et al. (2011), b) year that state laws limit burning of fields, in addition to c) mean annual precipitation and mean annual temperature from a 4-kilometer gridded product from the PRISM Climate Group (2015). A K-fold model fitting procedure is used due to low frequency of burning and likelihood that outliers could influence the model fit. Specifically, the model is trained with a random selection of sample locations and evaluated with the remaining sample. This process is

repeated ten times to select a model that is most common among the set of ten, and avoid models that appear to be influenced by outliers due to the random draw of survey locations for training the model. In order to address uncertainty, a Monte Carlo analysis is used to sample the parameter estimates for the logistical regression model and produce one thousand estimates of burning for each crop in the remaining forty-two states included in this Inventory. State-level area burned data are divided by state-level crop area data to estimate the percent of crop area burned by crop type for each state. Table 5-32 shows the resulting percentage of crop residue burned at the national scale by crop type. State-level estimates are also available upon request.

Table 5-32: U.S. Average Percent Crop Area Burned by Crop (Percent)

Crop	1990	2005	2011	2012	2013	2014
Maize	+	+	+	+	+	+
Rice	8%	8%	4%	5%	4%	6%
Wheat	1%	2%	2%	2%	2%	1%
Barley	1%	+	1%	1%	1%	1%
Oats	1%	1%	1%	1%	2%	1%
Other Small Grains	1%	1%	1%	1%	1%	1%
Sorghum	1%	1%	1%	1%	1%	1%
Cotton	1%	1%	1%	1%	1%	1%
Grass Hay	+	+	+	+	+	+
Legume Hay	+	+	+	+	+	+
Peas	+	+	1%	+	+	+
Sunflower	+	+	+	+	+	+
Tobacco	2%	2%	2%	2%	3%	3%
Vegetables	+	+	+	+	+	+
Chickpeas	+	1%	+	+	0%	0%
Dry Beans	1%	1%	1%	1%	+	+
Lentils	+	+	1%	+	+	+
Peanuts	3%	3%	3%	3%	3%	3%
Soybeans	+	+	+	1%	1%	1%
Potatoes	+	+	+	+	+	+
Sugarbeets	+	+	+	+	+	+

+ Does not exceed 0.5 percent

Additional parameters are needed to estimate the amount of burning, including residue: crop ratios, dry matter fractions, carbon fractions, nitrogen fractions and combustion efficiency. Residue: crop product mass ratios, residue dry matter fractions, and the residue N contents are obtained from several sources (IPCC 2006 and sources at bottom of Table 5-33). The residue C contents for all crops are based on IPCC (2006) default value for herbaceous biomass. The combustion efficiency is assumed to be 90 percent for all crop types (IPCC/UNEP/OECD/IEA 1997). See Table 5-33 for a summary of the crop-specific conversion factors. Emission ratios and mole ratio conversion factors for all gases are based on the *Revised 1996 IPCC Guidelines* (IPCC/UNEP/OECD/IEA 1997) (see Table 5-34).

Table 5-33: Parameters for Estimating Emissions from Field Burning of Agricultural Residues

Crop	Residue/Crop Ratio	Dry Matter Fraction	Carbon Fraction	Nitrogen Fraction	Combustion Efficiency (Fraction)
Maize	0.707	0.56	0.47	0.01	0.90
Rice	1.340	0.89	0.47	0.01	0.90
Wheat	1.725	0.89	0.47	0.01	0.90
Barley	1.181	0.89	0.47	0.01	0.90
Oats	1.374	0.89	0.47	0.01	0.90
Other Small Grains	1.777	0.88	0.47	0.01	0.90
Sorghum	0.780	0.60	0.47	0.01	0.90
Cotton	7.443	0.93	0.47	0.01	0.90
Grass Hay	0.208	0.90	0.47	0.02	0.90
Legume Hay	0.290	0.67	0.47	0.01	0.90
Peas	1.677	0.91	0.47	0.01	0.90
Sunflower	1.765	0.88	0.47	0.01	0.90
Tobacco	0.300	0.87	0.47	0.01	0.90
Vegetables	0.708	0.08	0.47	0.01	0.90
Chickpeas	1.588	0.91	0.47	0.01	0.90
Dry Beans	0.771	0.90	0.47	0.01	0.90
Lentils	1.837	0.91	0.47	0.02	0.90
Peanuts	1.600	0.94	0.47	0.02	0.90
Soybeans	1.500	0.91	0.47	0.01	0.90
Potatoes	0.379	0.25	0.47	0.02	0.90
Sugarbeets	0.196	0.22	0.47	0.02	0.90

Notes: Chickpeas: IPCC (2006), Table 11.2; values are for Beans & pulses.
Cotton: Combined sources (Heitholt et al. 1992; Halevy 1976; Wells and Meredith 1984; Sadras and Wilson 1997; Pettigrew and Meredith 1997; Torbert and Reeves 1994; Gerik et al. 1996; Brouder and Cassmen 1990; Fritschi et al. 2003; Pettigrew et al. 2005; Bouquet and Breitenbeck 2000; Mahroni and Aharonov 1964; Bange and Milroy 2004; Hollifield et al. 2000; Mondino et al. 2004; Wallach et al. 1978).
Lentils: IPCC (2006), Table 11.2; Beans & pulses.
Peas: IPCC (2006), Table 11.2; values are for Beans & pulses.
Peanuts: IPCC (2006); Table 11.2; Root ratio and belowground N content values are for Root crops, other.
Sugarbeets: IPCC (2006); Table 11.2; values are for Tubers.
Sunflower: IPCC (2006), Table 11.2; values are for Grains.
Sugarcane: combined sources (Wiedenfels 2000, Dua and Sharma 1976; Singels & Bezuidenhout 2002; Stirling et al. 1999; Sitompul et al. 2000).
Tobacco: combined sources (Beyaert 1996; Moustakas and Ntzanis 2005; Crafts-Brandner et al. 1994; Hopkinson 1967; Crafts-Brandner et al. 1987).
Vegetables (Combination of carrots, lettuce/cabbage, melons, onions, peppers and tomatoes):
Carrots: McPharlin et al. (1992); Gibberd et al. (2003); Reid and English (2000); Peach et al. (2000); see IPCC Tubers for R:S and N fraction.
Lettuce, cabbage: combined sources (Huett and Dettman 1991; De Pinheiro Henriques & Marcelis 2000; Huett and Dettman 1989; Peach et al. 2000; Kage et al. 2003; Tan et al. 1999; Kumar et al. 1994; MacLeod et al. 1971; Jacobs et al. 2004; Jacobs et al. 2001; Jacobs et al. 2002); values from IPCC Grains used for N fraction.
Melons: Valantin et al. (1999); squash for R:S; IPCC Grains for N fraction.
Onion: Peach et al. (2000), Halvorson et al. (2002); IPCC (2006) Tubers for N fraction.
Peppers: combined sources (Costa and Gianquinto 2002; Marcussi et al. 2004; Tadesse et al. 1999; Diaz-Perez et al. 2008); IPCC Grains for N fraction.
Tomatoes: Scholberg et al. (2000a,b); Akintoye et al. (2005); values for AGR-N and BGR-N are from Grains.

Table 5-34: Greenhouse Gas Emission Ratios and Conversion Factors

Gas	Emission Ratio	Conversion Factor
CH_4:C	0.005[a]	16/12
CO:C	0.060[a]	28/12
N_2O:N	0.007[b]	44/28
NO_x:N	0.121[b]	30/14

[a] Mass of C compound released (units of C) relative to mass of total C released from burning (units of C).
[b] Mass of N compound released (units of N) relative to mass of total N released from burning (units of N).

For this Inventory, new activity data on the burned areas have not been analyzed for 2015 to 2021. To complete the emissions time series, a linear extrapolation of the trend is applied to estimate the emissions in the last seven years of the inventory. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors is used to estimate the trend in emissions over time from 1990 through 2014, and the trend is used to approximate the CH_4, N_2O, CO and NO_x from 2015 to 2021 (Brockwell and Davis 2016). The Tier 2 method described previously will be applied to recalculate the emissions for the last seven years in the time series (2015 to 2021) in a future Inventory.

In order to ensure time-series consistency, the same method is applied from 1990 to 2014, and a linear extrapolation method is used to approximate emissions for the remainder of the time series based on the emissions data from 1990 to 2014. This extrapolation method is consistent with data splicing methods in IPCC (2006).

Uncertainty

Emissions are estimated using a linear regression model with autoregressive moving-average (ARMA) errors for 2021. The linear regression ARMA model produced estimates of the upper and lower bounds to quantify uncertainty (Table 5-35), and the results are summarized in Table 5-35. Methane emissions from field burning of agricultural residues in 2021 are between 0.4 and 0.6 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 16 percent below and 16 percent above the 2021 emission estimate of 0. MMT CO_2 Eq. Nitrous oxide emissions are between 0.1 and 0.2 MMT CO_2 Eq., or approximately 19 percent below and 19 percent above the 2021 emission estimate of 0.2 MMT CO_2 Eq.

Table 5-35: Approach 2 Quantitative Uncertainty Estimates for CH_4 and N_2O Emissions from Field Burning of Agricultural Residues (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Field Burning of Agricultural Residues	CH_4	0.5	0.4	0.6	-16%	16%
Field Burning of Agricultural Residues	N_2O	0.2	0.1	0.2	-19%	19%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Due to data limitations, there are additional uncertainties in agricultural residue burning, particularly the potential omission of burning associated with Kentucky bluegrass (produced on farms for turf grass installation) and sugarcane (see Annex 5 on sugarcane).

QA/QC and Verification

A source-specific QA/QC plan for field burning of agricultural residues is implemented with Tier 1 analyses, consistent with the U.S. Inventory QA/QC plan outlined in Annex 8. Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. An error was identified in the calculation of the emissions using the IPCC (2006) equation, which was corrected in Box 5.6.

Recalculations Discussion

EPA updated the global warming potentials (GWPs) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series to ensure consistency.

As a result of this change, CO_2-equivalent CH_4 emissions increased by an annual average of 0.05 MMT CO_2 Eq., or 12 percent, over the time series from 1990 to 2020 compared to the previous Inventory. In contrast, N_2O emissions decreased by an annual average of 0.02 MMT CO_2 Eq., or 11 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A key planned improvement is to estimate the emissions associated with field burning of agricultural residues in the states of Alaska and Hawaii. In addition, a new method is in development that will directly link agricultural residue burning with the Tier 3 methods that are used in several other source categories, including Agricultural Soil Management, Cropland Remaining Cropland, and Land Converted to Cropland chapters of the Inventory. The method is based on simulating burning events directly within the DayCent process-based model framework using information derived from remote sensing fire products as described in the Methodology section. This improvement will lead to greater consistency in the methods for across sources, ensuring mass balance of C and N in the Inventory analysis.

As previously noted in this chapter, remote sensing data were used in combination with a resource survey to estimate non-CO_2 emissions and these data did not allow identification of burning of sugarcane (see Annex 5). EPA has received feedback on this category/crop type, which includes average estimates of emissions of sugarcane burning found in academic literature. EPA plans to incorporate the burning of sugarcane into the analysis during a future Inventory, as early as the 1990-2022 Inventory, when an updated analysis is conducted (see Annex 5).

6. Land Use, Land-Use Change, and Forestry

This chapter provides an assessment of the greenhouse gas fluxes resulting from land use and land-use change in the United States.[1] The Intergovernmental Panel on Climate Change's *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006) recommends reporting fluxes according to changes within and conversions between all land use types including: Forest Land, Cropland, Grassland, Wetlands, and Settlements (as well as Other Land).

The greenhouse gas flux from Forest Land Remaining Forest Land is reported for all forest ecosystem carbon (C) pools (i.e., aboveground biomass, belowground biomass, dead wood, litter, and mineral and organic soils), harvested wood pools, and non-carbon dioxide (non-CO_2) emissions from forest fires, the application of synthetic nitrogen fertilizers to forest soils, and the draining of organic soils. Fluxes from Land Converted to Forest Land are included for aboveground biomass, belowground biomass, dead wood, litter, and C stock changes from mineral soils, while C stock changes from drained organic soils and all non-CO_2 emissions from Land Converted to Forest Land are included in the fluxes from Forest Land Remaining Forest Land as it is not currently possible to separate these fluxes by conversion category.

Fluxes are reported for four agricultural land use/land-use change categories: Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland. The reported greenhouse gas fluxes from these agricultural lands include changes in soil organic C stocks in mineral and organic soils due to land use and management, and for the subcategories of Forest Land Converted to Cropland and Forest Land Converted to Grassland, the changes in aboveground biomass, belowground biomass, dead wood, and litter C stocks are also reported. The greenhouse gas flux from Grassland Remaining Grassland also includes estimates of non-CO_2 emissions from grassland fires occurring on both Grassland Remaining Grassland and Land Converted to Grassland.

Fluxes from Wetlands Remaining Wetlands include changes in C stocks and methane (CH_4) and nitrous oxide (N_2O) emissions from managed peatlands, aboveground and belowground biomass, dead organic matter, soil C stock changes and CH_4 emissions from coastal wetlands, as well as N_2O emissions from aquaculture. In addition, CH_4 emissions from reservoirs and other constructed waterbodies are included for the subcategory Flooded Land Remaining Flooded Land. Estimates for Land Converted to Wetlands include aboveground and belowground biomass, dead organic matter and soil C stock changes, and CH_4 emissions from land converted to vegetated coastal wetlands. Carbon dioxide (CO_2) and CH_4 emissions are included for reservoirs and other constructed waterbodies under the subcategory Land Converted to Flooded Land.

[1] The term "flux" is used to describe the exchange of CO_2 to and from the atmosphere, with net flux of CO_2 being either positive or negative depending on the overall balance. Removal and long-term storage of CO_2 from the atmosphere is also referred to as "carbon sequestration."

Fluxes from Settlements Remaining Settlements include changes in C stocks from organic soils, N_2O emissions from nitrogen fertilizer additions to soils, and CO_2 fluxes from settlement trees and landfilled yard trimmings and food scraps. The reported greenhouse gas flux from Land Converted to Settlements includes changes in C stocks in mineral and organic soils due to land use and management for all land use conversions to settlements, and the C stock changes in aboveground biomass, belowground biomass, dead wood, and litter are also included for the subcategory Forest Land Converted to Settlements.

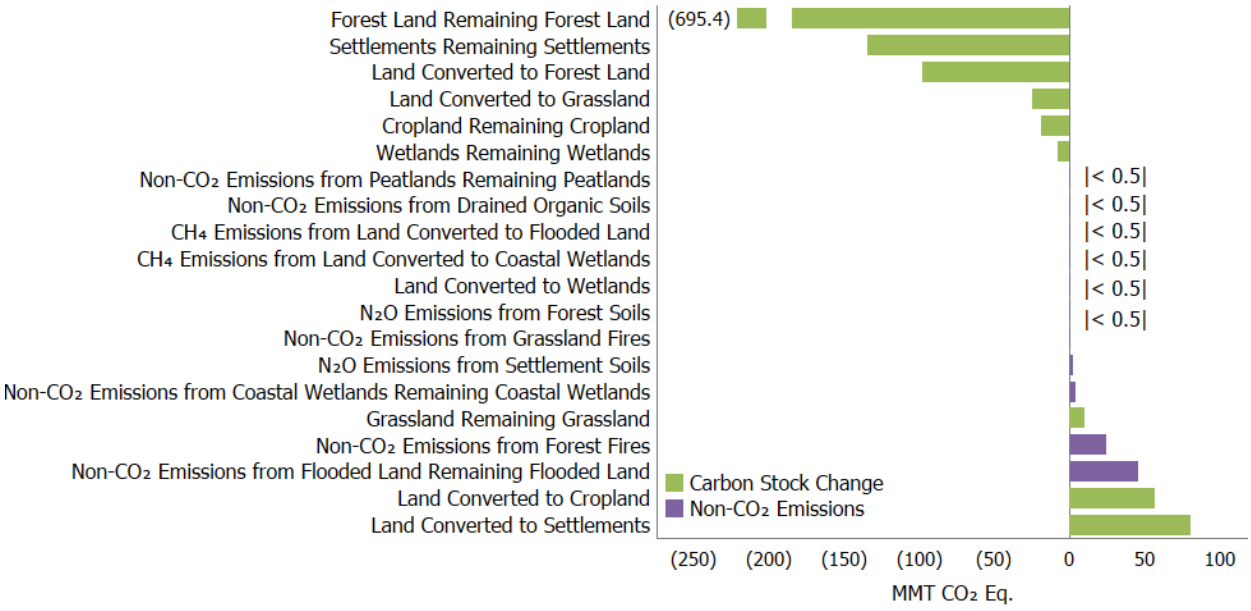
In 2021, the Land Use, Land-Use Change, and Forestry (LULUCF) sector resulted in a net increase in C stocks (i.e., net CO_2 removals) of 832.0 MMT CO_2 Eq. This represents an offset of approximately 13.1 percent of total (i.e., gross) greenhouse gas emissions in 2021. Emissions of CH_4 and N_2O from LULUCF activities in 2021 were 66.0 and 11.8 MMT CO_2 Eq., respectively, and combined represent 1.2 percent of total greenhouse gas emissions.[3] In 2021, the overall net flux from LULUCF resulted in a removal of 754.2 MMT CO_2 Eq. Emissions, removals and net greenhouse gas flux from LULUCF are summarized in Figure 6-1 and Table 6-1 by land use and category, and Table 6-2 and Table 6-3 by gas in MMT CO_2 Eq. and kt, respectively. Trends in LULUCF sources and sinks over the 1990 to 2021 time series are shown in Figure 6-2.

Flooded Land Remaining Flooded Land was the largest source of non-CO_2 emissions from LULUCF in 2021, accounting for 58.4 percent of the LULUCF sector emissions. Non-CO_2 emissions from forest fires are the second largest source of LULUCF sector emissions; these emissions have increased 341.4 percent since 1990 and account for 31.4 percent of LULUCF emissions in 2021. Coastal Wetlands Remaining Coastal Wetlands and Settlements Remaining Settlements soils accounted for 5.7 and 2.6 percent of non-CO_2 emissions from LULUCF in 2021, respectively, and the remaining sources account for less than one percent each.

[2] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[3] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils.

Figure 6-1: 2021 LULUCF Chapter Greenhouse Gas Sources and Sinks



Note: Parentheses in horizontal axis indicate net sequestration.

Figure 6-2: Trends in Emissions and Removals (Net CO_2 Flux) from Land Use, Land-Use Change, and Forestry

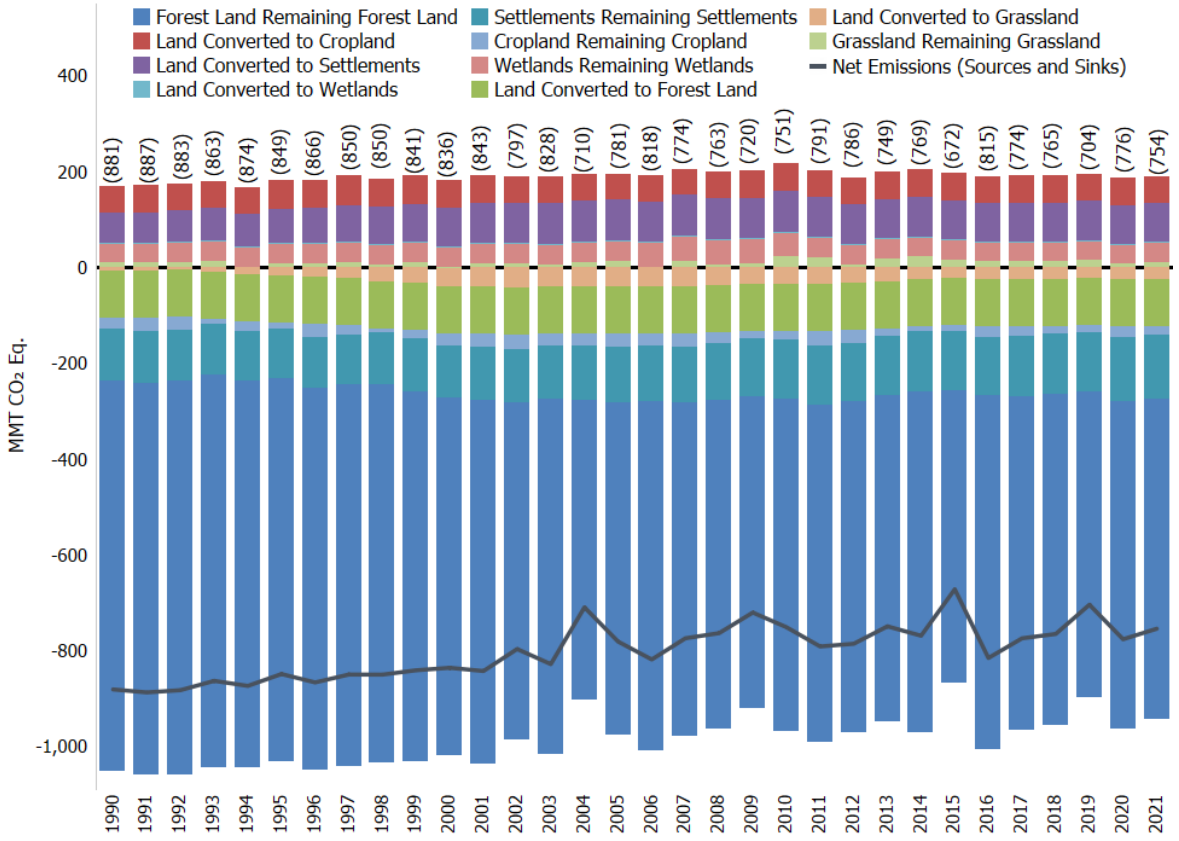


Table 6-1: Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Forest Land Remaining Forest Land	**(815.8)**	**(695.4)**	**(695.2)**	**(692.9)**	**(638.1)**	**(684.0)**	**(670.5)**
Changes in Forest Carbon Stocks[a]	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Non-CO_2 Emissions from Forest Fires[b]	5.5	18.3	15.0	11.0	10.8	23.0	24.4
N_2O Emissions from Forest Soils[c]	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Non-CO_2 Emissions from Drained Organic Soils[d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Forest Land	**(98.5)**	**(98.4)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**
Changes in Forest Carbon Stocks[e]	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	**(23.2)**	**(29.0)**	**(22.3)**	**(16.6)**	**(14.5)**	**(23.3)**	**(18.9)**
Changes in Mineral and Organic Soil Carbon Stocks	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	**54.8**	**54.7**	**56.6**	**56.3**	**56.3**	**56.7**	**56.5**
Changes in all Ecosystem Carbon Stocks[f]	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	**8.8**	**11.7**	**11.6**	**11.9**	**14.6**	**6.7**	**10.6**
Changes in Mineral and Organic Soil Carbon Stocks	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Non-CO_2 Emissions from Grassland Fires[g]	0.2	0.7	0.6	0.6	0.6	0.6	0.6
Land Converted to Grassland	**(6.7)**	**(40.1)**	**(24.5)**	**(24.2)**	**(23.3)**	**(25.9)**	**(24.7)**
Changes in all Ecosystem Carbon Stocks[f]	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	**41.5**	**43.1**	**41.8**	**41.8**	**41.8**	**41.8**	**41.8**
Changes in Organic Soil Carbon Stocks in Peatlands	1.1	1.1	0.8	0.8	0.8	0.7	0.7
Non-CO_2 Emissions from Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Changes in Biomass, DOM, and Soil Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(8.8)
CH_4 Emissions from Coastal Wetlands Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
N_2O Emissions from Coastal Wetlands Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
CH_4 Emissions from Flooded Land Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Land Converted to Wetlands	**3.3**	**1.4**	**0.8**	**0.8**	**0.8**	**0.6**	**0.6**
Changes in Biomass, DOM, and Soil Carbon Stocks in Land Converted to Coastal Wetlands	0.5	0.5	(+)	(+)	(+)	(+)	(+)
CH_4 Emissions from Land Converted to Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Changes in Land Converted to Flooded Land	1.4	0.4	0.4	0.4	0.4	0.3	0.3
CH_4 Emissions from Land Converted to Flooded Land	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Settlements Remaining Settlements	**(107.8)**	**(113.9)**	**(125.6)**	**(125.0)**	**(124.5)**	**(131.6)**	**(132.5)**
Changes in Organic Soil Carbon Stocks	11.3	12.2	16.0	15.9	15.9	15.9	15.9
Changes in Settlement Tree Carbon Stocks	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
N_2O Emissions from Settlement Soils[h]	1.8	2.8	1.9	2.0	2.0	2.0	2.1
Changes in Yard Trimming and Food Scrap Carbon Stocks in Landfills	(24.5)	(11.4)	(13.8)	(13.4)	(13.1)	(12.8)	(12.6)
Land Converted to Settlements	**62.5**	**85.0**	**80.9**	**81.0**	**81.1**	**81.0**	**81.0**
Changes in all Ecosystem Carbon Stocks[f]	62.5	85.0	80.9	81.0	81.1	81.0	81.0
LULUCF Emissions[i]	**57.9**	**72.4**	**68.3**	**64.4**	**64.2**	**76.4**	**77.8**
CH_4	53.5	61.3	60.1	57.3	56.9	65.4	66.0

N_2O	4.4	11.1	8.3	7.0	7.3	11.0	11.8
LULUCF Carbon Stock Change[j]	**(938.9)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
LULUCF Sector Net Total[k]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

[a] Includes the net changes to carbon stocks stored in all forest ecosystem pools (estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land) and harvested wood products.

[b] Estimates include CH_4 and N_2O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include N_2O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land. Carbon stock changes from drained organic soils are included with the Forest Land Remaining Forest Land forest ecosystem pools.

[e] Includes the net changes to carbon stocks stored in all forest ecosystem pools.

[f] Includes changes in mineral and organic soil carbon stocks for all land-use conversions to cropland, grassland, and settlements. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements.

[g] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[h] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

[i] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands, Flooded Land Remaining Flooded Land, and Land Converted to Flooded Land; and N_2O emissions from forest soils and settlement soils.

[j] LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land-use conversion categories.

[k] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

The C stock changes and emissions of CH_4 and N_2O from LULUCF are summarized in Table 6-2 (MMT CO_2 Eq.) and Table 6-3 (kt). Total net C sequestration in the LULUCF sector decreased by approximately 11.4 percent between 1990 and 2021. This decrease was primarily due to a decline in the rate of net C accumulation in Forest Land, as well as an increase in emissions from Land Converted to Settlements.[4] Specifically, there was a net C accumulation in Settlements Remaining Settlements, which increased from 1990 to 2021, while the net C accumulation in Forest Land Remaining Forest Land and Land Converted to Wetlands slowed over this period. Net C accumulation remained steady from 1990 to 2021 in Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, and Wetlands Remaining Wetlands, while net C accumulation fluctuated in Grassland Remaining Grassland.

Flooded Land Remaining Flooded Land was the largest source of CH_4 emissions from LULUCF in 2021, totaling 45.4 MMT CO_2 Eq. (1,623 kt of CH_4). Forest fires resulted in CH_4 emissions of 15.5 MMT CO_2 Eq. (554 kt of CH_4). Coastal Wetlands Remaining Coastal Wetlands resulted in CH_4 emissions of 4.3 MMT CO_2 Eq. (154 kt of CH_4). Grassland fires resulted in CH_4 emissions of 0.3 MMT CO_2 Eq. (12 kt of CH_4). Land Converted to Flooded Land and Land Converted to Wetlands each resulted in CH_4 emissions of 0.2 MMT CO_2 Eq. (6 kt of CH_4). Drained organic soils on forest lands and Peatlands Remaining Peatlands resulted in CH_4 emissions of less than 0.05 MMT CO_2 Eq. each.

For N_2O emissions, forest fires were the largest source from LULUCF in 2021, totaling 8.9 MMT CO_2 Eq. (34 kt of N_2O). Nitrous oxide emissions from fertilizer application to settlement soils in 2021 totaled to 2.1 MMT CO_2 Eq. (8 kt of N_2O). This represents an increase of 14.9 percent since 1990. Additionally, the application of synthetic

[4] Carbon sequestration estimates are net figures. The C stock in a given pool fluctuates due to both gains and losses. When losses exceed gains, the C stock decreases, and the pool acts as a source. When gains exceed losses, the C stock increases, and the pool acts as a sink; also referred to as net C sequestration or removal.

fertilizers to forest soils in 2021 resulted in N_2O emissions of 0.4 MMT CO_2 Eq. (2 kt of N_2O). Nitrous oxide emissions from fertilizer application to forest soils have increased by 455.1 percent since 1990, but still account for a relatively small portion of overall emissions. Grassland fires resulted in N_2O emissions of 0.3 MMT CO_2 Eq. (1 kt of N_2O). Coastal Wetlands Remaining Coastal Wetlands resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (1 kt of N_2O). Drained organic soils on forest lands resulted in N_2O emissions of 0.1 MMT CO_2 Eq. (less than 0.05 kt of N_2O), and Peatlands Remaining Peatlands resulted in N_2O emissions of less than 0.05 MMT CO_2 Eq.

Table 6-2: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (MMT CO_2 Eq.)

Gas/Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Carbon Stock Change (CO_2)[a]	**(938.9)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
Forest Land Remaining Forest Land	(821.4)	(714.2)	(710.7)	(704.4)	(649.3)	(707.4)	(695.4)
Land Converted to Forest Land	(98.5)	(98.4)	(98.3)	(98.3)	(98.3)	(98.3)	(98.3)
Cropland Remaining Cropland	(23.2)	(29.0)	(22.3)	(16.6)	(14.5)	(23.3)	(18.9)
Land Converted to Cropland	54.8	54.7	56.6	56.3	56.3	56.7	56.5
Grassland Remaining Grassland	8.7	11.0	10.9	11.3	14.0	6.0	10.0
Land Converted to Grassland	(6.7)	(40.1)	(24.5)	(24.2)	(23.3)	(25.9)	(24.7)
Wetlands Remaining Wetlands	(7.4)	(6.60)	(7.95)	(7.99)	(8.03)	(8.06)	(8.09)
Land Converted to Wetlands	1.9	0.8	0.3	0.3	0.3	0.3	0.3
Settlements Remaining Settlements	(109.6)	(116.6)	(127.5)	(127.0)	(126.5)	(133.6)	(134.5)
Land Converted to Settlements	62.5	85.0	80.9	81.0	81.1	81.0	81.0
CH_4	**53.5**	**61.3**	**60.1**	**57.3**	**56.9**	**65.4**	**66.0**
Forest Land Remaining Forest Land: Forest Fires[b]	3.2	10.9	9.6	6.9	6.4	15.0	15.5
Forest Land Remaining Forest Land: Drained Organic Soils[d]	+	+	+	+	+	+	+
Grassland Remaining Grassland: Grassland Fires[c]	0.1	0.4	0.3	0.3	0.3	0.3	0.3
Wetlands Remaining Wetlands: Flooded Land Remaining Flooded Land	44.6	45.3	45.4	45.4	45.4	45.4	45.4
Wetlands Remaining Wetlands: Coastal Wetlands Remaining Coastal Wetlands	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Wetlands Remaining Wetlands: Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Land Converted to Wetlands: Land Converted to Flooded Lands	1.1	0.3	0.3	0.3	0.3	0.2	0.2
Land Converted to Wetlands: Land Converted to Coastal Wetlands	0.3	0.3	0.2	0.2	0.2	0.2	0.2
N_2O	**4.4**	**11.1**	**8.3**	**7.0**	**7.3**	**11.0**	**11.8**
Forest Land Remaining Forest Land: Forest Fires[b]	2.3	7.4	5.4	4.2	4.4	8.0	8.9
Forest Land Remaining Forest Land: Forest Soils[f]	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Forest Land Remaining Forest Land: Drained Organic Soils[d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Grassland Remaining Grassland: Grassland Fires[c]	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Wetlands Remaining Wetlands: Coastal Wetlands Remaining Coastal Wetlands	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Wetlands Remaining Wetlands: Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Settlements Remaining Settlements: Settlement Soils[e]	1.8	2.8	1.9	2.0	2.0	2.0	2.1
LULUCF Carbon Stock Change[a]	**(938.86)**	**(853.5)**	**(842.5)**	**(829.5)**	**(768.2)**	**(852.5)**	**(832.0)**
LULUCF Emissions[g]	**57.9**	**72.4**	**68.3**	**64.4**	**64.2**	**76.4**	**77.8**
LULUCF Sector Net Total[h]	**(881.0)**	**(781.1)**	**(774.2)**	**(765.1)**	**(704.0)**	**(776.2)**	**(754.2)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

[a] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[b] Estimates include CH_4 and N_2O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[e] Estimates include N_2O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[f] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements.

[g] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Flooded Land Remaining Flooded Land, Land Converted to Flooded Land, and Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils.

[h] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes in units of MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-3: Emissions and Removals from Land Use, Land-Use Change, and Forestry by Gas (kt)

Gas/Land-Use Category	1990	2005	2017	2018	2019	2020	2021
Carbon Stock Change (CO_2)[a]	**(938,856)**	**(853,529)**	**(842,516)**	**(829,501)**	**(768,224)**	**(852,534)**	**(832,039)**
Forest Land Remaining Forest Land	(821,444)	(714,232)	(710,697)	(704,446)	(649,336)	(707,426)	(695,354)
Land Converted to Forest Land	(98,452)	(98,429)	(98,322)	(98,263)	(98,253)	(98,254)	(98,254)
Cropland Remaining Cropland	(23,176)	(29,001)	(22,293)	(16,597)	(14,544)	(23,335)	(18,940)
Land Converted to Cropland	54,792	54,651	56,597	56,327	56,280	56,725	56,511
Grassland Remaining Grassland	8,694	11,040	10,928	11,266	13,997	6,046	10,005
Land Converted to Grassland	(6,684)	(40,098)	(24,467)	(24,205)	(23,304)	(25,921)	(24,669)
Wetlands Remaining Wetlands	(7,372)	(6,601)	(7,953)	(7,990)	(8,031)	(8,059)	(8,095)
Land Converted to Wetlands	1884	820	339	341	349	250	256
Settlements Remaining Settlements	(109,567)	(116,642)	(127,510)	(126,961)	(126,469)	(133,610)	(134,514)
Land Converted to Settlements	62,469	84,965	80,860	81,026	81,087	81,050	81,014
CH_4	**1,911**	**2,190**	**2,145**	**2,048**	**2,032**	**2,336**	**2,356**
Forest Land Remaining Forest Land:							
Forest Fires[b]	116	390	342	245	228	534	554
Forest Land Remaining Forest Land: Drained Organic Soils[d]	1	1	1	1	1	1	1
Grassland Remaining Grassland:							
Grassland Fires[c]	3	13	12	12	12	12	12
Wetlands Remaining Wetlands: Flooded Land Remaining Flooded Land	1,592.8	1,617.0	1,620.7	1,620.8	1,620.9	1,622.7	1,622.8
Wetlands Remaining Wetlands: Coastal Wetlands Remaining Coastal Wetlands	149	151	153	153	153	154	154
Wetlands Remaining Wetlands: Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Land Converted to Wetlands: Land Converted to Flooded Lands	39	9	9	9	9	6	6
Land Converted to Wetlands: Land Converted to Coastal Wetlands	10	10	8	7	7	7	6

N_2O	**17**	**42**	**31**	**27**	**27**	**41**	**45**
Forest Land Remaining Forest Land: Forest Fires[b]	9	28	21	16	17	30	34
Forest Land Remaining Forest Land: Forest Soils[f]	+	2	2	2	2	2	2
Forest Land Remaining Forest Land: Drained Organic Soils[d]	+	+	+	+	+	+	+
Grassland Remaining Grassland: Grassland Fires[c]	+	1	1	1	1	1	1
Wetlands Remaining Wetlands: Coastal Wetlands Remaining Coastal Wetlands	+	1	+	1	1	1	1
Wetlands Remaining Wetlands: Peatlands Remaining Peatlands	+	+	+	+	+	+	+
Settlements Remaining Settlements: Settlement Soils[e]	7	10	7	7	8	8	8

+ Absolute value does not exceed 0.5 kt.

[a] LULUCF Carbon Stock Change is the net C stock change from the following categories: Forest Land Remaining Forest Land, Land Converted to Forest Land, Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, Land Converted to Grassland, Wetlands Remaining Wetlands, Land Converted to Wetlands, Settlements Remaining Settlements, and Land Converted to Settlements.

[b] Estimates include CH_4 and N_2O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[e] Estimates include N_2O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[f] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements.

Notes: Totals by gas may not sum due to independent rounding. Parentheses indicate net sequestration.

Each year, some emission and sink estimates in the LULUCF sector of the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emissions and sinks estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. Of the updates implemented for this Inventory, the most significant include (1) Flooded Land Remaining Flooded Land and Land Converted to Flooded Land: the National Wetland Inventory (NWI) is now used as the primary data source for flooded land surface area rather than the National Hydrography Data (NHD as the primary geospatial data source, (2) Forest Lands: use of new data from the National Forest Inventory (NFI) as well as updated fire data and harvested wood products' (HWP) data, and using plot-level soil orders based on the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories; and (3) Coastal Wetlands: an update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land and to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since, states classified as wet temperate, cold temperate and Mediterranean climate zones fall under the category of Land Converted to Forest Land. Together, these updates decreased total C sequestration by 40.4 MMT CO_2 Eq. (5.0 percent) and increased total non-CO_2 emissions by 23.4 MMT CO_2 Eq. (44.1 percent), compared to the previous Inventory (i.e., 1990 to 2020). In addition, for the current Inventory, CO_2-equivalent emissions totals of CH_4 and N_2O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). Including the impacts of the GWP update, non-CO_2 emissions from LULUCF increased by an average of 33.8 MMT CO_2 (76 percent) across the timeseries. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

For more information on specific methodological updates, please see the Recalculations discussion within the respective source category section of this chapter.

Emissions and removals reported in the LULUCF chapter include those from all states; however, for Hawaii and Alaska some emissions and removals from land use and land-use change are not included (see chapter sections on Uncertainty and Planned Improvements for more details). In addition, U.S. Territories are not included for most categories. EPA continues to review available data on an ongoing basis to include emissions and removals from U.S. Territories in future inventories to the extent they are occurring (e.g., see Box 6-2). See Annex 5 for more information on EPA's assessment of the emissions and removals not included in this Inventory.

Box 6-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the gross emissions total presented in this report for the United States excludes emissions and removals from LULUCF. The LULUCF Sector Net Total presented in this report for the United States includes emissions and removals from LULUCF. All emissions and removals estimates are calculated using internationally accepted methods provided by the IPCC in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines), 2013 Supplement to the 2006 IPCC Guidelines for National GHG Inventories: Wetlands,* and the *2019 Refinement to the 2006 IPCC Guidelines for National GHG Inventories*. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common manner in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement.[5] The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and removals provided in the Land Use Land-Use Change and Forestry chapter does not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follow this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals.

6.1 Representation of the U.S. Land Base

A national land use representation system that is consistent and complete, both temporally and spatially, is needed in order to assess land use and land-use change status and the associated greenhouse gas fluxes over the Inventory time series. This system should be consistent with IPCC (2006), such that all countries reporting on national greenhouse gas fluxes to the UNFCCC should: (1) describe the methods and definitions used to determine areas of managed and unmanaged lands in the country (Table 6-4), (2) describe and apply a consistent set of definitions for land-use categories over the entire national land base and time series (i.e., such that increases in the land areas within particular land-use categories are balanced by decreases in the land areas of other categories unless the national land base is changing) (Table 6-5), and (3) account for greenhouse gas fluxes on all managed lands. The IPCC (2006, Vol. IV, Chapter 1) considers all anthropogenic greenhouse gas emissions and removals associated with land use and management to occur on managed land, and all emissions and removals on managed land should be reported based on this guidance (See IPCC (2010), Ogle et al. (2018) for further discussion). Consequently, managed land serves as a proxy for anthropogenic emissions and removals. This proxy is intended to provide a practical framework for conducting an inventory, even though some of the greenhouse gas emissions and removals on managed land are influenced by natural processes that may or may not be interacting with the

[5] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

anthropogenic drivers. This section of the Inventory has been developed in order to comply with this guidance. While the *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* provide guidance for factoring out natural emissions and removals, the United States does not apply this guidance and estimates all emissions/removals on managed land regardless of whether the driver was natural.

Three databases are used to track land management in the United States and are used as the basis to classify United States land area into the thirty-six IPCC land use and land-use change categories (Table 6-5) (IPCC 2006). The three primary databases are the U.S. Department of Agriculture (USDA) National Resources Inventory (NRI),[6] the USDA Forest Service (USFS) Forest Inventory and Analysis (FIA)[7] Database, and the Multi-Resolution Land Characteristics Consortium (MRLC) National Land Cover Dataset (NLCD).[8]

The total land area included in the United States Inventory is 936 million hectares across the 50 states.[9] Approximately 886 million hectares of this land base is considered *managed* and 50 million hectares is *unmanaged*, a distribution that has remained stable over the time series of the Inventory (Table 6-5). In 2021, the United States had a total of 280 million hectares of managed forest land (0.71 percent decrease compared to 1990). There are 160 million hectares of cropland (8.3 percent decrease compared to 1990), 339 million hectares of managed Grassland (0.4 percent increase compared to 1990), 39 million hectares of managed Wetlands (4.6 percent increase compared to 1990), 47 million hectares of Settlements (41 percent increase compared to 1990), and 21 million hectares of managed Other Land (1.0 percent decrease compared to 1990) (Table 6-5).

Wetlands are not differentiated between managed and unmanaged with the exception of remote areas in Alaska, and so are reported mostly as managed.[10] In addition, C stock changes are not currently estimated for the entire managed land base, which leads to discrepancies between the managed land area data presented here and in the subsequent sections of the Inventory (e.g., Grassland Remaining Grassland within interior Alaska).[11,12] Planned improvements are under development to estimate C stock changes and greenhouse gas emissions on all managed land and to ensure consistency between the total area of managed land in the land-representation description and the remainder of the Inventory.

Dominant land uses vary by region, largely due to climate patterns, soil types, geology, proximity to coastal regions, and historical settlement patterns (Figure 6-3). Forest land tends to be more common in the eastern United States, mountainous regions of the western United States, and Alaska. Cropland is concentrated in the mid-continent region of the United States, and Grassland is more common in the western United States and Alaska. Wetlands are fairly ubiquitous throughout the United States, though they are more common in the upper Midwest

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[6] NRI data are available at https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/.

[7] FIA data are available at https://www.fia.fs.usda.gov/tools-data/index.php.

[8] NLCD data are available at http://www.mrlc.gov/ and MRLC is a consortium of several U.S. government agencies.

[9] The current land representation does not include areas from U.S. Territories, but there are planned improvements to include these regions in future Inventories. U.S. Territories represent approximately 0.1 percent of the total land base for the United States. See Box 6-2.

[10] According to the IPCC (2006), wetlands are considered managed if they are created through human activity, such as dam construction, or the water level is artificially altered by human activity. Distinguishing between managed and unmanaged wetlands in the conterminous United States and Alaska is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management. As a result, all Wetlands in the conterminous United States and Hawaii are reported as managed in the Land Representation, but emission/removal estimates only developed for those wetlands that are included under the Flooded Lands, Coastal Wetlands or Peat Extraction categories. See the Planned Improvements section of the Inventory for future refinements to the Wetland area estimates.

[11] Other discrepancies occur because the coastal wetlands analysis is based on another land use product (NOAA C-CAP) that is not currently incorporated into the land representation analysis for this section, which relies on the NRI and NLCD for wetland areas. EPA anticipates addressing these discrepancies in future Inventories.

[12] These "managed area" discrepancies also occur in the Common Reporting Format (CRF) tables submitted to the UNFCCC.

and eastern portions of the country, as well as coastal regions. Settlements are more concentrated along the coastal margins and in the eastern states.

Table 6-4: Managed and Unmanaged Land Area by Land-Use Categories for All 50 States (Thousands of Hectares)

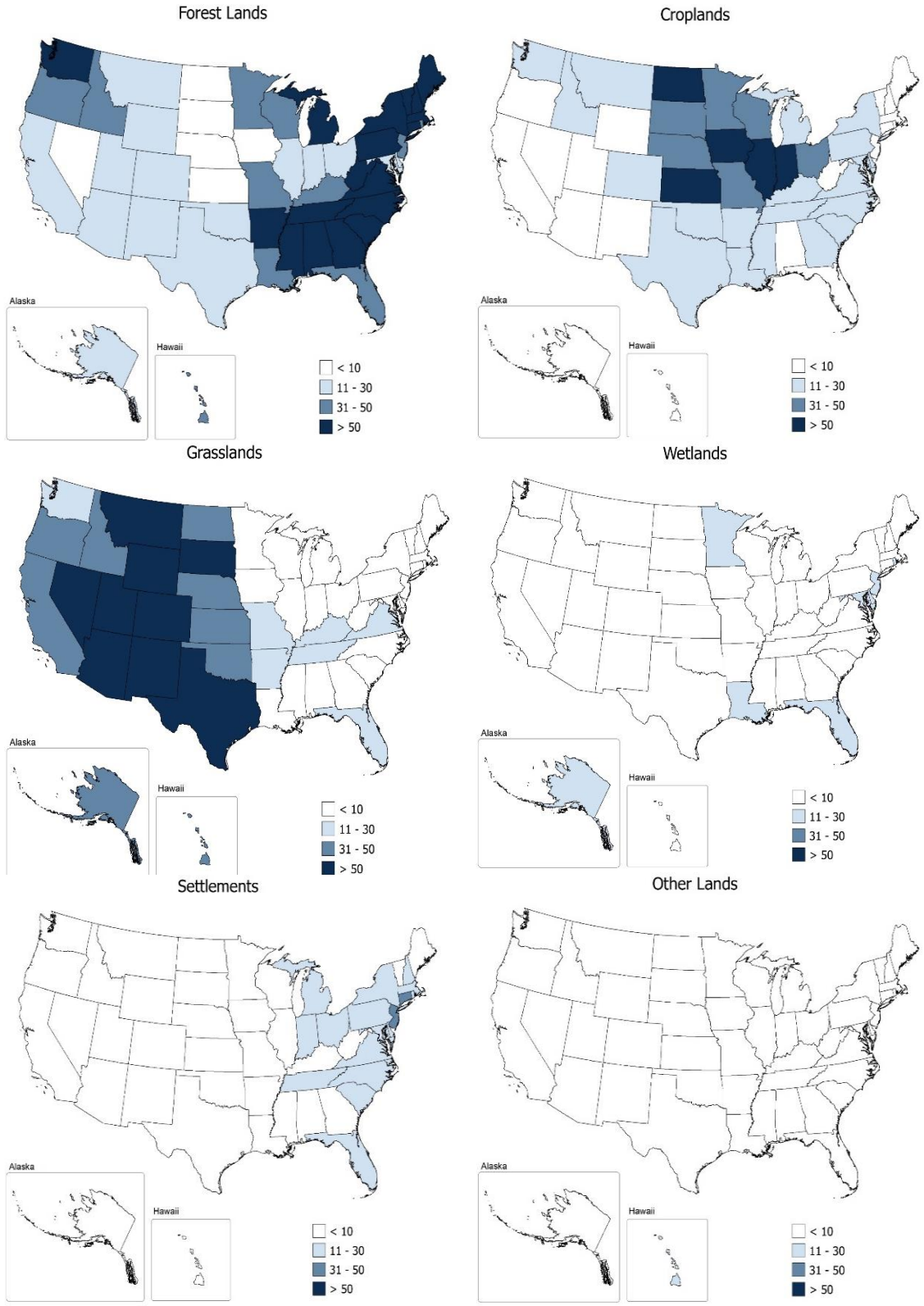
Land Use Categories	1990	2005	2017	2018	2019	2020	2021
Managed Lands	**886,533**	**886,530**	**886,531**	**886,531**	**886,531**	**886,531**	**886,531**
Forest	282,357	281,755	281,057	280,870	280,686	280,519	280,363
Croplands	174,496	165,622	161,922	161,394	160,693	160,111	160,077
Grasslands	337,639	339,694	338,053	338,264	338,722	339,138	338,989
Settlements	33,427	40,210	45,595	45,972	46,306	46,654	46,970
Wetlands	37,704	38,661	39,108	39,251	39,380	39,382	39,438
Other	20,910	20,588	20,796	20,779	20,743	20,727	20,693
Unmanaged Lands	**49,708**	**49,711**	**49,710**	**49,710**	**49,710**	**49,710**	**49,710**
Forest	10,260	10,260	10,264	10,264	10,264	10,264	10,269
Croplands	0	0	0	0	0	0	0
Grasslands	24,666	24,686	24,696	24,696	24,696	24,696	24,691
Settlements	0	0	0	0	0	0	0
Wetlands	4,048	4,047	4,058	4,058	4,058	4,058	4,058
Other	10,734	10,718	10,692	10,692	10,692	10,692	10,692
Total Land Areas	**936,241**	**936,241**	**936,241**	**936,241**	**936,241**	**936,241**	**936,241**
Forest	292,617	292,016	291,321	291,134	290,951	290,782	290,632
Croplands	174,496	165,622	161,922	161,394	160,693	160,111	160,077
Grasslands	362,305	364,380	362,749	362,960	363,417	363,834	363,680
Settlements	33,427	40,210	45,595	45,972	46,307	46,654	46,971
Wetlands	41,752	42,708	43,167	43,310	43,439	43,441	43,496
Other	31,644	31,306	31,488	31,471	31,435	31,419	31,385

Table 6-5: Land Use and Land-Use Change for the U.S. Managed Land Base for All 50 States (Thousands of Hectares)

Land Use & Land-Use Change Categories[a]	1990	2005	2017	2018	2019	2020	2021
Total Forest Land	**282,357**	**281,755**	**281,057**	**280,870**	**280,686**	**280,519**	**280,363**
FF	281,232	280,457	279,841	279,778	279,616	279,446	279,298
CF	216	154	110	101	87	83	82
GF	805	1,028	959	855	862	867	869
WF	13	23	19	19	16	15	14
SF	11	18	19	19	19	19	19
OF	79	77	108	99	86	89	81
Total Cropland	**174,496**	**165,622**	**161,922**	**161,394**	**160,693**	**160,111**	**160,077**
CC	162,265	150,400	148,327	149,721	149,504	149,817	150,586
FC	178	83	64	63	63	63	66
GC	11,673	14,623	13,121	11,231	10,758	9,914	9,132
WC	119	178	102	99	98	86	81
SC	75	102	122	107	105	101	97
OC	186	235	186	173	166	129	115
Total Grassland	**337,639**	**339,694**	**338,053**	**338,264**	**338,722**	**339,138**	**338,989**
GG	328,320	316,625	318,704	321,748	322,632	323,883	325,096
FG	591	642	722	733	746	726	704
CG	8,177	17,746	16,075	13,594	13,491	13,205	12,200
WG	168	466	199	181	172	159	143
SG	43	525	283	230	190	139	100
OG	341	3,692	2,070	1,778	1,491	1,026	746

Total Wetlands	**37,704**	**38,661**	**39,108**	**39,251**	**39,380**	**39,382**	**39,438**
WW	37,148	36,636	37,727	38,020	38,283	38,426	38,613
FW	38	73	71	69	57	57	51
CW	145	637	403	362	310	261	221
GW	326	1,169	662	564	501	415	342
SW	0	38	21	17	14	10	2
OW	47	107	225	220	216	212	210
Total Settlements	**33,427**	**40,210**	**45,595**	**45,972**	**46,306**	**46,654**	**46,970**
SS	30,561	31,445	39,875	40,771	41,617	42,467	43,189
FS	301	503	483	467	449	460	456
CS	1,231	3,604	2,110	1,917	1,726	1,528	1,366
GS	1,276	4,371	2,919	2,630	2,349	2,062	1,830
WS	4	59	39	30	25	18	14
OS	54	229	169	157	141	120	115
Total Other Land	**20,910**	**20,588**	**20,796**	**20,779**	**20,743**	**20,727**	**20,693**
OO	20,175	17,019	17,874	18,059	18,305	18,563	18,817
FO	53	81	97	96	98	100	106
CO	287	603	670	629	582	540	489
GO	371	2,764	1,929	1,772	1,541	1,309	1,068
WO	22	100	208	206	206	205	204
SO	2	21	18	17	11	10	10
Grand Total	**886,533**	**886,530**	**886,531**	**886,531**	**886,531**	**886,531**	**886,531**

Figure 6-3: Percent of Total Land Area for Each State in the General Land Use Categories for 2021



Methodology and Time-Series Consistency

IPCC (2006) describes three approaches for representing land areas. Approach 1 provides data on the total area for each individual land use category, but does not provide detailed information on transfer of land area between categories following land-use change and is not spatially explicit other than at the national or regional level. With Approach 1, total net conversions between categories can be detected, but not the individual changes (i.e., additions and/or losses) between the land-use categories that led to those net changes. Approach 2 introduces tracking of individual land-use changes between the categories (e.g., Forest Land to Cropland, Cropland to Forest Land, and Grassland to Cropland), using survey samples or other forms of data, but does not provide spatially-explicit location data. Approach 3 extends Approach 2 by providing spatially-explicit location data, such as surveys with spatially identified sample locations and maps obtained from remote sensing products. The three approaches are not presented as hierarchical tiers and are not mutually exclusive.

According to IPCC (2006), the approach or mix of approaches selected by an inventory agency should reflect calculation needs and national circumstances. For this analysis, the NRI, FIA, and the NLCD have been combined to provide a complete representation of land use for managed lands. These data sources are described in more detail later in this section. NRI, FIA and NLCD are Approach 3 data sources that provide spatially-explicit representations of land use and land-use conversions. Lands are treated as remaining in the same category (e.g., Cropland Remaining Cropland) if a land-use change has not occurred in the last 20 years. Otherwise, the land is classified in a land-use change category based on the current use and most recent use before conversion to the current use (e.g., Cropland Converted to Forest Land).

Definitions of Land Use in the United States

Managed and Unmanaged Land

The United States definition of managed land is similar to the general definition of managed land provided by the IPCC (2006), but with some additional elaboration to reflect national circumstances. Based on the following definitions, most lands in the United States are classified as managed:

- *Managed Land*: Land is considered managed if direct human intervention has influenced its condition. Direct intervention occurs mostly in areas accessible to human activity and includes altering or maintaining the condition of the land to produce commercial or non-commercial products or services; to serve as transportation corridors or locations for buildings, landfills, or other developed areas for commercial or non-commercial purposes; to extract resources or facilitate acquisition of resources; or to provide social functions for personal, community, or societal objectives where these areas are readily accessible to society.[13]
- *Unmanaged Land*: All other land is considered unmanaged. Unmanaged land is largely comprised of areas inaccessible to society due to the remoteness of the locations. Though these lands may be influenced

[13] Wetlands are an exception to this general definition, because these lands, as specified by IPCC (2006), are only considered managed if they are created through human activity, such as dam construction, or the water level is artificially altered by human activity. Distinguishing between managed and unmanaged wetlands in the United States is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management or origin (i.e., constructed rather than natural origin). Therefore, unless wetlands are converted into cropland or grassland, it is not possible to know if they are artificially created or if the water table is managed based on the use of NRI data. As a result, most wetlands are reported as managed with the exception of wetlands in remote areas of Alaska, but emissions from managed wetlands are only reported for coastal regions, flooded lands (e.g., reservoirs) and peatlands where peat extraction occurs due to insufficient activity data to estimate emissions and limited resources to improve the Inventory. See the Planned Improvements section of the Inventory for future refinements to the wetland area estimates.

indirectly by human actions such as atmospheric deposition of chemical species produced in industry or CO_2 fertilization, they are not influenced by a direct human intervention.[14]

In addition, land that is previously managed remains in the managed land base for 20 years before re-classifying the land as unmanaged in order to account for legacy effects of management on C stocks.[15] Unmanaged land is also re-classified as managed over time if anthropogenic activity is introduced into the area based on the definition of managed land.

Land-Use Categories

As with the definition of managed lands, IPCC (2006) provides general non-prescriptive definitions for the six main land-use categories: Forest Land, Cropland, Grassland, Wetlands, Settlements and Other Land. In order to reflect national circumstances, country-specific definitions have been developed, based predominantly on criteria used in the land use surveys for the United States. Specifically, the definition of Forest Land is based on the FIA definition of forest,[16] while definitions of Cropland, Grassland, and Settlements are based on the NRI.[17] The definitions for Other Land and Wetlands are based on the IPCC (2006) definitions for these categories.

- *Forest Land*: A land-use category that includes areas at least 120 feet (36.6 meters) wide and at least one acre (0.4 hectare) in size with at least 10 percent cover (or equivalent stocking) by live trees including land that formerly had such tree cover and that will be naturally or artificially regenerated. Trees are woody plants having a more or less erect perennial stem(s) capable of achieving at least 3 inches (7.6 cm) in diameter at breast height, or 5 inches (12.7 cm) diameter at root collar, and a height of 16.4 feet (5 m) at maturity in situ. Forest Land includes all areas recently having such conditions and currently regenerating or capable of attaining such condition in the near future. Forest Land also includes transition zones, such as areas between forest and non-forest lands that have at least 10 percent cover (or equivalent stocking) with live trees and forest areas adjacent to urban and built-up lands. Unimproved roads and trails, streams, and clearings in forest areas are classified as forest if they are less than 120 feet (36.6 m) wide or an acre (0.4 ha) in size. However, land is not classified as Forest Land if completely surrounded by urban or developed lands, even if the criteria are consistent with the tree area and cover requirements for Forest Land. These areas are classified as Settlements. In addition, Forest Land does not include land that is predominantly under an agricultural land use (Nelson et al. 2020).
- *Cropland*: A land-use category that includes areas used for the production of adapted crops for harvest; this category includes both cultivated and non-cultivated lands. Cultivated crops include row crops or close-grown crops and also pasture in rotation with cultivated crops. Non-cultivated cropland includes continuous hay, perennial crops (e.g., orchards) and horticultural cropland. Cropland also includes land with agroforestry, such as alley cropping and windbreaks,[18] if the dominant use is crop production, assuming the stand or woodlot does not meet the criteria for Forest Land. Lands in temporary fallow or

[14] There are some areas, such as Forest Land and Grassland in Alaska that are classified as unmanaged land due to the remoteness of their location.

[15] There are examples of managed land transitioning to unmanaged land in the U.S. For example, in 2018, 100 hectares of managed grassland converted to unmanaged because data indicated that no further grazing occurred. Livestock data are collected annually by the Department of Agriculture, and no livestock had occurred in the area since the mid-1970s, and therefore there was no longer active management through livestock grazing. The area is also remote, at least 10 miles from roads and settlements, and therefore the land was no longer managed based on the implementation criteria.

[16] See https://www.fia.fs.usda.gov/library/field-guides-methods-proc/docs/2022/core_ver9-2_9_2022_SW_HW%20table.pdf, page 23.

[17] See https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/technical/nra/nri/.

[18] Currently, there is no data source to account for biomass C stock change associated with woody plant growth and losses in alley cropping systems and windbreaks in cropping systems, although these areas are included in the Cropland land base.

enrolled in conservation reserve programs (i.e., set-asides[19]) are also classified as Cropland, as long as these areas do not meet the Forest Land criteria. Roads through Cropland, including interstate highways, state highways, other paved roads, gravel roads, dirt roads, and railroads are excluded from Cropland area estimates and are, instead, classified as Settlements.

- *Grassland*: A land-use category on which the plant cover is composed principally of grasses, grass-like plants (i.e., sedges and rushes), forbs, or shrubs suitable for grazing and browsing, and includes both pastures and native rangelands. This includes areas where practices such as clearing, burning, chaining, and/or chemicals are applied to maintain the grass vegetation. Land is also categorized as Grassland if there have been three or fewer years of continuous hay production.[20] Savannas, deserts, and tundra are considered Grassland.[21] Drained wetlands are considered Grassland if the dominant vegetation meets the plant cover criteria for Grassland. Woody plant communities of low forbs, shrubs and woodlands, such as sagebrush, mesquite, chaparral, mountain shrubland, and pinyon-juniper, are also classified as Grassland if they do not meet the criteria for Forest Land. Grassland includes land managed with agroforestry practices, such as silvopasture and windbreaks, if the land is principally grass, grass-like plants, forbs, and shrubs suitable for grazing and browsing, and assuming the stand or woodlot does not meet the criteria for Forest Land. Roads through Grassland, including interstate highways, state highways, other paved roads, gravel roads, dirt roads, and railroads are excluded from Grassland and are, instead, classified as Settlements.
- *Wetlands*: A land-use category that includes land covered or saturated by water for all or part of the year, in addition to lakes, reservoirs, and rivers. In addition, all coastal wetlands are considered managed regardless of whether the water level is changed or if they were created by human activity. Certain areas that fall under the managed Wetlands definition are included in other land uses based on the IPCC guidance and national circumstances, including lands that are flooded for most or just part of the year in Croplands (e.g., rice cultivation and cranberry production), Grasslands (e.g., wet meadows dominated by grass cover) and Forest Lands (e.g., Riparian Forests near waterways). See Section 6.8 Wetlands Remaining Wetlands for more information.
- *Settlements*: A land-use category representing developed areas consisting of units equal to or greater than 0.25 acres (0.1 ha) that includes residential, industrial, commercial, and institutional land; construction sites; public administrative sites; railroad yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment plants; water control structures and spillways; parks within urban and built-up areas; and highways, railroads, and other transportation facilities. Also included are all tracts that may meet the definition of Forest Land, and tracts of less than 10 acres (4.05 ha) that may meet the definitions for Cropland, Grassland, or Other Land but are completely surrounded by urban or built-up land, and so are included in the Settlements category. Rural transportation corridors located within other land uses (e.g., Forest Land, Cropland, and Grassland) are also included in Settlements.
- *Other Land*: A land-use category that includes bare soil, rock, ice, and all land areas that do not fall into any of the other five land-use categories. Following the guidance provided by the IPCC (2006), C stock changes and non-CO_2 emissions are not estimated for Other Lands because these areas are largely devoid of biomass, litter and soil C pools. However, C stock changes and non-CO_2 emissions should be estimated

[19] A set-aside is cropland that has been taken out of active cropping and converted to some type of vegetative cover, including, for example, native grasses or trees, but is still classified as cropland based on national circumstances.

[20] Areas with four or more years of continuous hay production are Cropland because the land is typically more intensively managed with cultivation, greater amounts of inputs, and other practices. Occasional harvest of hay from grasslands typically does not involve cultivation or other intensive management practices.

[21] *2006 IPCC Guidelines* do not include provisions to separate desert and tundra as land-use categories.

for *Land Converted to Other Land* during the first 20 years following conversion to account for legacy effects.

Land Use Data Sources: Description and Application to U.S. Land Area Classification

U.S. Land Use Data Sources

The three main sources for land use data in the United States are the NRI, FIA, and the NLCD (Table 6-6). These data sources are combined to account for land use in all 50 states. FIA and NRI data are used when available for an area because these surveys contain additional information on management, site conditions, crop types, biometric measurements, and other data that are needed to estimate C stock changes, N_2O, and CH_4 emissions on those lands. If NRI and FIA data are not available for an area, however, then the NLCD product is used to represent the land use.

Table 6-6: Data Sources Used to Determine Land Use and Land Area for the Conterminous United States, Hawaii, and Alaska

	NRI	FIA	NLCD
Forest Land			
Conterminous United States			
Non-Federal		•	
Federal		•	
Hawaii			
Non-Federal	•		
Federal			•
Alaska			
Non-Federal		•	
Federal		•	
Croplands, Grasslands, Other Lands, Settlements, and Wetlands			
Conterminous United States			
Non-Federal	•		
Federal			•
Hawaii			
Non-Federal	•		
Federal			•
Alaska			
Non-Federal			•
Federal			•

National Resources Inventory

For the Inventory, the NRI is the official source of data for land use and land-use change on non-federal lands in the conterminous United States and Hawaii, and is also used to determine the total land base for the conterminous United States and Hawaii. The NRI is a statistically-based survey conducted by the USDA Natural Resources Conservation Service and is designed to assess soil, water, and related environmental resources on non-federal lands. The NRI has a stratified multi-stage sampling design, where primary sample units are stratified on the basis of county and township boundaries defined by the United States Public Land Survey (Nusser and Goebel 1997). Within a primary sample unit (typically a 160 acre [64.75 ha] square quarter-section), three sample points are selected according to a restricted randomization procedure. Each point in the survey is assigned an area weight (expansion factor) based on other known areas and land use information (Nusser and Goebel 1997). The NRI survey utilizes data obtained from remote sensing imagery and site visits in order to provide detailed information on land use and management, particularly for Croplands and Grasslands (i.e., agricultural lands), and is used as the

basis to account for C stock changes in agricultural lands (except federal grasslands). The NRI survey was conducted every 5 years between 1982 and 1997, but shifted to annualized data collection in 1998. The land use between five-year periods from 1982 and 1997 are assumed to be the same for a five-year time period if the land use is the same at the beginning and end of the five-year period (Note: most of the data has the same land use at the beginning and end of the five-year periods). If the land use had changed during a five-year period, then the change is assigned at random to one of the five years. For crop histories, years with missing data are estimated based on the sequence of crops grown during years preceding and succeeding a missing year in the NRI history. This gap-filling approach allows for development of a full time series of land use data for non-federal lands in the conterminous United States and Hawaii. This Inventory incorporates data through 2017 from the NRI. The land use patterns are assumed to remain the same from 2018 through 2021 for this Inventory, but the time series will be updated when new data are integrated into the land representation analysis.

Forest Inventory and Analysis

The FIA program, conducted by the USFS, is the official source of data on forest land area and management data for the Inventory and is another statistically-based survey for the United States. FIA engages in a hierarchical system of sampling, with sampling categorized as Phases 1 through 3, in which sample points for phases are subsets of the previous phase. Phase 1 refers to collection of remotely-sensed data (either aerial photographs or satellite imagery) primarily to classify land into forest or non-forest and to identify landscape patterns like fragmentation and urbanization. Phase 2 is the collection of field data on a network of ground plots that enable classification and summarization of area, tree, and other attributes associated with forest land uses. Phase 3 plots are a subset of Phase 2 plots where data on indicators of forest health are measured. Data from all three phases are also used to estimate C stock changes for forest land. Historically, FIA inventory surveys have been conducted periodically, with all plots in a state being measured at a frequency of every five to 10 years. A new national plot design and annual sampling design was introduced by the FIA program in 1998 and is now used in all states. Annualized sampling means that a portion of plots throughout each state is sampled each year, with the goal of measuring all plots once every five to seven years in the eastern United States and once every ten years in the western United States. See Annex 3.13 to see the specific survey data available by state. The most recent year of available data varies state by state (range of most recent data is from 2018 through 2021; see Table A-183 in Annex 3.13).

National Land Cover Dataset

As noted above, while the NRI survey sample covers the conterminous United States and Hawaii, land use data are only collected on non-federal lands. Gaps exist in the land representation when the NRI and FIA datasets are combined, such as federal grasslands operated by Bureau of Land Management (BLM), USDA, and National Park Service, as well as Alaska.[22] The NLCD is used to account for land use on federal lands in the conterminous United States and Hawaii, in addition to federal and non-federal lands in Alaska with the exception of forest lands in Alaska.

NLCD products provide land-cover for 1992, 2001, 2004, 2006, 2008, 2011, 2013, 2016, and 2019 in the conterminous United States (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015), and also for Alaska in 2001, 2011, and 2016 and Hawaii in 2001. A NLCD change product is not available for Hawaii because data are only available for one year, i.e., 2001. The NLCD products are based primarily on Landsat Thematic Mapper imagery at a 30-meter resolution, and the land cover categories have been aggregated into the 36 IPCC land-use categories for the conterminous United States and Alaska, and into the six IPCC land-use categories for Hawaii. The land use patterns are assumed to remain the same after the last year of data in the time series, which is 2001 for Hawaii,

[22] The NRI survey program does not include U.S. Territories with the exception of non-federal lands in Puerto Rico. The FIA program recently began implementing surveys of forest land in U.S. Territories and those data will be used in the years ahead. Furthermore, NLCD does not include coverage for all U.S. Territories.

2019 for the conterminous United States and 2016 for Alaska, but the time series will be updated when new data are released.

For the conterminous United States, the aggregated maps of IPCC land-use categories obtained from the NLCD products were used in combination with the NRI database to represent land use and land-use change for federal lands, with the exception of forest lands, which are based on FIA. Specifically, NRI survey locations designated as federal lands were assigned a land use/land-use change category based on the NLCD maps that had been aggregated into the IPCC categories. This analysis addressed shifts in land ownership across years between federal or non-federal classes as represented in the NRI survey (i.e., the ownership is classified for each survey location in the NRI). The sources of these additional data are discussed in subsequent sections of the report.

Managed Land Designation

Lands are designated as managed in the United States based on the definition provided earlier in this section. The following criteria are used in order to apply the definition in an analysis of managed land:

- All croplands and settlements are designated as managed so only grassland, forest land, wetlands or other lands may be designated as unmanaged land;[23]
- All forest lands with active fire protection are considered managed;
- All forest lands designated for timber harvests are considered managed;
- All grasslands are considered managed at a county scale if there are grazing livestock in the county;
- Other areas are considered managed if accessible based on the proximity to roads and other transportation corridors, and/or infrastructure;
- Protected lands maintained for recreational and conservation purposes are considered managed (i.e., managed by public and/or private organizations);
- Lands with active and/or past resource extraction are considered managed; and
- Lands that were previously managed but subsequently classified as unmanaged, remain in the managed land base for 20 years following the conversion to account for legacy effects of management on C stocks.

The analysis of managed lands, based on the criteria listed above, is conducted using a geographic information system (Ogle et al. 2018). Lands that are used for crop production or settlements are determined from the NLCD (Fry et al. 2011; Homer et al. 2007; Homer et al. 2015). Forest lands with active fire management are determined from maps of federal and state management plans from the National Atlas (U.S. Department of Interior 2005) and Alaska Interagency Fire Management Council (1998). It is noteworthy that all forest lands in the conterminous United States have active fire protection, and are therefore designated as managed regardless of accessibility or other criteria. In addition, forest lands with timber harvests are designated as managed based on county-level estimates of timber products in the U.S. Forest Service Timber Products Output Reports (U.S. Department of Agriculture 2012). Timber harvest data lead to additional designation of managed forest land in Alaska. The designation of grasslands as managed is based on grazing livestock population data at the county scale from the USDA National Agricultural Statistics Service (U.S. Department of Agriculture 2015). Accessibility is evaluated based on a 10-km buffer surrounding road and train transportation networks using the ESRI Data and Maps product (ESRI 2008), and a 10-km buffer surrounding settlements using NLCD.

Lands maintained for recreational purposes are determined from analysis of the Protected Areas Database (U.S. Geological Survey 2012). The Protected Areas Database includes lands protected from conversion of natural habitats to anthropogenic uses and describes the protection status of these lands. Lands are considered managed that are protected from development if the regulations allow for extractive or recreational uses or suppression of

[23] All wetlands are considered managed in this Inventory with the exception of remote areas in Alaska. Distinguishing between managed and unmanaged wetlands in the conterminous United States and Hawaii is difficult due to limited data availability. Wetlands are not characterized within the NRI with information regarding water table management. Regardless, a planned improvement is underway to subdivide managed and unmanaged wetlands.

natural disturbance (e.g., forest lands with active fire protection). Lands that are protected from development and not accessible to human intervention, including no suppression of disturbances or extraction of resources, are not included in the managed land base.

Multiple data sources are used to determine lands with active resource extraction: Alaska Oil and Gas Information System (Alaska Oil and Gas Conservation Commission 2009), Alaska Resource Data File (U.S. Geological Survey 2012), Active Mines and Mineral Processing Plants (U.S. Geological Survey 2005), and *Coal Production and Preparation Report* (U.S. Energy Information Administration 2011). A buffer of 3,300 and 4,000 meters is established around petroleum extraction and mine locations, respectively, to account for the footprint of operation and impacts of activities on the surrounding landscape. The buffer size is based on visual analysis of disturbance to the landscape for approximately 130 petroleum extraction sites and 223 mines. After applying the criteria identified above, the resulting managed land area is overlaid on the NLCD to estimate the area of managed land by land use for both federal and non-federal lands in Alaska. The remaining land represents the unmanaged land base. The resulting spatial product is also used to identify NRI survey locations that are considered managed and unmanaged for the conterminous United States and Hawaii.[24]

Approach for Combining Data Sources

The managed land base in the United States has been classified into the 36 IPCC land use/land-use conversion categories (Table 6-5) using definitions developed to meet national circumstances, while adhering to IPCC guidelines (2006).[25] In practice, the land was initially classified into land use subcategories within the NRI, FIA, and NLCD datasets, and then aggregated into the 36 broad land use and land-use change categories identified in IPCC (2006).

All three datasets provide information on forest land areas in the conterminous United States, but the area data from FIA serve as the official dataset for forest land. Therefore, another step in the analysis is to address the inconsistencies in the representation of the forest land among the three databases. NRI and FIA have different criteria for classifying forest land in addition to different sampling designs, leading to discrepancies in the resulting estimates of forest land area on non-federal land in the conterminous United States. Similarly, there are discrepancies between the NLCD and FIA data for defining and classifying forest land on federal lands. Any change in forest land area in the NRI and NLCD also requires a corresponding change in other land use areas because of the dependence between the forest land area and the amount of land designated as other land uses, such as the amount of grassland, cropland, and wetlands (i.e., areas for the individual land uses must sum to the total managed land area of the country).

FIA is the main database for forest statistics, and consequently, the NRI and NLCD are adjusted to achieve consistency with FIA estimates of forest land in the conterminous United States. Adjustments are made in the Forest Land Remaining Forest Land, Land Converted to Forest Land, and Forest Land converted to other uses (i.e., Grassland, Cropland, Settlements, Other Lands, and Wetlands). All adjustments are made at the state scale to address the discrepancies in areas associated with forest land and conversions to and from Forest Land. There are three steps in this process. The first step involves adjustments to Land Converted to Forest Land (Grassland, Cropland, Settlements, Other Lands, and Wetlands), followed by a second step in which there are adjustments in Forest Land converted to another land use (i.e., Grassland, Cropland, Settlements, Other Lands, and Wetlands), and the last step is to adjust Forest Land Remaining Forest Land.

In the first step, Land Converted to Forest Land in the NRI and NLCD are adjusted to match the state-level estimates in the FIA data for non-federal and federal Land Converted to Forest Land, respectively. FIA data have not provided specific land-use categories that are converted to forest land in the past, but rather a sum of all land

[24] The exception is cropland and settlement areas in the NRI, which are classified as managed, regardless of the managed land base obtained from the spatial analysis described in this section.

[25] Definitions are provided in the previous section.

converted to forest land.[26] The NRI and NLCD provide information on specific land-use conversions, such as Grassland Converted to Forest Land. Therefore, adjustments at the state level to NRI and NLCD are made proportional to the amount of specific land-use conversions into forest land for the state, prior to any further adjustments. For example, if 50 percent of the land-use change to forest land is associated with Grassland Converted to Forest Land in a state according to NRI or NLCD, then half of the discrepancy with FIA data in the area of Land Converted to Forest Land is addressed by increasing or decreasing the area in Grassland Converted to Forest Land. Moreover, any increase or decrease in Grassland Converted to Forest Land in NRI or NLCD is addressed by a corresponding change in the area of Grassland Remaining Grassland, so that the total amount of managed area is not changed within an individual state.

In the second step, state-level areas are adjusted in the NRI and NLCD to address discrepancies with FIA data for forest land converted to other uses. Similar to Land Converted to Forest Land, FIA have not provided information on the specific land-use changes in the past,[27] so areas associated with forest land conversion to other land uses in NRI and NLCD are adjusted proportional to the amount of area in each conversion class in these datasets.

In the final step, the area of Forest Land Remaining Forest Land in each state according to the NRI and NLCD is adjusted to match the FIA estimates for non-federal and federal land, respectively. It is assumed that the majority of the discrepancy in Forest Land Remaining Forest Land is associated with less-precise estimates of Grassland Remaining Grassland and Wetlands Remaining Wetlands in the NRI and NLCD. This step also assumes that there are no changes in the land-use conversion categories. Therefore, corresponding adjustments are made in the area estimates of Grassland Remaining Grassland and Wetlands Remaining Wetlands from the NRI and NLCD. This adjustment balances the change in Forest Land Remaining Forest Land area, which ensures no change in the overall amount of managed land within an individual state. The adjustments are based on the proportion of land within each of these land-use categories at the state level according to NRI and NLCD (i.e., a higher proportion of Grassland led to a larger adjustment in Grassland area).

The modified NRI data are then aggregated to provide the land use and land-use change data for non-federal lands in the conterminous United States, and the modified NLCD data are aggregated to provide the land use and land-use change data for federal lands. Data for all land uses in Hawaii are based on NRI for non-federal lands and on NLCD for federal lands. Land use data in Alaska are based on the NLCD data after adjusting this dataset to be consistent with forest land areas in the FIA (Table 6-6). The result is land use and land-use change data for the conterminous United States, Hawaii, and Alaska.

A summary of the details on the approach used to combine data sources for each land use are described below.

- *Forest Land*: Land representation for both non-federal and federal forest lands in the conterminous United States and Alaska are based on the FIA. FIA is used as the basis for both forest land area data as well as to estimate C stocks and fluxes on forest land in the conterminous United States and Alaska. FIA does have survey plots in Alaska that are used to determine the C stock changes, and the associated area data for this region are harmonized with NLCD using the methods described above. NRI is used in the current report to provide forest land areas on non-federal lands in Hawaii, and NLCD is used for federal lands. FIA data is being collected in Hawaii and U.S. Territories, however there is insufficient data to make population estimates for this Inventory.
- *Cropland*: Cropland is classified using the NRI, which covers all non-federal lands within 49 states (excluding Alaska), including state and local government-owned land as well as tribal lands. NRI is used as the basis for both cropland area data as well as to estimate soil C stocks and fluxes on cropland. NLCD is used to determine cropland area and soil C stock changes on federal lands in the conterminous United

[26] The FIA program has started to collect data on the specific land uses that are converted to Forest Land, which will be further investigated and incorporated into a future Inventory.

[27] The FIA program has started to collect data on specific land uses following conversion from Forest Land, which will be further investigated and incorporated into a future Inventory.

States and Hawaii. NLCD is also used to determine croplands in Alaska, but C stock changes are not estimated for this region in the current Inventory.

- *Grassland*: Grassland on non-federal lands is classified using the NRI within 49 states (excluding Alaska), including state and local government-owned land as well as tribal lands. NRI is used as the basis for both grassland area data as well as to estimate soil C stocks and non-CO_2 greenhouse emissions on grassland. Grassland area and soil C stock changes are determined using the classification provided in the NLCD for federal land within the conterminous United States. NLCD is also used to estimate the areas of federal and non-federal grasslands in Alaska, and the federal grasslands in Hawaii, but the current Inventory does not include C stock changes in these areas.
- *Wetlands*: NRI captures wetlands on non-federal lands within 49 states (excluding Alaska), while the land representation data for federal wetlands and wetlands in Alaska are based on the NLCD.[28]
- *Settlements*: NRI captures non-federal settlement area in 49 states (excluding Alaska). If areas of forest land or grassland under 10 acres (4.05 ha) are contained within settlements or urban areas, they are classified as settlements (urban) in the NRI database. If these parcels exceed the 10-acre (4.05 ha) threshold and are grassland, they are classified as grassland by NRI. Regardless of size, a forested area is classified as non-forest by FIA if it is located within an urban area. Land representation for settlements on federal lands and Alaska is based on the NLCD.
- *Other Land*: Any land that is not classified into one of the previous five land-use categories is categorized as other land using the NRI for non-federal areas in the conterminous United States and Hawaii and using the NLCD for the federal lands in all regions of the United States and for non-federal lands in Alaska.

Some lands can be classified into one or more categories due to multiple uses that meet the criteria of more than one definition. However, a ranking has been developed for assignment priority in these cases. The ranking process is from highest to lowest priority based on the following order:

Settlements > Cropland > Forest Land > Grassland > Wetlands > Other Land

Settlements are given the highest assignment priority because they are extremely heterogeneous with a mosaic of patches that include buildings, infrastructure, and travel corridors, but also open grass areas, forest patches, riparian areas, and gardens. The latter examples could be classified as grassland, forest land, wetlands, and cropland, respectively, but when located in close proximity to settlement areas, they tend to be managed in a unique manner compared to non-settlement areas. Consequently, these areas are assigned to the Settlements land-use category. Cropland is given the second assignment priority, because cropping practices tend to dominate management activities on areas used to produce food, forage, or fiber. The consequence of this ranking is that crops in rotation with pasture are classified as cropland, and land with woody plant cover that is used to produce crops (e.g., orchards) is classified as cropland, even though these areas may also meet the definitions of grassland or forest land, respectively. Similarly, wetlands are considered croplands if they are used for crop production, such as rice or cranberries. Forest land occurs next in the priority assignment because traditional forestry practices tend to be the focus of the management activity in areas with woody plant cover that are not croplands (e.g., orchards) or settlements (e.g., housing subdivisions with significant tree cover). Grassland occurs next in the ranking, while wetlands and then other land complete the list.

The assignment priority does not reflect the level of importance for reporting greenhouse gas emissions and removals on managed land, but is intended to classify all areas into a discrete land-use category. Currently, the IPCC does not make provisions in the guidelines for assigning land to multiple uses. For example, a wetland is classified as forest land if the area has sufficient tree cover to meet the stocking and stand size requirements.

[28] This analysis does not distinguish between managed and unmanaged wetlands except for remote areas in Alaska, but there is a planned improvement to subdivide managed and unmanaged wetlands for the entire land base.

Similarly, wetlands are classified as cropland if they are used for crop production, such as rice, or as grassland if they are composed principally of grasses, grass-like plants (i.e., sedges and rushes), forbs, or shrubs suitable for grazing and browsing. Regardless of the classification, emissions and removals from these areas should be included in the Inventory if the land is considered managed, and therefore impacted by anthropogenic activity in accordance with the guidance provided by the IPCC (2006).

QA/QC and Verification

The land base obtained from the NRI, FIA, and NLCD was compared to the Topologically Integrated Geographic Encoding and Referencing (TIGER) survey (U.S. Census Bureau 2010). The United States Census Bureau gathers data on the population and economy and has a database of land areas for the country. The area estimates of land-use categories, based on NRI, FIA, and NLCD, are obtained from remote sensing data instead of the land survey approach used by the United States Census Survey. The Census does not provide a time series of land-use change data or land management information, which is needed for estimating greenhouse gas emissions from land use and land-use change. Regardless, the Census does provide sufficient information to provide a quality assurance check on the Inventory data. There are 46 million more hectares of land in the United States according to the Census, compared to the total area estimate of 936 million hectares obtained from the combined NRI, FIA, and NLCD data. Much of this difference is associated with open waters in coastal regions and the Great Lakes, which is included in the TIGER Survey of the Census, but not included in the land representation using the NRI, FIA and NLCD. There is only a 0.4 percent difference when open water in coastal regions is removed from the TIGER data. General QC procedures for data gathering and data documentation also were applied consistent with the QA/QC and Verification Procedures described in Annex 8.

Recalculations Discussion

Major updates were made in this Inventory associated with the release of new land use and land cover data. The land representation data were recalculated from the previous Inventory with the following datasets: a) updated FIA data from 1990 to 2021 for the conterminous United States and Alaska, b) updated NRI data from 1990 to 2017 for the conterminous United States and Hawaii, and c) updated NLCD data for the conterminous United States from 2001 through 2019 and Alaska from 2001 through 2016. With these recalculations, managed forest land essentially remained the same as the previous Inventory across the time series from 1990 to 2021 according to the new FIA data. According to the new NRI and NLCD data, as well as harmonization of these data with the new FIA data (See section "Approach for Combining Data Sources"), grassland and settlements remained essentially unchanged from the previous Inventory and cropland, wetlands, and other land decreased by an average of 0.1 percent, 0.9 percent, and 5.8 percent, respectively.

Planned Improvements

Research is underway to harmonize NRI and FIA sampling frames to improve consistency and facilitate estimation using multi-frame sampling. This includes development of a common land use classification schema between the two land inventories that can be used in the harmonization process. These steps will allow for population estimation exclusive of auxiliary information (e.g., NLCD). The multi-frame sample will also serve as reference data for the development of spatially explicit and spatially continuous map products for each year in the Inventory time series. Another key planned improvement for the Inventory is to fully incorporate area data by land use type for U.S. Territories. Fortunately, most of the managed land in the United States is included in the current land use data, but a complete reporting of all lands in the United States is a key goal for the near future. Preliminary land use area data for U.S. Territories by land-use category are provided in Box 6-2.

Box 6-2: Preliminary Estimates of Land Use in U.S. Territories

Several programs have developed land cover maps for U.S. Territories using remote sensing imagery, including the Gap Analysis Program, Caribbean Land Cover project, National Land Cover Dataset (NLCD), USFS Pacific

Islands Imagery Project, and the National Oceanic and Atmospheric Administration (NOAA) Coastal Change Analysis Program (C-CAP). Land-cover data can be used to inform a land use classification if there is a time series to evaluate the dominate practices. For example, land that is principally used for timber production with tree cover over most of the time series is classified as forest land even if there are a few years of grass dominance following timber harvest. These products were reviewed and evaluated for use in the national Inventory as a step towards implementing a planned improvement to include U.S. Territories in the land representation for the Inventory. Recommendations are to use the NOAA C-CAP Regional Land Cover Database for the smaller island Territories (U.S. Virgin Islands, Guam, Northern Marianas Islands, and American Samoa) because this program is ongoing and therefore will be continually updated. The C-CAP product does not cover the entire territory of Puerto Rico, so the NLCD was used for this area. The final selection of land-cover products for these territories is still under discussion. Results are presented below (in hectares). The total land area of all U.S. Territories is 1.05 million hectares, representing 0.1 percent of the total land base for the United States (see Table 6-7).

Table 6-7: Total Land Area (Hectares) by Land Use Category for U.S. Territories

	Puerto Rico	U.S. Virgin Islands	Guam	Northern Marianas Islands	American Samoa	Total
Cropland	19,712	138	236	289	389	20,764
Forest Land	404,004	13,107	24,650	25,761	15,440	482,962
Grasslands	299,714	12,148	15,449	13,636	1,830	342,777
Other Land	5,502	1,006	1,141	5,186	298	13,133
Settlements	130,330	7,650	11,146	3,637	1,734	154,496
Wetlands	24,525	4,748	1,633	260	87	31,252
Total	**883,788**	**38,796**	**54,255**	**48,769**	**19,777**	**1,045,385**

Note: Totals may not sum due to independent rounding.

Methods in the *2013 Supplement to the 2006 Guidelines for National Greenhouse Gas Inventories: Wetlands* (IPCC 2014) have been applied to estimate emissions and removals from coastal wetlands. Specifically, greenhouse gas emissions from coastal wetlands have been developed for the Inventory using the NOAA C-CAP land cover product. The NOAA C-CAP product is not used directly in the land representation analysis, however, so a planned improvement for future Inventories is to reconcile the coastal wetlands data from the C-CAP product with the wetlands area data provided in the NRI, FIA and NLCD. Estimates from flooded lands are also included in this Inventory, but data are not directly used in the land representation analysis at this time; this is a planned improvement to includes for future inventories. In addition, the current Inventory does not include a classification of managed and unmanaged wetlands, except for remote areas in Alaska. Consequently, there is a planned improvement to classify managed and unmanaged wetlands for the conterminous United States and Hawaii, and more detailed wetlands datasets will be evaluated and integrated into the analysis to meet this objective.

6.2 Forest Land Remaining Forest Land (CRF Category 4A1)

Changes in Forest Carbon Stocks (CRF Category 4A1)

Delineation of Carbon Pools

For estimating carbon (C) stocks or stock change (flux), C in forest ecosystems can be divided into the following five storage pools (IPCC 2006):

- Aboveground biomass, which includes all living biomass above the soil including stem, stump, branches, bark, seeds, and foliage. This category includes live understory.
- Belowground biomass, which includes all living biomass of coarse living roots greater than 2 millimeters (mm) diameter.
- Dead wood, which includes all non-living woody biomass either standing, lying on the ground (but not including litter), or in the soil.
- Litter, which includes all duff, humus, and fine woody debris above the mineral soil as well as woody fragments with diameters of up to 7.5 cm.
- Soil organic C (SOC), including all organic material in soil to a depth of 1 meter but excluding the coarse roots of the belowground pools.

In addition, there are two harvested wood pools included when estimating C flux:

- Harvested wood products (HWP) in use.
- HWP in solid waste disposal sites (SWDS).

Forest Carbon Cycle

Carbon is continuously cycled among the previously defined C storage pools and the atmosphere as a result of biogeochemical processes in forests (e.g., photosynthesis, respiration, decomposition, and disturbances such as fires or pest outbreaks) and anthropogenic activities (e.g., harvesting, thinning, and replanting). As trees photosynthesize and grow, C is removed from the atmosphere and stored in living tree biomass. As trees die and otherwise deposit litter and debris on the forest floor, C is released to the atmosphere and is also transferred to the litter, dead wood, and soil pools by organisms that facilitate decomposition.

The net change in forest C is not equivalent to the net flux between forests and the atmosphere because timber harvests do not cause an immediate flux of all harvested biomass C to the atmosphere. Instead, harvesting transfers a portion of the C stored in wood to a "product pool." Once in a product pool, the C is emitted over time as CO_2 in the case of decomposition and as CO_2, CH_4, N_2O, CO, and NO_x when the wood product combusts. The rate of emission varies considerably among different product pools. For example, if timber is harvested to produce energy, combustion releases C immediately, and these emissions are reported for information purposes in the Energy sector while the harvest (i.e., the associated reduction in forest C stocks) and subsequent combustion are implicitly estimated in the Land Use, Land-Use Change, and Forestry (LULUCF) sector (i.e., the portion of harvested timber combusted to produce energy does not enter the HWP pools). Conversely, if timber is harvested and used as lumber in a house, it may be many decades or even centuries before the lumber decays and C is released to the atmosphere. If wood products are disposed of in SWDS, the C contained in the wood may be released many years

or decades later or may be stored almost permanently in the SWDS. These latter fluxes, with the exception of CH_4 from wood in SWDS, which is included in the Waste sector, are also estimated in the LULUCF sector.

Net Change in Carbon Stocks within Forest Land of the United States

This section describes the general method for quantifying the net changes in C stocks in the five C storage pools and two harvested wood pools (a more detailed description of the methods and data is provided in Annex 3.13). The underlying methodology for determining C stock and stock change relies on data from the national forest inventory (NFI) conducted by the Forest Inventory and Analysis (FIA) program within the USDA Forest Service. The annual NFI is implemented across all U.S. Forest lands within the conterminous 48 states and Alaska and inventories have been initiated in Hawaii and some of the U.S. Territories. The methods for estimation and monitoring are continuously improved and these improvements are reflected in the C estimates (Domke et al. 2022). First, the total C stocks are estimated for each C storage pool at the individual NFI plot, next the annual net changes in C stocks for each pool at the population are estimated, and then the changes in stocks are summed for all pools to estimate total net flux at the population level (e.g., U.S. state). Changes in C stocks from disturbances, such natural disturbances (e.g., wildfires, insects/disease, wind) or harvesting, are included in the net changes (See Box 6-3 for more information). For instance, an inventory conducted after a fire implicitly includes only the C stocks remaining on the NFI plot. The IPCC (2006) recommends estimating changes in C stocks from forest lands according to several land-use types and conversions, specifically Forest Land Remaining Forest Land and Land Converted to Forest Land, with the former being lands that have been forest lands for 20 years or longer and the latter being lands (i.e., croplands, grassland, wetlands, settlements and other lands) that have been converted to forest lands for less than 20 years. The methods and data used to delineate forest C stock changes by these two categories continue to improve and in order to facilitate this delineation, a combination of modeling approaches for C estimation were used in this Inventory.

Forest Area in the United States

Approximately 32 percent of the U.S. land area is estimated to be forested based on the U.S. definition of forest land as provided in Section 6.1 Representation of the U.S. Land Base. All annual NFI plots included in the public FIA database as of August 2022 (which includes data collected through 2021 – note that the ongoing COVID 19 pandemic has resulted in delays in data collection in many states) were used in this Inventory. The NFIs from the conterminous United States (USDA Forest Service 2022a, 2022b) and Alaska comprise an estimated 280 million hectares of forest land that are considered managed and are included in the current Inventory. Some differences also exist in forest land area estimates from the latest update to the Resources Planning Act (RPA) Assessment (Oswalt et al. 2019) and the forest land area estimates included in this report, which are based on the annual NFI data through 2021 for all states (USDA Forest Service 2022b; Nelson et al. 2020). Sufficient annual NFI data are not yet available for Hawaii and the U.S. Territories to include them in this section of the Inventory but estimates of these areas are included in Oswalt et al. (2019). While Hawaii and U.S. Territories have relatively small areas of forest land and thus may not substantially influence the overall C budget for forest land, these regions will be added to the forest C estimates as sufficient data become available. Since Hawaii was not included in this section of the current Inventory, this results in small differences in the area estimates reported in this section and those reported in Section 6.1 Representation of the U.S. Land Base. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1).[29] Agroforestry systems that meet the definition of forest land are also not currently included in the current Inventory since they are not explicitly

[29] See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land.

inventoried (i.e., classified as an agroforestry system) by either the FIA program or the Natural Resources Inventory (NRI)[30] of the USDA Natural Resources Conservation Service (Perry et al. 2005).

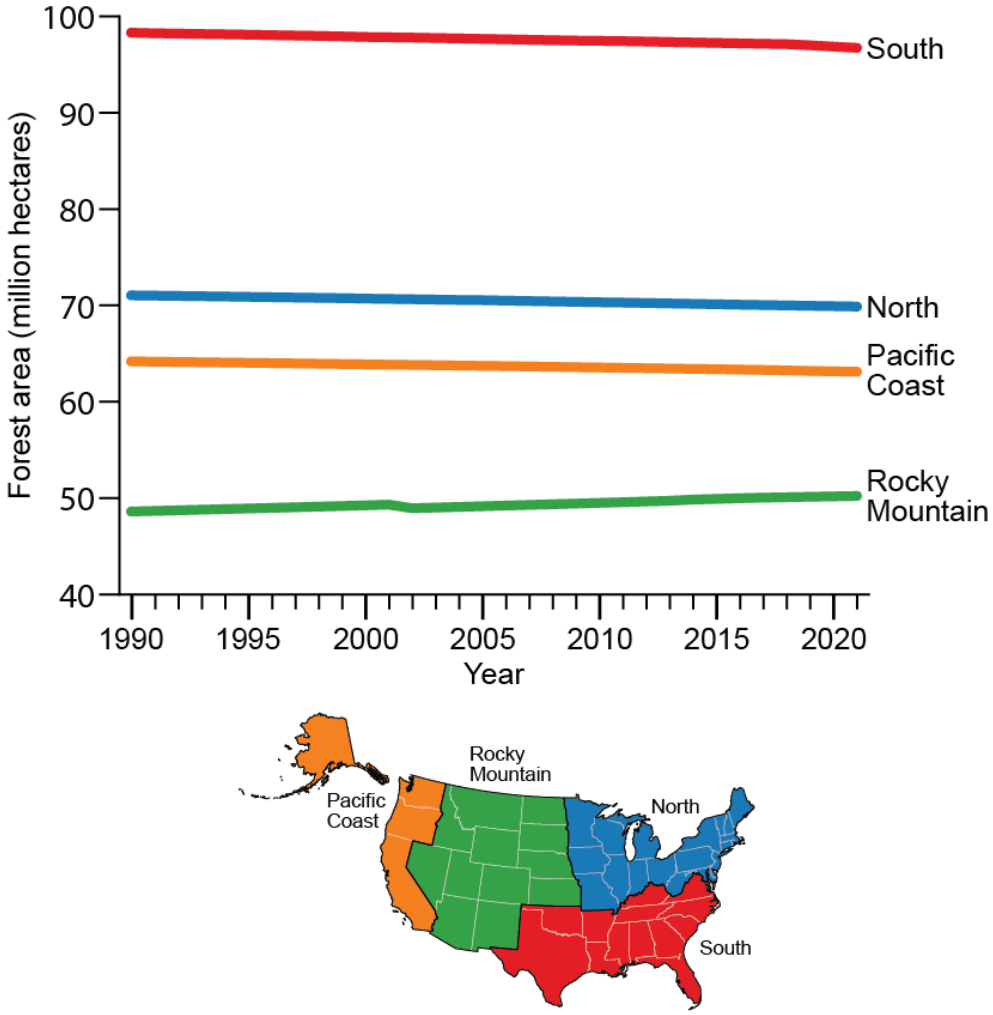
An estimated 67 percent (208 million hectares) of U.S. forests in Alaska, Hawaii and the conterminous United States are classified as timberland, meaning they meet minimum levels of productivity and have not been removed from production. Approximately ten percent of Alaska forest land and 73 percent of forest land in the conterminous United States are classified as timberland. Of the remaining non-timberland, nearly 33 million hectares are reserved forest lands (withdrawn by law from management for production of wood products) and 102 million hectares are lower productivity forest lands (Oswalt et al. 2019). Historically, the timberlands in the conterminous 48 states have been more frequently or intensively surveyed than the forest lands removed from production because they do not meet the minimum level of productivity.

Since the late 1980s, gross forest land area in Alaska, Hawaii, and the conterminous United States has increased by about 13 million hectares (Oswalt et al. 2019). The southern region of the United States contains the most forest land (Figure 6-4). A substantial portion of this accrued forest land is from the conversion of abandoned croplands to forest (e.g., Woodall et al. 2015b). Estimated forest land area in the conterminous United States and Alaska represented in this Inventory is stable, but there are substantial conversions as described in Section 6.1 Representation of the U.S. Land Base and each of the land conversion sections for each land-use category (e.g., Land Converted to Cropland, Land Converted to Grassland). The major influences on the net C flux from forest land across the 1990 to 2021 time series are management activities, natural disturbance, particularly wildfire, and the ongoing impacts of current and previous land-use conversions. These activities affect the net flux of C by altering the amount of C stored in forest ecosystems and also the area converted to forest land. For example, intensified management of forests that leads to an increased rate of growth of aboveground biomass (and possible changes to the other C storage pools) may increase the eventual biomass density of the forest, thereby increasing the uptake and storage of C in the aboveground biomass pool.[31] Though harvesting forests removes much of the C in aboveground biomass (and possibly changes C density in other pools), on average, the estimated volume of annual net growth in aboveground tree biomass in the conterminous United States is essentially twice the volume of annual removals on timberlands (Oswalt et al. 2019). The net effects of forest management and changes in Forest Land Remaining Forest Land are captured in the estimates of C stocks and fluxes presented in this section.

[30] The Natural Resources Inventory of the USDA Natural Resources Conservation Service is described in Section 6.1 Representation of the U.S. Land Base.

[31] The term “biomass density” refers to the mass of live vegetation per unit area. It is usually measured on a dry-weight basis. A carbon fraction of 0.5 is used to convert dry biomass to C (USDA Forest Service 2022d).

Figure 6-4: Changes in Forest Area by Region for Forest Land Remaining Forest Land in the conterminous United States and Alaska (1990-2021)



Forest Carbon Stocks and Stock Change

In the Forest Land Remaining Forest Land category, forest management practices, the regeneration of forest areas cleared more than 20 years prior to the reporting year, and timber harvesting have resulted in net removal (i.e., net sequestration or accumulation) of C each year from 1990 through 2021. The rate of forest clearing in the 17th century following European settlement had slowed by the late 19th century. Through the later part of the 20th century, many areas of previously forested land in the United States were allowed to revert to forests or were actively reforested. The impacts of these land-use changes still influence C fluxes from these forest lands. More recently, the 1970s and 1980s saw a resurgence of federally sponsored forest management programs (e.g., the Forestry Incentive Program) and soil conservation programs (e.g., the Conservation Reserve Program), which have focused on tree planting, improving timber management activities, combating soil erosion, and converting marginal cropland to forests. In addition to forest regeneration and management, forest harvests and natural disturbance have also affected net C fluxes. Because most of the timber harvested from U.S. forest land is used in wood products, and many discarded wood products are disposed of in SWDS rather than by incineration, significant quantities of C in harvested wood are transferred to these long-term storage pools rather than being released rapidly to the atmosphere (Skog 2008). By maintaining current harvesting practices and regeneration activities on forested lands, along with continued input of harvested products into the HWP pool, C stocks in the

Forest Land Remaining Forest Land category are likely to continue to increase in the near term, though possibly at a lower rate. Changes in C stocks in the forest ecosystem and harvested wood pools associated with Forest Land Remaining Forest Land were estimated to result in net removal of 695.4 MMT CO_2 Eq. (189.6 MMT C) in 2021 (Table 6-8, Table 6-9, Table A-192, Table A-193 and state-level estimates in Table A-196). The estimated net uptake of C in the Forest Ecosystem was 592.5 MMT CO_2 Eq. (161.6 MMT C) in 2021 (Table 6-8 and Table 6-9). The majority of this uptake in 2021, 409.1 MMT CO_2 Eq. (111.6 MMT C), was from aboveground biomass. Overall, estimates of average C density in forest ecosystems (including all pools) increased consistently over the time series with an average of approximately 192 MT C ha^{-1} from 1990 to 2021. This was calculated by dividing the Forest Land area estimates by Forest Ecosystem C Stock estimates for every year (see Table 6-10 and Table A-194) and then calculating the mean across the entire time series, i.e., 1990 through 2021. The increasing forest ecosystem C density, when combined with relatively stable forest area, results in net C accumulation over time. Aboveground live biomass is responsible for the majority of net C uptake among all forest ecosystem pools (Figure 6-5). These increases may be influenced in some regions by reductions in C density or forest land area due to natural disturbances (e.g., wildfire, weather, insects/disease), particularly in Alaska. The inclusion of all managed forest land in Alaska has increased the interannual variability in carbon stock change estimates over the time series, and much of this variability can be attributed to severe fire years (e.g., 2019). The distribution of carbon in forest ecosystems in Alaska is substantially different from forests in the conterminous United States. In Alaska, more than 11 percent of forest ecosystem C is stored in the litter carbon pool whereas in the conterminous United States, only 7 percent of the total ecosystem C stocks are in the litter pool. Much of the litter material in forest ecosystems is combusted during fire (IPCC 2006) leading to substantial C losses in this pool during severe fire years (Figure 6-5, Table A-194).

The estimated net uptake of C in HWP was 102.8 MMT CO_2 Eq. (28.0 MMT C) in 2021 (Table 6-8, Table 6-9, Table A-192, and Table A-193). The majority of this uptake, 65.1 MMT CO_2 Eq. (17.7 MMT C), was from wood and paper in SWDS. Products in use accounted for an estimated 37.8 MMT CO_2 Eq. (10.3 MMT C) in 2021.

Table 6-8: Net CO_2 Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT CO_2 Eq.)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Forest Ecosystem	**(697.7)**	**(608.2)**	**(610.4)**	**(610.5)**	**(559.8)**	**(610.8)**	**(592.5)**
Aboveground Biomass	(499.1)	(443.8)	(425.9)	(428.0)	(410.8)	(419.0)	(409.1)
Belowground Biomass	(101.8)	(89.8)	(84.5)	(85.1)	(81.6)	(83.1)	(81.1)
Dead Wood	(100.8)	(97.9)	(100.0)	(102.7)	(98.2)	(102.3)	(101.1)
Litter	0.9	22.5	(2.0)	1.6	30.4	(1.9)	1.9
Soil (Mineral)	3.2	0.5	(0.1)	0.6	0.7	(5.4)	(4.0)
Soil (Organic)	(0.8)	(0.4)	1.4	2.3	(1.1)	0.1	0.1
Drained Organic Soil[a]	0.8	0.8	0.8	0.8	0.8	0.8	0.8
Harvested Wood	**(123.8)**	**(106.0)**	**(100.3)**	**(94.0)**	**(89.6)**	**(96.6)**	**(102.8)**
Products in Use	(54.8)	(42.6)	(34.9)	(28.9)	(25.1)	(32.0)	(37.8)
SWDS	(69.0)	(63.4)	(65.3)	(65.1)	(64.5)	(64.6)	(65.1)
Total Net Flux	**(821.4)**	**(714.2)**	**(710.7)**	**(704.4)**	**(649.3)**	**(707.4)**	**(695.4)**

[a] These estimates include C stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land. See the section below on CO_2, CH_4, and N_2O Emissions from Drained Organic Soils for the methodology used to estimate the CO_2 emissions from drained organic soils. Also, Table 6-20 and 6-21 for non-CO_2 emissions from drainage of organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land.

Notes: Forest ecosystem C stock changes do not include forest stocks in U.S. Territories because managed

forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in Section 6.1 Representation of the U.S. Land Base, so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stock changes do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Parentheses indicate net C uptake (i.e., a net removal of C from the atmosphere). Total net flux is an estimate of the actual net flux between the total forest C pool and the atmosphere. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding.

Table 6-9: Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Forest Ecosystem	**(190.3)**	**(165.9)**	**(166.5)**	**(166.5)**	**(152.7)**	**(166.6)**	**(161.6)**
Aboveground Biomass	(136.1)	(121.0)	(116.1)	(116.7)	(112.0)	(114.3)	(111.6)
Belowground Biomass	(27.8)	(24.5)	(23.0)	(23.2)	(22.3)	(22.7)	(22.1)
Dead Wood	(27.5)	(26.7)	(27.3)	(28.0)	(26.8)	(27.9)	(27.6)
Litter	0.2	6.1	(0.6)	0.4	8.3	(0.5)	0.5
Soil (Mineral)	0.9	0.1	(0.0)	0.2	0.2	(1.5)	(1.1)
Soil (Organic)	(0.2)	(0.1)	0.4	0.6	(0.3)	0.0	0.0
Drained Organic Soil[a]	0.21	0.2	0.2	0.2	0.2	0.2	0.2
Harvested Wood	**(33.8)**	**(28.9)**	**(27.3)**	**(25.6)**	**(24.4)**	**(26.3)**	**(28.0)**
Products in Use	(14.9)	(11.6)	(9.5)	(7.9)	(6.8)	(8.7)	(10.3)
SWDS	(18.8)	(17.3)	(17.8)	(17.8)	(17.6)	(17.6)	(17.7)
Total Net Flux	**(224.0)**	**(194.8)**	**(193.8)**	**(192.1)**	**(177.1)**	**(192.9)**	**(189.6)**

[a] These estimates include carbon stock changes from drained organic soils from both Forest Land Remaining Forest Land and Land Converted to Forest Land. See the section below on CO_2, CH_4, and N_2O Emissions from Drained Organic Soils for the methodology used to estimate the C flux from drained organic soils. Also, see Table 6-20 and 6-21 for greenhouse gas emissions from non-CO_2 gases changes from drainage of organic soils from Forest Land Remaining Forest Land and Land Converted to Forest Land.

Notes: Forest ecosystem C stock changes do not include forest stocks in U.S. Territories because managed forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in 6.1 Representation of the U.S. Land Base so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stock changes do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Parentheses indicate net C uptake (i.e., a net removal of C from the atmosphere). Total net flux is an estimate of the actual net flux between the total forest C pool and the atmosphere. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding.

Stock estimates for forest ecosystem and harvested wood C storage pools are presented in Table 6-10. Together, the estimated aboveground biomass and soil C pools account for a large proportion of total forest ecosystem C stocks. Forest land area estimates are also provided in Table 6-10, but these do not precisely match those in Section 6.1 Representation of the U.S. Land Base for Forest Land Remaining Forest Land. This is because the forest land area estimates in Table 6-10 only include managed forest land in the conterminous U.S. and Alaska while the area estimates in Section 6.1 also include all managed forest land in Hawaii. Differences also exist because forest land area estimates are based on the latest NFI data through 2021, and woodland areas previously included as forest land have been separated and included in the Grassland categories in this Inventory.[32]

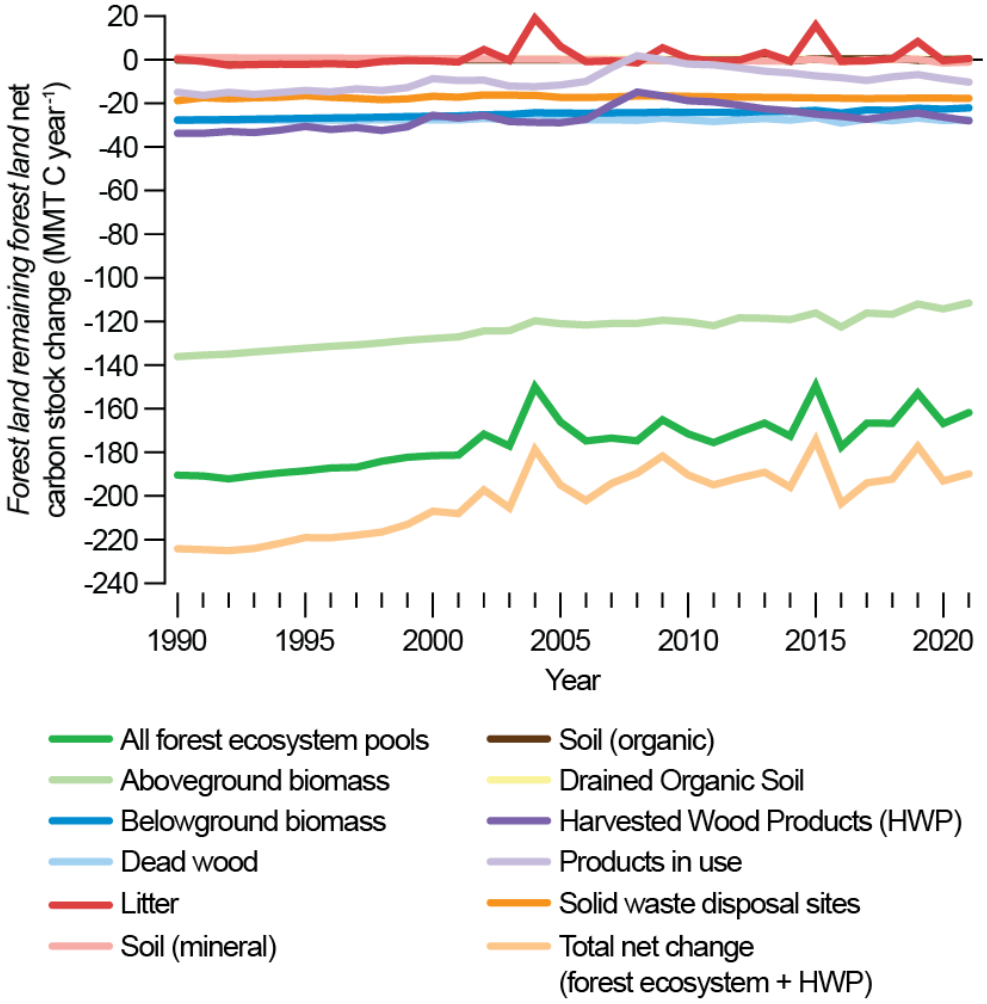
Table 6-10: Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

	1990	2005	2018	2019	2020	2021	2022
Forest Area (1,000 ha)	***282,150***	***281,096***	***280,467***	***280,299***	***280,120***	***279,962***	***279,800***
Carbon Pools (MMT C)							
Forest Ecosystem	**51,354**	**54,098**	**56,303**	**56,470**	**56,623**	**56,790**	**56,951**
Aboveground Biomass	11,899	13,849	15,406	15,523	15,635	15,749	15,861
Belowground Biomass	2,344	2,740	3,052	3,076	3,098	3,121	3,143
Dead Wood	1,948	2,359	2,717	2,745	2,771	2,799	2,827
Litter	3,929	3,922	3,896	3,896	3,888	3,888	3,888
Soil (Mineral)	25,920	25,911	25,914	25,914	25,914	25,915	25,916
Soil (Organic)	5,315	5,318	5,318	5,317	5,317	5,317	5,317
Harvested Wood	**1,895**	**2,353**	**2,645**	**2,671**	**2,695**	**2,721**	**2,749**
Products in Use	1,249	1,447	1,516	1,523	1,530	1,539	1,549
SWDS	646	906	1,129	1,147	1,165	1,182	1,200
Total C Stock	**53,249**	**56,451**	**58,948**	**59,141**	**59,318**	**59,511**	**59,701**

Notes: Forest area and C stock estimates include all Forest Land Remaining Forest Land in the conterminous 48 states and Alaska. Forest ecosystem C stocks do not include forest stocks in U.S. Territories because managed forest land for U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stocks do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. However, managed forest land area for Hawaii is included in Section 6.1 Representation of the U.S. Land Base so there are small differences in the forest land area estimates in this Section and Section 6.1. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land. The forest ecosystem C stocks do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). Forest ecosystem C stocks on managed forest land in Alaska were compiled using the gain-loss method as described in Annex 3.13. Harvested wood product stocks include exports, even if the logs are processed in other countries, and exclude imports. Harvested wood estimates are based on results from annual surveys and models. Totals may not sum due to independent rounding. Population estimates compiled using FIA data are assumed to represent stocks as of January 1 of the inventory year. Flux is the net annual change in stock. Thus, an estimate of flux for 2021 requires estimates of C stocks for 2021 and 2022.

[32] See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.2 Forest Land Remaining Forest Land.

Figure 6-5: Estimated Net Annual Changes in C Stocks for All C Pools in Forest Land Remaining Forest Land in the Conterminous United States and Alaska (1990-2021)



Box 6-3: CO_2 Emissions from Forest Fires

As stated previously, the forest inventory approach implicitly includes all C losses due to disturbances such as forest fires, because only C remaining in the forest is estimated. Net C stock change is estimated by subtracting consecutive C stock estimates. A forest fire disturbance removes C from the forest. The inventory data from the NFI on which net C stock estimates are based already reflect this C loss. Therefore, estimates of net annual changes in C stocks for U.S. forest land already includes CO_2 emissions from forest fires occurring in the conterminous states as well as the portion of managed forest lands in Alaska. Because it is of interest to quantify the magnitude of CO_2 emissions from fire disturbance, these separate estimates are highlighted here. Note that these CO_2 estimates are based on the same methodology as applied for the non-CO_2 greenhouse gas emissions from forest fires that are also quantified in a separate section below as required by IPCC Guidance and UNFCCC reporting requirements.

Emissions estimates are developed using IPCC (2006) methodology and based on U.S.-specific data and models to quantify the primary fire-specific components: area burned; availability and combustibility of fuel; fire severity (or consumption); and CO_2 and non-CO_2 emissions. Estimated CO_2 emissions for fires on forest lands in the conterminous U.S. and in Alaska for 2021 are 203 MMT CO_2 per year (Table 6-11). This estimate is an

embedded component of the net annual forest C stock change estimates provided previously (i.e., Table 6-9), but this separate approach to estimating CO_2 emissions is necessary in order to associate these emissions with fire. See the discussion in Annex 3.13 for more details on this methodology. Note that in Alaska, a portion of the forest lands are considered unmanaged, therefore the estimates for Alaska provided in Table 6-11 include only managed forest land within the state, which is consistent with C stock change estimates provided above.

Table 6-11: Estimates of CO_2 (MMT per Year) Emissions[a] from Forest Fires in the Conterminous 48 States and Alaska

Year	CO_2 emitted from fires on forest land in the Conterminous 48 States (MMT yr^{-1})	CO_2 emitted from fires on forest land in Alaska (MM Tyr^{-1})	Total CO_2 emitted (MMTyr^{-1})
1990	13.6	38.6	**52.2**
2005	31.1	137.4	**168.4**
2017	119.0	4.5	**123.5**
2018	87.4	7.6	**95.0**
2019	22.3	77.9	**100.2**
2020	181.2	1.6	**182.8**
2021	196.6	5.9	**202.6**

[a] These emissions have already been included in the estimates of net annual changes in C stocks, which include the amount sequestered minus any emissions, including the assumption that combusted wood may continue to decay through time.
Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The methodology described herein is consistent with the 2006 IPCC Guidelines. Forest ecosystem C stocks and net annual C stock change were determined according to the stock-difference method for the conterminous United States, which involved applying C estimation factors to annual forest inventories across time to obtain C stocks and then subtracting between the years to obtain the stock change. The gain-loss method was used to estimate C stocks and net annual C stock changes in Alaska. The approaches for estimating carbon stocks and stock changes on Forest Land Remaining Forest Land are described in Annex 3.13. All annual NFI plots available in the public FIA database (USDA Forest Service 2022b) were used in the current Inventory. Additionally, NFI plots established and measured in 2014 as part of a pilot inventory in interior Alaska were also included in this Inventory as were plots established and measured since 2015 as part of the operational NFI in interior Alaska. Some of the data from the pilot and operational NFI in interior Alaska are not yet available in the public FIA database. Only plots which meet the definition of forest land (see Section 6.1 Representation of the U.S. Land Base) are measured in the NFI; as part of the pre-field process in the FIA program, all plots or portions of plots (i.e., conditions) are classified into a land-use category. This land use information on each forest and non-forest plot was used to estimate forest land area and land converted to and from forest land over the time series. The estimates in this section of the report are based on land use information from the NFI and they may differ from the other land-use categories where area estimates reported in the Land Representation were not updated (see Section 6.1 Representation of the U.S. Land Base). Further, Hawaii was not included in this section of the current Inventory, which also contributes to small differences in the area estimates reported in this section and those reported in Section 6.1 Representation of the U.S. Land Base (See Annex 3.13 for details on differences).

To implement the stock-difference approach, forest land conditions in the conterminous United States were observed on NFI plots at time t_0 and at a subsequent time $t_1=t_0+s$, where s is the time step (time measured in years) and is indexed by discrete (e.g., 5 year) forest age classes. The inventory from t_0 to t_1 was then projected to 2021. This projection approach requires simulating changes in the age-class distribution resulting from forest aging

and disturbance events and then applying C density estimates for each age class to obtain population estimates for the nation. In cases where there are t_1 estimates in the last year (e.g., 2021) of the NFI no projections are necessary for those plots. To implement the gain-loss approach in Alaska, forest land conditions in Alaska were observed on NFI plots from 2004 to 2021. Plot-level data from the NFI were harmonized with auxiliary data describing climate, forest structure, disturbance, and other site-specific conditions to develop non-parametric models to predict carbon stocks by forest ecosystem carbon pool as well as fluxes over the entire inventory period, 1990 to 2021. First, carbon stocks for each forest ecosystem carbon pool were predicted for the year 2016 for all base intensity NFI plot locations (each plot representing approximately 2,403 ha) in coastal southeast and southcentral Alaska and for 1/5 intensity plots in interior Alaska (each plot representing 12,015 ha). Next, the chronosequence of sampled NFI plots and auxiliary information (e.g., climate, forest structure, disturbance, and other site-specific data) were used to predict annual gains and losses for each forest ecosystem carbon pool. The annual gains and losses were then combined with the stock estimates and disturbance information to compile plot- and population-level carbon stocks and fluxes for each year from 1990 to 2021. To estimate C stock changes in harvested wood, estimates were based on factors such as the allocation of wood to various primary and end-use products as well as half-life (the time at which half of the amount placed in use will have been discarded from use) and expected disposition (e.g., product pool, SWDS, combustion). An overview of the different methodologies and data sources used to estimate the C in forest ecosystems within the conterminous states and Alaska and harvested wood products for all of the United States is provided below. See Annex 3.13 for details and additional information related to the methods and data.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. Details on the emission/removal trends and methodologies through time are described in more detail in the Introduction and Methodology sections.

Forest Ecosystem Carbon from Forest Inventory

The United States applied the compilation approach described in Woodall et al. (2015a) for the current Inventory which removes the older periodic inventory data, which may be inconsistent with annual inventory data, from the estimation procedures. This approach enables the delineation of forest C accumulation by forest growth, land-use change, and natural disturbances such as fire. Development will continue on a system that attributes changes in forest C to disturbances and delineates Land Converted to Forest Land from Forest Land Remaining Forest Land. As part of this development, C pool science will continue and will be expanded to improve the estimates of C stock transfers from forest land to other land uses and include techniques to better identify land-use change (see the Planned Improvements section below).

Unfortunately, the annual FIA inventory system does not extend into the 1970s, necessitating the adoption of a system to estimate carbon stocks prior to the establishment of the annual forest inventory. The estimation of carbon stocks prior to the annual national forest inventory consisted of a modeling framework comprised of a forest dynamics module (age transition matrices) and a land use dynamics module (land area transition matrices). The forest dynamics module assesses forest uptake, forest aging, and disturbance effects (e.g., disturbances such as wind, fire, and floods identified by foresters on inventory plots). The land use dynamics module assesses C stock transfers associated with afforestation and deforestation (Woodall et al. 2015b). Both modules are developed from land use area statistics and C stock change or C stock transfer by age class. The required inputs are estimated from more than 625,000 forest and non-forest observations recorded in the FIA national database (U.S. Forest Service 2022a, b, c). Model predictions prior to the annual inventory period are constructed from the estimation system using the annual estimates. The estimation system is driven by the annual forest inventory system conducted by the FIA program (Frayer and Furnival 1999; Bechtold and Patterson 2005; USDA Forest Service 2022d, 2022a). The FIA program relies on a rotating panel statistical design with a sampling intensity of one 674.5 m^2 ground plot per 2,403 ha of land and water area. A five or seven-panel design, with 20 percent or 14.3 percent of the field plots typically measured each year within a state, is used in the eastern United States and a ten-panel design, with typically 10 percent of the field plots measured each year within a state, is used in the western United States. The interpenetrating hexagonal design across the U.S. landscape enables the sampling of plots at various intensities in a spatially and temporally unbiased manner. Typically, tree and site attributes are measured with

higher sample intensity while other ecosystem attributes such as downed dead wood are sampled during summer months at lower intensities. The first step in incorporating FIA data into the estimation system is to identify annual inventory datasets by state. Inventories include data collected on permanent inventory plots on forest lands and were organized as separate datasets, each representing a complete inventory, or survey, of an individual state at a specified time. Many of the annual inventories reported for states are represented as "moving window" averages, which mean that a portion—but not all—of the previous year's inventory is updated each year (USDA Forest Service 2022d). Forest C estimates are organized according to these state surveys, and the frequency of surveys varies by state.

Using this FIA data, separate estimates were prepared for the five C storage pools identified by IPCC (2006) and described above. All estimates were based on data collected from the extensive array of permanent, annual forest inventory plots and associated models (e.g., live tree belowground biomass) in the United States (USDA Forest Service 2022b, 2022c). Carbon conversion factors were applied at the disaggregated level of each inventory plot and then appropriately expanded to population estimates.

Carbon in Biomass

Live tree C pools include aboveground and belowground (coarse root) biomass of live trees with diameter at breast height (dbh) of at least 2.54 cm at 1.37 m above the litter. Separate estimates were made for above- and belowground biomass components. If inventory plots included data on individual trees, aboveground and belowground (coarse roots) tree C was based on Woodall et al. (2011a), which is also known as the component ratio method (CRM), and is a function of tree volume, species, and diameter. An additional component of foliage, which was not explicitly included in Woodall et al. (2011a), was added to each tree following the same CRM method.

Understory vegetation is a minor component of biomass, which is defined in the FIA program as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density were based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003). Understory biomass represented over 1 percent of C in biomass, but its contribution rarely exceeded 2 percent of the total carbon stocks or stock changes across all forest ecosystem C pools each year.

Carbon in Dead Organic Matter

Dead organic matter is calculated as three separate pools—standing dead trees, downed dead wood, and litter—with C stocks estimated from sample data or from models as described below. The standing dead tree C pool includes aboveground and belowground (coarse root) biomass for trees of at least 12.7 cm dbh. Calculations followed the basic method applied to live trees (Woodall et al. 2011a) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). Downed dead wood estimates are based on measurement of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008; Woodall et al. 2013). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. A modeling approach, using litter C measurements from FIA plots (Domke et al. 2016), was used to estimate litter C for every FIA plot used in the estimation framework.

Carbon in Forest Soil

Soil carbon is the largest terrestrial C sink with much of that C in forest ecosystems. The FIA program has been consistently measuring soil attributes as part of the annual inventory since 2001 and has amassed an extensive

inventory of soil measurement data on forest land in the conterminous U.S. and coastal Alaska (O'Neill et al. 2005). Observations of mineral and organic soil C on forest land from the FIA program and the International Soil Carbon Monitoring Network were used to develop and implement a modeling approach that enabled the prediction of mineral and organic (i.e., undrained organic soils) soil C to a depth of 100 cm from empirical measurements to a depth of 20 cm and included site-, stand-, and climate-specific variables that yield predictions of soil C stocks specific to forest land in the United States (Domke et al. 2017). This new approach allowed for separation of mineral and organic soils, the latter also referred to as Histosols, in the Forest Land Remaining Forest Land category. Note that mineral and organic (i.e., undrained organic soils) soil C stock changes are reported to a depth of 100 cm for Forest Land Remaining Forest Land to remain consistent with past reporting in this category, however for consistency across land-use categories, mineral (e.g., cropland, grassland, settlements) soil C is reported to a depth of 30 cm in Section 6.3 Land Converted to Forest Land. Estimates of C stock changes from organic soils shown in Table 6-8 and Table 6-9 include the emissions from drained organic forest soils, and the methods used to develop these estimates can be found in the Drained Organic Soils section below.

Harvested Wood Carbon

Estimates of the HWP contribution to forest C sinks and emissions (hereafter called "HWP contribution") were based on methods described in Skog (2008) using the WOODCARB II model. These methods are based on IPCC (2006) guidance for estimating the HWP contribution. IPCC (2006) provides methods that allow for reporting of the HWP contribution using one of several different methodological approaches: Production, stock change and atmospheric flow, as well as a default method that assumes there is no change in HWP C stocks (see Annex 3.13 for more details about each approach). The United States uses the production approach to report HWP contribution. Under the production approach, C in exported wood was estimated as if it remains in the United States, and C in imported wood was not included in the estimates. Though reported U.S. HWP estimates are based on the production approach, estimates resulting from use of the two alternative approaches, the stock change and atmospheric flow approaches, are also presented for comparison (see Annex 3.13). Annual estimates of change were calculated by tracking the annual estimated additions to and removals from the pool of products held in end uses (i.e., products in use such as housing or publications) and the pool of products held in SWDS. The C loss from harvest is reported in the Forest Ecosystem component of the Forest Land Remaining Forest Land and Land Converted to Forest Land sections and for informational purposes in the Energy sector, but the non-CO_2 emissions associated with biomass energy are included in the Energy sector emissions (see Chapter 3). EPA includes HWP within the forest chapter because forests are the source of wood that goes into the HWP estimates.

Solidwood products include lumber and panels. End-use categories for solidwood include single and multifamily housing, alteration and repair of housing, and other end uses. There is one product category and one end-use category for paper. Additions to and removals from pools were tracked beginning in 1900, with the exception of additions of softwood lumber to housing, which began in 1800. Solidwood and paper product production and trade data were taken from USDA Forest Service and other sources (Hair and Ulrich 1963; Hair 1958; USDC Bureau of Census 1976; Ulrich 1985, 1989; Steer 1948; AF&PA 2006a, 2006b; Howard 2003, 2007; Howard and Jones 2016; Howard and Liang 2019). Estimates for disposal of products reflects the change over time in the fraction of products discarded to SWDS (as opposed to burning or recycling) and the fraction of SWDS that were in sanitary landfills versus dumps.

There are five annual HWP variables that were used in varying combinations to estimate HWP contribution using any one of the three main approaches listed above. These are:

(1A) annual change of C in wood and paper products in use in the United States,

(1B) annual change of C in wood and paper products in SWDS in the United States,

(2A) annual change of C in wood and paper products in use in the United States and other countries where the wood came from trees harvested in the United States,

(2B) annual change of C in wood and paper products in SWDS in the United States and other countries where the wood came from trees harvested in the United States,

(3) C in imports of wood, pulp, and paper to the United States,

(4) C in exports of wood, pulp and paper from the United States, and

(5) C in annual harvest of wood from forests in the United States.

The sum of variables 2A and 2B yielded the estimate for HWP contribution under the production estimation approach. A key assumption for estimating these variables that adds uncertainty in the estimates was that products exported from the United States and held in pools in other countries have the same half-lives for products in use, the same percentage of discarded products going to SWDS, and the same decay rates in SWDS as they would in the United States.

Uncertainty

A quantitative uncertainty analysis placed bounds on the flux estimates for forest ecosystems through a combination of sample-based and model-based approaches to uncertainty estimation for forest ecosystem CO_2 flux using IPCC Approach 1 (Table 6-12 and Table A-196 for state-level uncertainties). A Monte Carlo Stochastic Simulation of the methods described above, and probabilistic sampling of C conversion factors, were used to determine the HWP uncertainty using IPCC Approach 2. See Annex 3.13 for additional information. The 2021 net annual change for forest C stocks was estimated to be between -773.6 and -618.1 MMT CO_2 Eq. around a central estimate of -695.4 MMT CO_2 Eq. at a 95 percent confidence level. This includes a range of -665.6 to -519.5 MMT CO_2 Eq. around a central estimate of -592.5 MMT CO_2 Eq. for forest ecosystems and -130.9 to -77.8 MMT CO_2 Eq. around a central estimate of -102.8 MMT CO_2 Eq. for HWP.

Table 6-12: Quantitative Uncertainty Estimates for Net CO_2 Flux from Forest Land Remaining Forest Land: Changes in Forest C Stocks (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate (MMT CO_2 Eq.)		Uncertainty Range Relative to Flux Estimate (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Forest Ecosystem C Pools[a]	CO_2	(592.5)	(665.6)	(519.5)	-12.3%	12.3%
Harvested Wood Products[b]	CO_2	(102.8)	(130.9)	(77.8)	-27.3%	24.3%
Total Forest	**CO_2**	**(695.4)**	**(773.6)**	**(618.1)**	**-11.3%**	**11.1%**

[a] Range of flux estimates predicted through a combination of sample-based and model-based uncertainty for a 95 percent confidence interval, IPCC Approach 1.

[b] Range of flux estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval, IPCC Approach 2.

Notes: Parentheses indicate negative values or net uptake. Totals may not sum due to independent rounding.

QA/QC and Verification

The FIA program has conducted consistent forest surveys based on extensive statistically-based sampling of most of the forest land in the conterminous U.S., dating back to 1952. The FIA program includes numerous quality assurance and quality control (QA/QC) procedures, including calibration among field crews, duplicate surveys of some plots, and systematic checking of recorded data. Because of the statistically-based sampling, the large number of survey plots, and the quality of the data, the survey databases developed by the FIA program form a strong foundation for C stock estimates. Field sampling protocols, summary data, and detailed inventory databases are archived and are publicly available (USDA Forest Service 2022d).

General quality control procedures were used in performing calculations to estimate C stocks based on survey data. For example, the C datasets, which include inventory variables such as areas and volumes, were compared to standard inventory summaries such as the forest resource statistics of Oswalt et al. (2019) or selected population estimates generated from the FIA database, which are available at an FIA internet site (USDA Forest Service

2022b). Agreement between the C datasets and the original inventories is important to verify accuracy of the data used.

Estimates of the HWP variables and the HWP contribution under the production estimation approach use data from U.S. Census and USDA Forest Service surveys of production and trade and other sources (Hair and Ulrich 1963; Hair 1958; USDC Bureau of Census 1976; Ulrich 1985, 1989; Steer 1948; AF&PA 2006a, 2006b; Howard 2003, 2007; Howard and Jones 2016; Howard and Liang 2019; AF&PA 2021; FAO 2021). Factors to convert wood and paper to units of C are based on estimates by industry and U.S. Forest Service published sources (see Annex 3.13). The WOODCARB II model uses estimation methods suggested by IPCC (2006). Estimates of annual C change in solidwood and paper products in use were calibrated to meet two independent criteria. The first criterion is that the WOODCARB II model estimate of C in houses standing in 2001 needs to match an independent estimate of C in housing based on U.S. Census and USDA Forest Service survey data. Meeting the first criterion resulted in an estimated half-life of about 80 years for single family housing built in the 1920s, which is confirmed by other U.S. Census data on housing. The second criterion is that the WOODCARB II model estimate of wood and paper being discarded to SWDS needs to match EPA estimates of discards used in the Waste sector each year over the period 1990 to 2000 (EPA 2006). These criteria help reduce uncertainty in estimates of annual change in C in products in use in the United States and, to a lesser degree, reduce uncertainty in estimates of annual change in C in products made from wood harvested in the United States. In addition, WOODCARB II landfill decay rates have been validated by ensuring that estimates of CH_4 emissions from landfills based on EPA (2006) data are reasonable in comparison to CH_4 estimates based on WOODCARB II landfill decay rates.

Recalculations Discussion

The methods used in the current Inventory to compile estimates for forest ecosystem carbon stocks and stock changes and HWPs from 1990 through 2021 are consistent with those used in the previous (1990 through 2020) Inventory. Population estimates of carbon stocks and stock changes were compiled using NFI data from each U.S. state and national estimates were compiled by summing over all states. New NFI data in most states were incorporated in the latest Inventory which contributed to decreases in forest land area estimates and carbon stocks, particularly in Alaska where new data from 2018 to 2021, particularly litter and soil data, were included (Table 6-13). Fire data sources were also updated for Alaska through 2021 and this combined with the new NFI data for the years 2018 through 2021 resulted in substantial changes in carbon stocks and stock changes. Soil (organic) carbon stocks decreased in the latest Inventory relative to the previous Inventory and mineral soil carbon stocks increased slightly in this Inventory relative to the previous Inventory. These changes can be attributed to obtaining plot-level soil orders using the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset (Soil Survey Staff 2020a, 2020b), rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories (Table 6-13). This resulted in a structural change in the soil carbon estimates for mineral and organic soils across the entire time series, particularly in Alaska where new data on forest area was included for the years 2018 through 2021 (Table 6-8). Finally, recent land-use change in Alaska (since 2015) also contributed to variability in soil carbon stocks and stock changes in recent years in the time series, which led to differences in estimates in the previous Inventory and the current Inventory. New data included in the HWP time-series result in a minor decrease (< 1 percent) in carbon stocks in the HWP pools but a substantial increase (60 percent) in the carbon stock change estimates for Products in Use and to a lesser extent (2 percent) in SWDS between the previous Inventory and the current Inventory. With the easing of the global pandemic and the return of consumers to the marketplace, there was a rebound in the purchase and accumulation of both paper and solid wood products. This rebound is expected to continue in 2022.

Table 6-13: Recalculations of Forest Area (1,000 ha) and C Stocks in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

	2021 Estimate, Previous Inventory	2021 Estimate, Current Inventory	2022 Estimate, Current Inventory
Forest Area (1000 ha)	***281,951***	***279,962***	***279,800***

Carbon Pools (MMT C)			
Forest	**58,316**	**56,790**	**56,951**
Aboveground Biomass	15,688	15,749	15,861
Belowground Biomass	3,106	3,121	3,143
Dead Wood	2,896	2,799	2,827
Litter	3,810	3,888	3,888
Soil (Mineral)	25,459	25,915	25,916
Soil (Organic)	7,357	5,317	5,317
Harvested Wood	**2,718**	**2,721**	**2,749**
Products in Use	1,536	1,539	1,549
SWDS	1,182	1,182	1,200
Total Stock	**61,034**	**59,511**	**59,701**

Note: Totals may not sum due to independent rounding.

Table 6-14: Recalculations of Net C Flux from Forest Ecosystem Pools in Forest Land Remaining Forest Land and Harvested Wood Pools (MMT C)

Carbon Pool (MMT C)	2020 Estimate, Previous Inventory	2020 Estimate, Current Inventory	2021 Estimate, Current Inventory
Forest	**(159.4)**	**(166.6)**	**(161.6)**
Aboveground Biomass	(108.7)	(114.3)	(111.6)
Belowground Biomass	(21.6)	(22.7)	(22.1)
Dead Wood	(27.7)	(27.9)	(27.6)
Litter	(0.5)	(0.5)	0.5
Soil (Mineral)	(1.1)	(1.5)	(1.1)
Soil (Organic)	0.1	0.0	0.0
Drained organic soil	0.2	0.2	0.2
Harvested Wood	**(22.8)**	**(26.3)**	**(28.0)**
Products in Use	(5.5)	(8.7)	(10.3)
SWDS	(17.3)	(17.6)	(17.7)
Total Net Flux	**(182.2)**	**(192.9)**	**(189.6)**

Note: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Planned Improvements

Reliable estimates of forest C stocks and changes across the diverse ecosystems of the United States require a high level of investment in both annual monitoring and associated analytical techniques. Development of improved monitoring/reporting techniques is a continuous process that occurs simultaneously with annual Inventory submissions. Planned improvements can be broadly assigned to the following categories: development of a robust estimation and reporting system, individual C pool estimation, coordination with other land-use categories, and annual inventory data incorporation.

While this Inventory submission includes C change by Forest Land Remaining Forest Land and Land Converted to Forest Land and C stock changes for all IPCC pools in these two categories, there are many improvements that are still necessary. The estimation approach used for the conterminous United States in the current Inventory for the forest land category operates at the state scale, whereas previously the western United States and southeast and southcentral coastal Alaska operated at a regional scale. While this is an improvement over previous Inventories and led to improved estimation and separation of land-use categories in the current Inventory, research is underway to leverage all FIA data and auxiliary information (i.e., remotely sensed information) to operate at finer spatial and temporal scales. As in past submissions, emissions and removals associated with natural (e.g., wildfire, insects, and disease) and human (e.g., harvesting) disturbances are implicitly included in the report given the design of the annual NFI, but not explicitly estimated. In addition to integrating auxiliary information into the estimation framework and leveraging all NFI plot measurements, alternative estimators are also being evaluated which will eliminate latency in population estimates from the NFI, improve annual estimation and characterization

of interannual variability, facilitate attribution of fluxes to particular activities, and allow for streamlined harmonization of NFI data with auxiliary data products. This will also facilitate separation of prescribed and wildfire emissions in future reports. The transparency and repeatability of estimation and reporting systems will be improved through the dissemination of open-source code (e.g., R programming language) in concert with the public availability of the annual NFI (USDA Forest Service 2022b). Also, several FIA database processes are being institutionalized to increase efficiency and QA/QC in reporting and further improve transparency, completeness, consistency, accuracy, and availability of data used in reporting. Finally, a combination of approaches was used to estimate uncertainty associated with C stock changes in the Forest Land Remaining Forest Land category in this report. There is research underway investigating more robust approaches to estimate total uncertainty (Clough et al. 2016), which will be considered in future Inventory reports.

The modeling framework used to estimate downed dead wood within the dead wood C pool (Smith et al. 2022) will be updated similar to the litter (Domke et al. 2016) and soil C pools (Domke et al. 2017). Finally, components of other pools, such as C in belowground biomass (Russell et al. 2015) and understory vegetation (Russell et al. 2014; Johnson et al. 2017), are being explored but may require additional investment in field inventories before improvements can be realized in the Inventory report.

The foundation of forest C estimation and reporting is the annual NFI. The ongoing annual surveys by the FIA program are expected to improve the accuracy and precision of forest C estimates as new state surveys become available (USDA Forest Service 2022b). With the exception of Wyoming (which will have sufficient remeasurements in the years ahead), all other states in the conterminous United States now have sufficient annual NFI data to consistently estimate C stocks and stock changes for the future using the state-level compilation system. The FIA program continues to install permanent plots in Alaska as part of the operational NFI, and as more plots are added to the NFI, they will be used to improve estimates for all managed forest land in Alaska. The methods used to include all managed forest land in the conterminous United States will be used in future Inventories for Hawaii and U.S. Territories as forest C data become available (only a small number of plots from Hawaii are currently available from the annualized sampling design). To that end, research is underway to incorporate all NFI information (both annual and periodic data) and the dense time series of remotely sensed data in multiple inferential frameworks for estimating greenhouse gas emissions and removals as well as change (i.e., disturbance or land-use changes) detection and attribution across the entire reporting period and all managed forest land in the United States. Leveraging this auxiliary information will aid the efforts to improve estimates for interior Alaska as well as the entire inventory system. In addition to fully inventorying all managed forest land in the United States, the more intensive sampling (i.e., more samples) of fine woody debris, litter, and SOC on a subset of FIA plots continues and will substantially improve spatial and temporal resolution of C pools (Westfall et al. 2013) as this information becomes available (Woodall et al. 2011b). Increased sample intensity of some C pools and using annualized sampling data as it becomes available for those states currently not reporting are planned for future submissions. There will also be improved methods and models to characterize standing live and dead tree carbon in the next Inventory. The NFI sampling frame extends beyond the forest land-use category (e.g., woodlands, which fall into the grasslands land-use category, and urban areas, which fall into the settlements land-use category) with inventory-relevant information for trees outside of forest land. These data will be utilized as they become available in the NFI.

Non-CO_2 Emissions from Forest Fires

Emissions of non-CO_2 gases from forest fires were estimated using U.S.-specific data and models for annual area of forest burned, fuel, consumption, and emission consistent with IPCC (2006). In 2021, emissions from this source were estimated to be 15.5 MMT CO_2 Eq. of CH_4 and 8.9 MMT CO_2 Eq. of N_2O (Table 6-15; kt units provided in Table 6-16). The estimates of non-CO_2 emissions from forest fires include the conterminous 48 states plus managed forest land in Alaska (Ogle et al. 2018).

Table 6-15: Non-CO_2 Emissions from Forest Fires (MMT CO_2 Eq.)[a]

Gas	1990	2005	2017	2018	2019	2020	2021
CH_4	3.2	10.9	9.6	6.9	6.4	15.0	15.5
N_2O	2.3	7.4	5.4	4.2	4.4	8.0	8.9
Total	**5.5**	**18.3**	**15.0**	**11.0**	**10.8**	**23.0**	**24.4**

[a] These estimates include Non-CO_2 emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

Note: Totals may not sum due to independent rounding

Table 6-16: Non-CO_2 Emissions from Forest Fires (kt)[a]

Gas	1990	2005	2017	2018	2019	2020	2021
CH_4	116	39.	342	245	228	534	554
N_2O	9	28	21	16	17	30	34
CO	2,985	10,039	7,298	5,347	5,885	11,080	11,798
NO_x	48	145	122	100	89	171	201

[a] These estimates include Non-CO_2 emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

Methodology and Time-Series Consistency

Non-CO_2 emissions from forest fires—primarily CH_4 and N_2O emissions—were calculated consistent with IPCC (2006) methodology, which included U.S.-specific data and models on area burned, fuel, consumption, and emission. The annual estimates were calculated by the Wildland Fire Emissions Inventory System (WFEIS, French et al. 2011, 2014) with area burned based on Monitoring Trends in Burn Severity (MTBS, Eidenshink et al. 2007) or MODIS burned area mapping (MODIS MCD64A1, Giglio et al. 2018) data. The MTBS data available for this report (MTBS 2022) included fires through 2020, and the MODIS-based records include 2001 through 2021. Emissions reported here are calculated from MTBS data for the 1990 to 2020 interval, and the 2001 through 2021 emissions are also based on MODIS burned areas. Where both the MTBS and MODIS sources are available, the predictions are averaged. Note that N_2O emissions are not included in WFEIS calculations; the emissions provided here are based on the average N_2O to CO_2 ratio of 0.000166 following Larkin et al. (2014). See Emissions from Forest Fires in Annex 3.13 for further details on all fire-related emissions calculations for forests. Consistent use of available data sources, data processing, and calculation methods were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Uncertainty estimates for non-CO_2 emissions from forest fires are based on a Monte Carlo (IPCC Approach 2) approach to propagate variability among the alternate WFEIS annual estimates per state. Uncertainty in parts of the WFEIS system are not currently quantified. Among potential sources for future analysis are burned areas from MTBS or MODIS, the fuels models or the Consume model (Prichard et al. 2014). See Annex 3.13 for the quantities and assumptions employed to define and propagate uncertainty. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-17.

Table 6-17: Quantitative Uncertainty Estimates of Non-CO_2 Emissions from Forest Fires (MMT CO_2 Eq. and Percent)[a]

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[b] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Non-CO_2 Emissions from	CH_4	15.5	10.5	20.5	-32%	32%

Forest Fires						
Non-CO_2 Emissions from Forest Fires	N_2O	8.9	2.6	15.3	-71%	72%

[a] These estimates include Non-CO_2 emissions from forest fires on Forest Land Remaining Forest Land and Land Converted to Forest Land.

[b] Range of flux estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for estimating non-CO_2 emissions from forest fires included checking input data, documentation, and calculations to ensure data were properly handled through the inventory process and results were consistent with values expected from those calculations. The QA/QC procedures did not reveal any inaccuracies or incorrect input values.

Recalculations Discussion

The methods used in the current (1990 through 2021) Inventory to compile estimates of non-CO_2 emissions from forest fires represent a slight change relative to the previous (1990 through 2020) Inventory. The basic components of calculating forest fire emissions (IPCC 2006) remain unchanged, but the WFEIS-based estimates now include both MTBS and MODIS based burns and two alternate fuel models where available. An additional source of change leading to recalculations are recent and ongoing updates to the MTBS fire records (i.e., including both most-recent as well as possible updates to past years' fires).

The EPA also updated global warming potentials (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

The net result of implementing AR5 GWP values and other improvements listed above was an average annual increase of 0.2 MMT CO_2 Eq., or 1 percent, in total non-CO_2 emissions from forest fires across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Continuing improvements are planned for developing better fire and site-specific estimates for forest fires. The focus will be on addressing three aspects of reporting: best use of WFEIS, better resolution of uncertainty as discussed above, and identification of burned areas that are not captured by MTBS records.

N_2O Emissions from N Additions to Forest Soils

Of the synthetic nitrogen (N) fertilizers applied to soils in the United States, no more than one percent is applied to forest soils. Application rates are similar to those occurring on cropland soils, but in any given year, only a small proportion of total forested land receives N fertilizer. This is because forests are typically fertilized only twice during their approximately 40-year growth cycle (once at planting and once midway through their life cycle). While the rate of N fertilizer application for the area of forests that receives N fertilizer in any given year is relatively high, the annual application rate is quite low over the entire area of forest land.

N additions to soils result in direct and indirect N_2O emissions. Direct emissions occur on-site due to the N additions. Indirect emissions result from fertilizer N that is transformed and transported to another location through volatilization in the form of ammonia [NH_3] and nitrogen oxide [NO_x], in addition to leaching and runoff of nitrates [NO_3], and later converted into N_2O at off-site locations from the original N application. The indirect

emissions are assigned to forest land because the management activity leading to the emissions occurred in forest land.

Direct soil N_2O emissions from Forest Land Remaining Forest Land and Land Converted to Forest Land[33] in 2021 were 0.3 MMT CO_2 Eq. (1.2 kt), and the indirect emissions were 0.1 MMT CO_2 Eq. (0.4 kt). Total emissions for 2021 were 0.4 MMT CO_2 Eq. (1.5 kt) and have increased by 455 percent from 1990 to 2021. Total forest soil N_2O emissions are summarized in Table 6-18.

Table 6-18: N_2O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO_2 Eq. and kt N_2O)

	1990	2005	2017	2018	2019	2020	2021
Direct N_2O Fluxes from Soils							
MMT CO_2 Eq.	0.1	0.3	0.3	0.3	0.3	0.3	0.3
kt N_2O	0.2	1.2	1.2	1.2	1.2	1.2	1.2
Indirect N_2O Fluxes from Soils							
MMT CO_2 Eq.	+	0.1	0.1	0.1	0.1	0.1	0.1
kt N_2O	0.1	0.4	0.4	0.4	0.4	0.4	0.4
Total							
MMT CO_2 Eq.	**0.1**	**0.4**	**0.4**	**0.4**	**0.4**	**0.4**	**0.4**
kt N_2O	**0.3**	**1.5**	**1.5**	**1.5**	**1.5**	**1.5**	**1.5**

+ Does not exceed 0.05 MMT CO_2 Eq. or 0.05 kt.

Notes: Totals may not sum due to independent rounding. The N_2O emissions from Land Converted to Forest Land are included with Forest Land Remaining Forest Land because it is not currently possible to separate the activity data by land-use conversion category.

Methodology and Time-Series Consistency

The IPCC Tier 1 approach is used to estimate N_2O from soils within Forest Land Remaining Forest Land and Land Converted to Forest Land. According to U.S. Forest Service statistics for 1996 (USDA Forest Service 2001), approximately 75 percent of trees planted are for timber, and about 60 percent of national total harvested forest area is in the southeastern United States. Although southeastern pine plantations represent the majority of fertilized forests in the United States, this Inventory also incorporated N fertilizer application to commercial Douglas-fir stands in western Oregon and Washington. For the Southeast, estimates of direct N_2O emissions from fertilizer applications to forests are based on the area of pine plantations receiving fertilizer in the southeastern United States and estimated application rates (Albaugh et al. 2007; Fox et al. 2007). Fertilizer application is rare for hardwoods and therefore not included in the inventory (Binkley et al. 1995). For each year, the area of pine receiving N fertilizer is multiplied by the weighted average of the reported range of N fertilization rates (121 lbs. N per acre). Area data for pine plantations receiving fertilizer in the Southeast are not available for 2005 through 2021, so data from 2004 are used for these years. For commercial forests in Oregon and Washington, only fertilizer applied to Douglas-fir is addressed in the inventory because the vast majority (approximately 95 percent) of the total fertilizer applied to forests in this region is applied to Douglas-fir (Briggs 2007). Estimates of total Douglas-fir area and the portion of fertilized area are multiplied to obtain annual area estimates of fertilized Douglas-fir stands. Similar to the Southeast, data are not available for 2005 through 2021, so data from 2004 are used for these years. The annual area estimates are multiplied by the typical rate used in this region (200 lbs. N per acre) to estimate total N applied (Briggs 2007), and the total N applied to forests is multiplied by the IPCC (2006) default emission factor of one percent to estimate direct N_2O emissions.

For indirect emissions, the volatilization and leaching/runoff N fractions for forest land are calculated using the IPCC default factors of 10 percent and 30 percent, respectively. The amount of N volatilized is multiplied by the

[33] The N_2O emissions from Land Converted to Forest Land are included with Forest Land Remaining Forest Land because it is not currently possible to separate the activity data by land-use conversion category.

IPCC default factor of one percent for the portion of volatilized N that is converted to N_2O off-site. The amount of N leached/runoff is multiplied by the IPCC default factor of 0.075 percent for the portion of leached/runoff N that is converted to N_2O off-site. The resulting estimates are summed to obtain total indirect emissions.

The same method is applied in all years of this Inventory to ensure time-series consistency from 1990 through 2021.

Uncertainty

The amount of N_2O emitted from forests depends not only on N inputs and fertilized area, but also on a large number of variables, including organic C availability, oxygen gas partial pressure, soil moisture content, pH, temperature, and tree planting/harvesting cycles. The effect of the combined interaction of these variables on N_2O flux is complex and highly uncertain. IPCC (2006) does not incorporate any of these variables into the default methodology, except variation in estimated fertilizer application rates and estimated areas of forested land receiving N fertilizer. All forest soils are treated equivalently under this methodology. Furthermore, only applications of synthetic N fertilizers to forest are captured in this Inventory, so applications of organic N fertilizers are not estimated. However, the total quantity of organic N inputs to soils in the United States is included in the inventory for Agricultural Soil Management (Section 5.4) and Settlements Remaining Settlements (Section 6.10).

Uncertainties exist in the fertilization rates, annual area of forest lands receiving fertilizer, and the emission factors. Fertilization rates are assigned a default level[34] of uncertainty at ±50 percent, and area receiving fertilizer is assigned a ±20 percent according to expert knowledge (Binkley 2004). The uncertainty ranges around the 2004 activity data and emission factor input variables are directly applied to the 2021 emission estimates. IPCC (2006) provided estimates for the uncertainty associated with direct and indirect N_2O emission factor for synthetic N fertilizer application to soils.

Uncertainty is quantified using simple error propagation methods (IPCC 2006). The results of the quantitative uncertainty analysis are summarized in Table 6-19. Direct N_2O fluxes from soils in 2021 are estimated to be between 0.1 and 1.0 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 59 percent below and 211 percent above the emission estimate of 0.3 MMT CO_2 Eq. for 2021. Indirect N_2O emissions in 2021 are 0.1 MMT CO_2 Eq. and have a range are between 0.01 and 0.3 MMT CO_2 Eq., which is 86 percent below to 238 percent above the emission estimate for 2021.

Table 6-19: Quantitative Uncertainty Estimates of N_2O Fluxes from Soils in Forest Land Remaining Forest Land and Land Converted to Forest Land (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate (MMT CO_2 Eq.)		(%)	
Forest Land Remaining Forest Land			**Lower Bound**	**Upper Bound**	**Lower Bound**	**Upper Bound**
Direct N_2O Fluxes from Soils	N_2O	0.3	0.1	1.0	-59%	+211%
Indirect N_2O Fluxes from Soils	N_2O	0.1	+	0.3	-86%	+238%

+ Does not exceed 0.05 MMT CO_2 Eq.

QA/QC and Verification

The spreadsheet containing fertilizer applied to forests and calculations for N_2O and uncertainty ranges are checked and verified based on the sources of these data.

[34] Uncertainty is unknown for the fertilization rates so a conservative value of ±50 percent is used in the analysis.

Recalculations Discussion

EPA updated global warming potential (GWP) for calculating CO_2-equivalent emissions of N_2O (from 298 to 265) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWP values provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

As a result of this change, calculated CO_2-equivalent emissions decreased by an annual average of 0.04 MMT CO_2 Eq., or 11 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

CO_2, CH_4, and N_2O Emissions from Drained Organic Soils[35]

Drained organic soils on forest land are identified separately from other forest soils largely because mineralization of the exposed or partially dried organic material results in continuous CO_2 and N_2O emissions (IPCC 2006). In addition, the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* (IPCC 2014) calls for estimating CH_4 emissions from these drained organic soils and the ditch networks used to drain them.

Organic soils are identified on the basis of thickness of organic horizon and percent organic matter content. All organic soils are assumed to have originally been wet, and drained organic soils are further characterized by drainage or the process of artificially lowering the soil water table, which exposes the organic material to drying and the associated emissions described in this section. The land base considered here is drained inland organic soils that are coincident with forest area as identified by the NFI of the USDA Forest Service (USDA Forest Service 2022b).

The estimated area of drained organic soils on forest land is 70,849 ha and did not change over the time series based on the data used to compile the estimates in the current Inventory. These estimates are based on permanent plot locations of the NFI (USDA Forest Service 2022b) coincident with mapped organic soil locations (STATSGO2 2016), which identifies forest land on organic soils. Forest sites that are drained are not explicitly identified in the data, but for this estimate, planted forest stands on sites identified as mesic or xeric (which are identified in USDA Forest Service 2022c, d) are labeled “drained organic soil” sites.

Land use, region, and climate are broad determinants of emissions as are more site-specific factors such as nutrient status, drainage level, exposure, or disturbance. Current data are limited in spatial precision and thus lack site specific details. At the same time, corresponding emissions factor data specific to U.S. forests are similarly lacking. Tier 1 estimates are provided here following IPCC (2014). Total annual non-CO_2 emissions on forest land with drained organic soils in 2021 are estimated as 0.8 MMT CO_2 Eq. per year (Table 6-20; kt units provided in 6-21).

The Tier 1 methodology provides methods to estimate emissions of CO_2 from three pathways: direct emissions primarily from mineralization; indirect, or off-site, emissions associated with dissolved organic carbon releasing CO_2 from drainage waters; and emissions from (peat) fires on organic soils. Data about forest fires specifically located on drained organic soils are not currently available; as a result, no corresponding estimate is provided here. Non-CO_2 emissions provided here include CH_4 and N_2O. Methane emissions generally associated with anoxic conditions do occur from the drained land surface, but the majority of these emissions originate from ditches

[35] Estimates of CO_2 emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

constructed to facilitate drainage at these sites. Emission of N_2O can be significant from these drained organic soils in contrast to the very low emissions from wet organic soils.

Table 6-20: Non-CO_2 Emissions from Drained Organic Forest Soils[a,b] (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
CH_4	+	+	+	+	+	+	+
N_2O	0.1	0.1	0.1	0.1	0. 1	0.1	0.1
Total	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] This table includes estimates from Forest Land Remaining Forest Land and Land Converted to Forest Land.

[b] Estimates of CO_2 emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

Note: Totals may not sum due to independent rounding.

Table 6-21: Non-CO_2 Emissions from Drained Organic Forest Soils[a,b] (kt)

Source	1990	2005	2017	2018	2019	2020	2021
CH_4	1	1	1	1	1	1	1
N_2O	+	+	+	+	+	+	+

+ Does not exceed 0.5 kt.

[a] This table includes estimates from Forest Land Remaining Forest Land and Land Converted to Forest Land.

[b] Estimates of CO_2 emissions from drained organic soils are described in this section but reported in Table 6-8 and Table 6-9 for both Forest Land Remaining Forest Land and Land Converted to Forest Land in order to allow for reporting of all C stock changes on forest lands in a complete and comprehensive manner.

Methodology and Time-Series Consistency

The Tier 1 methods for estimating CO_2, CH_4 and N_2O emissions from drained inland organic soils on forest lands follow IPCC (2006), with extensive updates and additional material presented in the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* (IPCC 2014). With the exception of quantifying area of forest on drained organic soils, which is user-supplied, all quantities necessary for Tier 1 estimates are provided in Chapter 2, Drained Inland Organic Soils of IPCC (2014).

Estimated area of drained organic soils on forest land is 70,849 ha based on analysis of the permanent NFI of the USDA Forest Service and did not change over the time series. The most recent plot data per state within the inventories were used in a spatial overlay with the STATSGO2 (2016) soils data, and forest plots coincident with the soil order histosol were selected as having organic soils. Information specific to identifying "drained organic" are not in the inventory data so an indirect approach was employed here. Specifically, artificially regenerated forest stands (inventory field STDORGCD=1) on mesic or xeric sites (inventory field 11≤PHYSCLCD≤29) are labeled "drained organic soil" sites. From this selection, forest area and sampling error for forest on drained organic sites are based on the population estimates developed within the inventory data for each state (USDA Forest Service 2022d). Eight states, all temperate forests (including pine forest in northern Florida, which largely display characteristics of temperate forests), were identified as having drained organic soils (Table 6-22).

Table 6-22: States identified as having Drained Organic Soils, Area of Forest on Drained Organic Soils, and Sampling Error

State	Forest on Drained Organic Soil (1,000 ha)	Sampling Error (68.3% as ± Percentage of Estimate)
Florida	2.4	79
Georgia	3.7	71
Michigan	18.7	34
Minnesota	30.2	19
North Carolina	1.3	99
Virginia	2.3	102
Washington	2.1	101
Wisconsin	10.1	30
Total	**70.8**	**14**

Note: Totals may not sum due to independent rounding.

The Tier 1 methodology provides methods to estimate emissions for three pathways of C emission as CO_2. Note that subsequent mention of equations and tables in the remainder of this section refer to Chapter 2 of IPCC (2014). The first pathway–direct CO_2 emissions–is calculated according to Equation 2.3 and Table 2.1 as the product of forest area and emission factor for temperate drained forest land. The second pathway—indirect, or off-site, emissions—is associated with dissolved organic carbon (DOC) releasing CO_2 from drainage waters according to Equation 2.4 and Table 2.2, which represent a default composite of the three pathways for this flux: (1) the flux of DOC from natural (undrained) organic soil; (2) the proportional increase in DOC flux from drained organic soils relative to undrained sites; and (3) the conversion factor for the part of DOC converted to CO_2 after export from a site. The third pathway—emissions from (peat) fires on organic soils—assumes that the drained organic soils burn in a fire, but not any wet organic soils. However, this Inventory currently does not include emissions for this pathway because data on the combined fire and drained organic soils information are not available at this time; this may become available in the future with additional analysis.

Non-CO_2 emissions, according to the Tier 1 method, include methane (CH_4), nitrous oxide (N_2O), and carbon monoxide (CO). Emissions associated with peat fires include factors for CH_4 and CO in addition to CO_2, but fire estimates are assumed to be zero for the current Inventory, as discussed above. Methane emissions generally associated with anoxic conditions do occur from the drained land surface, but the majority of these emissions originate from ditches constructed to facilitate drainage at these sites. From this, two separate emission factors are used, one for emissions from the area of drained soils and a second for emissions from drainage ditch waterways. Calculations are conducted according to Equation 2.6 and Tables 2.3 and 2.4, which includes the default fraction of the total area of drained organic soil which is occupied by ditches. Emissions of N_2O can be significant from these drained soils in contrast to the very low emissions from wet organic soils. Calculations are conducted according to Equation 2.7 and Table 2.5, which provide the estimate as kg N per year.

Methodological calculations were applied to the entire set of estimates for 1990 through 2021. Year-specific data are not available. Estimates are based on a single year and applied as the annual estimates over the interval.

Uncertainty

Uncertainties are based on the sampling error associated with forest area of drained organic soils and the uncertainties provided in the Chapter 2 (IPCC 2014) emissions factors (Table 6-23). The estimates and resulting quantities representing uncertainty are based on the IPCC Approach 1–error propagation. However, probabilistic sampling of the distributions defined for each emission factor produced a histogram result that contained a mean and 95 percent confidence interval. The primary reason for this approach was to develop a numerical representation of uncertainty with the potential for combining with other forest components. The methods and parameters applied here are identical to previous inventories, but input values were resampled for this Inventory, which results in minor changes in the number of significant digits in the resulting estimates, relative to past values. The total non-CO_2 emissions in 2021 from drained organic soils on Forest Land Remaining Forest Land and Land

Converted to Forest Land were estimated to be between 0 and 0.150 MMT CO_2 Eq. around a central estimate of 0.068 MMT CO_2 Eq. at a 95 percent confidence level.

Table 6-23: Quantitative Uncertainty Estimates for Non-CO_2 Emissions on Drained Organic Forest Soils (MMT CO_2 Eq. and Percent)[a]

Source	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
CH_4	+	+	+	-69%	+82%
N_2O	0.1	+	0.1	-118%	+132%
Total	**0.1**	**+**	**0.2**	**-107%**	**+120%**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of flux estimates predicted through a combination of sample-based and IPCC defaults for a 95 percent confidence interval, IPCC Approach 1.

Note: Totals may not sum due to independent rounding.

QA/QC and Verification

IPCC (2014) guidance cautions of a possibility of double counting some of these emissions. Specifically, the off-site emissions of dissolved organic C from drainage waters may be double counted if soil C stock and change is based on sampling and this C is captured in that sampling. Double counting in this case is unlikely since plots identified as drained were treated separately in this chapter. Additionally, some of the non-CO_2 emissions may be included in either the Wetlands or sections on N_2O emissions from managed soils. These paths to double counting emissions are unlikely here because these issues are taken into consideration when developing the estimates and this chapter is the only section directly including such emissions on forest land.

Recalculations Discussion

The EPA updated global warming potentials (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. As a result of this change, there was a minimal decrease in average annual calculated CO_2-equivalent total emissions from drained organic forest soils from 1990 through 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Additional data will be compiled to update estimates of forest areas on drained organic soils as new reports and geospatial products become available.

6.3 Land Converted to Forest Land (CRF Source Category 4A2)

The C stock change estimates for Land Converted to Forest Land that are provided in this Inventory include all forest land in an inventory year that had been in another land use(s) during the previous 20 years.[36] For example, cropland or grassland converted to forest land during the past 20 years would be reported in this category. Converted lands are in this category for 20 years as recommended in the *2006 IPCC Guidelines* (IPCC 2006), after which they are classified as Forest Land Remaining Forest Land. Estimates of C stock changes from all pools (i.e., aboveground and belowground biomass, dead wood, litter and soils), as recommended by IPCC (2006), are included in the Land Converted to Forest Land category of this Inventory.

Area of Land Converted to Forest in the United States[37]

Land conversion to and from forests has occurred regularly throughout U.S. history. The 1970s and 1980s saw a resurgence of federally sponsored forest management programs (e.g., the Forestry Incentive Program) and soil conservation programs (e.g., the Conservation Reserve Program), which have focused on tree planting, improving timber management activities, combating soil erosion, and converting marginal cropland to forests. Recent analyses suggest that net accumulation of forest area continues in areas of the United States, in particular the northeastern United States (Woodall et al. 2015b). Specifically, the annual conversion of land from other land-use categories (i.e., Cropland, Grassland, Wetlands, Settlements, and Other Lands) to Forest Land resulted in a fairly continuous net annual accretion of Forest Land area from over the time series at an average rate of 1.0 million ha $year^{-1}$.

Over the 20-year conversion period used in the Land Converted to Forest Land category, the conversion of cropland to forest land resulted in the largest source of C transfer and uptake, accounting for approximately 39 percent of the uptake annually. Estimated C uptake has remained relatively stable over the time series across all conversion categories (see Table 6-24). The net flux of C from all forest pool stock changes in 2021 was -98.3 MMT CO_2 Eq. (-26.8 MMT C) (Table 6-24 and Table 6-25).

Mineral soil C stocks increased slightly over the time series for Land Converted to Forest Land. The small gains are associated with Cropland Converted to Forest Land, Settlements Converted to Forest Land, and Other Land Converted to Forest Land. Much of this conversion is from soils that are more intensively used under annual crop production or settlement management, or are conversions from other land, which has little to no soil C. In contrast, Grassland Converted to Forest Land leads to a loss of soil C across the time series, which negates some of the gain in soil C with the other land-use conversions. Managed Pasture to Forest Land is the most common conversion. This conversion leads to a loss of soil C because pastures are mostly improved in the United States with fertilization and/or irrigation, which enhances C input to soils relative to typical forest management activities.

[36] The annual NFI data used to compile estimates of carbon transfer and uptake in this section are based on 5- to 10-yr remeasurements so the exact conversion period was limited to the remeasured data over the time series.

[37] The estimates reported in this section only include the 48 conterminous states in the United States. Land use conversions to forest land in Alaska are currently included in the Forest Land Remaining Forest Land section because currently there is insufficient data to separate the changes and estimates for Hawaii were not included because there is insufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land.

Table 6-24: Net CO_2 Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT CO_2 Eq.)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Forest Land	**(38.5)**	**(38.1)**	**(37.9)**	**(37.8)**	**(37.8)**	**(37.8)**	**(37.8)**
Aboveground Biomass	(22.2)	(22.0)	(21.9)	(21.9)	(21.9)	(21.9)	(21.9)
Belowground Biomass	(4.3)	(4.3)	(4.2)	(4.2)	(4.2)	(4.2)	(4.2)
Dead Wood	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)
Litter	(6.9)	(6.8)	(6.8)	(6.8)	(6.8)	(6.8)	(6.8)
Mineral Soil	(0.3)	(0.3)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Grassland Converted to Forest Land	**(12.2)**	**(12.2)**	**(12.3)**	**(12.3)**	**(12.3)**	**(12.3)**	**(12.3)**
Aboveground Biomass	(6.1)	(6.2)	(6.2)	(6.2)	(6.2)	(6.2)	(6.2)
Belowground Biomass	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
Dead Wood	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)
Litter	(4.1)	(4.1)	(4.1)	(4.1)	(4.1)	(4.1)	(4.1)
Mineral Soil	0.2	0.3	0.3	0.3	0.3	0.3	0.3
Other Land Converted to Forest Land	**(9.9)**	**(10.5)**	**(10.7)**	**(10.7)**	**(10.7)**	**(10.7)**	**(10.7)**
Aboveground Biomass	(4.7)	(4.7)	(4.8)	(4.8)	(4.8)	(4.8)	(4.8)
Belowground Biomass	(0.8)	(0.8)	(0.8)	(0.8)	(0.8)	(0.8)	(0.8)
Dead Wood	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Litter	(2.5)	(2.5)	(2.5)	(2.5)	(2.5)	(2.5)	(2.5)
Mineral Soil	(0.6)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Settlements Converted to Forest Land	**(34.4)**	**(34.2)**	**(34.0)**	**(34.0)**	**(34.0)**	**(34.0)**	**(34.0)**
Aboveground Biomass	(21.0)	(20.9)	(20.7)	(20.7)	(20.7)	(20.7)	(20.7)
Belowground Biomass	(4.0)	(4.0)	(3.9)	(3.9)	(3.9)	(3.9)	(3.9)
Dead Wood	(4.0)	(4.0)	(3.9)	(3.9)	(3.9)	(3.9)	(3.9)
Litter	(5.4)	(5.4)	(5.3)	(5.3)	(5.3)	(5.3)	(5.3)
Mineral Soil	(0.1)	(0.04)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Wetlands Converted to Forest Land	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**
Aboveground Biomass	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)
Belowground Biomass	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Dead Wood	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Mineral Soil	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total Aboveground Biomass Flux	**(55.5)**	**(55.3)**	**(55.2)**	**(55.1)**	**(55.1)**	**(55.1)**	**(55.1)**
Total Belowground Biomass Flux	**(10.4)**	**(10.3)**	**(10.3)**	**(10.3)**	**(10.3)**	**(10.3)**	**(10.3)**
Total Dead Wood Flux	**(11.6)**	**(11.6)**	**(11.6)**	**(11.6)**	**(11.6)**	**(11.6)**	**(11.6)**
Total Litter Flux	**(20.1)**	**(20.1)**	**(20.1)**	**(20.1)**	**(20.1)**	**(20.1)**	**(20.1)**
Total Mineral Soil Flux	**(0.8)**	**(1.1)**	**(1.1)**	**(1.1)**	**(1.1)**	**(1.1)**	**(1.1)**
Total Flux	**(98.5)**	**(98.4)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**	**(98.3)**

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. Forest ecosystem C stock changes from land conversion in Alaska are currently included in the Forest Land Remaining Forest Land section because there is insufficient data to separate the changes at this time. Forest ecosystem C stock changes from land conversion do not include U.S. Territories because managed forest land in U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes from land conversion do not include Hawaii because there is insufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land. The forest ecosystem C stock changes from land conversion do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for all organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land section of the Inventory.

Table 6-25: Net C Flux from Forest C Pools in Land Converted to Forest Land by Land-Use Change Category (MMT C)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Forest Land	**(10.5)**	**(10.4)**	**(10.3)**	**(10.3)**	**(10.3)**	**(10.3)**	**(10.3)**
Aboveground Biomass	(6.1)	(6.0)	(6.0)	(6.0)	(6.0)	(6.0)	(6.0)
Belowground Biomass	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)	(1.2)
Dead Wood	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Litter	(1.9)	(1.9)	(1.8)	(1.8)	(1.8)	(1.8)	(1.8)
Mineral Soil	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Grassland Converted to Forest Land	**(3.3)**	**(3.3)**	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**	**(3.4)**
Aboveground Biomass	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)	(1.7)
Belowground Biomass	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Dead Wood	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Litter	(1.0)	(1.0)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Mineral Soil	0.0	0.1	0.1	0.1	0.1	0.1	0.1
Other Land Converted to Forest Land	**(2.7)**	**(2.9)**	**(2.9)**	**(2.9)**	**(2.9)**	**(2.9)**	**(2.9)**
Aboveground Biomass	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Belowground Biomass	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)
Mineral Soil	(0.2)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Settlements Converted to Forest Land	**(9.4)**	**(9.3)**	**(9.3)**	**(9.3)**	**(9.3)**	**(9.3)**	**(9.3)**
Aboveground Biomass	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)	(5.7)
Belowground Biomass	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Dead Wood	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)	(1.1)
Litter	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)	(1.5)
Mineral Soil	+	+	+	+	+	+	+
Wetlands Converted to Forest Land	**(0.9)**	**(0.9)**	**(0.9)**	**(0.9)**	**(0.9)**	**(0.9)**	**(0.9)**
Aboveground Biomass	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Belowground Biomass	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.3)	(0.3)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Mineral Soil	+	+	+	+	+	+	+
Total Aboveground Biomass Flux	**(15.1)**	**(15.1)**	**(15.0)**	**(15.0)**	**(15.0)**	**(15.0)**	**(15.0)**
Total Belowground Biomass Flux	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**
Total Dead Wood Flux	**(3.2)**	**(3.2)**	**(3.2)**	**(3.2)**	**(3.2)**	**(3.2)**	**(3.2)**
Total Litter Flux	**(5.5)**	**(5.5)**	**(5.5)**	**(5.5)**	**(5.5)**	**(5.5)**	**(5.5)**
Total Mineral Soil Flux	**(0.2)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**
Total Flux	**(26.9)**	**(26.8)**	**(26.8)**	**(26.8)**	**(26.8)**	**(26.8)**	**(26.8)**

+ Absolute value does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. Forest ecosystem C stock changes from land conversion in Alaska are currently included in the Forest Land Remaining Forest Land section because there is not sufficient data to separate the changes at this time. Forest ecosystem C stock changes from land conversion do not include U.S. Territories because managed forest land in U.S. Territories is not currently included in Section 6.1 Representation of the U.S. Land Base. The forest ecosystem C stock changes from land conversion do not include Hawaii because there is not sufficient NFI data to support inclusion at this time. Also, it is not possible to separate Forest Land Remaining Forest Land from Land Converted to Forest Land in Wyoming because of the split annual cycle method used for population estimation, this prevents harmonization of forest land in Wyoming with the NRI/NLCD method used in section 6.1 Representation of the U.S. Land Base (CRF Category 4.1). See Annex 3.13, Table A-195 for annual differences between the forest area reported in Section 6.1 Representation of the U.S. Land Base and Section 6.3 Land Converted to Forest Land. The forest

ecosystem C stock changes from land conversion do not include trees on non-forest land (e.g., agroforestry systems and settlement areas—see Section 6.10 Settlements Remaining Settlements for estimates of C stock change from settlement trees). It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land section of the Inventory.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate stock changes in all forest C pools for Land Converted to Forest Land. National Forest Inventory data and IPCC (2006) defaults for reference C stocks were used to compile separate estimates for the five C storage pools. Estimates for Aboveground and Belowground Biomass, Dead Wood and Litter were based on data collected from the extensive array of permanent, annual NFI plots and associated models (e.g., live tree belowground biomass estimates) in the United States (USDA Forest Service 2022b, 2022c). Carbon conversion factors were applied at the individual plot and then appropriately expanded to state population estimates, which are summed to provide the national estimate. To ensure consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, all soil estimates are based on methods from Ogle et al. (2003, 2006) and IPCC (2006).

The methods used for estimating carbon stocks and stock changes in the Land Converted to Forest Land are consistent with those used for Forest Land Remaining Forest Land. For land-use conversion, IPCC (2006) default biomass C stock values were applied in the year of conversion on individual plots to estimate the carbon stocks removed due to land-use conversion from Croplands and Grasslands. There is no biomass loss data or IPCC (2006) defaults to include transfers, losses, or gains of carbon in the year of the conversion for other land use (i.e., Other Lands, Settlements, Wetlands) conversions to Forest Land so these were incorporated for these conversion categories. All annual NFI plots included in the public FIA database as of August 2022 were used in this Inventory. Forest Land conditions were observed on NFI plots at time t_0 and at a subsequent time $t_1=t_0+s$, where s is the time step (time measured in years) and is indexed by discrete (e.g., 5 year) forest age classes. The inventory from t_0 was then projected from t_1 to 2021. This projection approach requires simulating changes in the age-class distribution resulting from forest aging and disturbance events and then applying C density estimates for each age class to obtain population estimates for the nation.

Carbon in Biomass

Live tree C pools include aboveground and belowground (coarse root) biomass of live trees with diameter at breast height (dbh) of at least 2.54 cm at 1.37 m above the forest floor. Separate estimates were made for above and belowground biomass components. If inventory plots included data on individual trees, above- and belowground tree C was based on Woodall et al. (2011a), which is also known as the component ratio method (CRM), and is a function of volume, species, and diameter. An additional component of foliage, which was not explicitly included in Woodall et al. (2011a), was added to each tree following the same CRM method.

Understory vegetation is a minor component of biomass and is defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For the current Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density were based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003). Understory biomass represented over one percent of C in biomass, but its contribution rarely exceeded 2 percent of the total.

Biomass losses associated with conversion from Grassland and Cropland to Forest Land were assumed to occur in the year of conversion. To account for these losses, IPCC (2006) defaults for aboveground and belowground biomass on Grasslands and aboveground biomass on Croplands were subtracted from sequestration in the year of the conversion. As previously discussed, for all other land use (i.e., Other Lands, Settlements, Wetlands) conversions to Forest Land no biomass loss data were available, and no IPCC (2006) defaults currently exist to include transfers, losses, or gains of carbon in the year of the conversion, so none were incorporated for these

conversion categories. As defaults or country-specific data become available for these conversion categories, they will be incorporated.

Carbon in Dead Organic Matter

Dead organic matter was initially calculated as three separate pools—standing dead trees, downed dead wood, and litter—with C stocks estimated from sample data or from models. The standing dead tree C pool includes aboveground and belowground (coarse root) biomass for trees of at least 12.7 cm dbh. Calculations followed the basic method applied to live trees (Woodall et al. 2011a) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). Downed dead wood estimates are based on measurement of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008; Woodall et al. 2013). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. A modeling approach, using litter C measurements from FIA plots (Domke et al. 2016) was used to estimate litter C for every FIA plot used in the estimation framework. Dead organic matter C stock estimates are included for all land-use conversions to Forest Land.

Mineral Soil Carbon Stock Changes

A Tier 2 method is applied to estimate mineral soil C stock changes for Land Converted to Forest Land (Ogle et al. 2003, 2006; IPCC 2006). For this method, land is stratified by climate, soil types, land use, and land management activity, and then assigned reference carbon levels and factors for the forest land and the previous land use. The difference between the stocks is reported as the stock change under the assumption that the change occurs over 20 years. Reference C stocks have been estimated from data in the National Soil Survey Characterization Database (USDA-NRCS 1997), and U.S.-specific stock change factors have been derived from published literature (Ogle et al. 2003, 2006). Land use and land-use change patterns are determined from a combination of the Forest Inventory and Analysis Dataset (FIA), the 2015 National Resources Inventory (NRI) (USDA-NRCS 2018), and National Land Cover Dataset (NLCD) (Yang et al. 2018). See Annex 3.12 (Methodology for Estimating N_2O Emissions, CH_4 Emissions and Soil Organic C Stock Changes from Agricultural Soil Management) for more information about this method. Note that soil C in this Inventory is reported to a depth of 100 cm in the Forest Land Remaining Forest Land category (Domke et al. 2017) while other land-use categories report soil C to a depth of 30 cm. However, to ensure consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, soil C estimates were based on a 30 cm depth using methods from Ogle et al. (2003, 2006) and IPCC (2006), as described in Annex 3.12.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Mineral soil organic C stock changes from 2016 to 2021 are estimated using a linear extrapolation method described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data and is a standard data splicing method for estimating emissions at the end of a time series if activity data are not available (IPCC 2006). The Tier 2 method described previously will be applied to recalculate the 2016 to 2021 emissions in a future Inventory.

Uncertainty

A quantitative uncertainty analysis placed bounds on the flux estimates for Land Converted to Forest Land through a combination of sample-based and model-based approaches to uncertainty for forest ecosystem CO_2 Eq. flux (IPCC Approach 1). Uncertainty estimates for forest pool C stock changes were developed using the same

methodologies as described in the Forest Land Remaining Forest Land section for aboveground and belowground biomass, dead wood, and litter. The exception was when IPCC default estimates were used for reference C stocks in certain conversion categories (i.e., Cropland Converted to Forest Land and Grassland Converted to Forest Land). In those cases, the uncertainties associated with the IPCC (2006) defaults were included in the uncertainty calculations. IPCC Approach 2 was used for mineral soils and is described in the Cropland Remaining Cropland section.

Uncertainty estimates are presented in Table 6-26 for each land conversion category and C pool. Uncertainty estimates were obtained using a combination of sample-based and model-based approaches for all non-soil C pools (IPCC Approach 1) and a Monte Carlo approach (IPCC Approach 2) was used for mineral soil. Uncertainty estimates were combined using the error propagation model (IPCC Approach 1). The combined uncertainty for all C stocks in Land Converted to Forest Land ranged from 11 percent below to 11 percent above the 2021 C stock change estimate of -98.3 MMT CO_2 Eq.

Table 6-26: Quantitative Uncertainty Estimates for Forest C Pool Stock Changes (MMT CO_2 Eq. per Year) in 2021 from Land Converted to Forest Land by Land Use Change

Land Use/Carbon Pool	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Range[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Cropland Converted to Forest Land	**(37.8)**	**(46.5)**	**(29.2)**	**-23%**	**23%**
Aboveground Biomass	(21.9)	(30.3)	(13.5)	-38%	38%
Belowground Biomass	(4.2)	(5.3)	(3.2)	-25%	25%
Dead Wood	(4.8)	(6.0)	(3.5)	-26%	26%
Litter	(6.8)	(7.8)	(5.7)	-16%	16%
Mineral Soils	(0.2)	(0.5)	0.1	-135%	135%
Grassland Converted to Forest Land	**(12.3)**	**(14.8)**	**(9.9)**	**-20%**	**20%**
Aboveground Biomass	(6.2)	(7.6)	(4.9)	-22%	22%
Belowground Biomass	(1.0)	(1.3)	(0.7)	-28%	28%
Dead Wood	(1.2)	(1.4)	(1.1)	-12%	12%
Litter	(4.1)	(4.7)	(3.6)	-13%	13%
Mineral Soils	0.3	(0.1)	0.6	-137%	137%
Other Lands Converted to Forest Land	**(10.7)**	**(13.0)**	**(8.3)**	**-22%**	**22%**
Aboveground Biomass	(4.8)	(6.9)	(2.7)	-44%	44%
Belowground Biomass	(0.8)	(1.3)	(0.4)	-51%	51%
Dead Wood	(1.3)	(1.9)	(0.8)	-42%	42%
Litter	(2.5)	(3.2)	(1.9)	-25%	25%
Mineral Soils	(1.1)	(1.9)	(0.4)	-68%	68%
Settlements Converted to Forest Land	**(34.0)**	**(40.5)**	**(27.5)**	**-19%**	**19%**
Aboveground Biomass	(20.7)	(26.9)	(14.5)	-30%	30%
Belowground Biomass	(3.9)	(5.3)	(2.6)	-33%	33%
Dead Wood	(3.9)	(5.1)	(2.8)	-29%	29%
Litter	(5.3)	(6.2)	(4.4)	-17%	17%
Mineral Soil	(0.1)	(0.1)	(0.0)	-47%	47%
Wetlands Converted to Forest Land	**(3.4)**	**(3.6)**	**(3.3)**	**-5%**	**5%**
Aboveground Biomass	(1.5)	(1.7)	(1.4)	-9%	9%
Belowground Biomass	(0.3)	(0.3)	(0.3)	-11%	11%
Dead Wood	(0.4)	(0.4)	(0.3)	-12%	12%
Litter	(1.3)	(1.3)	(1.2)	-5%	5%
Mineral Soils	0.0	0.0	0.0	NA	NA
Total: Aboveground Biomass	**(55.1)**	**(65.9)**	**(44.4)**	**-19%**	**19%**
Total: Belowground Biomass	**(10.3)**	**(12.0)**	**(8.5)**	**-17%**	**17%**
Total: Dead Wood	**(11.6)**	**(13.4)**	**(9.8)**	**-15%**	**15%**
Total: Litter	**(20.1)**	**(21.7)**	**(18.5)**	**-8%**	**8%**

Total: Mineral Soils	**(1.1)**	**(1.7)**	**(0.6)**	**-51%**	**51%**
Total: Lands Converted to Forest Lands	**(98.3)**	**(109.4)**	**(87.1)**	**-11%**	**11%**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

NA (Not Applicable)

[a] Range of flux estimate for 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net uptake. It is not possible to separate emissions from drained organic soils between Forest Land Remaining Forest Land and Land Converted to Forest Land so estimates for organic soils are included in Table 6-8 and Table 6-9 of the Forest Land Remaining Forest Land section of the Inventory.

QA/QC and Verification

See QA/QC and Verification sections under Forest Land Remaining Forest Land and, for mineral soil estimates, Cropland Remaining Cropland.

Recalculations Discussion

The approach for estimating carbon stock changes in Land Converted to Forest Land is consistent with the methods used for Forest Land Remaining Forest Land and is described in Annex 3.13. The Land Converted to Forest Land estimates in this Inventory are based on the land-use change information in the annual NFI. All conversions are based on empirical estimates compiled using plot remeasurements from the NFI, IPCC (2006) default biomass C stocks removed from Croplands and Grasslands in the year of conversion on individual plots and the Tier 2 method for estimating mineral soil C stock changes (Ogle et al. 2003, 2006; IPCC 2006). All annual NFI plots included in the public FIA database as of August 2022 were used in this Inventory. This is the fourth year that remeasurement data from the annual NFI were available throughout the conterminous United States (with the exception of Wyoming) to estimate land-use conversion. The availability of remeasurement data from the annual NFI allowed for consistent plot-level estimation of C stocks and stock changes for Forest Land Remaining Forest Land and the Land Converted to Forest Land categories. Estimates in the previous Inventory were based on state-level carbon density estimates and a combination of NRI data and NFI data in the eastern United States. The refined analysis in this Inventory resulted in changes in the Land Converted to Forest Land categories. Overall, the Land Converted to Forest Land C stock changes decreased by approximately 1 percent in 2020 between the previous Inventory and the current Inventory (Table 6-27). This decrease is directly attributed to the incorporation of annual NFI data into the compilation system.

Table 6-27: Recalculations of the Net C Flux from Forest C Pools in Land Converted to Forest Land by Land Use Change Category (MMT C)

Conversion category and Carbon pool (MMT C)	2020 Estimate, Previous Inventory	2020 Estimate, Current Inventory	2021 Estimate, Current Inventory
Cropland Converted to Forest Land	**(10.8)**	**(10.3)**	**(10.3)**
Aboveground Biomass	(6.3)	(6.0)	(6.0)
Belowground Biomass	(1.2)	(1.2)	(1.2)
Dead Wood	(1.4)	(1.3)	(1.3)
Litter	(1.9)	(1.8)	(1.8)
Mineral soil	(0.1)	(0.1)	(0.1)
Grassland Converted to Forest Land	**(3.2)**	**(3.4)**	**(3.4)**
Aboveground Biomass	(1.7)	(1.7)	(1.7)
Belowground Biomass	(0.3)	(0.3)	(0.3)
Dead Wood	(0.3)	(0.3)	(0.3)
Litter	(1.1)	(1.1)	(1.1)
Mineral soil	0.1	0.1	0.1
Other Land Converted to Forest Land	**(3.0)**	**(2.9)**	**(2.9)**

Aboveground Biomass	(1.3)	(1.3)	(1.3)
Belowground Biomass	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)
Litter	(0.7)	(0.7)	(0.7)
Mineral soil	(0.3)	(0.3)	(0.3)
Settlements Converted to Forest Land	**(9.3)**	**(9.3)**	**(9.3)**
Aboveground Biomass	(5.7)	(5.7)	(5.7)
Belowground Biomass	(1.1)	(1.1)	(1.1)
Dead Wood	(1.1)	(1.1)	(1.1)
Litter	(1.5)	(1.5)	(1.5)
Mineral soil	(0.0)	(0.0)	(0.0)
Wetlands Converted to Forest Land	**(0.9)**	**(0.9)**	**(0.9)**
Aboveground Biomass	(0.4)	(0.4)	(0.4)
Belowground Biomass	(0.1)	(0.1)	(0.1)
Dead Wood	(0.1)	(0.1)	(0.1)
Litter	(0.3)	(0.4)	(0.4)
Mineral soil	0.0	0.0	0.0
Total Aboveground Biomass Flux	**(15.3)**	**(15.0)**	**(15.0)**
Total Belowground Biomass Flux	**(2.9)**	**(2.8)**	**(2.8)**
Total Dead Wood Flux	**(3.2)**	**(3.2)**	**(3.2)**
Total Litter Flux	**(5.4)**	**(5.5)**	**(5.5)**
Total SOC (mineral) Flux	**(0.3)**	**(0.3)**	**(0.3)**
Total Flux	**(27.1)**	**(26.8)**	**(26.8)**

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Planned Improvements

There are many improvements necessary to improve the estimation of carbon stock changes associated with land-use conversion to forest land over the entire time series. First, soil C has historically been reported to a depth of 100 cm in the Forest Land Remaining Forest Land category (Domke et al. 2017) while other land-use categories (e.g., Grasslands and Croplands) report soil carbon to a depth of 30 cm. To ensure greater consistency in the Land Converted to Forest Land category where C stock transfers occur between land-use categories, all mineral soil estimates in the Land Converted to Forest Land category in this Inventory are based on methods from Ogle et al. (2003, 2006) and IPCC (2006). Methods have recently been developed (Domke et al. 2017) to estimate soil C to depths of 20, 30, and 100 cm in the Forest Land category using in situ measurements from the Forest Inventory and Analysis program within the USDA Forest Service and the International Soil Carbon Network. In subsequent Inventories, a common reporting depth will be defined for all land-use conversion categories and Domke et al. (2017) will be used in the Forest Land Remaining Forest Land and Land Converted to Forest Land categories to ensure consistent reporting across all forest land. Second, there will be improved methods and models to characterize standing live and dead tree carbon in the next Inventory. Third, due to the 5 to 10-year remeasurement periods within the FIA program and limited land-use change information available over the entire time series, estimates presented in this section may not reflect the entire 20-year conversion history. Work is underway to integrate the dense time series of remotely sensed data into a new estimation system, which will facilitate land conversion estimation over the entire time series.

6.4 Cropland Remaining Cropland (CRF Category 4B1)

Carbon (C) in cropland ecosystems occurs in biomass, dead organic matter, and soils. However, C storage in cropland biomass and dead organic matter is relatively ephemeral and does not need to be reported according to

the IPCC (2006), with the exception of C stored in perennial woody crop biomass, such as citrus groves and apple orchards, in addition to the biomass, downed wood and dead organic matter in agroforestry systems. Within soils, C is found in organic and inorganic forms of C, but soil organic C is the main source and sink for atmospheric CO_2 in most soils. IPCC (2006) recommends reporting changes in soil organic C stocks due to agricultural land use and management activities for mineral and organic soils.[38]

Well-drained mineral soils typically contain from 1 to 6 percent organic C by weight, whereas mineral soils with high water tables for substantial periods of a year may contain significantly more C (NRCS 1999). Conversion of mineral soils from their native state to agricultural land uses can cause up to half of the soil organic C to be lost to the atmosphere due to enhanced microbial decomposition. The rate and ultimate magnitude of C loss depends on subsequent management practices, climate and soil type (Ogle et al. 2005). Agricultural practices, such as clearing, drainage, tillage, planting, grazing, crop residue management, fertilization, application of biosolids (i.e., treated sewage sludge) and flooding, can modify both organic matter inputs and decomposition, and thereby result in a net C stock change (Paustian et al. 1997a; Lal 1998; Conant et al. 2001; Ogle et al. 2005; Griscom et al. 2017; Ogle et al. 2019). Eventually, the soil can reach a new equilibrium that reflects a balance between C inputs (e.g., decayed plant matter, roots, and organic amendments such as manure and crop residues) and C loss through microbial decomposition of organic matter (Paustian et al. 1997b).

Organic soils, also referred to as histosols, include all soils with more than 12 to 20 percent organic C by weight, depending on clay content (NRCS 1999; Brady and Weil 1999). The organic layer of these soils can be very deep (i.e., several meters), and form under inundated conditions that results in minimal decomposition of plant residues. When organic soils are prepared for crop production, they are drained and tilled, leading to aeration of the soil that accelerates both the decomposition rate and CO_2 emissions.[39] Due to the depth and richness of the organic layers, C loss from drained organic soils can continue over long periods of time, which varies depending on climate and composition (i.e., decomposability) of the organic matter (Armentano and Menges 1986). Due to deeper drainage and more intensive management practices, the use of organic soils for annual crop production leads to higher C loss rates than drainage of organic soils in grassland or forests (IPCC 2006).

Cropland Remaining Cropland includes all cropland in an Inventory year that has been cropland for a continuous time period of at least 20 years. This determination is based on the United States Department of Agriculture (USDA) National Resources Inventory (NRI) for non-federal lands (USDA-NRCS 2018a) and the National Land Cover Dataset for federal lands (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015). Cropland includes all land that is used to produce food and fiber, forage that is harvested and used as feed (e.g., hay and silage), in addition to cropland that has been enrolled in the Conservation Reserve Program (CRP)[40] (i.e., considered set-aside cropland).

There are several discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Cropland Remaining Cropland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Cropland Remaining Cropland Inventory. Second, cropland in Alaska is not included in the Inventory, and third, some miscellaneous croplands are also not included in the Inventory due to limited understanding of greenhouse gas emissions from these management systems (e.g., aquaculture). These differences lead to discrepancies

[38] Carbon dioxide emissions associated with liming and urea application are also estimated but are included in the Liming and Urea Fertilization sections of the Agriculture chapter of the Inventory.

[39] N_2O emissions from drained organic soils are included in the Agricultural Soil Management section of the Agriculture chapter of the Inventory.

[40] The Conservation Reserve Program (CRP) is a land conservation program administered by the Farm Service Agency (FSA). In exchange for a yearly rental payment, farmers enrolled in the program agree to remove environmentally sensitive land from agricultural production and plant species that will improve environmental health and quality. Contracts for land enrolled in CRP are 10 to 15 years in length. The long-term goal of the program is to re-establish valuable land cover to help improve water quality, prevent soil erosion, and reduce loss of wildlife habitat.

between the managed area in Cropland Remaining Cropland and the cropland area included in the Inventory analysis (Table 6-31). Improvements are underway to incorporate the latest NRI dataset, croplands in Alaska and miscellaneous croplands as part of future C inventories (See Planned Improvements section).

Land use and land management of mineral soils are the largest contributor to total net C stock change, especially in the early part of the time series (see Table 6-28 and Table 6-29). In 2021, mineral soils are estimated to sequester 51.8 MMT CO_2 Eq. from the atmosphere (14.1 MMT C). This rate of C storage in mineral soils represents about a 11 percent decrease in the rate since the initial reporting year of 1990. Carbon dioxide emissions from organic soils are 32.9 MMT CO_2 Eq. (9.0 MMT C) in 2021, which is a 6 percent decrease compared to 1990. In total, United States agricultural soils in Cropland Remaining Cropland sequestered approximately 18.9 MMT CO_2 Eq. (5.2 MMT C) in 2021.

Table 6-28: Net CO_2 Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT CO_2 Eq.)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Mineral Soils	(58.2)	(62.4)	(55.1)	(49.4)	(47.4)	(56.2)	(51.8)
Organic Soils	35.0	33.4	32.8	32.8	32.9	32.9	32.9
Total Net Flux	**(23.2)**	**(29.0)**	**(22.3)**	**(16.6)**	**(14.5)**	**(23.3)**	**(18.9)**

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-29: Net CO_2 Flux from Soil C Stock Changes in Cropland Remaining Cropland (MMT C)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Mineral Soils	(15.9)	(17.0)	(15.0)	(13.5)	(12.9)	(15.3)	(14.1)
Organic Soils	9.5	9.1	8.9	8.9	9.0	9.0	9.0
Total Net Flux	**(6.3)**	**(7.9)**	**(6.1)**	**(4.5)**	**(4.0)**	**(6.4)**	**(5.2)**

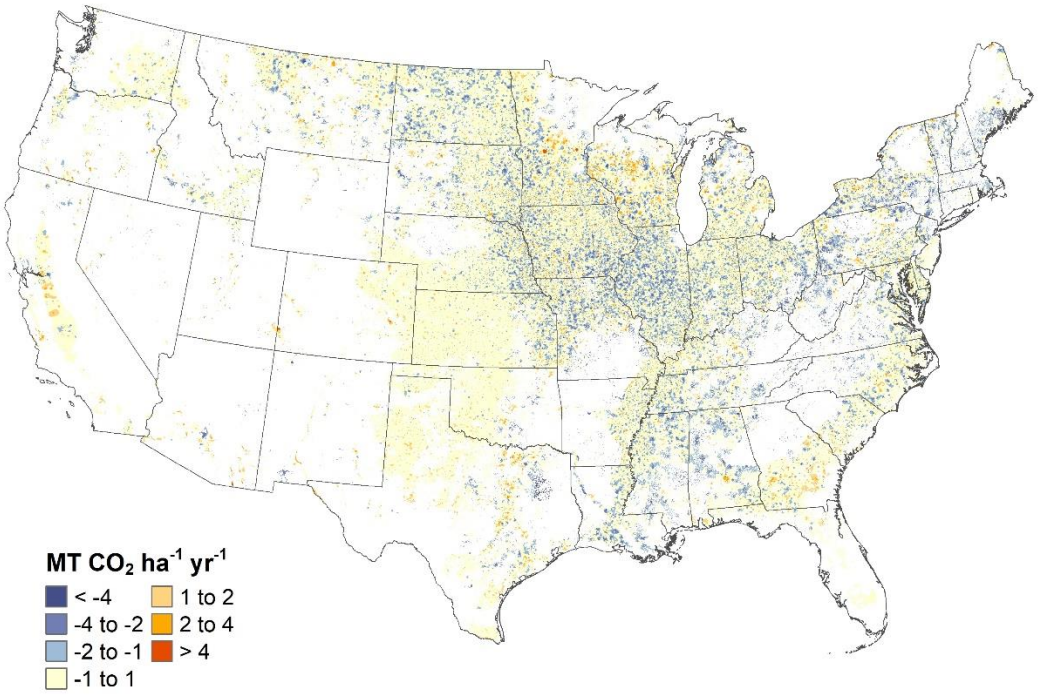
Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Soil organic C stocks increase in Cropland Remaining Cropland largely due to conservation tillage (i.e., reduced- and no-till practices), land set-aside from production in the Conservation Reserve Program, annual crop production with hay or pasture in rotations, and manure amendments. However, there is a decline in the net amount of C sequestration (i.e., 2021 is 18 percent less than 1990 for mineral and organic soils), and this decline is due to lower sequestration rates in set-aside lands, less impact of manure amendments and annual crop production with hay and pasture in rotation. Soil organic C losses from drainage of organic soils are relatively stable across the time series with a small decline associated with the land base declining for Cropland Remaining Cropland on organic soils since 1990.

The spatial variability in the 2015 annual soil organic C stock changes[41] are displayed in Figure 6-6 and Figure 6-7 for mineral and organic soils, respectively. Isolated areas with high rates of C accumulation occur throughout the agricultural land base in the United States, but there are more concentrated areas. In particular, higher rates of net C accumulation in mineral soils occur in the Corn Belt region, which is the region with the largest amounts of conservation tillage, along with moderate rates of CRP enrollment. The regions with the highest rates of emissions from drainage of organic soils occur in the Southeastern Coastal Region (particularly Florida), upper Midwest and Northeast surrounding the Great Lakes, and isolated areas along the Pacific Coast (particularly California), which coincides with the largest concentrations of organic soils in the United States that are used for agricultural production.

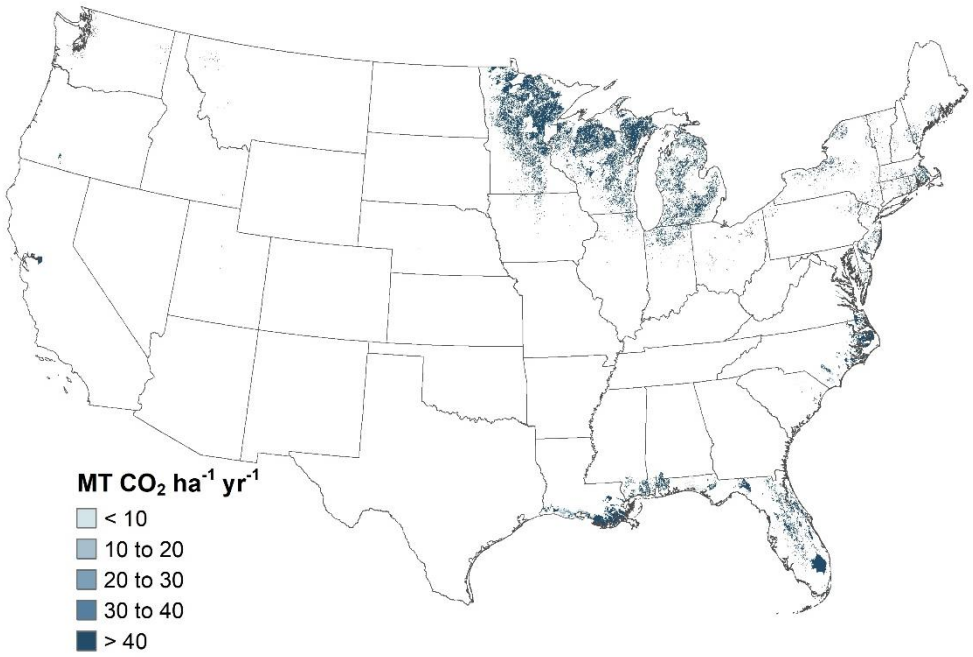
[41] Only national-scale emissions are estimated for 2016 to 2021 in this Inventory using the surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Figure 6-6: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015. Negative values represent a net increase in soil organic C stocks, and positive values represent a net decrease in soil organic C stocks.

Figure 6-7: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Cropland Remaining Cropland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate changes in soil organic C stocks for Cropland Remaining Cropland, including (1) agricultural land use and management activities on mineral soils; and (2) agricultural land use and management activities on organic soils. Carbon dioxide emissions and removals[42] due to changes in mineral soil organic C stocks are estimated using a Tier 3 method for the majority of annual crops (Ogle et al. 2010). A Tier 2 IPCC method is used for the remaining crops not included in the Tier 3 method (see list of crops in the Mineral Soil Carbon Stock Changes section below) (Ogle et al. 2003, 2006). In addition, a Tier 2 method is used for very gravelly, cobbly, or shaley soils (i.e., classified as soils that have greater than 35 percent of soil volume comprised of gravel, cobbles, or shale, regardless of crop). Emissions from organic soils are estimated using a Tier 2 IPCC method. While a combination of Tier 2 and 3 methods are used to estimate C stock changes across most of the time series, a surrogate data method has been applied to estimate stock changes in the last few years of the Inventory. Stock change estimates based on surrogate data will be recalculated in a future Inventory report using the Tier 2 and 3 methods when data become available.

Soil organic C stock changes on non-federal lands are estimated for Cropland Remaining Cropland (as well as agricultural land falling into the IPCC categories Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland) according to land use histories recorded in the USDA NRI survey (USDA-NRCS 2018a). The NRI is a statistically-based sample of all non-federal land, and includes approximately 489,178 survey locations in agricultural land for the conterminous United States and Hawaii. Each survey location is associated with an

[42] Removals occur through uptake of CO_2 into crop and forage biomass that is later incorporated into soil C pools.

"expansion factor" that allows scaling of C stock changes from NRI survey locations to the entire country (i.e., each expansion factor represents the amount of area that is expected to have the same land use/management history as the sample point). Land use and some management information (e.g., crop type, soil attributes, and irrigation) are collected for each NRI point on a 5-year cycle beginning from 1982 through 1997. For cropland, data has been collected for 4 out of 5 years during each survey cycle (i.e., 1979 through 1982, 1984 through 1987, 1989 through 1992, and 1994 through 1997). In 1998, the NRI program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2018a). NRI survey locations are classified as Cropland Remaining Cropland in a given year between 1990 and 2015 if the land use has been cropland for a continuous time period of at least 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Cropland Remaining Cropland in the early part of the time series to the extent that some areas are converted to cropland between 1971 and 1978.

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate organic C stock changes for mineral soils on the majority of land that is used to produce annual crops and forage crops that are harvested and used as feed (e.g., hay and silage) in the United States. These crops include alfalfa hay, barley, corn, cotton, grass hay, grass-clover hay, oats, peanuts, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, tobacco and wheat, but is not applied to estimate organic C stock changes from other crops or rotations with other crops. The model-based approach uses the DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001, 2011) to estimate soil organic C stock changes, soil nitrous oxide (N_2O) emissions from agricultural soil management, and methane (CH_4) emissions from rice cultivation. Carbon and N dynamics are linked in plant-soil systems through the biogeochemical processes of microbial decomposition and plant production (McGill and Cole 1981). Coupling the two source categories (i.e., agricultural soil C and N_2O) in a single inventory analysis ensures that there is a consistent treatment of the processes and interactions between C and N cycling in soils.

The remaining crops on mineral soils are estimated using an IPCC Tier 2 method (Ogle et al. 2003), including some vegetables, perennial/horticultural crops, and crops that are rotated with these crops. The Tier 2 method is also used for very gravelly, cobbly, or shaley soils (greater than 35 percent by volume), and soil organic C stock changes on federal croplands. Mineral soil organic C stocks are estimated using a Tier 2 method for these areas because the DayCent model, which is used for the Tier 3 method, has not been fully tested for estimating C stock changes associated with these crops and rotations, as well as cobbly, gravelly, or shaley soils. In addition, there is insufficient information to simulate croplands on federal lands using DayCent.

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 stock change data that are derived using the Tier 2 and 3 methods. Surrogate data for these regression models include corn and soybean yields from USDA-NASS statistics,[43] and weather data from the PRISM Climate Group (PRISM 2018). See Box 6-4 for more information about the surrogate data method. Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

[43] See https://quickstats.nass.usda.gov/.

Box 6-4: Surrogate Data Method

Time series extension is needed because there are typically gaps at the end of the time series. This is mainly because the NRI, which provides critical data for estimating greenhouse gas emissions and removals, does not release new activity data every year.

A surrogate data method has been used to impute missing emissions at the end of the time series for soil organic C stock changes in Cropland Remaining Cropland, Land Converted to Cropland, Grassland Remaining Grassland, and Land Converted to Grassland. A linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to estimate the relationship between the surrogate data and the modeled 1990 to 2015 emissions data that has been compiled using the inventory methods described in this section. The model to extend the time series is given by

$$Y = X\beta + \varepsilon,$$

where Y is the response variable (e.g., soil organic carbon), Xβ contains specific surrogate data depending on the response variable, and ε is the remaining unexplained error. Models with a variety of surrogate data were tested, including commodity statistics, weather data, or other relevant information. Parameters are estimated from the emissions data for 1990 to 2015 using standard statistical techniques, and these estimates are used to predict the missing emissions data for 2016 to 2021.

A critical issue with application of splicing methods is to adequately account for the additional uncertainty introduced by predicting emissions rather than compiling the full inventory. Consequently, uncertainty will increase for years with imputed estimates based on the splicing methods, compared to those years in which the full inventory is compiled. This added uncertainty is quantified within the model framework using a Monte Carlo approach. The approach requires estimating parameters for results in each iteration of the Monte Carlo analysis for the full inventory (i.e., the surrogate data model is refit with the emissions estimated in each Monte Carlo iteration from the full inventory analysis with data from 1990 to 2015), estimating emissions from each model and deriving confidence intervals combining uncertainty across all iterations. This approach propagates uncertainties through the calculations from the original inventory and the surrogate data method. Furthermore, the 95 percent confidence intervals are estimated using the 3 sigma rules assuming a unimodal density (Pukelsheim 1994).

Tier 3 Approach. Mineral soil organic C stocks and stock changes are estimated to a 30 cm depth using the DayCent biogeochemical[44] model (Parton et al. 1998; Del Grosso et al. 2001, 2011), which simulates cycling of C, N, and other nutrients in cropland, grassland, forest, and savanna ecosystems. The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Input data on land use and management are specified at a daily resolution and include land-use type, crop/forage type, and management activities (e.g., planting, harvesting, fertilization, manure amendments, tillage, irrigation, cover crops, and grazing; more information is provided below). The model simulates net primary productivity (NPP) using the NASA-CASA production algorithm MODIS Enhanced Vegetation Index (EVI) products, MOD13Q1 and MYD13Q1, for most croplands[45] (Potter et al. 1993, 2007). The model simulates soil temperature and water dynamics, using daily weather data from a 4-

[44] Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

[45] NPP is estimated with the NASA-CASA algorithm for most of the cropland that is used to produce major commodity crops in the central United States from 2000 to 2015. Other regions and years prior to 2000 are simulated with a method that incorporates water, temperature and moisture stress on crop production (see Metherell et al. 1993), but does not incorporate the additional information about crop condition provided with remote sensing data.

kilometer gridded product developed by the PRISM Climate Group (2018), and soil attributes from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2019). This method is more accurate than the Tier 1 and 2 approaches provided by the IPCC (2006) because the simulation model treats changes as continuous over time as opposed to the simplified discrete changes represented in the default method (see Box 6-5 for additional information).

Box 6-5: Tier 3 Approach for Soil C Stocks Compared to Tier 1 or 2 Approaches

A Tier 3 model-based approach is used to estimate soil organic C stock changes for the majority of agricultural land with mineral soils. This approach results in a more complete and accurate estimation of soil organic C stock changes and entails several fundamental differences from the IPCC Tier 1 or 2 methods, as described below.

1) The IPCC Tier 1 and 2 methods are simplified approaches for estimating soil organic C stock changes and classify land areas into discrete categories based on highly aggregated information about climate (six regions), soil (seven types), and management (eleven management systems) in the United States. In contrast, the Tier 3 model incorporates the same variables (i.e., climate, soils, and management systems) with considerably more detail both temporally and spatially, and captures multi-dimensional interactions through the more complex model structure.

2) The IPCC Tier 1 and 2 methods have a coarser spatial resolution in which data are aggregated to soil types in climate regions, of which there about 30 combinations in the United States. In contrast, the Tier 3 model simulates soil C dynamics at about 350,000 individual NRI survey locations in crop fields and grazing lands.

The IPCC Tier 1 and 2 methods use a simplified approach for estimating changes in C stocks that assumes a step-change from one equilibrium level of the C stock to another equilibrium level. In contrast, the Tier 3 approach simulates a continuum of C stock changes that may reach a new equilibrium over an extended period of time depending on the environmental conditions (i.e., a new equilibrium often requires hundreds to thousands of years to reach). More specifically, the DayCent model, which is used in the United States Inventory, simulates soil C dynamics (and CO_2 emissions and uptake) on a daily time step based on C emissions and removals from plant production and decomposition processes. These changes in soil organic C stocks are influenced by multiple factors that affect primary production and decomposition, including changes in land use and management, weather variability and secondary feedbacks between management activities, climate, and soils.

Historical land-use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018a). Additional sources of activity data are used to supplement the activity data from the NRI. The USDA-NRCS Conservation Effects and Assessment Project (CEAP) provides data on a variety of cropland management activities, and is used to inform the inventory analysis about tillage practices, mineral fertilization, manure amendments, cover cropping management, as well as planting and harvest dates (USDA-NRCS 2018b; USDA-NRCS 2012). CEAP data are collected at a subset of NRI survey locations, and currently provide management information from approximately 2002 to 2006. These data are combined with other datasets in an imputation analysis that extend the time series from 1990 to 2015. This imputation analysis is comprised of three steps: a) determine the trends in management activity across the time series by combining information across several datasets (discussed below), b) use an artificial neural network to determine the likely management practice at a given NRI survey location (Cheng and Titterington 1994), and c) assign management practices from the CEAP survey to the specific NRI locations using predictive mean matching methods that is adapted to reflect the trending information (Little 1988, van Buuren 2012). The artificial neural network is a machine learning method that approximates nonlinear functions of inputs and searches through a very large class of models to impute an initial value for management practices at specific NRI survey locations. The predictive mean matching method identifies the most similar management activity recorded in the CEAP survey that matches the prediction from the artificial neural network. Predictive mean matching ensures that imputed management activities are realistic for each NRI survey location, and not odd or physically unrealizable results that could be generated by the artificial neural network. There are six complete imputations of the management activity data using these methods.

To determine trends in mineral fertilization and manure amendments from 1979 to 2015, CEAP data are combined with information on fertilizer use and rates by crop type for different regions of the United States from the USDA Economic Research Service. The data collection program was known as the Cropping Practices Surveys through 1995 (USDA-ERS 1997), and is now part of a data collection program known as the Agricultural Resource Management Surveys (ARMS) (USDA-ERS 2018). Additional data on fertilization practices are compiled through other sources particularly the National Agricultural Statistics Service (USDA-NASS 1992, 1999, 2004). The donor survey data from CEAP contain both mineral fertilizer rates and manure amendment rates, so that the selection of a donor via predictive mean matching yields the joint imputation of both rates. This approach captures the relationship between mineral fertilization and manure amendment practices for U.S. croplands based directly on the observed patterns in the CEAP survey data.

To determine the trends in tillage management from 1979 to 2015, CEAP data are combined with Conservation Technology Information Center data between 1989 and 2004 (CTIC 2004) and USDA-ERS Agriculture Resource Management Surveys (ARMS) data from 2002 to 2015 (Claasen et al. 2018). CTIC data are adjusted for long-term adoption of no-till agriculture (Towery 2001). It is assumed that the majority of agricultural lands are managed with full tillage prior to 1985. For cover crops, CEAP data are combined with information from 2011 to 2016 in the USDA Census of Agriculture (USDA-NASS 2012, 2017). It is assumed that cover cropping was minimal prior to 1990 and the rates increased linearly over the decade to the levels of cover crop management derived from the CEAP survey.

Uncertainty in the C stock estimates from DayCent associated with management activity includes input uncertainty due to missing management data in the NRI survey, which is imputed from other sources as discussed above; model uncertainty due to incomplete specification of C and N dynamics in the DayCent model algorithms and associated parameterization; and sampling uncertainty associated with the statistical design of the NRI survey. To assess input uncertainty, the C and N dynamics at each NRI survey location are simulated six times using the imputation product and other model driver data. Uncertainty in parameterization and model algorithms are determined using a structural uncertainty estimator as described in Ogle et al. (2007, 2010). Sampling uncertainty is assessed using the NRI replicate sampling weights.

Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015 using the DayCent model. However, note that the areas have been modified in the original NRI survey through the process in which the Forest Inventory and Analysis (FIA) survey data and the National Land Cover Dataset (Homer et al. 2007; Fry et al. 2011; Homer et al. 2015) are harmonized with the NRI data. This process ensures that the areas of Forest Land Remaining Forest Land and Land Converted to Forest Land are consistent with other land-use categories while maintaining a consistent time series for the total land area of the United States. For example, if the FIA estimate less Cropland Converted to Forest Land than the NRI, then the amount of area for this land-use conversion is reduced in the NRI dataset and re-classified as Cropland Remaining Cropland (See Section 6.1, Representation of the U.S. Land Base for more information). Further elaboration on the methodology and data used to estimate stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 3 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Time series of activity data will be updated in a future inventory, and emissions from 2016 to 2021 will be recalculated.

Tier 2 Approach. In the IPCC Tier 2 method, data on climate, soil types, land use, and land management activity are used to classify land area and apply appropriate factors to estimate soil organic C stock changes to a 30 cm depth (Ogle et al. 2003, 2006). The primary source of activity data for land use, crop and irrigation histories is the 2015 NRI survey (USDA-NRCS 2018a). Each NRI survey location is classified by soil type, climate region, and management condition using data from other sources. Survey locations on federal lands are included in the NRI, but land use and cropping history are not compiled for these locations in the survey program (i.e., NRI is restricted to data collection on non-federal lands). Therefore, land-use patterns for the NRI survey locations on federal lands are

based on the National Land Cover Database (NLCD) (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007; Homer et al. 2015).

Additional management activities needed for the Tier 2 method are based on the imputation product described for the Tier 3 approach, including tillage practices, mineral fertilization, and manure amendments that are assigned to NRI survey locations. The one exception are activity data on wetland restoration of Conservation Reserve Program land that are obtained from Euliss and Gleason (2002). Climate zones in the United States are classified using mean precipitation and temperature (1950 to 2000) variables from the WorldClim data set (Hijmans et al. 2005) and potential evapotranspiration data from the Consortium for Spatial Information (CGIAR-CSI) (Zomer et al. 2008, 2007) (Figure A-9). IPCC climate zones are then assigned to NRI survey locations.

Reference C stocks are estimated using the National Soil Survey Characterization Database (NRCS 1997) with cultivated cropland as the reference condition, rather than native vegetation as used in IPCC (2006). Soil measurements under agricultural management are much more common and easily identified in the National Soil Survey Characterization Database (NRCS 1997) than are soils under a native condition, and therefore cultivated cropland provides a more robust sample for estimating the reference condition. Country-specific C stock change factors are derived from published literature to determine the impact of management practices on soil organic C storage (Ogle et al. 2003, 2006). The factors represent changes in tillage, cropping rotations, intensification, and land-use change between cultivated and uncultivated conditions. However, country-specific factors associated with organic matter amendments are not estimated due to an insufficient number of studies in the United States to analyze the impacts. Instead, factors from IPCC (2006) are used to estimate the effect of those activities.

Changes in soil organic C stocks for mineral soils are estimated 1,000 times for 1990 through 2015, using a Monte Carlo stochastic simulation approach and probability distribution functions for the country-specific stock change factors, reference C stocks, and land use activity data (Ogle et al. 2003; Ogle et al. 2006). Further elaboration on the methodology and data used to estimate stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future inventory, and emissions from 2016 to 2021 will be recalculated (see Planned Improvements section).

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Cropland Remaining Cropland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific C loss rates (Ogle et al. 2003) rather than default IPCC rates. The final estimates include a measure of uncertainty as determined from a Monte Carlo Simulation with 1,000 iterations. Emissions are based on the land area data for drained organic soils from 1990 to 2015 for Cropland Remaining Cropland in the 2015 NRI (USDA-NRCS 2018a). Further elaboration on the methodology and data used to estimate stock changes from organic soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the same Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in a future inventory when new activity data are incorporated into the analysis.

Uncertainty

Uncertainty is quantified for changes in soil organic C stocks associated with Cropland Remaining Cropland (including both mineral and organic soils). Uncertainty estimates are presented in Table 6-30 for each subsource (mineral and organic soil C stocks) and the methods that are used in the Inventory analyses (i.e., Tier 2 and Tier 3). Uncertainty for the Tier 2 and 3 approaches is derived using a Monte Carlo approach (see Annex 3.12 of EPA 2022 for further discussion). For 2016 to 2021, additional uncertainty is propagated through the Monte Carlo Analysis that is associated with the surrogate data method. Soil organic C stock changes from the Tier 2 and 3 approaches are combined using the simple error propagation method provided by the IPCC (2006). The combined uncertainty is calculated by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities.

The combined uncertainty for soil organic C stocks in Cropland Remaining Cropland ranges from 406 percent below to 406 percent above the 2021 stock change estimate of -18.9 MMT CO_2 Eq. The large relative uncertainty around the 2021 stock change estimate is mostly due to variation in soil organic C stock changes that is not explained by the surrogate data method, leading to high prediction error.

Table 6-30: Approach 2 Quantitative Uncertainty Estimates for Soil C Stock Changes occurring within Cropland Remaining Cropland (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Mineral Soil C Stocks: Cropland Remaining Cropland, Tier 3 Inventory Methodology	(46.6)	(120.8)	27.6	-159%	159%
Mineral Soil C Stocks: Cropland Remaining Cropland, Tier 2 Inventory Methodology	(5.2)	(12.3)	1.8	-134%	134%
Organic Soil C Stocks: Cropland Remaining Cropland, Tier 2 Inventory Methodology	32.9	13.9	51.9	-58%	58%
Combined Uncertainty for Flux associated with Agricultural Soil Carbon Stock Change in Cropland Remaining Cropland	**(18.9)**	**(95.9)**	**58.0**	**-406%**	**406%**

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation with a 95 percent confidence interval.
Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Uncertainty is also associated with lack of reporting of agricultural woody biomass and dead organic matter C stock changes. However, woody biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations. There will be removal and replanting of tree crops each year, but the net effect on biomass C stock changes is probably minor because the overall area and tree density is relatively constant across time series. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may have more significant changes over the Inventory time series, compared to perennial woody crops, at least in some regions of the United States, but there are currently no datasets to evaluate the trends. Changes in litter C stocks are also assumed to be negligible in croplands over annual time frames, although there are certainly significant changes at sub-annual time scales across seasons. This trend may change in the future, particularly if crop residue becomes a viable feedstock for bioenergy production.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. Results from the DayCent model are compared to field measurements and soil monitoring sites associated with the NRI (Spencer et al. 2011), and a statistical relationship has been developed to

assess uncertainties in the predictive capability of the model (Ogle et al. 2007). The comparisons include 72 long-term experiment sites and 142 NRI soil monitoring network sites, with 948 observations across all of the sites (see Annex 3.12 of EPA 2022 for more information).

Recalculations Discussion

There are no recalculations in the time series from the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. This latter improvement will be conducted using the Tier 2 method for mineral and organic soils that is described earlier in this section. The analysis will initially focus on land-use change, which typically has a larger impact on soil organic C stock changes than management practices, but will be further refined over time to incorporate management data. These two improvements will resolve most of the differences between the managed land base for Cropland Remaining Cropland and amount of area currently included in Cropland Remaining Cropland Inventory (See Table 6-31).

Table 6-31: Comparison of Managed Land Area in Cropland Remaining Cropland and Area in the Current Cropland Remaining Cropland Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	Managed Land	Inventory	Difference
1990	162,265	162,134	131
1991	161,834	161,692	142
1992	161,336	161,223	113
1993	159,567	159,420	147
1994	157,880	157,703	178
1995	157,269	157,025	244
1996	156,630	156,380	250
1997	156,010	155,738	271
1998	152,330	151,987	343
1999	151,429	151,105	324
2000	151,246	150,952	294
2001	150,725	150,442	283
2002	150,417	150,146	271
2003	151,043	150,814	229
2004	150,769	150,616	153
2005	150,400	150,275	126
2006	149,893	149,762	131
2007	150,100	150,003	97
2008	149,706	149,694	11
2009	149,646	149,714	-68
2010	149,215	149,314	-100
2011	148,619	148,815	-195
2012	148,290	148,495	-205
2013	148,653	148,989	-336
2014	149,136	149,463	-327

2015	148,520	148,851	-331
2016	148,432	*	*
2017	148,327	*	*
2018	149,721	*	*
2019	149,504	*	*
2020	149,817	*	*
2021	150,586	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

There are several other planned improvements underway related to the plant production module in DayCent. A key improvement for a future Inventory will be to incorporate additional management activity data from the USDA-NRCS Conservation Effects Assessment Project survey. The CEAP survey has compiled new data in recent years. Crop parameters associated with temperature effects on plant production will be further improved in DayCent with additional model calibration. Senescence events following grain filling in crops, such as wheat, are being modified based on recent model algorithm development, and will be incorporated. There will also be further testing and parameterization of the DayCent model to reduce the bias in model predictions for grasslands, which was discovered through model evaluation by comparing output to measurement data from 72 experimental sites and 142 NRI soil monitoring network sites (See QA/QC and Verification section).

Improvements are underway to simulate crop residue burning in the DayCent model based on the amount of crop residues burned according to the data that are used in the Field Burning of Agricultural Residues source category (see Section 5.7). This improvement will more accurately represent the C inputs to the soil that are associated with residue burning. In addition, a review of available data on biosolids (i.e., treated sewage sludge) application will be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements.

Many of these improvements are expected to be completed for the 1990 through 2022 Inventory (i.e., 2024 submission to the UNFCCC). However, the timeline may be extended if there are insufficient resources to fund all or part of these planned improvements.

6.5 Land Converted to Cropland (CRF Category 4B2)

Land Converted to Cropland includes all cropland in an inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2018), and used to produce food or fiber, or forage that is harvested and used as feed (e.g., hay and silage). For example, Grassland or Forest Land Converted to Cropland during the past 20 years would be reported in this category. Recently converted lands are retained in this category for 20 years as recommended by IPCC (2006).

Land-use change can lead to large losses of C to the atmosphere, particularly conversions from forest land (Houghton et al. 1983; Houghton and Nassikas 2017). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally, although this source may be declining according to a recent assessment (Tubiello et al. 2015).

The *2006 IPCC Guidelines* recommend reporting changes in biomass, dead organic matter and soil organic C stocks with land-use change. All soil organic C stock changes are estimated and reported for Land Converted to Cropland, but reporting of C stock changes for aboveground and belowground biomass, dead wood, and litter pools is limited

to Forest Land Converted to Cropland and Grassland Converted Cropland for woodland conversions (i.e., woodland conversion to cropland).[46]

There are several discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Cropland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Land Converted to Cropland Inventory. Second, cropland in Alaska is not included in the Inventory, but is a relatively small amount of U.S. cropland area (approximately 28,700 hectares). Third, some miscellaneous croplands are also not included in the Inventory due to limited understanding of greenhouse gas emissions from these management systems (e.g., aquaculture). These differences lead to small discrepancies between the managed area in Land Converted to Cropland and the cropland area included in the Land Converted to Cropland Inventory analysis (Table 6-35). Improvements are underway to incorporate the latest NRI dataset, croplands in Alaska and miscellaneous croplands as part of future C inventories (See Planned Improvements section).

Forest Land Converted to Cropland is the largest source of emissions from 1990 to 2021, accounting for approximately 86 percent of the average total loss of C among all of the land-use conversions in Land Converted to Cropland. The pattern is due to the large losses of biomass and dead organic matter C for Forest Land Converted to Cropland. The next largest source of emissions is Grassland Converted to Cropland accounting for approximately 17 percent of the total emissions (Table 6-32 and Table 6-33). The net change in total C stocks for 2021 led to CO_2 emissions to the atmosphere of 56.5 MMT CO_2 Eq. (15.4 MMT C), including 29.8 MMT CO_2 Eq. (8.1 MMT C) from aboveground biomass C losses, 5.8 MMT CO_2 Eq. (1.6 MMT C) from belowground biomass C losses, 5.8 MMT CO_2 Eq. (1.6 MMT C) from dead wood C losses, 8.2 MMT CO_2 Eq. (2.2 MMT C) from litter C losses, 3.2 MMT CO_2 Eq. (0.9 MMT C) from mineral soils and 3.8 MMT CO_2 Eq. (1.0 MMT C) from drainage and cultivation of organic soils. Emissions in 2021 are 3 percent higher than emissions in the initial reporting year, i.e., 1990.

Table 6-32: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland by Land Use Change Category (MMT CO_2 Eq.)

	1990	2005	2017	2018	2019	2020	2021
Grassland Converted to Cropland	**8.0**	**8.6**	**9.8**	**9.6**	**9.6**	**9.9**	**9.8**
Aboveground Live Biomass	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Litter	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Mineral Soils	4.1	4.0	5.4	5.1	5.1	5.5	5.3
Organic Soils	2.7	3.5	3.3	3.3	3.3	3.3	3.3
Forest Land Converted to Cropland	**48.2**	**48.1**	**48.5**	**48.5**	**48.5**	**48.5**	**48.5**
Aboveground Live Biomass	28.8	28.9	29.2	29.2	29.2	29.2	29.2
Belowground Live Biomass	5.6	5.6	5.7	5.7	5.7	5.7	5.7
Dead Wood	5.5	5.5	5.5	5.5	5.5	5.5	5.5
Litter	7.8	7.8	8.0	8.0	8.0	8.0	8.0
Mineral Soils	0.4	0.2	0.1	0.1	0.1	0.2	0.1
Organic Soils	0.1	0.1	+	+	+	+	+
Other Lands Converted to Cropland	**(2.2)**	**(2.9)**	**(2.2)**	**(2.2)**	**(2.3)**	**(2.3)**	**(2.3)**
Mineral Soils	(2.3)	(2.9)	(2.2)	(2.2)	(2.3)	(2.3)	(2.3)
Organic Soils	0.2	0.1	+	+	+	+	+
Settlements Converted to Cropland	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**
Mineral Soils	(0.1)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Organic Soils	+	+	+	+	+	+	+

[46] Changes in biomass C stocks are estimated for Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions. There is a planned improvement to include the effect of other land-use conversions, in addition to herbaceous grassland conversions to cropland in a future Inventory. Note: changes in dead organic matter are assumed negligible for other land-use conversions to cropland, except Forest Land and woodland conversions.

Wetlands Converted to Cropland	**0.8**	**0.9**	**0.6**	**0.6**	**0.6**	**0.6**	**0.7**
Mineral Soils	0.3	0.3	0.2	0.2	0.2	0.2	0.2
Organic Soils	0.6	0.6	0.3	0.4	0.4	0.4	0.4
Aboveground Live Biomass	**29.4**	**29.5**	**29.8**	**29.8**	**29.8**	**29.8**	**29.8**
Belowground Live Biomass	**5.7**	**5.7**	**5.8**	**5.8**	**5.8**	**5.8**	**5.8**
Dead Wood	**5.7**	**5.7**	**5.8**	**5.8**	**5.8**	**5.8**	**5.8**
Litter	**8.0**	**8.1**	**8.2**	**8.2**	**8.2**	**8.2**	**8.2**
Total Mineral Soil Flux	**2.3**	**1.3**	**3.4**	**3.1**	**3.0**	**3.5**	**3.2**
Total Organic Soil Flux	**3.7**	**4.3**	**3.7**	**3.7**	**3.7**	**3.8**	**3.8**
Total Net Flux	**54.8**	**54.7**	**56.6**	**56.3**	**56.3**	**56.7**	**56.5**

+ Does not exceed 0.05 MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-33: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Land Converted to Cropland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Grassland Converted to Cropland	**2.2**	**2.4**	**2.7**	**2.6**	**2.6**	**2.7**	**2.7**
Aboveground Live Biomass	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Litter	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	1.1	1.1	1.5	1.4	1.4	1.5	1.5
Organic Soils	0.7	1.0	0.9	0.9	0.9	0.9	0.9
Forest Land Converted to Cropland	**13.1**	**13.1**	**13.2**	**13.2**	**13.2**	**13.2**	**13.2**
Aboveground Live Biomass	7.9	7.9	8.0	8.0	8.0	8.0	8.0
Belowground Live Biomass	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Dead Wood	1.5	1.5	1.5	1.5	1.5	1.5	1.5
Litter	2.1	2.1	2.2	2.2	2.2	2.2	2.2
Mineral Soils	0.1	+	+	+	+	+	+
Organic Soils	+	+	+	+	+	+	+
Other Lands Converted to Cropland	**(0.6)**	**(0.8)**	**(0.6)**	**(0.6)**	**(0.6)**	**(0.6)**	**(0.6)**
Mineral Soils	(0.6)	(0.8)	(0.6)	(0.6)	(0.6)	(0.6)	(0.6)
Organic Soils	+	+	+	+	+	+	+
Settlements Converted to Cropland	**+**	**+**	**+**	**+**	**+**	**+**	**+**
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Cropland	**0.2**	**0.3**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**
Mineral Soils	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Organic Soils	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Aboveground Live Biomass	**8.0**	**8.1**	**8.1**	**8.1**	**8.1**	**8.1**	**8.1**
Belowground Live Biomass	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**
Dead Wood	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**
Litter	**2.2**	**2.2**	**2.2**	**2.2**	**2.2**	**2.2**	**2.2**
Total Mineral Soil Flux	**0.6**	**0.4**	**0.9**	**0.8**	**0.8**	**0.9**	**0.9**
Total Organic Soil Flux	**1.0**	**1.2**	**1.0**	**1.0**	**1.0**	**1.0**	**1.0**
Total Net Flux	**14.9**	**14.9**	**15.4**	**15.4**	**15.3**	**15.5**	**15.4**

+ Does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Cropland, including (1) loss of aboveground and belowground biomass, dead wood and litter C with conversion of forest lands to croplands, as well as (2) the impact from all land-use conversions to cropland on mineral and soil organic C stocks.

Biomass, Dead Wood and Litter Carbon Stock Changes

A Tier 2 method is applied to estimate biomass, dead wood, and litter C stock changes for Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions. Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022). However, there are no country-specific data for cropland biomass, so default biomass values (IPCC 2006) were used to estimate the carbon stocks for the new cropland (litter and dead wood carbon stocks were assumed to be zero since no reference C density estimates exist for croplands). The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

For dead organic matter, if FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots are measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016). In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 so that changes reflect anthropogenic activity and not methodological adjustments. See Annex 3.13 for more information about reference C density estimates for forest land and the compilation system used to estimate carbon stock changes from forest land. See the Grassland Remaining Grassland section for more information about estimation of biomass, deadwood and litter C stock changes for woodlands.

Soil Carbon Stock Changes

Soil organic stock changes are estimated for Land Converted to Cropland according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information (e.g., crop type, soil attributes, and irrigation) had been collected for each NRI point on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, which are currently available through 2017, however this Inventory uses the previous NRI with annual data available through 2015 (USDA-NRCS 2018). NRI survey locations are classified as Land Converted to Cropland in a given year between 1990 and 2015 if the land use is cropland but had been another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998, which may have led to an underestimation of Land Converted to Cropland in the early part of the time series to the extent that some areas are converted to cropland from 1971 to 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes from 1990 to 2015 for mineral soils on the majority of land that is used to produce annual crops and forage crops that are harvested and used as feed (e.g., hay and silage) in the United States. These crops include alfalfa hay, barley, corn, cotton, grass hay, grass-clover hay, oats, peanuts, potatoes, rice, sorghum, soybeans, sugar beets, sunflowers, tobacco, and wheat. Soil organic C stock changes on the remaining mineral soils are estimated with the IPCC Tier 2 method (Ogle et al. 2003), including land used to produce some vegetables and perennial/horticultural crops and crops rotated with these crops; land on very gravelly, cobbly, or shaley soils (greater than 35 percent by volume); and land converted from another land use or federal ownership.[47]

For the years 2016 to 2021, a surrogate data method is used to estimate soil organic C stock changes at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 stock change data from the Tier 2 and 3 methods. Surrogate data for these regression models include corn and soybean yields from USDA-NASS statistics,[48] and weather data from the PRISM Climate Group (PRISM 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method. Stock change estimates for 2016 to 2021 will be recalculated in future Inventories when the time series of activity data are updated.

Tier 3 Approach. For the Tier 3 method, mineral soil organic C stocks and stock changes are estimated using the DayCent biogeochemical model (Parton et al. 1998; Del Grosso et al. 2001, 2011). The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. National estimates are obtained by using the model to simulate historical land-use change patterns as recorded in the USDA NRI survey (USDA-NRCS 2018). Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015. See the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022) for additional discussion of the Tier 3 methodology for mineral soils.

In order to ensure time-series consistency, the Tier 3 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (described in Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

Tier 2 Approach. For the mineral soils not included in the Tier 3 analysis, soil organic C stock changes are estimated using a Tier 2 Approach, as described in the Tier 2 Approach for mineral soils in Cropland Remaining Cropland. In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the 2016 to 2021 time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

[47] Federal land is not a land use, but rather an ownership designation that is treated as grassland for purposes of these calculations. The specific land use on federal lands is not identified in the NRI survey (USDA-NRCS 2018).

[48] See https://quickstats.nass.usda.gov/.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Cropland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific C loss rates (Ogle et al. 2003) as described in the Cropland Remaining Cropland section for organic soils. Further elaboration on the methodology is also provided in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series (i.e., 2016 to 2021) are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in a future inventory when new activity data are incorporated into the analysis.

Uncertainty

The uncertainty analyses for biomass, dead wood and litter C losses with Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversions are conducted in the same way as the uncertainty assessment for forest ecosystem C flux associated with Forest Land Remaining Forest Land. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006) by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13.

The uncertainty analyses for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in Cropland Remaining Cropland. The uncertainty for annual C emission estimates from drained organic soils in Land Converted to Cropland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with the surrogate data method, which is also described in Cropland Remaining Cropland.

Uncertainty estimates are presented in Table 6-34 for each subsource (i.e., biomass C stocks, dead wood C stocks, litter C stocks, soil organic C stocks for mineral and organic soils) and the method applied in the Inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates for the total C stock changes for biomass, dead organic matter and soils are combined using the simple error propagation methods provided by the IPCC (2006), as discussed in the previous paragraph. The combined uncertainty for total C stocks in Land Converted to Cropland ranged from 94 percent below to 94 percent above the 2021 stock change estimate of 56.5 MMT CO_2 Eq. The large relative uncertainty in the 2021 estimate is mostly due to variation in soil organic C stock changes that is not explained by the surrogate data method, leading to high prediction error with this splicing method.

Table 6-34: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Cropland (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Grassland Converted to Cropland	**9.8**	**(25.6)**	**45.1**	**-362%**	**362%**
Aboveground Live Biomass	0.6	(0.1)	1.3	-125%	125%
Belowground Live Biomass	0.1	+	0.2	-137%	120%
Dead Wood	0.2	(0.1)	0.5	-134%	123%
Litter	0.2	(0.1)	0.5	-134%	119%
Mineral Soil C Stocks: Tier 3	1.0	(34.1)	36.1	-3,546%	3,546%

Mineral Soil C Stocks: Tier 2	4.3	1.2	7.4	-71%	71%
Organic Soil C Stocks: Tier 2	3.3	0.8	5.8	-75%	75%
Forest Land Converted to Cropland	**48.5**	**8.7**	**88.3**	**-82%**	**82%**
Aboveground Live Biomass	29.2	(7.9)	66.4	-127%	127%
Belowground Live Biomass	5.7	(1.5)	12.9	-127%	127%
Dead Wood	5.5	(1.5)	12.6	-127%	127%
Litter	8.0	(2.2)	18.1	-127%	127%
Mineral Soil C Stocks: Tier 2	0.1	(0.1)	0.4	-145%	145%
Organic Soil C Stocks: Tier 2	+	(0.1)	0.2	-2,595%	2,595%
Other Lands Converted to Cropland	**(2.3)**	**(3.8)**	**(0.8)**	**-66%**	**66%**
Mineral Soil C Stocks: Tier 2	(2.3)	(3.8)	(0.8)	-66%	66%
Organic Soil C Stocks: Tier 2	+	+	+	0%	0%
Settlements Converted to Cropland	**(0.1)**	**(0.3)**	**+**	**-116%**	**116%**
Mineral Soil C Stocks: Tier 2	(0.2)	(0.3)	+	-90%	90%
Organic Soil C Stocks: Tier 2	+	+	0.1	-85%	85%
Wetlands Converted to Croplands	**0.7**	**+**	**1.3**	**-98%**	**98%**
Mineral Soil C Stocks: Tier 2	0.2	+	0.5	-110%	110%
Organic Soil C Stocks: Tier 2	0.4	(0.2)	1.0	-142%	142%
Total: Land Converted to Cropland	**56.5**	**3.2**	**109.8**	**-94%**	**94%**
Aboveground Live Biomass	**29.8**	**(7.3)**	**67.0**	**-125%**	**125%**
Belowground Live Biomass	**5.8**	**(1.4)**	**13.0**	**-125%**	**125%**
Dead Wood	**5.8**	**(1.3)**	**12.8**	**-123%**	**122%**
Litter	**8.2**	**(1.9)**	**18.3**	**-124%**	**124%**
Mineral Soil C Stocks: Tier 3	**1.0**	**(34.1)**	**36.1**	**-3,546%**	**3,546%**
Mineral Soil C Stocks: Tier 2	**2.2**	**(1.2)**	**5.7**	**-155%**	**155%**
Organic Soil C Stocks: Tier 2	**3.8**	**1.2**	**6.4**	**-68%**	**68%**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Uncertainty is also associated with lack of reporting of agricultural biomass and dead organic matter C stock changes. Biomass C stock changes are likely minor in perennial crops, such as orchards and nut plantations, given the small amount of change in land that is used to produce these commodities in the United States. In contrast, agroforestry practices, such as shelterbelts, riparian forests and intercropping with trees, may have led to larger changes in biomass C stocks at least in some regions of the United States. However, there are currently no datasets to evaluate the trends. Changes in dead organic matter C stocks are assumed to be negligible with conversion of land to croplands with the exception of forest lands, which are included in this analysis. This assumption will be further explored in a future Inventory.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland for information on QA/QC steps.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Grassland Converted to Cropland (i.e., woodland conversion to cropland), updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Cropland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Cropland has an estimated larger C loss of 2.6 MMT CO_2 Eq. on average over the time series. This represents a 4.9 percent increase in C stock changes for Land Converted to Grassland compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the Inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. These two improvements will resolve most of the discrepancies between the managed land base for Land Converted to Cropland and amount of area currently included in Land Converted to Cropland Inventory (See Table 6-35). Another planned improvement is to estimate the biomass C stock changes for other land-use changes besides Forest Land Converted to Cropland and Grassland Converted to Cropland for woodland conversion. Additional planned improvements are discussed in the Planned Improvements section of Cropland Remaining Cropland.

Table 6-35: Comparison of Managed Land Area in Land Converted to Cropland and the Area in the current Land Converted to Cropland Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	Managed Land	Inventory	Difference
1990	12,230	12,308	-77
1991	12,561	12,654	-94
1992	12,858	12,943	-85
1993	14,093	14,218	-125
1994	15,266	15,400	-134
1995	15,439	15,581	-143
1996	15,740	15,888	-148
1997	15,919	16,073	-154
1998	17,263	17,440	-177
1999	17,659	17,819	-160
2000	17,518	17,693	-175
2001	17,441	17,600	-158
2002	17,311	17,487	-177
2003	16,064	16,257	-194
2004	15,136	15,317	-182
2005	15,221	15,424	-202
2006	15,149	15,410	-262
2007	14,734	14,923	-189
2008	14,248	14,399	-150
2009	13,762	13,814	-52
2010	13,888	13,905	-17
2011	14,209	14,186	22
2012	14,450	14,429	21
2013	13,991	13,752	239
2014	13,464	13,050	414
2015	13,561	13,049	512
2016	13,519	*	*
2017	13,594	*	*
2018	11,673	*	*
2019	11,189	*	*
2020	10,293	*	*
2021	9,491	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

6.6 Grassland Remaining Grassland (CRF Category 4C1)

Carbon (C) in grassland ecosystems occurs in biomass, dead organic matter, and soils. Soils are the largest pool of C in grasslands, and have the greatest potential for longer-term storage or release of C. Biomass and dead organic matter C pools are relatively ephemeral compared to the soil C pool, with the exception of C stored in tree and shrub biomass that occurs in grasslands. The *2006 IPCC Guidelines* recommend reporting changes in biomass, dead organic matter and soil organic C stocks with land use and management. C stock changes for aboveground and belowground biomass, dead wood and litter pools are reported for woodlands (i.e., a subcategory of grasslands[49]), and may be extended to include agroforestry management associated with grasslands in the future. For soil organic C, the *2006 IPCC Guidelines* (IPCC 2006) recommend reporting changes due to (1) agricultural land use and management activities on mineral soils, and (2) agricultural land use and management activities on organic soils.[50]

Grassland Remaining Grassland includes all grassland in an Inventory year that had been grassland for a continuous time period of at least 20 years (USDA-NRCS 2018). Grassland includes pasture and rangeland that are primarily, but not exclusively used for livestock grazing. Rangelands are typically extensive areas of native grassland that are not intensively managed, while pastures are typically seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation or interseeding of legumes. Woodlands are also considered grassland and are areas of continuous tree cover that do not meet the definition of forest land (See Land Representation section for more information about the criteria for forest land).

There are two discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Grassland Remaining Grassland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not yet been incorporated into the Grassland Remaining Grassland Inventory. Second, grassland in Alaska is not included in the Inventory, and is approximately 50 million hectares. These differences lead to discrepancies between the managed area in Grassland Remaining Grassland and the grassland area included in the Grassland Remaining Grassland Inventory analysis (Table 6-39). Improvements are underway to incorporate the latest NRI dataset, and grasslands in Alaska as part of future C inventories (See Planned Improvements section).

For Grassland Remaining Grassland, there has been considerable variation in C stocks between 1990 and 2021. These changes are driven by variability in weather patterns and associated interaction with land management activity. Moreover, changes are small on a per hectare rate basis across the time series even in the years with a larger total change in stocks. The net change in total C stocks for 2021 led to net CO_2 emissions to the atmosphere of 10.0 MMT CO_2 Eq. (2.7 MMT C), including 2.1 MMT CO_2 Eq. (0.6 MMT C) from net losses of aboveground biomass C, 0.3 MMT CO_2 Eq. (0.1 MMT C) from net losses in belowground biomass C, 3.0 MMT CO_2 Eq. (0.8 MMT C) from net losses in dead wood C, less than 0.05 MMT CO_2 Eq. (less than 0.05 MMT C) from net gains in litter C, 0.8 MMT CO_2 Eq. (0.2 MMT C) from net gains in mineral soil organic C, and 5.4 MMT CO_2 Eq. (1.5 MMT C) from losses of C due to drainage and cultivation of organic soils (Table 6-36 and Table 6-37). Losses of carbon are 15 percent higher in 2021 compared to 1990, but as noted previously, stock changes are highly variable from 1990 to 2021, with an average annual change of 9.4 MMT CO_2 Eq. (2.6 MMT C).

[49] Woodlands are considered grasslands in the U.S. Land Representation because they do not meet the definition of forest land.

[50] CO_2 emissions associated with liming and urea fertilization are also estimated but included in the Agriculture chapter of the report.

Table 6-36: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT CO_2 Eq.)

	1990	2005	2017	2018	2019	2020	2021
Aboveground Live Biomass	1.4	1.7	2.1	2.1	2.1	2.1	2.1
Belowground Live Biomass	0.2	0.3	0.3	0.3	0.3	0.3	0.3
Dead Wood	3.2	3.2	3.0	3.0	3.0	3.0	3.0
Litter	(0.3)	(0.1)	+	+	+	+	+
Mineral Soils	(2.2)	0.8	0.1	0.4	3.2	(4.8)	(0.8)
Organic Soils	6.3	5.2	5.4	5.4	5.4	5.4	5.4
Total Net Flux	**8.7**	**11.0**	**10.9**	**11.3**	**14.0**	**6.0**	**10.0**

+ Does not exceed 0.05 MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-37: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes in Grassland Remaining Grassland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Aboveground Live Biomass	0.4	0.5	0.6	0.6	0.6	0.6	0.6
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.9	0.9	0.8	0.8	0.8	0.8	0.8
Litter	(0.1)	+	+	+	+	+	+
Mineral Soils	(0.6)	0.2	+	0.1	0.9	(1.3)	(0.2)
Organic Soils	1.7	1.4	1.5	1.5	1.5	1.5	1.5
Total Net Flux	**2.4**	**3.0**	**3.0**	**3.1**	**3.8**	**1.6**	**2.7**

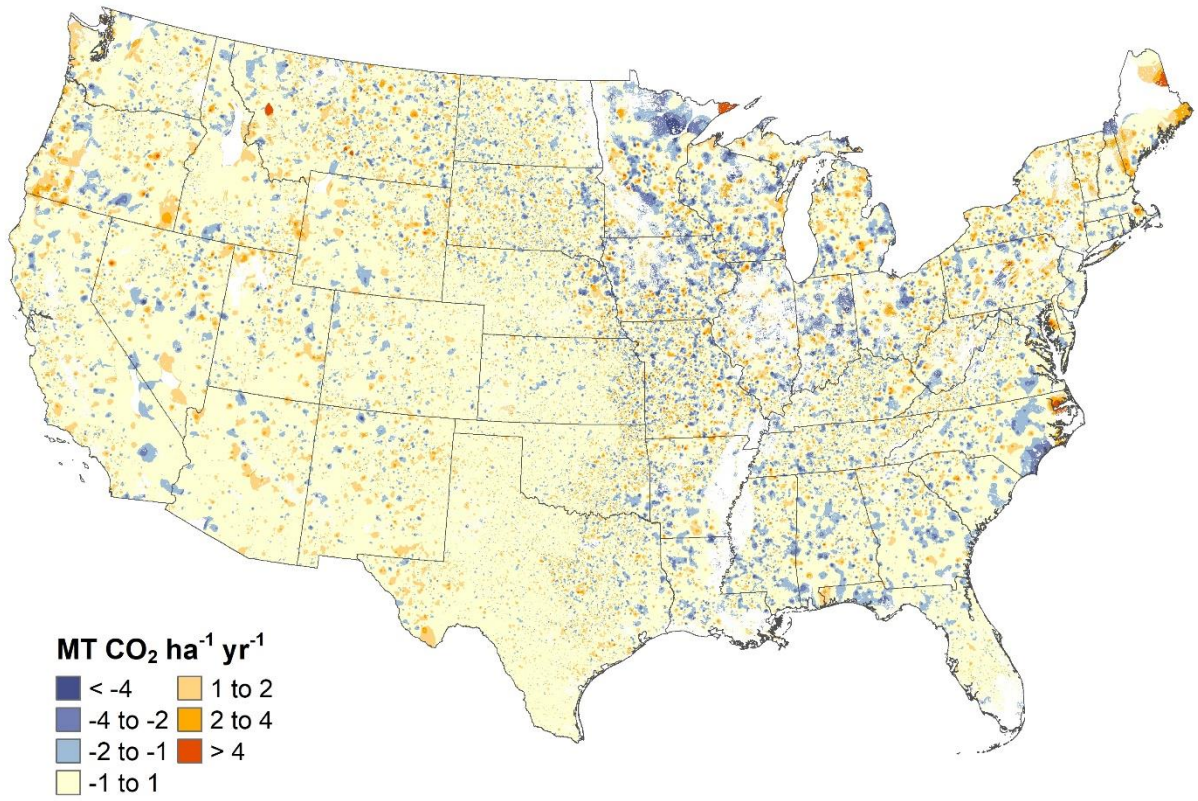
+ Does not exceed 0.05 MMT C

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

The spatial variability in soil organic C stock changes for 2015[51] is displayed in Figure 6-8 for mineral soils and in Figure 6-9 for organic soils. Although relatively small on a per-hectare basis, grassland soils gained C in isolated areas that mostly occurred in pastures of the eastern United States. For organic soils, the regions with the highest rates of emissions coincide with the largest concentrations of organic soils used for managed grassland, including the Southeastern Coastal Region (particularly Florida), upper Midwest and Northeast, and a few isolated areas along the Pacific Coast.

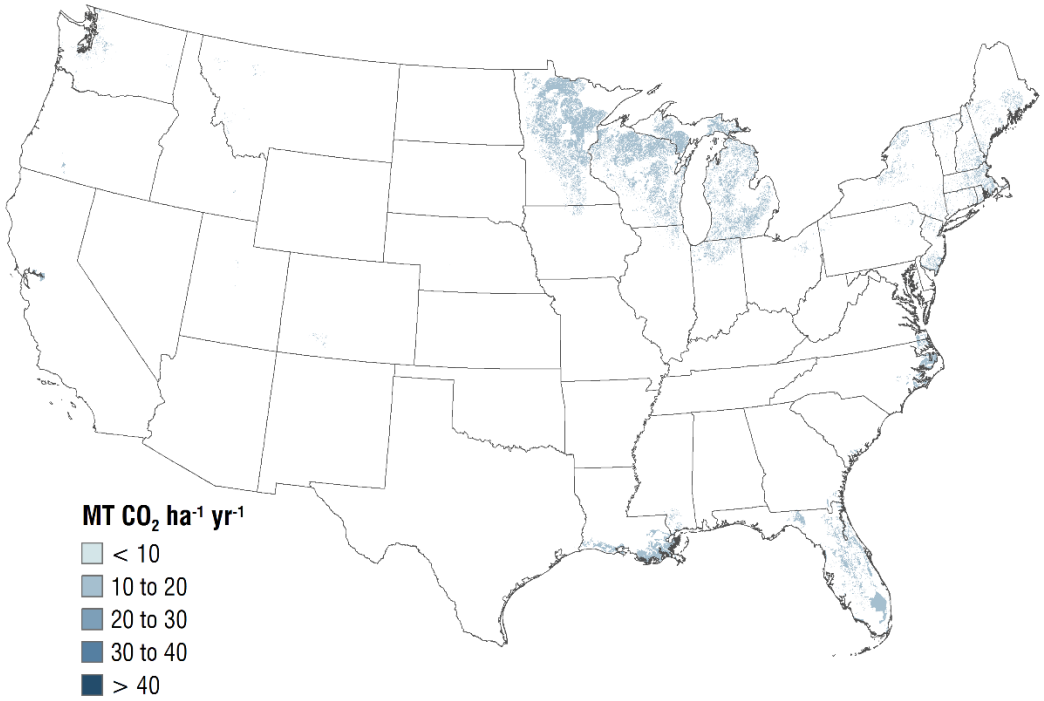
[51] Only national-scale emissions are estimated for 2016 to 2021 in the current Inventory using the surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Figure 6-8: Total Net Annual Soil C Stock Changes for Mineral Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland



Note: Only national-scale soil organic C stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015. Negative values represent a net increase in soil organic C stocks, and positive values represent a net decrease in soil organic C stocks.

Figure 6-9: Total Net Annual Soil C Stock Changes for Organic Soils under Agricultural Management within States, 2015, Grassland Remaining Grassland



Note: Only national-scale soil organic carbon stock changes are estimated for 2016 to 2021 in the current Inventory using a surrogate data method, and therefore the fine-scale emission patterns in this map are based on inventory data from 2015.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Grassland Remaining Grassland, including (1) aboveground and belowground biomass, dead wood and litter C for woodlands, as well as (2) soil organic C stocks for mineral and organic soils.

Biomass, Dead Wood and Litter Carbon Stock Changes

Woodlands are lands that do not meet the definition of forest land or agroforestry (see Section 6.1 Representation of the U.S. Land Base), but include woody vegetation with C storage in aboveground and belowground biomass, dead wood and litter C (IPCC 2006) as described in the Forest Land Remaining Forest Land section. Carbon stocks and net annual C stock change were determined according to the stock-difference method for the conterminous United States, which involved applying C estimation factors to annual forest inventories across time to obtain C stocks and then subtracting the values between years to estimate the stock changes. The methods for estimating carbon stocks and stock changes for woodlands in Grassland Remaining Grassland are consistent with those in the Forest Land Remaining Forest Land section and are described in Annex 3.13. All annual National Forest Inventory (NFI) plots available in the public FIA database (USDA Forest Service 2022) were used in the current Inventory. While the NFI is an all-lands inventory, only those plots that meet the definition of forest land are typically measured. However, in some cases, particularly in the Central Plains and Southwest United States, woodlands have been measured as part of the survey. This analysis is limited to those plots and is not considered a comprehensive assessment of trees outside of forest land that meet the definition of grassland. The same methods are applied from 1990 to 2021 in order to ensure time-series consistency. This methodology is consistent with IPCC (2006).

Soil Carbon Stock Changes

The following section includes a brief description of the methodology used to estimate changes in soil organic C stocks for Grassland Remaining Grassland, including: (1) agricultural land use and management activities on mineral soils; and (2) agricultural land use and management activities on organic soils. Further elaboration on the methodologies and data used to estimate stock changes from mineral and organic soils are provided in the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022).

Soil organic C stock changes are estimated for Grassland Remaining Grassland on non-federal lands according to land use histories recorded in the 2015 USDA NRI survey (USDA-NRCS 2018). Land use and some management information (e.g., grass type, soil attributes, and irrigation) were originally collected for each NRI survey location on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2015). NRI survey locations are classified as Grassland Remaining Grassland in a given year between 1990 and 2015 if the land use had been grassland for 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Grassland Remaining Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes from 1990 to 2015 for most mineral soils in Grassland Remaining Grassland. The C stock changes for the remaining soils are estimated with an IPCC Tier 2 method (Ogle et al. 2003), including gravelly, cobbly, or shaley soils (greater than 35 percent by volume), the additional stock changes associated with biosolids (i.e., treated sewage sludge) amendments, and federal land.[52]

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 emissions data from the Tier 2 and 3 methods. Surrogate data for these regression models are based on weather data from the PRISM Climate Group (PRISM Climate Group 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method.

Tier 3 Approach. Mineral soil organic C stocks and stock changes for Grassland Remaining Grassland are estimated using the DayCent biogeochemical[53] model (Parton et al. 1998; Del Grosso et al. 2001, 2011), as described in Cropland Remaining Cropland. The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Historical land-use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018).

The amount of manure produced by each livestock type is calculated for managed and unmanaged waste management systems based on methods described in Section 5.2 Manure Management and Annex 3.11. Manure N deposition from grazing animals (i.e., pasture/range/paddock (PRP) manure) is an input to the DayCent model to

[52] Federal land is not a land use, but rather an ownership designation that is treated as grassland for purposes of these calculations. The specific land use on federal lands is not identified in the NRI survey (USDA-NRCS 2018).

[53] Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

estimate the influence of PRP manure on C stock changes for lands included in the Tier 3 method. Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015 using the NRI survey data. Further elaboration on the Tier 3 methodology and data used to estimate C stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors, described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data (see the Planned Improvements section in Cropland Remaining Cropland).

Tier 2 Approach. The Tier 2 approach is based on the same methods described in the Tier 2 portion of Cropland Remaining Cropland section for mineral soils, with the exception of the manure N deposition from grazing animals (i.e., PRP manure), and the land use and management data that are used in the Inventory for federal grasslands. First, the PRP N manure is included in the Tier 2 method that is not deposited on lands included in the Tier 3 method. Second, the NRI (USDA-NRCS 2018) provides land use and management histories for all non-federal lands, and is the basis for the Tier 2 analysis for these areas. However, NRI does not provide land use information on federal lands. The land use data for federal lands is based on the National Land Cover Database (NLCD) (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007; Homer et al. 2015). In addition, the Bureau of Land Management (BLM) manages some of the federal grasslands, and compiles information on grassland condition through the BLM Rangeland Inventory (BLM 2014). To estimate soil organic C stock changes from federal grasslands, rangeland conditions in the BLM data are aligned with IPCC grassland management categories of nominal, moderately degraded, and severely degraded in order to apply the appropriate emission factors. Further elaboration on the Tier 2 methodology and data used to estimate C stock changes from mineral soils are described in Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, time series of activity data will be updated in a future Inventory, and emissions from 2016 to 2021 will be recalculated.

Additional Mineral C Stock Change Calculations

A Tier 2 method is used to adjust annual C stock change estimates for mineral soils between 1990 and 2021 to account for additional C stock changes associated with biosolids (i.e., treated sewage sludge) amendments. Estimates of the amounts of biosolids N applied to agricultural land are derived from national data on biosolids generation, disposition, and N content (see Section 7.2, Wastewater Treatment for a detailed discussion of the methodology for estimating treated sewage sludge available for land application application). Although biosolids can be added to land managed for other land uses, it is assumed that agricultural amendments only occur in Grassland Remaining Grassland. Total biosolids generation data for 1988, 1996, and 1998, in dry mass units, are obtained from EPA (1999) and estimates for 2004 are obtained from an independent national biosolids survey (NEBRA 2007). These values are linearly interpolated to estimate values for the intervening years, and linearly extrapolated to estimate values for years since 2004. Nitrogen application rates from Kellogg et al. (2000) are used to determine the amount of area receiving biosolids amendments. The soil organic C storage rate is estimated at 0.38 metric tons C per hectare per year for biosolids amendments to grassland as described above. The stock change rate is based on country-specific factors and the IPCC default method (see Annex 3.12 of EPA (2022) for further discussion).

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Grassland Remaining Grassland are estimated using the Tier 2 method in IPCC (2006), which utilizes country-specific C loss rates (Ogle et al. 2003) rather than default IPCC rates. For more information, see the Cropland Remaining Cropland section for organic soils and Annex 3.12 of EPA (2022).

In order to ensure time-series consistency, the Tier 2 methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes for the remainder of the time series (i.e., 2016 to 2021) are approximated with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for approximating emissions at the end of a time series (IPCC 2006). Estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Uncertainty

The uncertainty analysis for biomass, dead wood and litter C losses with woodlands is conducted in the same way as the uncertainty assessment for forest ecosystem C flux associated with Forest Land Remaining Forest Land. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006) by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13.

Uncertainty analysis for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in the Cropland Remaining Cropland section and Annex 3.12 of EPA (2022). The uncertainty for annual C emission estimates from drained organic soils in Grassland Remaining Grassland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with the surrogate data method.

Uncertainty estimates are presented in Table 6-38 for each subcategory (i.e., soil organic C stocks for mineral and organic soils) and the method applied in the Inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), i.e., by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities.

The combined uncertainty for soil organic C stocks in Grassland Remaining Grassland ranges from more than 1417 percent below and above the 2021 stock change estimate of 10.0 MMT CO_2 Eq. The large relative uncertainty is mostly due to high levels of uncertainty in the Tier 3 method and variation in soil organic C stock changes that is not explained by the surrogate data method.

Table 6-38: Approach 2 Quantitative Uncertainty Estimates for C Stock Changes Occurring Within Grassland Remaining Grassland (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Woodland Biomass:					
Aboveground live biomass	2.1	1.8	2.3	-12%	11%

Belowground live biomass	0.3	0.3	0.3	-4%	4%
Dead wood	3.0	2.6	3.4	-13%	14%
Litter	+	+	0.1	-20%	20%
Mineral Soil C Stocks Grassland Remaining Grassland, Tier 3 Methodology	1.8	(139.6)	143.2	-7961%	7961%
Mineral Soil C Stocks: Grassland Remaining Grassland, Tier 2 Methodology	(0.9)	(10.0)	8.1	-960%	960%
Mineral Soil C Stocks: Grassland Remaining Grassland, Tier 2 Methodology (Change in Soil C due to Biosolids [i.e., Treated Sewage Sludge] Amendments)	(1.7)	(2.5)	(0.8)	-50%	50%
Organic Soil C Stocks: Grassland Remaining Grassland, Tier 2 Methodology	5.4	1.2	9.6	-77%	77%
Combined Uncertainty for Flux Associated with Carbon Stock Changes Occurring in Grassland Remaining Grassland	**10.0**	**(131.7)**	**151.7**	**-1417%**	**1417%**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Uncertainty is also associated with a lack of reporting on biomass, dead wood and litter C stock changes for agroforestry systems. Changes in biomass and dead organic matter C stocks are assumed to be negligible in other grasslands, largely comprised of herbaceous biomass, although there are certainly significant changes at sub-annual time scales across seasons.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland.

Recalculations Discussion

Recalculations are associated with updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in woodlands for Grassland Remaining Grassland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result of these new data, Grassland Remaining Grassland has a larger loss of at 2.2 MMT CO_2 Eq. compared to the previous Inventory, or 28 percent on average over the time series for Grassland Remaining Grassland compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the Inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for grassland. While both improvements are needed, the latter improvement is a significant development that will resolve the majority of the discrepancy between the managed land base for Grassland Remaining Grassland and amount of area currently included in Grassland Remaining Grassland Inventory (see Table 6-39).

Table 6-39: Comparison of Managed Land Area in Grassland Remaining Grassland and the Area in the current Grassland Remaining Grassland Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	Managed Land	Inventory	Difference
1990	328,320	277,406	50,914
1991	327,812	276,918	50,894
1992	327,355	276,422	50,933
1993	325,620	274,484	51,137
1994	324,006	272,813	51,194
1995	323,134	271,975	51,159
1996	322,284	271,123	51,160
1997	321,526	270,259	51,268
1998	319,596	268,174	51,422
1999	318,701	267,301	51,400
2000	317,690	266,202	51,488
2001	316,849	265,649	51,200
2002	316,455	265,192	51,263
2003	316,780	265,403	51,377
2004	316,810	265,421	51,389
2005	316,625	265,123	51,502
2006	316,344	264,804	51,540
2007	316,326	264,749	51,577
2008	316,496	264,878	51,618
2009	316,792	265,099	51,693
2010	316,652	264,942	51,711
2011	316,403	264,627	51,776
2012	316,294	264,413	51,881
2013	317,153	265,239	51,914
2014	318,024	266,180	51,844
2015	318,146	266,234	51,912
2016	318,513	*	*
2017	318,704	*	*
2018	321,748	*	*
2019	322,632	*	*
2020	323,883	*	*
2021	325,096	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

Additionally, a review of available data on biosolids (i.e., treated sewage sludge) application will be undertaken to improve the distribution of biosolids application on croplands, grasslands and settlements. For information about other improvements, see the Planned Improvements section in Cropland Remaining Cropland.

Non-CO_2 Emissions from Grassland Fires (CRF Source Category 4C1)

Fires are common in grasslands, and are thought to have been a key feature shaping the evolution of the grassland vegetation in North America (Daubenmire 1968; Anderson 2004). Fires can occur naturally through lightning

strikes, but are also an important management practice to remove standing dead vegetation and improve forage for grazing livestock. Woody and herbaceous biomass will be oxidized in a fire, although in this section the current focus is primarily on herbaceous biomass.[54] Biomass burning emits a variety of trace gases including non-CO_2 greenhouse gases such as CH_4 and N_2O, as well as CO and NO_x that can become greenhouse gases when they react with other gases in the atmosphere (Andreae and Merlet 2001). IPCC (2006) recommends reporting non-CO_2 greenhouse gas emissions from all wildfires and prescribed burning occurring in managed grasslands.

Biomass burning in grassland of the United States (Including burning emissions in Grassland Remaining Grassland and Land Converted to Grassland) is a relatively small source of emissions, but it has increased by over 300 percent since 1990. In 2021, CH_4 and N_2O emissions from biomass burning in grasslands were 0.3 MMT CO_2 Eq. (12 kt) and 0.3 MMT CO_2 Eq. (1 kt), respectively. Annual emissions from 1990 to 2021 have averaged approximately 0.3 MMT CO_2 Eq. (12 kt) of CH_4 and 0.3 MMT CO_2 Eq. (1 kt) of N_2O (see Table 6-40 and Table 6-41).

Table 6-40: CH_4 and N_2O Emissions from Biomass Burning in Grassland (MMT CO_2 Eq.)

	1990	2005	2017	2018	2019	2020	2021
CH_4	0.1	0.4	0.3	0.3	0.3	0.3	0.3
N_2O	0.1	0.3	0.3	0.3	0.3	0.3	0.3
Total Net Flux	**0.2**	**0.7**	**0.6**	**0.6**	**0.6**	**0.6**	**0.6**

Table 6-41: CH_4, N_2O, CO, and NO_x Emissions from Biomass Burning in Grassland (kt)

	1990	2005	2017	2018	2019	2020	2021
CH_4	3	13	12	12	12	12	12
N_2O	+	1	1	1	1	1	1
CO	84	358	345	331	341	334	339
NO_x	5	21	21	20	20	20	20

+ Does not exceed 0.5 kt.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate non-CO_2 greenhouse gas emissions from biomass burning in grassland, including (1) determination of the land base that is classified as managed grassland; (2) assessment of managed grassland area that is burned each year, and (3) estimation of emissions resulting from the fires. For this Inventory, the IPCC Tier 1 method is applied to estimate non-CO_2 greenhouse gas emissions from biomass burning in grassland from 1990 to 2014 (IPCC 2006). A data splicing method is used to estimate the emissions from 2015 to 2021, which is discussed later in this section.

The land area designated as managed grassland is based primarily on the National Resources Inventory (NRI) (Nusser and Goebel 1997; USDA-NRCS 2015). NRI has survey locations across the entire United States, but does not classify land use on federally-owned areas, and so survey locations on federal lands are designated as grassland using land cover data from the National Land Cover Dataset (NLCD) (Fry et al. 2011; Homer et al. 2007; Homer et al. 2015) (see Section 6.1 Representation of the U.S. Land Base).

The area of biomass burning in grasslands (Grassland Remaining Grassland and Land Converted to Grassland) is determined using 30-m fire data from the Monitoring Trends in Burn Severity (MTBS) program for 1990 through

[54] A planned improvement is underway to incorporate woodland tree biomass into the Inventory for non-CO_2 emissions from grassland fires.

2014.[55] NRI survey locations on grasslands are designated as burned in a year if there is a fire within 500 m of the survey point according to the MTBS fire data. The area of biomass burning is estimated from the NRI spatial weights and aggregated to the country (Table 6-42).

Table 6-42: Thousands of Grassland Hectares Burned Annually

Year	Thousand Hectares
1990	317
2005	1,343
2017	NE
2018	NE
2019	NE
2020	NE
2021	NE

Notes: Burned area was not estimated (NE) for 2015 to 2021 but will be updated in a future Inventory. Burned area for the year 2014 is estimated to be 1,659 thousand hectares.

For 1990 to 2014, the total area of grassland burned is multiplied by the IPCC default factor for grassland biomass (4.1 tonnes dry matter per ha) (IPCC 2006) to estimate the amount of combusted biomass. A combustion factor of 1 is assumed in this Inventory, and the resulting biomass estimate is multiplied by the IPCC default grassland emission factors for CH_4 (2.3 g CH_4 per kg dry matter), N_2O (0.21 g N_2O per kg dry matter), CO (65 g CO per kg dry matter) and NO_x (3.9 g NO_x per kg dry matter) (IPCC 2006). The Tier 1 analysis is implemented in the Agriculture and Land Use National Greenhouse Gas Inventory (ALU) software (Ogle et al. 2016).[56]

A linear extrapolation of the trend in the time series is applied to estimate emissions for 2015 to 2021. Specifically, a linear regression model with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) is used to derive the trend in emissions over time from 1990 to 2014, and the trend is used to approximate the 2015 to 2021 emissions. The Tier 1 method described previously will be applied to recalculate the 2015 to 2021 emissions in a future Inventory.

The same methods are applied from 1990 to 2014, and a data splicing method is used to extend the time series from 2015 to 2021 ensuring a consistent time series of emissions data. The trend extrapolation is a standard data splicing method for estimating emissions at the end of a time series if activity data are not available (IPCC 2006).

Uncertainty

Emissions are estimated using a linear regression model with ARMA errors for 2015 to 2021. The model produces estimates for the upper and lower bounds of the emission estimate and the results are summarized in Table 6-43. Methane emissions from Biomass Burning in Grassland for 2021 are estimated to be between approximately 0.0 and 0.8 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 100 percent below and 138 percent above the 2021 emission estimate of 0.3 MMT CO_2 Eq. Nitrous oxide emissions are estimated to be between approximately 0.0 and 0.7 MMT CO_2 Eq., or 100 percent below and 143 percent above the 2021 emission estimate of 0.3 MMT CO_2 Eq.

[55] See http://www.mtbs.gov.

[56] See http://www.nrel.colostate.edu/projects/ALUsoftware/.

Table 6-43: Uncertainty Estimates for Non-CO_2 Greenhouse Gas Emissions from Biomass Burning in Grassland (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Grassland Burning	CH_4	0.3	+	0.8	-100%	+145%
Grassland Burning	N_2O	0.3	+	0.7	-100%	+145%

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by linear regression time-series model for a 95 percent confidence interval.

Uncertainty is also associated with lack of reporting of emissions from biomass burning in grassland of Alaska. Grassland burning emissions could be relatively large in this region of the United States, and therefore extending this analysis to include Alaska is a planned improvement for the Inventory. There is also uncertainty due to lack of reporting combustion of woody biomass, and this is another planned improvement.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. Quality control identified problems with input data for common reporting format tables in the spreadsheets, which have been corrected.

Recalculations Discussion

EPA updated global warming potentials (GWP) for calculating the CO_2-equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. As a result of this change, there was a net decrease in calculated CO_2-equivalent emissions by an annual average of less than 0.05 MMT CO_2 Eq., or 0.03 percent, over the time series from 1990 to 2020 compared to the previous Inventory. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

A data splicing method is applied to estimate emissions in the latter part of the time series, which introduces additional uncertainty in the emissions data. Therefore, a key improvement for the next Inventory will be to update the time series with new activity data from the Monitoring Trends in Burn Severity program and recalculate the emissions. Two other planned improvements have been identified for this source category, including a) incorporation of country-specific grassland biomass factors, and b) extending the analysis to include Alaska. In the current Inventory, biomass factors are based on a global default for grasslands that is provided by the IPCC (2006). There is considerable variation in grassland biomass, however, which would affect the amount of fuel available for combustion in a fire. Alaska has an extensive area of grassland and includes tundra vegetation, although some of the areas are not managed. There has been an increase in fire frequency in boreal forest of the region (Chapin et al. 2008), and this may have led to an increase in burning of neighboring grassland areas. There is also an effort under development to incorporate grassland fires into DayCent model simulations. Lastly, a future Inventory will incorporate non-CO_2 greenhouse emissions from burning woodland tree biomass in grasslands. These

improvements are expected to reduce uncertainty and produce more accurate estimates of non-CO_2 greenhouse gas emissions from grassland burning.

6.7 Land Converted to Grassland (CRF Category 4C2)

Land Converted to Grassland includes all grassland in an Inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2018).[57] For example, cropland or forest land converted to grassland during the past 20 years would be reported in this category. Recently converted lands are retained in this category for 20 years as recommended by IPCC (2006). Grassland includes pasture and rangeland that are used primarily but not exclusively for livestock grazing. Rangelands are typically extensive areas of native grassland that are not intensively managed, while pastures are typically seeded grassland (possibly following tree removal) that may also have additional management, such as irrigation or interseeding of legumes.

Land use change can lead to large losses of C to the atmosphere, particularly conversions from forest land (Houghton et al. 1983, Houghton and Nassikas 2017). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally, although this source may be declining according to a recent assessment (Tubiello et al. 2015).

IPCC (2006) recommends reporting changes in biomass, dead organic matter, and soil organic C stocks due to land-use change. All soil organic C stock changes are estimated and reported for Land Converted to Grassland, but there is limited reporting of other pools in this Inventory. Losses of aboveground and belowground biomass, dead wood and litter C from Forest Land Converted to Grassland are reported, as well as gains and losses associated with conversions to woodlands[58] from other land uses, including Croplands Converted to Grasslands, Settlements Converted to Grasslands and Other Lands Converted to Grasslands. However, the current Inventory does not include the gains and losses in aboveground and belowground biomass, dead wood and litter C for other land-use conversions to grassland that are not woodlands.[59]

There are two discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Grassland. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not yet been incorporated into the Land Converted to Grassland Inventory. Second, grassland in Alaska is not included in the Inventory. These differences lead to discrepancies between the managed area in Land Converted to Grassland and the grassland area included in the Land Converted to Grassland Inventory analysis (Table 6-47). Improvements are underway to incorporate the latest NRI dataset, and grasslands in Alaska as part of future C inventories (See Planned Improvements Section).

[57] NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 2001. This may have led to an underestimation of Land Converted to Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978.

[58] Woodlands are considered grasslands in the U.S. Land Representation because they do not meet the definition of Forest Land.

[59] Changes in biomass C stocks are not currently reported for other conversions to grassland (other than forest land conversion to grassland and other land -use conversions to woodlands), but this is a planned improvement for a future Inventory. Note: changes in dead organic matter are assumed negligible for other land-use conversions (i.e., other than forest land) to grassland based on the Tier 1 method in IPCC (2006).

The largest C losses with Land Converted to Grassland are associated with aboveground biomass, belowground biomass, and litter C losses from Forest Land Converted to Grassland (see Table 6-44 and Table 6-45). These three pools led to net emissions in 2021 of 12.6, 2.2, and 4.8 MMT CO_2 Eq. (3.4, 0.6, and 1.3 MMT C), respectively. In contrast, land use and management of mineral soils in Land Converted to Grassland led to an increase in soil organic C stocks, estimated at 42.6 MMT CO_2 Eq. (11.6 MMT C) in 2021. The gains are primarily associated with Other Land Converted to Grassland, and also due to Cropland Converted to Grassland, which leads to less intensive management of the soil. Drainage of organic soils for grassland management led to CO_2 emissions to the atmosphere of 1.8 MMT CO_2 Eq. (0.5 MMT C). The total net C stock change in 2021 for Land Converted to Grassland is estimated as a gain of 24.7 MMT CO_2 Eq. (6.7 MMT C), which represents an increase in C stock change of 269 percent compared to the initial reporting year of 1990.

Table 6-44: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT CO_2 Eq.)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Grassland	**(19.1)**	**(24.2)**	**(18.6)**	**(18.5)**	**(18.0)**	**(20.3)**	**(19.3)**
Aboveground Live Biomass	(0.4)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Belowground Live Biomass	(0.1)	(0.1)	+	+	+	+	+
Dead Wood	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Mineral Soils	(18.9)	(25.0)	(19.4)	(19.3)	(18.7)	(21.0)	(20.1)
Organic Soils	0.6	1.5	1.4	1.3	1.3	1.3	1.3
Forest Land Converted to Grassland	**20.1**	**20.2**	**19.7**	**19.7**	**19.6**	**19.6**	**19.6**
Aboveground Live Biomass	13.3	13.1	12.6	12.6	12.6	12.6	12.6
Belowground Live Biomass	2.3	2.3	2.2	2.2	2.2	2.2	2.2
Dead Wood	(0.3)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	4.8	4.9	4.8	4.8	4.8	4.8	4.8
Mineral Soils	(0.1)	(0.1)	+	+	(0.1)	+	+
Organic Soils	+	0.2	0.2	0.2	0.2	0.2	0.2
Other Lands Converted to Grassland	**(7.2)**	**(34.5)**	**(24.6)**	**(24.4)**	**(24.0)**	**(24.3)**	**(24.0)**
Aboveground Live Biomass	(1.6)	(1.5)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Belowground Live Biomass	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Dead Wood	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)	(0.4)
Litter	(0.8)	(0.8)	(0.7)	(0.7)	(0.7)	(0.7)	(0.7)
Mineral Soils	(4.2)	(31.7)	(22.2)	(21.9)	(21.6)	(21.9)	(21.6)
Organic Soils	+	+	0.1	0.1	0.1	0.1	0.1
Settlements Converted to Grassland	**(0.6)**	**(1.7)**	**(1.3)**	**(1.2)**	**(1.2)**	**(1.3)**	**(1.2)**
Aboveground Live Biomass	(0.2)	(0.2)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Mineral Soils	(0.2)	(1.4)	(1.0)	(0.9)	(0.9)	(1.0)	(0.9)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Grassland	**0.1**	**0.2**	**0.3**	**0.3**	**0.3**	**0.2**	**0.2**
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	0.1	0.2	0.2	0.2	0.2	0.2	0.2
Aboveground Live Biomass	**11.1**	**11.1**	**11.0**	**11.0**	**10.9**	**10.9**	**10.9**
Belowground Live Biomass	**2.1**	**2.0**	**2.0**	**2.0**	**2.0**	**2.0**	**2.0**
Dead Wood	**(0.9)**	**(0.8)**	**(0.7)**	**(0.7)**	**(0.7)**	**(0.7)**	**(0.7)**
Litter	**3.7**	**3.8**	**3.9**	**3.9**	**3.9**	**3.9**	**3.9**
Total Mineral Soil Flux	**(23.4)**	**(58.2)**	**(42.5)**	**(42.2)**	**(41.3)**	**(43.9)**	**(42.6)**
Total Organic Soil Flux	**0.8**	**1.9**	**1.9**	**1.9**	**1.8**	**1.8**	**1.8**
Total Net Flux	**(6.7)**	**(40.1)**	**(24.5)**	**(24.2)**	**(23.3)**	**(25.9)**	**(24.7)**

+ Does not exceed 0.05 MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-45: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Grassland (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Grassland	**(5.2)**	**(6.6)**	**(5.1)**	**(5.1)**	**(4.9)**	**(5.5)**	**(5.3)**
Aboveground Live Biomass	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	(0.1)	+	+	+	+	+	+
Mineral Soils	(5.2)	(6.8)	(5.3)	(5.3)	(5.1)	(5.7)	(5.5)
Organic Soils	0.2	0.4	0.4	0.4	0.4	0.4	0.4
Forest Land Converted to Grassland	**5.5**	**5.5**	**5.4**	**5.4**	**5.4**	**5.4**	**5.4**
Aboveground Live Biomass	3.6	3.6	3.4	3.4	3.4	3.4	3.4
Belowground Live Biomass	0.6	0.6	0.6	0.6	0.6	0.6	0.6
Dead Wood	(0.1)	(0.1)	+	+	+	+	+
Litter	1.3	1.3	1.3	1.3	1.3	1.3	1.3
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	+	0.1	0.1	0.1	0.1	0.1
Other Lands Converted to Grassland	**(2.0)**	**(9.4)**	**(6.7)**	**(6.6)**	**(6.5)**	**(6.6)**	**(6.5)**
Aboveground Live Biomass	(0.4)	(0.4)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)
Belowground Live Biomass	(0.1)	+	+	+	+	+	+
Dead Wood	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Litter	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Mineral Soils	(1.2)	(8.6)	(6.1)	(6.0)	(5.9)	(6.0)	(5.9)
Organic Soils	+	+	+	+	+	+	+
Settlements Converted to Grassland	**(0.2)**	**(0.5)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**
Aboveground Live Biomass	+	+	+	+	+	+	+
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	+	+	+	+	+	+	+
Mineral Soils	+	(0.4)	(0.3)	(0.3)	(0.2)	(0.3)	(0.3)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Grassland	**+**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Aboveground Live Biomass	**3.0**	**3.0**	**3.0**	**3.0**	**3.0**	**3.0**	**3.0**
Belowground Live Biomass	**0.6**	**0.6**	**0.5**	**0.5**	**0.5**	**0.5**	**0.5**
Dead Wood	**(0.3)**	**(0.2)**	**(0.2)**	**(0.2)**	**(0.2)**	**(0.2)**	**(0.2)**
Litter	**1.0**	**1.0**	**1.1**	**1.1**	**1.1**	**1.1**	**1.1**
Total Mineral Soil Flux	**(6.4)**	**(15.9)**	**(11.6)**	**(11.5)**	**(11.3)**	**(12.0)**	**(11.6)**
Total Organic Soil Flux	**0.2**	**0.5**	**0.5**	**0.5**	**0.5**	**0.5**	**0.5**
Total Net Flux	**(1.8)**	**(10.9)**	**(6.7)**	**(6.6)**	**(6.4)**	**(7.1)**	**(6.7)**

+ Does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Grassland, including (1) loss of aboveground and belowground biomass, dead wood and litter C with Forest Land Converted to Grassland and other land-use conversions to woodlands, as well as (2) the impact from all land-use conversions to grassland on mineral and organic soil organic C stocks.

Biomass, Dead Wood, and Litter Carbon Stock Changes

A Tier 3 method is applied to estimate biomass, dead wood and litter C stock changes for Forest Land Converted to Grassland and other land-use conversions to woodlands (i.e., Croplands Converted to Grasslands, Settlements Converted to Grasslands and Other Lands Converted to Grasslands). Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022). There are limited data on the herbaceous grassland C stocks following conversion so default biomass estimates (IPCC 2006) for grasslands are used to estimate C stock changes (Note: litter and dead wood C stocks are assumed to be zero following conversion because no reference C density estimates exist for grasslands). The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion.

The amount of biomass C that is lost abruptly with Forest Land Converted to Grasslands is estimated based on the amount of C before conversion and the amount of C following conversion according to remeasurements in the FIA program. This approach is consistent with IPCC (2006) that assumes there is an abrupt change during the first year, but does not necessarily capture the slower change over the years following conversion until a new steady state is reached. It was determined that using an IPCC Tier I approach that assumes all C is lost in the year of conversion for Forest Land Converted to Grasslands in the West and Great Plains states does not accurately characterize the transfer of C in woody biomass during abrupt or gradual land-use change. To estimate this transfer of C in woody biomass, state-specific C densities for woody biomass remaining on these former forest lands following conversion to grasslands were developed and included in the estimation of C stock changes from Forest Land Converted to Grasslands in the West and Great Plains states. A review of the literature in grassland and rangeland ecosystems (Asner et al. 2003; Huang et al. 2009; Tarhouni et al. 2016), as well as an analysis of FIA data, suggests that a conservative estimate of 50 percent of the woody biomass C density was lost during conversion from Forest Land to Grasslands. This estimate was used to develop state-specific C density estimates for biomass, dead wood, and litter for Grasslands in the West and Great Plains states and these state-specific C densities were applied in the compilation system to estimate the C losses associated with conversion from forest land to grassland in the West and Great Plains states. Further, losses from forest land to what are characterized as woodlands are included in this category using FIA plot re-measurements and the methods and models described hereafter.

If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

If FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter that are not attached to live or standing dead trees at transect intersection. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots is measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016). The same methods are applied from 1990 to 2021 in order to ensure time-series consistency. See Annex 3.13 for more information about reference C density estimates for forest land. See the Grassland Remaining Grassland section for more information about estimation of biomass, deadwood and litter C stock changes for woodlands.

Soil Carbon Stock Changes

Soil organic C stock changes are estimated for Land Converted to Grassland according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information (e.g., crop type, soil attributes, and irrigation) were originally collected for each NRI survey locations on a 5-year cycle beginning in 1982. In 1998, the NRI Program began collecting annual data, and the annual data are currently available through 2017, however this Inventory uses the previous NRI with annual data through 2015 (USDA-NRCS 2018). NRI survey locations are classified as Land Converted to Grassland in a given year between 1990 and 2015 if the land use is grassland but had been classified as another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an underestimation of Land Converted to Grassland in the early part of the time series to the extent that some areas are converted to grassland between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Homer et al. 2007; Fry et al. 2011; Homer et al. 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 3 model-based approach (Ogle et al. 2010) is applied to estimate C stock changes in mineral soils for most of the area in Land Converted to Grassland. C stock changes on the remaining area are estimated with an IPCC Tier 2 approach (Ogle et al. 2003), including prior cropland used to produce vegetables, tobacco, and perennial/horticultural crops; land areas with very gravelly, cobbly, or shaley soils (greater than 35 percent by volume); and land converted to grassland from another land use other than cropland.

A surrogate data method is used to estimate soil organic C stock changes from 2016 to 2021 at the national scale for land areas included in the Tier 2 and Tier 3 methods. Specifically, linear regression models with autoregressive moving-average (ARMA) errors (Brockwell and Davis 2016) are used to estimate the relationship between surrogate data and the 1990 to 2015 emissions data that are derived using the Tier 2 and 3 methods. Surrogate data for these regression models includes weather data from the PRISM Climate Group (PRISM Climate Group 2018). See Box 6-4 in the Methodology section of Cropland Remaining Cropland for more information about the surrogate data method.

Tier 3 Approach. Mineral soil organic C stocks and stock changes are estimated using the DayCent biogeochemical[60] model (Parton et al. 1998; Del Grosso et al. 2001, 2011). The DayCent model utilizes the soil C modeling framework developed in the Century model (Parton et al. 1987, 1988, 1994; Metherell et al. 1993), but has been refined to simulate dynamics at a daily time-step. Historical land use patterns and irrigation histories are simulated with DayCent based on the 2015 USDA NRI survey (USDA-NRCS 2018). Carbon stocks and 95 percent confidence intervals are estimated for each year between 1990 and 2015. See the Cropland Remaining Cropland section and Annex 3.12 for additional discussion of the Tier 3 methodology for mineral soils.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes from 2016 to 2021 are approximated using a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) errors, described in 0 of the Methodology section in Cropland Remaining Cropland. Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data (see the Planned Improvements section in Cropland Remaining Cropland).

Tier 2 Approach. For the mineral soils not included in the Tier 3 analysis, soil organic C stock changes are estimated using a Tier 2 Approach, as described in the Tier 2 Approach for mineral soils in Grassland Remaining Grassland and

[60] Biogeochemical cycles are the flow of chemical elements and compounds between living organisms and the physical environment.

Annex 3.12. In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). As with the Tier 3 method, stock change estimates for 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Grassland are estimated using the Tier 2 method provided in IPCC (2006), with country-specific C loss rates (Ogle et al. 2003) as described in the Cropland Remaining Cropland section. Further elaboration on the methodology is also provided in Annex 3.12 for organic soils.

In order to ensure time-series consistency, the Tier 2 method is applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. In addition, soil organic C stock changes are approximated for the remainder of the time series with a linear extrapolation of emission patterns from 1990 to 2015. The extrapolation is based on a linear regression model with moving-average (ARMA) (See Box 6-4 of the Methodology section in Cropland Remaining Cropland). Linear extrapolation is a standard data splicing method for estimating emissions at the end of a time series (IPCC 2006). Annual C emissions from drained organic soils from 2016 to 2021 will be recalculated in future Inventories with an updated time series of activity data.

Uncertainty

The uncertainty analyses for biomass, dead wood and litter C losses with Forest Land Converted to Grassland and other land-use conversions to woodlands are conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the Forest Land Remaining Forest Land category. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006), by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details see the Uncertainty Analysis in Annex 3.13.

The uncertainty analyses for mineral soil organic C stock changes using the Tier 3 and Tier 2 methodologies are based on a Monte Carlo approach that is described in the Cropland Remaining Cropland section and Annex 3.12. The uncertainty for annual C emission estimates from drained organic soils in Land Converted to Grassland is estimated using a Monte Carlo approach, which is also described in the Cropland Remaining Cropland section. For 2016 to 2021, there is additional uncertainty propagated through the Monte Carlo Analysis associated with a surrogate data method, which is also described in Cropland Remaining Cropland.

Uncertainty estimates are presented in Table 6-46 for each subsource (i.e., biomass C stocks, mineral and organic C stocks in soils) and the method applied in the inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), as discussed in the previous paragraph. The combined uncertainty for total C stocks in Land Converted to Grassland ranges from 149 percent below to 149 percent above the 2021 stock change estimate of 24.7 MMT CO_2 Eq. The large relative uncertainty around the 2021 stock change estimate is partly due to large uncertainties in biomass and dead organic matter C losses with Forest Land Conversion to Grassland, in addition to variation in soil organic C stock changes that is not explained by the surrogate data method.

Table 6-46: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Grassland (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate[a] (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Flux Estimate[a] (%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Cropland Converted to Grassland	**(19.3)**	**(48.9)**	**10.3**	**-153%**	**153%**
Aboveground Live Biomass	(0.3)	(0.6)	0.1	-129%	129%
Belowground Live Biomass	+	(0.1)	+	-167%	100%
Dead Wood	(0.1)	(0.3)	+	-133%	129%
Litter	(0.1)	(0.3)	+	-114%	127%
Mineral Soil C Stocks: Tier 3	(16.2)	(45.6)	13.1	-181%	181%
Mineral Soil C Stocks: Tier 2	(3.8)	(7.2)	(0.5)	-88%	88%
Organic Soil C Stocks: Tier 2	1.3	(0.1)	2.7	-105%	105%
Forest Land Converted to Grassland	**19.6**	**5.4**	**33.9**	**-73%**	**73%**
Aboveground Live Biomass	12.6	(0.6)	25.7	-104%	104%
Belowground Live Biomass	2.2	(0.1)	4.5	-105%	105%
Dead Wood	(0.1)	+	+	-100%	117%
Litter	4.8	(0.2)	9.9	-105%	104%
Mineral Soil C Stocks: Tier 2	+	(0.2)	0.1	-324%	324%
Organic Soil C Stocks: Tier 2	0.2	+	0.4	-119%	119%
Other Lands Converted to Grassland	**(24.0)**	**(40.5)**	**(7.5)**	**-69%**	**69%**
Aboveground Live Biomass	(1.3)	(2.1)	(0.5)	-63%	62%
Belowground Live Biomass	(0.2)	(0.3)	(0.1)	-68%	52%
Dead Wood	(0.4)	(0.6)	(0.1)	-66%	61%
Litter	(0.7)	(1.1)	(0.3)	-62%	63%
Mineral Soil C Stocks: Tier 2	(21.6)	(38.0)	(5.1)	-76%	76%
Organic Soil C Stocks: Tier 2	0.1	+	0.2	-163%	163%
Settlements Converted to Grassland	**(1.2)**	**(2.0)**	**(0.5)**	**-61%**	**62%**
Aboveground Live Biomass	(0.1)	(0.2)	+	-61%	73%
Belowground Live Biomass	+	+	+	-108%	100%
Dead Wood	(0.1)	(0.1)	+	-42%	29%
Litter	(0.1)	(0.1)	+	-46%	63%
Mineral Soil C Stocks: Tier 2	(0.9)	(1.7)	(0.2)	-80%	80%
Organic Soil C Stocks: Tier 2	+	+	+	-289%	289%
Wetlands Converted to Grasslands	**0.2**	**+**	**0.5**	**-120%**	**120%**
Mineral Soil C Stocks: Tier 2	+	(0.1)	0.1	-933%	933%
Organic Soil C Stocks: Tier 2	0.2	+	0.5	-119%	119%
Total: Land Converted to Grassland	**(24.7)**	**(61.4)**	**12.1**	**-149%**	**149%**
Aboveground Live Biomass	**10.9**	**(2.2)**	**24.1**	**-120%**	**120%**
Belowground Live Biomass	**2.0**	**(0.3)**	**4.3**	**-116%**	**116%**
Dead Wood	**(0.7)**	**(1.0)**	**(0.4)**	**-48%**	**47%**
Litter	**3.9**	**(1.2)**	**9.0**	**-130%**	**130%**
Mineral Soil C Stocks: Tier 3	**(16.2)**	**(45.6)**	**13.1**	**-181%**	**181%**
Mineral Soil C Stocks: Tier 2	**(26.4)**	**(43.2)**	**(9.6)**	**-64%**	**64%**
Organic Soil C Stocks: Tier 2	**1.8**	**0.4**	**3.2**	**-79%**	**79%**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Uncertainty is also associated with a lack of reporting on biomass, dead wood and litter C stock changes for conversions to agroforestry systems and herbaceous grasslands. The influence of agroforestry is difficult to address because there are currently no datasets to evaluate the trends in the area and associated C stocks in agroforestry

systems. The influence of land-use change to herbaceous grasslands and agroforestry will be further explored in a future Inventory.

QA/QC and Verification

See the QA/QC and Verification section in Cropland Remaining Cropland and Grassland Remaining Grassland for information on QA/QC steps.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks associated with conversions to woodlands from Cropland Converted to Grassland, Other Land Converted to Grassland, and Settlements Converted to Grassland; updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks from Forest Land Converted to Grassland; and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Grassland has an estimated increase in C stock changes of 2.9 MMT CO_2 Eq. on average over the time series, representing a 23 percent increase in C sequestration compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) conducting an analysis of C stock changes in Alaska for cropland. These two improvements will resolve the majority of the discrepancy between the managed land base for Land Converted to Grassland and amount of area currently included in Land Converted to Grassland Inventory (See Table 6.47).

Table 6-47: Comparison of Managed Land Area in Land Converted to Grassland and Area in the current Land Converted to Grassland Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	Managed Land	Inventory	Difference
1990	9,319	9,394	-75
1991	9,514	9,485	29
1992	9,733	9,691	43
1993	11,641	11,566	75
1994	13,391	13,378	14
1995	14,060	13,994	66
1996	14,749	14,622	127
1997	15,431	15,162	269
1998	19,309	19,052	258
1999	20,164	19,931	234
2000	21,295	20,859	436
2001	22,387	21,968	418
2002	22,863	22,392	471
2003	22,495	22,008	487
2004	23,164	22,547	617
2005	23,070	22,447	622
2006	23,409	22,702	707
2007	23,144	22,428	716

2008	23,448	22,661	787
2009	23,339	22,581	758
2010	23,415	22,634	780
2011	23,557	22,750	806
2012	23,383	22,596	787
2013	22,196	21,439	757
2014	20,856	20,163	693
2015	20,811	20,210	601
2016	20,083	*	*
2017	19,349	*	*
2018	16,517	*	*
2019	16,090	*	*
2020	15,254	*	*
2021	13,892	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

In addition, the amount of biomass C that is lost abruptly or the slower changes that continue to occur over a decade or longer with Forest Land Converted to Grasslands will be further refined in a future Inventory. The current values are estimated based on the amount of C before conversion and an estimated level of C left after conversion based on limited plot data from the FIA and published literature for the Western United States and Great Plains Regions. The amount of C left after conversion will be further investigated with additional data collection, particularly in the Western United States and Great Plains, including tree biomass, understory biomass, dead wood and litter C pools. In addition, biomass C stock changes will be estimated for conversions from other land uses to herbaceous grasslands. For information about other improvements, see the Planned Improvements section in Cropland Remaining Cropland.

6.8 Wetlands Remaining Wetlands (CRF Category 4D1)

Wetlands Remaining Wetlands includes all wetlands in an Inventory year that have been classified as a wetland for the previous 20 years, and in this Inventory, the flux estimates include Peatlands, Coastal Wetlands, and Flooded Land.

Peatlands Remaining Peatlands

Emissions from Managed Peatlands

Managed peatlands are peatlands that have been cleared and drained for the production of peat. The production cycle of a managed peatland has three phases: land conversion in preparation for peat extraction (e.g., clearing surface biomass, draining), extraction (which results in the emissions reported under Peatlands Remaining Peatlands), and abandonment, restoration, rewetting, or conversion of the land to another use.

Carbon dioxide emissions from the removal of biomass and the decay of drained peat constitute the major greenhouse gas flux from managed peatlands. Managed peatlands may also emit CH_4 and N_2O. The natural production of CH_4 is largely reduced but not entirely eliminated when peatlands are drained in preparation for

peat extraction (Strack et al. 2004 as cited in the *2006 IPCC Guidelines*). Drained land surface and ditch networks contribute to the CH_4 flux in peatlands managed for peat extraction. Methane emissions were considered insignificant under the IPCC Tier 1 methodology (IPCC 2006), but are included in the emissions estimates for Peatlands Remaining Peatlands consistent with the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* (IPCC 2013). Nitrous oxide emissions from managed peatlands depend on site fertility. In addition, abandoned and restored peatlands continue to release greenhouse gas emissions. Although methodologies are provided to estimate emissions and removals from rewetted organic soils (which includes rewetted/restored peatlands) in IPCC (2013) guidelines, information on the areal extent of rewetted/restored peatlands in the United States is currently unavailable. The current Inventory estimates CO_2, CH_4 and N_2O emissions from peatlands managed for peat extraction in accordance with IPCC (2006 and 2013) guidelines.

CO_2, N_2O, and CH_4 Emissions from Peatlands Remaining Peatlands

IPCC (2013) recommends reporting CO_2, N_2O, and CH_4 emissions from lands undergoing active peat extraction (i.e., Peatlands Remaining Peatlands) as part of the estimate for emissions from managed wetlands. Peatlands occur where plant biomass has sunk to the bottom of water bodies and water-logged areas and exhausted the oxygen supply below the water surface during the course of decay. Due to these anaerobic conditions, much of the plant matter does not decompose but instead forms layers of peat over decades and centuries. In the United States, peat is extracted for horticulture and landscaping growing media, and for a wide variety of industrial, personal care, and other products. It has not been used for fuel in the United States for many decades. Peat is harvested from two types of peat deposits in the United States: *Sphagnum* bogs in northern states (e.g., Minnesota) and wetlands in states further south (e.g., Florida). The peat from *Sphagnum* bogs in northern states, which is nutrient-poor, is generally corrected for acidity and mixed with fertilizer. Production from more southerly states is relatively coarse (i.e., fibrous) but nutrient-rich.

IPCC (2006 and 2013) recommend considering both on-site and off-site emissions when estimating CO_2 emissions from Peatlands Remaining Peatlands using the Tier 1 approach. Current IPCC methodologies estimate only on-site N_2O and CH_4 emissions. This is because off-site N_2O estimates are complicated by the risk of double-counting emissions from nitrogen fertilizers added to horticultural peat where subsequent runoff or leaching into waterbodies can result in indirect N_2O emissions that are already included within the Agricultural Soil Management category.

On-site emissions from managed peatlands occur as the land is drained and cleared of vegetation, and the underlying peat is exposed to sun, weather and oxygen. As this occurs, some peat deposit is lost and CO_2 is emitted from the oxidation of the peat. Since N_2O emissions from saturated ecosystems tend to be low unless there is an exogenous source of nitrogen, N_2O emissions from drained peatlands are dependent on nitrogen mineralization and therefore on soil fertility. Peatlands located on highly fertile/nutrient-rich soils, mostly made up of southern peatlands in Florida, contain significant amounts of organic nitrogen in inert/microbially inaccessible forms. Draining land in preparation for peat extraction allows bacteria to convert the organic nitrogen into nitrates through nitrogen mineralization which leach to the surface where they are reduced to N_2O during nitrification. Nitrate availability also contributes to the activity of methanogens and methanotrophs that result in CH_4 emissions (Blodau 2002; Treat et al. 2007 as cited in IPCC 2013). Drainage ditches, which are constructed to drain the land in preparation for peat extraction, also contribute to the flux of CH_4 through *in situ* production and lateral transfer of CH_4 from the organic soil matrix (IPCC 2013).

Off-site CO_2 emissions from managed peatlands occur from waterborne dissolved organic carbon losses and the horticultural and landscaping use of peat. Dissolved organic carbon from water drained off peatlands reacts within aquatic ecosystems and is converted to CO_2, which is then emitted to the atmosphere (Billet et al. 2004 as cited in IPCC 2013). During the horticultural and landscaping use of peat, nutrient-poor (but fertilizer-enriched) peat tends to be used in bedding plants and in greenhouse and plant nursery production, whereas nutrient-rich (but relatively coarse) peat is used directly in landscaping, athletic fields, golf courses, and plant nurseries. Most (nearly 94

percent) of the CO_2 emissions from peat occur off-site, as the peat is processed and sold to firms which, in the United States, use it predominantly for the aforementioned horticultural and landscaping purposes.

Total emissions from Peatlands Remaining Peatlands are estimated to be 0.7 MMT CO_2 Eq. in 2021 (see Table 6-48 and Table 6-49) comprising 0.7 MMT CO_2 Eq. (700 kt) of CO_2, 0.004 MMT CO_2 Eq. (0.15 kt) of CH_4 and 0.0005 MMT CO_2 Eq. (0.002 kt) of N_2O. Total emissions in 2021 are 4.5 percent less than total emissions in 2020.

Total emissions from Peatlands Remaining Peatlands have fluctuated between 0.7 and 1.3 MMT CO_2 Eq. across the time series with a decreasing trend from 1990 until 1993, followed by an increasing trend until reaching peak emissions in 2000. After 2000, emissions generally decreased until 2006 and then increased until 2009. The trend reversed in 2009 and total emissions have generally decreased between 2009 and 2021. Carbon dioxide emissions from Peatlands Remaining Peatlands have fluctuated between 0.7 and 1.3 MMT CO_2 across the time series, and these emissions drive the trends in total emissions. Methane and N_2O emissions remained close to zero across the time series.

Table 6-48: Emissions from Peatlands Remaining Peatlands (MMT CO_2 Eq.)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	**1.1**	**1.1**	**0.8**	**0.8**	**0.8**	**0.7**	**0.7**
Off-site	1.0	1.0	0.8	0.7	0.7	0.7	0.7
On-site	0.1	0.1	0.1	0.1	0.1	+	+
CH_4 (On-site)	**+**	**+**	**+**	**+**	**+**	**+**	**+**
N_2O (On-site)	**+**	**+**	**+**	**+**	**+**	**+**	**+**
Total	**1.1**	**1.1**	**0.8**	**0.8**	**0.8**	**0.7**	**0.7**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 6-49: Emissions from Peatlands Remaining Peatlands (kt)

Gas	1990	2005	2017	2018	2019	2020	2021
CO_2	**1,055**	**1,101**	**829**	**795**	**757**	**733**	**700**
Off-site	985	1,030	774	744	707	683	653
On-site	70	71	55	51	50	50	48
CH_4 (On-site)	**+**	**+**	**+**	**+**	**+**	**+**	**+**
N_2O (On-site)	**+**	**+**	**+**	**+**	**+**	**+**	**+**

+ Does not exceed 0.5 kt

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

Off-Site CO_2 Emissions

Carbon dioxide emissions from domestic peat production were estimated using a Tier 1 methodology consistent with IPCC (2006). Off-site CO_2 emissions from Peatlands Remaining Peatlands were calculated by apportioning the annual weight of peat produced in the United States (Table 6-50) into peat extracted from nutrient-rich deposits and peat extracted from nutrient-poor deposits using annual percentage-by-weight figures. These nutrient-rich and nutrient-poor production values were then multiplied by the appropriate default C fraction conversion factor taken from IPCC (2006) in order to obtain off-site emission estimates. For the conterminous 48 states, both annual percentages of peat type by weight and domestic peat production data were sourced from estimates and industry statistics provided in the *Minerals Yearbook* and *Mineral Commodity Summaries* from the U.S. Geological Survey (USGS 1995 through 2018; USGS 2022a; USGS 2022b; USGS 2022c). Hawaii is assumed to have no peat production due to its absence from these sources. To develop these data, the U.S. Geological Survey (USGS; U.S. Bureau of Mines prior to 1997) obtained production and use information by surveying domestic peat producers. On average,

about 75 percent of the peat operations respond to the survey; USGS estimates data for non-respondents on the basis of prior-year production levels (Apodaca 2011).

The estimates for Alaska rely on reported peat production from the annual *Alaska's Mineral Industry* reports (DGGS 1993 through 2015). Similar to the U.S. Geological Survey, the Alaska Department of Natural Resources, Division of Geological & Geophysical Surveys (DGGS) solicits voluntary reporting of peat production from producers for the *Alaska's Mineral Industry* report. However, the report does not estimate production for the non-reporting producers, resulting in larger inter-annual variation in reported peat production from Alaska depending on the number of producers who report in a given year (Szumigala 2011). In addition, in both the conterminous 48 states and Alaska, large variations in peat production can also result from variation in precipitation and the subsequent changes in moisture conditions, since unusually wet years can hamper peat production. The methodology estimates emissions from Alaska separately from the conterminous 48 states because Alaska previously conducted its own mineral surveys and reported peat production by volume, rather than by weight (Table 6-51). However, volume production data were used to calculate off-site CO_2 emissions from Alaska applying the same methodology but with volume-specific C fraction conversion factors from IPCC (2006).[61] Peat production was not reported for 2015 in *Alaska's Mineral Industry 2014* report (DGGS 2015), and reliable data are not available beyond 2012, so Alaska's peat production in 2013 through 2021 (reported in cubic yards) was assumed to be equal to the 2012 value.

Consistent with IPCC (2013) guidelines, off-site CO_2 emissions from dissolved organic carbon were estimated based on the total area of peatlands managed for peat extraction, which is calculated from production data using the methodology described in the On-Site CO_2 Emissions section below. Carbon dioxide emissions from dissolved organic C were estimated by multiplying the area of managed peatlands by the default emission factor for dissolved organic C provided in IPCC (2013).

The United States has largely imported peat from Canada for horticultural purposes; in 2021, imports of *Sphagnum* moss (nutrient-poor) peat from Canada represented 96 percent of total U.S. peat imports and 80 percent of U.S. domestic consumption (USGS 2022c). Most peat produced in the United States is reed-sedge peat, generally from southern states, which is classified as nutrient-rich by IPCC (2006). To be consistent with the Tier 1 method, only domestic peat production is accounted for when estimating off-site emissions. Higher-tier calculations of CO_2 emissions from apparent consumption would involve consideration of the percentages of peat types stockpiled (nutrient-rich versus nutrient-poor) as well as the percentages of peat types imported and exported.

Table 6-50: Peat Production of Conterminous 48 States (kt)

Type of Deposit	1990	2005	2017	2018	2019	2020	2021
Nutrient-Rich	595.1	657.6	423.3	416.7	410.4	430.7	378.0
Nutrient-Poor	55.4	27.4	74.7	62.3	45.6	13.3	42.0
Total Production	**692.0**	**685.0**	**498.0**	**479.0**	**456.0**	**444.0**	**420.0**

Sources: United States Geological Survey (USGS) (1991–2017) *Minerals Yearbook: Peat (1994–2016);* United States Geological Survey (USGS) (2018) *Minerals Yearbook: Peat – Tables-only release (2018);* United States Geological Survey (USGS) (2021) *Mineral Commodity Summaries: Peat (2021).*

Table 6-51: Peat Production of Alaska (Thousand Cubic Meters)

	1990	2005	2017	2018	2019	2020	2021
Total Production	49.7	47.8	93.1	93.1	93.1	93.1	93.1

Sources: Division of Geological & Geophysical Surveys (DGGS), Alaska Department of Natural Resources (1997–2015) *Alaska's Mineral Industry Report (1997–2014)*.

[61] Peat produced from Alaska was assumed to be nutrient poor; as is the case in Canada, "where deposits of high-quality [but nutrient poor] *Sphagnum* moss are extensive" (USGS 2008).

On-site CO_2 Emissions

IPCC (2006) suggests basing the calculation of on-site emission estimates on the area of peatlands managed for peat extraction differentiated by the nutrient type of the deposit (rich versus poor). Information on the area of land managed for peat extraction is currently not available for the United States, but consistent with IPCC (2006), an average production rate for the industry was applied to derive a land area estimate. In a mature industrialized peat industry, such as exists in the United States and Canada, the vacuum method can extract up to 100 metric tons per hectare per year (Cleary et al. 2005 as cited in IPCC 2006).[62] The area of land managed for peat extraction in the conterminous 48 states of the United States was estimated using both nutrient-rich and nutrient-poor production data and the assumption that 100 metric tons of peat are extracted from a single hectare in a single year, see Table 6-52. The annual land area estimates were then multiplied by the IPCC (2013) default emission factor in order to calculate on-site CO_2 emission estimates.

Production data are not available by weight for Alaska. In order to calculate on-site emissions resulting from Peatlands Remaining Peatlands in Alaska, the production data by volume were converted to weight using annual average bulk peat density values, and then converted to land area estimates using the assumption that a single hectare yields 100 metric tons, see Table 6-53. The IPCC (2006) on-site emissions equation also includes a term that accounts for emissions resulting from the change in C stocks that occurs during the clearing of vegetation prior to peat extraction. Area data on land undergoing conversion to peatlands for peat extraction is also unavailable for the United States. However, USGS records show that the number of active operations in the United States has been declining since 1990; therefore, it seems reasonable to assume that no new areas are being cleared of vegetation for managed peat extraction. Other changes in C stocks in living biomass on managed peatlands are also assumed to be zero under the Tier 1 methodology (IPCC 2006 and 2013).

Table 6-52: Peat Production Area of Conterminous 48 States (Hectares)

	1990[a]	2005	2017	2018	2019	2020	2021
Nutrient-Rich	5,951	6,576	4,233	4,167	4,104	4,307	3,780
Nutrient-Poor	554	274	747	623	456	133	420
Total Production	**6,920**	**6,850**	**4,980**	**4,790**	**4,560**	**4,440**	**4,200**

[a] A portion of the production in 1990 is of unknown nutrient type, resulting in a total production value greater than the sum of nutrient-rich and nutrient-poor.

Table 6-53: Peat Production Area of Alaska (Hectares)

	1990	2005	2017	2018	2019	2020	2021
Nutrient-Rich	0	0	0	0	0	0	0
Nutrient-Poor	286	104	333	212	329	428	428
Total Production	**286**	**104**	**333**	**212**	**329**	**428**	**428**

On-site N_2O Emissions

IPCC (2006) indicates the calculation of on-site N_2O emission estimates using Tier 1 methodology only considers nutrient-rich peatlands managed for peat extraction. These area data are not available directly for the United States, but the on-site CO_2 emissions methodology above details the calculation of nutrient-rich area data from production data. In order to estimate N_2O emissions, the land area estimate of nutrient-rich Peatlands Remaining Peatlands was multiplied by the appropriate default emission factor taken from IPCC (2013). See Planned Improvements section for additional information on the basis of land area estimates.

[62] The vacuum method is one type of extraction that annually "mills" or breaks up the surface of the peat into particles, which then dry during the summer months. The air-dried peat particles are then collected by vacuum harvesters and transported from the area to stockpiles (IPCC 2006).

On-site CH_4 Emissions

IPCC (2013) also suggests basing the calculation of on-site CH_4 emission estimates on the total area of peatlands managed for peat extraction. Area data is derived using the calculation from production data described in the On-site CO_2 Emissions section above. In order to estimate CH_4 emissions from drained land surface, the land area estimate of Peatlands Remaining Peatlands was multiplied by the emission factor for direct CH_4 emissions taken from IPCC (2013). In order to estimate CH_4 emissions from drainage ditches, the total area of peatland was multiplied by the default fraction of peatland area that contains drainage ditches, and the appropriate emission factor taken from IPCC (2013). See Table 6-54 for the calculated area of ditches and drained land.

Table 6-54: Peat Production (Hectares)

	1990	2005	2017	2018	2019	2020	2021
Conterminous 48 States							
Area of Drained Land	6,574	6,508	4,731	4,551	4,332	4,218	3,990
Area of Ditches	346	343	249	240	228	222	210
Total Production	**6,920**	**6,850**	**4,980**	**4,790**	**4,560**	**4,440**	**4,200**
Alaska							
Area of Drained Land	272	99	317	202	312	407	407
Area of Ditches	14	5	17	11	16	21	21
Total Production	**286**	**104**	**333**	**212**	**329**	**428**	**212**

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. The same data sources were used throughout the time series, when available. When data were unavailable or the available data were outliers, missing values were estimated based on the past available data.

Uncertainty

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the uncertainty of CO_2, CH_4, and N_2O emissions from Peatlands Remaining Peatlands for 2021, using the following assumptions:

- The uncertainty associated with peat production data was estimated to be ± 25 percent (Apodaca 2008) and assumed to be normally distributed.
- The uncertainty associated with peat production data stems from the fact that the USGS receives data from the smaller peat producers but estimates production from some larger peat distributors. The peat type production percentages were assumed to have the same uncertainty values and distribution as the peat production data (i.e., ± 25 percent with a normal distribution).
- The uncertainty associated with the reported production data for Alaska was assumed to be the same as for the conterminous 48 states, or ± 25 percent with a normal distribution. It should be noted that the DGGS estimates that around half of producers do not respond to their survey with peat production data; therefore, the production numbers reported are likely to underestimate Alaska peat production (Szumigala 2008).
- The uncertainty associated with the average bulk density values was estimated to be ± 25 percent with a normal distribution (Apodaca 2008).
- IPCC (2006 and 2013) gives uncertainty values for the emissions factors for the area of peat deposits managed for peat extraction based on the range of underlying data used to determine the emission factors. The uncertainty associated with the emission factors was assumed to be triangularly distributed.
- The uncertainty values surrounding the C fractions were based on IPCC (2006) and the uncertainty was assumed to be uniformly distributed.

- The uncertainty values associated with the fraction of peatland covered by ditches was assumed to be ± 100 percent with a normal distribution based on the assumption that greater than 10 percent coverage, the upper uncertainty bound, is not typical of drained organic soils outside of The Netherlands (IPCC 2013).

The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-55. Carbon dioxide emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.6 and 0.8 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of 16 percent below to 16 percent above the 2021 emission estimate of 0.7 MMT CO_2 Eq. Methane emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.002 and 0.007 MMT CO_2 Eq. This indicates a range of 58 percent below to 80 percent above the 2021 emission estimate of 0.004 MMT CO_2 Eq. Nitrous oxide emissions from Peatlands Remaining Peatlands in 2021 were estimated to be between 0.0003 and 0.0008 MMT CO_2 Eq. at the 95 percent confidence level. This indicates a range of 52 percent below to 53 percent above the 2021 emission estimate of 0.0005 MMT CO_2 Eq.

Table 6-55: Approach 2 Quantitative Uncertainty Estimates for CO_2, CH_4, and N_2O Emissions from Peatlands Remaining Peatlands (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Peatlands Remaining Peatlands	CO_2	0.7	0.6	0.8	-16%	16%
Peatlands Remaining Peatlands	CH_4	+	+	+	-58%	80%
Peatlands Remaining Peatlands	N_2O	+	+	+	-52%	53%

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

A QA/QC analysis was performed to review input data and calculations, and no issues were identified. In addition, the emission trends were analyzed to ensure they reflected activity data trends.

Recalculations Discussion

The conterminous 48 states peat production estimates for Peatlands Remaining Peatlands were updated using the Peat section of the *Mineral Commodity Summaries 2022*. The 2022 edition updated 2018, 2019, and 2020 peat production data and provided peat type production estimates for 2021. The updated data increased previously estimated emissions for 2018 by 0.4 percent, 2019 by 0.2 percent, and 2020 by 3.5 percent versus estimated emissions for 2018, 2019, and 2020 in the previous (i.e., 1990 through 2020) Inventory for Peatlands Remaining Peatlands.

Although Alaska peat production data for 2015 through 2021 were unavailable, 2014 data are available in the *Alaska's Mineral Industry 2014* report. However, the reported values represented an apparent 98 percent decrease in production since 2012. Due to the uncertainty of the most recent data, 2013, 2014, 2015, 2016, 2017, 2018, 2019, and 2020 values were assumed to be equal to the 2012 value, seen in the *Alaska's Mineral Industry 2013* report. If updated Alaska data are available for the next Inventory cycle, this will result in a recalculation in the next (i.e., 1990 through 2021) Inventory report.

EPA updated global warming potentials (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) and N_2O (from 298 to 265) to reflect the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWPs provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. This change resulted in an 11 percent reduction in CO_2 Eq. emissions for N_2O across the time series, as well as a 12 percent increase in CO_2 Eq. emissions for CH_4 across the

time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The cumulative effect of all of these changes was an average increase of 0.2 percent across the time series, with the smallest increase of 0.05 percent (0.0005 MMT CO_2 Eq.) in 1996 to the largest increase of 3.6 percent (0.03 MMT CO_2 Eq.) in 2020.

Planned Improvements

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

- The implied emission factors will be calculated and included in this chapter for future Inventories. Currently, the N_2O emissions calculation uses different land areas than the CO_2 and CH_4 emission calculations (see Methodology and Time Series Consistency in this chapter), so estimating the implied emission factor per total land area is not appropriate. The inclusion of implied emission factors in this chapter will provide another method of QA/QC and verification for Inventory data.

EPA notes the following improvements will continue to be investigated as time and resources allow, but there are no immediate plans to implement until data are available or identified:

- In order to further improve estimates of CO_2, N_2O, and CH_4 emissions from Peatlands Remaining Peatlands, future efforts will investigate if improved data sources exist for determining the quantity of peat harvested per hectare and the total area of land undergoing peat extraction.
- EPA plans to identify a new source for Alaska peat production. The current source has not been reliably updated since 2012 and Alaska Department of Natural Resources indicated future publication of data has been discontinued.
- Edits to the trends and methodology sections are planned based on expert review comments.

Coastal Wetlands Remaining Coastal Wetlands

Consistent with ecological definitions of wetlands,[63] the United States has historically included under the category of Wetlands those coastal shallow water areas of estuaries and bays that lie within the extent of the Land Representation. Guidance on quantifying greenhouse gas emissions and removals on Coastal Wetlands is provided in the *2013 Supplement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories: Wetlands* (*Wetlands Supplement*), which recognizes the particular importance of vascular plants in sequestering CO_2 from the atmosphere within biomass, dead organic material (DOM; including litter and dead wood stocks) and soils. Thus, the *Wetlands Supplement* provides specific guidance on quantifying emissions and removals on organic and mineral soils that are covered or saturated for part of the year by tidal fresh, brackish or saline water and are vegetated by vascular plants and may extend seaward to the maximum depth of vascular plant vegetation. The United States calculates emissions and removals based upon the stock change method for soil carbon (C) and the gain-loss method for biomass and DOM. Presently, this Inventory does not calculate the lateral flux of C to or from any land use. Lateral transfer of organic C to coastal wetlands and to marine sediments within U.S. waters is the subject of ongoing scientific investigation; there is currently no IPCC methodological guidance for lateral fluxes of C.

The United States recognizes both Vegetated Wetlands and Unvegetated Open Water as Coastal Wetlands. Per guidance provided by the *Wetlands Supplement*, sequestration of C into biomass, DOM and soil C pools is recognized only in Vegetated Coastal Wetlands and does not occur in Unvegetated Open Water Coastal Wetlands.

[63] See https://water.usgs.gov/nwsum/WSP2425/definitions.html; accessed August 2021.

The United States takes the additional step of recognizing that C stock losses occur when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands.

This Inventory includes all privately- and publicly-owned coastal wetlands (i.e., mangroves and tidal marsh) along the oceanic shores of the conterminous United States, but does not include Coastal Wetlands Remaining Coastal Wetlands in Alaska, Hawaii, or any of the United States Territories. Seagrasses are not currently included within the Inventory due to insufficient data on distribution, change through time and C stocks or C stock changes as a result of anthropogenic influence (see Planned Improvements).

Under the Coastal Wetlands Remaining Coastal Wetlands category, the following emissions and removals are quantified in this chapter:

1) Carbon stock changes and CH_4 emissions on Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands,
2) Carbon stock changes on Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands,
3) Carbon stock changes on Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands, and
4) Nitrous Oxide Emissions from Aquaculture in Coastal Wetlands.

Vegetated coastal wetlands hold C in all five C pools (i.e., aboveground biomass, belowground biomass, dead organic matter [DOM; dead wood and litter], and soil), though typically soil C and, to a lesser extent, aboveground and belowground biomass are the dominant pools, depending on wetland type (i.e., forested vs. marsh). Vegetated Coastal Wetlands are net accumulators of C over centuries to millennia as soils accumulate C under anaerobic soil conditions and C accumulates in plant biomass. Large emissions from soil C and biomass stocks occur when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands (e.g., when Vegetated Coastal Wetlands are lost due to subsidence, channel cutting through Vegetated Coastal Wetlands), but are still recognized as Coastal Wetlands in this Inventory. These C stock losses resulting from conversion to Unvegetated Open Water Coastal Wetlands can cause the release of decades to centuries of accumulated soil C, as well as the standing stock of biomass C. Conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands, either through restoration efforts or naturally, initiates the building of C stocks within soils and biomass. In applying the *Wetlands Supplement* methodologies for estimating CH_4 emissions, coastal wetlands in salinity conditions greater than 18 parts per thousand have little to no CH_4 emissions compared to those experiencing lower salinity brackish and freshwater conditions. Therefore, conversion of Vegetated Coastal Wetlands to or from Unvegetated Open Water Coastal Wetlands are conservatively assumed to not result in a change in salinity condition and are assumed to have no impact on CH_4 emissions. The *Wetlands Supplement* provides methodologies to estimate N_2O emissions from coastal wetlands that occur due to aquaculture. The N_2O emissions from aquaculture result from the N derived from consumption of the applied food stock that is then excreted as N load available for conversion to N_2O. While N_2O emissions can also occur due to anthropogenic N loading from the watershed and atmospheric deposition, these emissions are not reported here to avoid double-counting of indirect N_2O emissions with the Agricultural Soils Management, Forest Land and Settlements categories.

The *Wetlands Supplement* provides methodologies for estimating C stock changes and CH_4 emissions from mangroves, tidal marshes and seagrasses. Depending upon their height and area, C stock changes from mangroves may be reported under the Forest Land category or under Coastal Wetlands. If mangrove stature is 5 m or greater or if there is evidence that trees can obtain that height, mangroves are reported under the Forest Land category because they meet the definition of Forest Land. Mangrove forests that are less than 5 m are reported under Coastal Wetlands because they meet the definition of Wetlands. All other non-drained, intact coastal marshes are reported under Coastal Wetlands.

Because of human activities and level of regulatory oversight, all coastal wetlands within the conterminous United States are included within the managed land area described in Section 6.1 , and as such, estimates of C stock changes, emissions of CH_4, and emissions of N_2O from aquaculture from all coastal wetlands are included in this Inventory. At the present stage of inventory development, Coastal Wetlands are not explicitly shown in the Land Representation analysis while work continues to harmonize data from NOAA's Coastal Change Analysis Program (C-CAP)[64] with NRI, FIA and NLDC data used to compile the Land Representation. However, a check was undertaken to confirm that Coastal Wetlands recognized by C-CAP represented a subset of Wetlands recognized by the NRI for marine coastal states.

The greenhouse gas fluxes for all four wetland categories described above are summarized in Table 6-56. Coastal Wetlands Remaining Coastal Wetlands are generally a net C sink, with the fluxes ranging from -3.3 to -4.4 MMT CO_2 Eq. across the majority of the time series; however, between 2006 and 2010, they were a net source of emissions (ranging from 5.6 to 5.9 MMT CO_2 Eq.), resulting from a large loss of vegetated coastal wetlands to open water due to hurricanes (Table 6-56). Recognizing removals of CO_2 to soil of 10.2 MMT CO_2 Eq. and CH_4 emissions of 4.3 MMT CO_2 Eq. in 2021, Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are a net sink of 5.9MMT CO_2 Eq. Loss of coastal wetlands, primarily in the Mississippi Delta as a result of hurricane impacts and sediment diversion and other human impacts, recognized as Vegetated Coastal Wetlands Converted to Unvegetated Coastal Wetlands, drive an emission of 1.5 MMT CO_2 Eq. since 2011, primarily from soils. Building of new wetlands from open water, recognized as Unvegetated Coastal Wetlands Converted to Vegetated Coastal, results each year in removal of 0.1 MMT CO_2 Eq. Aquaculture is a minor industry in the United States, resulting in an emission of N_2O across the time series of between 0.1 to 0.2 MMT CO_2 Eq. In total, Coastal Wetlands are a net sink of 4.4 MMT CO_2 Eq. in 2021.

Table 6-56: Emissions and Removals from Coastal Wetlands Remaining Coastal Wetlands (MMT CO_2 Eq.)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands	**(6.0)**	**(6.0)**	**(5.9)**	**(5.9)**	**(5.9)**	**(5.9)**	**(5.9)**
Biomass C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Flux	(10.1)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)
Net CH_4 Flux	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands	**1.8**	**2.6**	**1.5**	**1.5**	**1.5**	**1.5**	**1.5**
Biomass C Flux	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Organic Matter C Flux	+	+	+	+	+	+	+
Soil C Flux	1.7	2.5	1.5	1.5	1.5	1.5	1.5
Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands	**(+)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**
Biomass C Flux	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Organic Matter C Flux	(+)	(+)	+	+	+	+	+
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Net N_2O Flux from Aquaculture in Coastal Wetlands	**0.1**	**0.2**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Total Biomass C Flux	**+**	**+**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**
Total Dead Organic Matter C Flux	**(+)**	**(+)**	**+**	**+**	**+**	**+**	**+**
Total Soil C Flux	**(8.4)**	**(7.7)**	**(8.7)**	**(8.7)**	**(8.7)**	**(8.7)**	**(8.7)**
Total CH_4 Flux	**4.2**	**4.2**	**4.3**	**4.3**	**4.3**	**4.3**	**4.3**
Total N_2O Flux	**0.1**	**0.2**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**

[64] See https://coast.noaa.gov/digitalcoast/tools/lca.html; accessed August 2021.

Total Flux	**(4.1)**	**(3.3)**	**(4.4)**	**(4.4)**	**(4.4)**	**(4.4)**	**(4.3)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Emissions and Removals from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands

The conterminous United States currently has 2.98 million hectares of intertidal Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands comprised of tidally influenced palustrine emergent marsh (661,731 ha), palustrine scrub shrub (133,365 ha) and estuarine emergent marsh (1,893,276 ha), estuarine scrub shrub (94,667 ha) and estuarine forested wetlands (195,221 ha). Mangroves fall under both estuarine forest and estuarine scrub shrub categories depending upon height. Dwarf mangroves, found in subtropical states along the Gulf of Mexico, do not attain the height status to be recognized as Forest Land, and are therefore always classified within Vegetated Coastal Wetlands. Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are found in cold temperate (53,970 ha), warm temperate (896,287 ha), subtropical (1,965,242 ha) and Mediterranean (62,761 ha) climate zones.

Soils are the largest C pool in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, reflecting long-term removal of atmospheric CO_2 by vegetation and transfer into the soil pool in the form of both autochthonous and allochthonous decaying organic matter. Soil C emissions are not assumed to occur in coastal wetlands that remain vegetated. This Inventory includes changes in C stocks in both biomass and soils. Changes in DOM C stocks are not included. Methane emissions from decomposition of organic matter in anaerobic conditions are present at salinity less than half that of sea water. Mineral and organic soils are not differentiated in terms of C stock changes or CH_4 emissions.

Table 6-57 through Table 6-59 summarize nationally aggregated biomass and soil C stock changes and CH_4 emissions on Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Intact Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands hold a total biomass C stock of 35.95 MMT C. Removals from biomass C stocks in 2021 were 0.05 MMT CO_2 Eq. (0.01 MMT C), which has increased over the time series (Table 6-57 and Table 6-58). Carbon dioxide emissions from biomass in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands between 2002 and 2011, with very low sequestration between 2002 and 2006 and emissions of 0.21 MMT CO_2 Eq. between 2007 and 2011, are not inherently typical and are a result of coastal wetland loss over time. Most of the coastal wetland loss has occurred in palustrine and estuarine emergent wetlands. Vegetated coastal wetlands maintain a large C stock within the top 1 meter of soil (estimated to be 804 MMT C) to which C accumulated at a rate of 10.2 MMT CO_2 Eq. (2.8 MMT C) in 2021, a value that has remained relatively constant across the reporting period. For Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, methane emissions of 4.3 of MMT CO_2 Eq. (154 kt CH_4) in 2021 (Table 6-59) offset C removals resulting in a net removal of 5.9 MMT CO_2 Eq. in 2021; this rate has been relatively consistent across the reporting period. Dead organic matter stock changes are not calculated in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands since this stock is considered to be in a steady state when using Tier 1 methods (IPCC 2014). Due to federal regulatory protection, loss of Vegetated Coastal Wetlands through human activities slowed considerably in the 1970s and the current annual rates of C stock change and CH_4 emissions are relatively constant over time.

Table 6-57: Net CO_2 Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil Flux	(10.1)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)	(10.2)
Total C Stock Change	**(10.2)**	**(10.2)**	**(10.2)**	**(10.2)**	**(10.2)**	**(10.2)**	**(10.2)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-58: Net CO_2 Flux from C Stock Changes in Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT C)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	(+)	+	(+)	(+)	(+)	(+)	(+)
Soil Flux	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)	(2.8)
Total C Stock Change	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**	**(2.8)**

+ Absolute value does not exceed 0.05 MMT C.

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-59: CH_4 Emissions from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands (MMT CO_2 Eq. and kt CH_4)

Year	1990	2005	2017	2018	2019	2020	2021
Methane Emissions (MMT CO_2 Eq.)	4.2	4.2	4.3	4.3	4.3	4.3	4.3
Methane Emissions (kt CH_4)	149	151	153	153	153	154	154

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate changes in biomass C stocks, soil C stocks and emissions of CH_4 for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Dead organic matter is not calculated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands since it is assumed to be in steady state (IPCC 2014).

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Above- and belowground biomass C stocks for palustrine (freshwater) and estuarine (saline) marshes are estimated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands on land below the elevation of high tides (taken to be mean high water spring tide elevation) and as far seawards as the extent of intertidal vascular plants according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2006, 2010, and 2016 NOAA C-CAP surveys (NOAA OCM 2020). C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Federal and non-federal lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets. Based upon NOAA C-CAP, coastal wetlands are subdivided into palustrine and estuarine classes and further subdivided into emergent marsh, scrub shrub and forest classes (Table 6-60). Biomass is not sensitive to soil organic matter content but is differentiated based on climate zone. Aboveground biomass C stocks for non-forested wetlands data are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for subtropical estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017). Root to shoot ratios from the *Wetlands Supplement* (Table 6-62; IPCC 2014) were used to account for belowground biomass, which were multiplied by the aboveground C stock. Above- and belowground values were summed to obtain total biomass C stocks. Biomass C stock changes per year for Wetlands Remaining Wetlands were determined by calculating the difference in area between that year and the previous year to calculate gain/loss of area for each climate type, which was multiplied by the mean biomass for that climate type.

Table 6-60: Area of Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands, Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands, and Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (ha)

Year	1990	2005	2017	2018	2019	2020	2021
Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands	2,975,477	2,985,783	2,973,256	2,974,523	2,975,789	2,977,055	2,978,322
Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands	1,720	2,515	1,488	1,488	1,488	1,488	1,488
Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands	952	1,769	2,406	2,406	2,406	2,406	2,406

Table 6-61: Aboveground Biomass Carbon Stocks for Vegetated Coastal Wetlands (t C ha^{-1})

	Climate Zone			
Wetland Type	Cold Temperate	Warm Temperate	Subtropical	Mediterranean
Palustrine Scrub/Shrub Wetland	3.25	3.17	2.24	4.69
Palustrine Emergent Wetland	3.25	3.17	2.24	4.69
Estuarine Forested Wetland	N/A	N/A	17.83	N/A
Estuarine Scrub/Shrub Wetland	3.05	3.05	2.43	3.44
Estuarine Emergent Wetland	3.05	3.10	2.43	3.44

Source: All data from Byrd et al. (2017, 2018 and 2020) except for subtropical estuarine forested wetlands, which is from Lu and Megonigal (2017); N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Table 6-62: Root to Shoot Ratios for Vegetated Coastal Wetlands

	Climate Zone			
Wetland Type	Cold Temperate	Warm Temperate	Subtropical	Mediterranean
Palustrine Scrub/Shrub Wetland	1.15	1.15	3.65	3.63
Palustrine Emergent Wetland	1.15	1.15	3.65	3.63
Estuarine Forested Wetland	N/A	N/A	0.96	N/A
Estuarine Scrub/Shrub Wetland	2.11	2.11	3.65	3.63
Estuarine Emergent Wetland	2.11	2.11	3.65	3.63

Source: All values from IPCC (2014); N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Soil Carbon Stock Changes

Soil C stock changes are estimated for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands for both mineral and organic soils. Soil C stock changes, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature (Table 6-63; Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Köster et al. 2007; Callaway et al. 2012a&b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016).

Tier 2 estimates of soil C removals associated with annual soil C accumulation on managed Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands were developed with country-specific soil C removal factors multiplied by activity data of land area for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands.

The methodology follows Eq. 4.7, Chapter 4 of the *Wetlands Supplement*, and is applied to the area of Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands on an annual basis. To estimate soil C stock changes, no differentiation is made between organic and mineral soils since currently no statistical evidence supports disaggregation (Holmquist et al. 2018).

Table 6-63: Annual Soil Carbon Accumulation Rates for Vegetated Coastal Wetlands (t C ha^{-1} yr^{-1})

Climate Zone	Cold Temperate	Warm Temperate	Subtropical	Mediterranean
Palustrine Scrub/Shrub Wetland	1.01	1.54	0.45	0.85
Palustrine Emergent Wetland	1.01	1.54	0.45	0.85
Estuarine Forested Wetland	N/A	N/A	0.87	N/A
Estuarine Scrub/Shrub Wetland	1.01	0.82	1.09	0.85
Estuarine Emergent Wetland	2.17	0.82	1.09	0.85

Source: All data from Lu and Megonigal (2017)[65]; N/A means there are currently no estuarine forested wetlands that are less than 5 meters tall; these forested wetlands meet the definition of forest land and are included in the Forest Land chapter.

Soil Methane Emissions

Tier 1 estimates of CH_4 emissions for Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands are derived from the same wetland map used in the analysis of wetland soil C fluxes, produced from C-CAP, LiDAR and tidal data, in combination with default CH_4 emission factors provided in Table 4.14 of the *Wetlands Supplement.* The methodology follows Equation 4.9, Chapter 4 of the *Wetlands Supplement*; Tier 1 emissions factors are multiplied by the area of freshwater (palustrine) coastal wetlands. The CH_4 fluxes applied are determined based on salinity; only palustrine wetlands are assumed to emit CH_4. Estuarine coastal wetlands in the C-CAP classification include wetlands with salinity less than 18 ppt, a threshold at which methanogenesis begins to occur (Poffenbarger et al. 2011), but the dataset currently does not differentiate estuarine wetlands based on their salinities and, as a result, CH_4 emissions from estuarine wetlands are not included at this time.

Uncertainty

Underlying uncertainties in the estimates of soil and biomass C stock changes and CH_4 emissions include uncertainties associated with Tier 2 literature values of soil C stocks, biomass C stocks and CH_4 flux, assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data. Uncertainty specific to Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands include differentiation of palustrine and estuarine community classes, which determines the soil C stock and CH_4 flux applied. Uncertainties for soil and biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass, are derived from the *2013 Wetlands Supplement*. Uncertainties for CH_4 flux are the Tier 1 default values reported in the *2013 IPCC Wetlands Supplement*. Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). However, there is significant uncertainty in salinity ranges for tidal and non-tidal estuarine wetlands and activity data used to apply CH_4 flux emission factors (delineation of an 18 ppt boundary) that will need significant improvement to reduce uncertainties. Details on the emission/removal trends and methodologies through time

[65] See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed August 2022.

are described in more detail in the introduction and the Methodology section. The combined uncertainty was calculated using the IPCC Approach 1 method of summing the squared uncertainty for each individual source (C-CAP, soil, biomass and CH_4) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-64 for each subcategory (i.e., soil C, biomass C and CH_4 emissions). The combined uncertainty across all subcategory is 37.0 percent below and above the estimate of -6.4 MMT CO_2 Eq, which is primarily driven by the uncertainty in the CH_4 estimates because there is high variability in CH_4 emissions when the salinity is less than 18 ppt. In 2021, the total flux was -6.4 MMT CO_2 Eq., with lower and upper estimates of -8.7 and -4.0 MMT CO_2 Eq.

Table 6-64: IPCC Approach 1 Quantitative Uncertainty Estimates for C Stock Changes and CH_4 Emissions occurring within Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands in 2021 (MMT CO_2 Eq. and Percent)

Source/Sink	Gas	2021 Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Estimate (MMT CO_2 Eq.)		Uncertainty Range Relative to Estimate (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Biomass C Stock Change	CO_2	(0.05)	(0.06)	(0.03)	-24.1%	24.1%
Soil C Stock Change	CO_2	(10.2)	(12.0)	(8.4)	-18.7%	18.7%
CH_4 emissions	CH_4	4.3	3.0	5.6	-29.9%	29.9%
Total Flux		**(5.9)**	**(8.1)**	**(3.8)**	**-37.0%**	**37.0%**

Note: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

QA/QC and Verification

NOAA provided the National LiDAR Dataset, tide data, and C-CAP land cover and land cover change mapping, all of which are subject to agency internal QA/QC assessment. Acceptance of final datasets into archive and dissemination are contingent upon the product compilation being compliant with mandatory QA/QC requirements (McCombs et al. 2016). QA/QC and verification of soil C stock datasets have been provided by the Smithsonian Environmental Research Center and Coastal Wetland Inventory team leads who reviewed summary tables against reviewed sources. Biomass C stocks are derived from peer-review literature and reviewed by the U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads before inclusion in this Inventory. A team of two evaluated and verified there were no computational errors within the calculation worksheets. Soil and biomass C stock change data are based upon peer-reviewed literature and CH_4 emission factors derived from the *Wetlands Supplement*.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land. The resulting changes in emissions and removals were minimal and did not affect source or sink status, but resulted in a slight decrease in removals between 1990 and 2001 (0.03 MMT CO_2 Eq.) and 2012 to 2020 (0.001 MMT CO_2 Eq.) and a slight increase in emissions between 2002 and 2006 (0.04-0.06 MMT CO_2 Eq.) and 2007 to 2011 (0.001 MMT CO_2 Eq.). The change did not affect CH_4 emissions because no emission factor currently is applied to estuarine wetlands.

In addition, the EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. This change resulted in an average annual increase of 0.46 MMT CO_2 Eq., or 12 percent, in calculated CO_2-equivalent CH_4 emissions from Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands from 1990 through 2020 compared to the previous Inventory. Further discussion on this update

and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

Harmonization across all spatial datasets used to calculate activity data is underway. Once completed, a better representation of forested tidal wetlands, palustrine tidal wetlands, and forest land near the tidal boundary will be obtained.

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of soil C stock and biomass estimates for coastal wetlands.[66] This dataset is currently in review and may be update in coming months. Refined error analysis combining land cover change and C stock estimates will be provided as new data are incorporated. Through this work, a model is in development to represent updated changes in soil C stocks for estuarine emergent wetlands.

Work is currently underway to examine the feasibility of incorporating seagrass soil and biomass C stocks into the Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands estimates. Additionally, investigation into quantifying the distribution, area, and emissions resulting from impounded waters (i.e., coastal wetlands where tidal connection to the ocean has been restricted or eliminated completely) is underway.

Emissions from Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands

Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands is a source of emissions from soil, biomass, and DOM C stocks. An estimated 1,488 ha of Vegetated Coastal Wetlands were converted to Unvegetated Open Water Coastal Wetlands in 2021, which largely occurred within estuarine and palustrine emergent wetlands. Prior to 2006, annual conversion to unvegetated open water coastal wetlands was higher than current rates: 1,720 between 1990 and 2000 and 2,515 ha between 2001 and 2005. The Mississippi Delta represents more than 40 percent of the total coastal wetland of the United States, and over 90 percent of the area of Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands. The drivers of coastal wetlands loss include legacy human impacts on sediment supply through rerouting river flow, direct impacts of channel cutting on hydrology, salinity and sediment delivery, and accelerated subsidence from aquifer extraction. Each of these drivers directly contributes to wetland erosion and subsidence, while also reducing the resilience of the wetland to build with sea-level rise or recover from hurricane disturbance. Over recent decades, the rate of Mississippi Delta wetland loss has slowed, though episodic mobilization of sediment occurs during hurricane events (Couvillion et al. 2011; Couvillion et al. 2016). The land cover analysis between the 2006 and 2011 C-CAP surveys coincides with two such events, hurricanes Katrina and Rita (both making landfall in the late summer of 2005), that occurred between these C-CAP survey dates. The subsequent 2016 C-CAP survey determined that erosion rates had slowed.

Shallow nearshore open water within the U.S. Land Representation is recognized as falling under the Coastal Wetlands category within this Inventory. While high resolution mapping of coastal wetlands provides data to support IPCC Approach 2 methods for tracking land cover change, the depth in the soil profile to which sediment is lost is less clear. This Inventory adopts the Tier 1 methodological guidance from the *Wetlands Supplement* for estimating emissions following the methodology for excavation (see Methodology section, below) when Vegetated Coastal Wetlands are converted to Unvegetated Open Water Coastal Wetlands, assuming a 1 m depth of disturbed soil. This 1 m depth of disturbance is consistent with estimates of wetland C loss provided in the literature and the *Wetlands Supplement* (Crooks et al. 2009; Couvillion et al. 2011; Delaune and White 2012; IPCC 2014). The same assumption on depth of soils impacted by erosion has been applied here. It is a reasonable Tier 1 assumption,

[66] See https://serc.si.edu/coastalcarbon; accessed August 2021.

based on experience, but estimates of emissions are sensitive to the depth to which the assumed disturbances have occurred (Holmquist et al. 2018). A Tier 1 assumption is also adopted in that all mobilized C is immediately returned to the atmosphere (as assumed for terrestrial land-use categories), rather than redeposited in long-term C storage. The science is currently under evaluation to adopt more refined emissions factors for mobilized coastal wetland C based upon the geomorphic setting of the depositional environment.

In 2021, there were 1,488 ha of Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (Table 6-60) across all wetland types and climates, which resulted in 1.5 MMT CO_2 Eq. (0.4 MMT C) and 0.06 MMT CO_2 Eq. (0.02 MMT C) lost through soil and biomass, respectively, with minimal DOM C stock loss (Table 6-65, and Table 6-66). Across the reporting period, the area of vegetated coastal wetlands converted to unvegetated open water coastal wetlands was greatest between the 2006 to 2011 C-CAP reporting period (11,373 ha) and has decreased since then to current levels (Table 6-60).

Table 6-65: Net CO_2 Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Organic Matter Flux	+	+	+	+	+	+	+
Soil Flux	1.7	2.5	1.5	1.5	1.5	1.5	1.5
Total C Stock Change	**1.8**	**2.6**	**1.5**	**1.5**	**1.5**	**1.5**	**1.5**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.
Note: Totals may not sum due to independent rounding.

Table 6-66: Net CO_2 Flux from C Stock Changes in Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands (MMT C)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass Flux	+	+	+	+	+	+	+
Dead Organic Matter Flux	+	+	+	+	+	+	+
Soil Flux	0.5	0.7	0.4	0.4	0.4	0.4	0.4
Total C Stock Change	**0.5**	**0.7**	**0.4**	**0.4**	**0.4**	**0.4**	**0.4**

+ Absolute value does not exceed 0.05 MMT C.
Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section includes a brief description of the methodology used to estimate changes in soil, biomass and DOM C stocks for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Biomass C stock changes for palustrine and estuarine marshes are estimated for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands on lands below the elevation of high tides (taken to be mean high water spring tide elevation) within the U.S. Land Representation according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2006, 2010, and 2016 NOAA C-CAP surveys. C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Publicly-owned and privately-owned lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets. The C-CAP database provides peer reviewed country-specific mapping to support IPCC Approach 3 quantification of coastal wetland distribution, including conversion to and from open water. Biomass C stocks are not sensitive to soil organic content but are

differentiated based on climate zone. Non-forested aboveground biomass C stock data are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017[67]; Table 6-61). Aboveground biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Root to shoot ratios from the *Wetlands Supplement* were used to account for belowground biomass, which were multiplied by the aboveground C stock (Table 6-62; IPCC 2014). Above- and belowground values were summed to obtain total biomass C stocks. Conversion to open water results in emissions of all biomass C stocks during the year of conversion; therefore, emissions are calculated by multiplying the C-CAP derived area of vegetated coastal wetlands lost that year in each climate zone by its mean biomass.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks for subtropical estuarine forested wetlands, are an emission from Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands across all years in the time series. Data on DOM C stocks are not currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone. Data for estuarine forested wetlands in other climate zones are not included since there is no estimated loss of these forests to unvegetated open water coastal wetlands across any year based on C-CAP data. For subtropical estuarine forested wetlands, Tier 1 estimates of mangrove DOM were used (IPCC 2014). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Conversion to open water results in emissions of all DOM C stocks during the year of conversion; therefore, emissions are calculated by multiplying the C-CAP derived area of vegetated coastal wetlands lost that year by its Tier 1 DOM C stock.

Soil Carbon Stock Changes

Soil C stock changes are estimated for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands. Country-specific soil C stocks were updated in 2018 based upon analysis of an assembled dataset of 1,959 cores from across the conterminous United States (Holmquist et al. 2018). This analysis demonstrated that it was not justified to stratify C stocks based upon mineral or organic soil classification, climate zone, or wetland classes; therefore, a single soil C stock of 270 t C ha^{-1} was applied to all classes. Following the Tier 1 approach for estimating CO_2 emissions with extraction provided within the *Wetlands Supplement*, soil C loss with conversion of Vegetated Coastal Wetlands to Unvegetated Open Water Coastal Wetlands is assumed to affect soil C stock to one-meter depth (Holmquist et al. 2018) with all emissions occurring in the year of wetland conversion, and multiplied by activity data of vegetated coastal wetland area converted to unvegetated open water wetlands. The methodology follows Eq. 4.6 in the *Wetlands Supplement*.

Soil Methane Emissions

A Tier 1 assumption has been applied that salinity conditions are unchanged and hence CH_4 emissions are assumed to be zero with conversion of Vegetated Coastal Wetlands to Unvegetated Open Water Coastal Wetlands.

Uncertainty

Underlying uncertainties in estimates of soil and biomass C stock changes are associated with country-specific (Tier 2) literature values of these stocks, while the uncertainties with the Tier 1 estimates are associated with subtropical estuarine forested wetland DOM stocks. Assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data are also included in this uncertainty

[67] See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed October 2022.

assessment. The IPCC default assumption of 1 m of soil erosion with anthropogenic activities was adopted to provide standardization in U.S. tidal C accounting (Holmquist et al. 2018). This depth of potentially erodible tidal wetland soil has not been comprehensively addressed since most soil cores analyzed were shallow (e.g., less than 50 cm) and do not necessarily reflect the depth to non-wetland soil or bedrock (Holmquist et al. 2018). Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes, which determines the soil C stock applied. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). For aboveground biomass C stocks, the mean standard error was very low and largely influenced by the uncertainty associated with the estimated map area (Byrd et al. 2018). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass, are derived from the *Wetlands Supplement*. Uncertainty for subtropical estuarine forested wetland DOM stocks was derived from those listed for the Tier 1 estimates (IPCC 2014). Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (+/-10 to 15 percent; IPCC 2003). The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-67 for each subcategory (i.e., soil C, biomass C, and DOM emissions). The combined uncertainty across all subcategory is 32.0 percent above and below the estimate of 1.5 MMT CO_2 Eq, which is driven by the uncertainty in the soil C estimates. In 2021, the total C flux was 1.5 MMT CO_2 Eq., with lower and upper estimates of 1.0 and 2.0 MMT CO_2 Eq.

Table 6-67: Approach 1 Quantitative Uncertainty Estimates for CO_2 Flux Occurring within Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands in 2020 (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Biomass C Stock	0.06	0.05	0.08	-24.1%	24.1%
Dead Organic Matter C Stock	0.0005	0.000	0.001	-25.8%	25.8%
Soil C Stock	1.5	1.3	1.7	-15.0%	15.0%
Total Flux	**1.5**	**1.0**	**2.0**	**-32.0%**	**32.0%**

Note: Totals may not sum due to independent rounding.

QA/QC and Verification

Data provided by NOAA (i.e., National LiDAR Dataset, NOS Tide Data, and C-CAP land cover and land cover change mapping) undergo internal agency QA/QC procedures. Acceptance of final datasets into archive and dissemination are contingent upon assurance that the data product is compliant with mandatory NOAA QA/QC requirements (McCombs et al. 2016). QA/QC and Verification of the soil C stock dataset have been provided by the Smithsonian Environmental Research Center and by the Coastal Wetlands project team leads who reviewed the estimates against primary scientific literature. Biomass C stocks are derived from peer-review literature and reviewed by the U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads before inclusion in the Inventory. For subtropical estuarine forested wetlands, Tier 1 estimates of mangrove DOM were used (IPCC 2014). Land cover estimates were assessed to ensure that the total land area did not change over the time series in which the inventory was developed, and were verified by a second QA team. A team of two evaluated and verified there were no computational errors within the calculation worksheets.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forest Land Remaining Forest Land. The resulting change in emissions and removals was negligible (±0.0001 MMT CO_2 Eq.) and did not affect whether a given year was a source or sink.

Planned Improvements

The depth of soil C affected by conversion of vegetated coastal wetlands converted to unvegetated coastal wetlands will be updated from the IPCC default assumption of 1 m of soil erosion when mapping and modeling advancements can quantitatively improve accuracy and precision. Improvements are underway to address this, first conducting a review of literature publications. Until the time where these more detailed and spatially distributed data are available, the IPCC default assumption that the top 1 m of soil is disturbed by anthropogenic activity will be applied. This is a longer-term improvement.

More detailed research is in development that provides a longer-term assessment and more highly refined rates of wetlands loss across the Mississippi Delta (e.g., Couvillion et al. 2016). The Mississippi Delta is the largest extent of coastal wetlands in the United States. Higher resolution imagery analysis would improve quantification of conversation to open water, which occurs not only at the edge of the marsh but also within the interior. Improved mapping could provide a more refined regional Approach 2-3 land representation to support the national-scale assessment provided by C-CAP.

An approach for calculating the fraction of remobilized coastal wetland soil C returned to the atmosphere as CO_2 is currently under review and may be included in future reports.

Research by USGS is investigating higher resolution mapping approaches to quantify conversion of coastal wetlands is also underway. Such approaches may form the basis for a full Approach 3 land representation assessment in future years. C-CAP data harmonization with the National Land Cover Dataset (NLCD) will be incorporated into a future iteration of the Inventory.

Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands

Open water within the U.S. land base, as described in Section 6.1 Representation of the U.S. Land Base, is recognized as Coastal Wetlands within this Inventory. The appearance of vegetated tidal wetlands on lands previously recognized as open water reflects either the building of new vegetated marsh through sediment accumulation or the transition from other lands uses through an intermediary open water stage as flooding intolerant plants are displaced and then replaced by wetland plants. Biomass, DOM and soil C accumulation on Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands begins with vegetation establishment.

Within the United States, conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands is predominantly due to engineered activities, which include active restoration of wetlands (e.g., wetlands restoration in San Francisco Bay), dam removals or other means to reconnect sediment supply to the nearshore (e.g., Atchafalaya Delta, Louisiana, Couvillion et al. 2011). Wetland restoration projects have been ongoing in the United States since the 1970s. Early projects were small, a few hectares in size. By the 1990s, restoration projects, each hundreds of hectares in size, were becoming common in major estuaries. In several coastal areas e.g., San Francisco Bay, Puget Sound, Mississippi Delta and south Florida, restoration activities are in planning and implementation phases, each with the goal of recovering tens of thousands of hectares of wetlands.

In 2021, 2,406 ha of unvegetated open water coastal wetlands were converted to vegetated coastal wetlands across all wetland types and climates, which has steadily increased over the reporting period (Table 6-59). This

resulted in 0.007 MMT CO_2 Eq. (0.002 MMT C) and 0.1 MMT CO_2 Eq. (0.03 MMT C) sequestered in soil and biomass, respectively (Table 6-68 and Table 6-69). The soil C stock has increased during the Inventory reporting period, likely due to increasing vegetated coastal wetland restoration over time. While DOM C stock increases are present, they are minimal in the early part of the time series and zero in the later because there are no conversions from unvegetated open water coastal wetlands to subtropical estuarine forested wetlands between 2011 and 2016 (and by proxy through 2021), and that is the only coastal wetland type where DOM data is currently available.

Throughout the reporting period, the amount of Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands has increased over time, reflecting the increase in engineered restoration activities mentioned above.

Table 6-68: CO_2 Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT CO_2 Eq.)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass C Flux	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
Dead Organic Matter C Flux	(+)	(+)	0	0	0	0	0
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total C Stock Change	**(+)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**	**(0.1)**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Table 6-69: CO_2 Flux from C Stock Changes from Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands (MMT C)

Year	1990	2005	2017	2018	2019	2020	2021
Biomass C Flux	(0.01)	(0.02)	(0.03)	(0.03)	(0.03)	(0.03)	(0.03)
Dead Organic Matter C Flux	(+)	(+)	0	0	0	0	0
Soil C Flux	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total C Stock Change	**(0.01)**	**(0.02)**	**(0.03)**	**(0.03)**	**(0.03)**	**(0.03)**	**(0.03)**

+ Absolute value does not exceed 0.005 MMT C.

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section includes a brief description of the methodology used to estimate changes in soil, biomass and DOM C stocks, and CH_4 emissions for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Quantification of regional coastal wetland biomass C stock changes for palustrine and estuarine marsh vegetation are presented for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands on lands below the elevation of high tides (taken to be mean high water spring tide elevation) according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2005, 2011, and 2016 NOAA C-CAP surveys. C-CAP areas are calculated at the state/territory level and summed according to climate zone to national values. Privately-owned and publicly-owned lands are represented. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets (Table 6-58). C-CAP provides peer reviewed high resolution -level mapping of coastal wetland distribution, including conversion to and from open water. Biomass C stock is not sensitive to soil organic content but differentiated based on climate zone. Data for non-forested wetlands are derived from a national assessment combining field plot data and aboveground biomass mapping by

remote sensing (Table 6-61; Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). The aboveground biomass C stock for subtropical estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017[68]). Aboveground biomass C stock data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment of a C stock to a disaggregation of a community class. Root to shoot ratios from the *Wetlands Supplement* were used to account for belowground biomass, which were multiplied by the aboveground C stock (Table 6-62; IPCC 2014). Above- and belowground values were summed to obtain total biomass C stocks.

Conversion of open water to Vegetated Coastal Wetlands results in the establishment of a standing biomass C stock; therefore, stock changes that occur are calculated by multiplying the C-CAP derived area gained that year in each climate zone by its mean biomass. While the process of revegetation of unvegetated open water wetlands can take many years to occur, it is assumed in the calculations that the total biomass is reached in the year of conversion.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks, are included for subtropical estuarine forested wetlands for Vegetated Coastal Wetlands Converted to Unvegetated Open Water Coastal Wetlands across all years. Tier 1 default or country-specific data on DOM are not currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone. Data for estuarine forested wetlands in other climate zones are not included since there is no estimated loss of these forests to unvegetated open water coastal wetlands across any year based on C-CAP data. Tier 1 estimates of subtropical estuarine forested wetland DOM were used (IPCC 2014). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Dead organic matter removals are calculated by multiplying the C-CAP derived area gained that year by its Tier 1 DOM C stock. Similar to biomass C stock gains, gains in DOM can take many years to occur, but for this analysis, the total DOM stock is assumed to accumulate during the first year of conversion.

Soil Carbon Stock Change

Soil C stock changes are estimated for Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands. Country-specific soil C removal factors associated with soil C accretion, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature and updated this year based upon refined review of the dataset (Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Koster et al. 2007; Callaway et al. 2012 a & b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016). Soil C stock changes are stratified based upon wetland class (Estuarine, Palustrine) and subclass (Emergent Marsh, Scrub Shrub). For soil C stock change, no differentiation is made for soil type (i.e., mineral, organic). Soil C removal factors were developed from literature references that provided soil C removal factors disaggregated by climate region and vegetation type by salinity range (estuarine or palustrine) as identified using NOAA C-CAP as described above (see Table 6-63 for values).

Tier 2 level estimates of C stock changes associated with annual soil C accumulation in Vegetated Coastal Wetlands were developed using country-specific soil C removal factors multiplied by activity data on Unvegetated Coastal Wetlands converted to Vegetated Coastal Wetlands. The methodology follows Eq. 4.7, Chapter 4 of the *Wetlands Supplement*, and is applied to the area of Unvegetated Coastal Wetlands converted to Vegetated Coastal Wetlands on an annual basis.

[68] See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed September 2022.

Soil Methane Emissions

A Tier 1 assumption has been applied that salinity conditions are unchanged and hence CH_4 emissions are assumed to be zero with conversion of Vegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands.

Uncertainty

Underlying uncertainties in estimates of soil and biomass C stock changes include uncertainties associated with country-specific (Tier 2) literature values of these C stocks, assumptions that underlie the methodological approaches applied and uncertainties linked to interpretation of remote sensing data. Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes that determines the soil C stock applied. Because mean soil and biomass C stocks for each available community class are in a fairly narrow range, the same overall uncertainty was applied to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). For aboveground biomass C stocks, the mean standard error was very low and largely influenced by error in estimated map area (Byrd et al. 2018). Uncertainty for root to shoot ratios, which are used for quantifying belowground biomass (Table 6-62), are derived from the *Wetlands Supplement*. Uncertainty for subtropical estuarine forested wetland DOM stocks were derived from those listed for the Tier 1 estimates (IPCC 2014). Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-70 for each subcategory (i.e., soil C, biomass C and DOM emissions). The combined uncertainty across all subsources is 33.4 percent above and below the estimate of -0.1 MMT CO_2 Eq. In 2021, the total C flux was -0.1 MMT CO_2 Eq., with lower and upper estimates of -0.1 and -0.07 MMT CO_2 Eq.

Table 6-70: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes Occurring within Unvegetated Open Water Coastal Wetlands Converted to Vegetated Coastal Wetlands in 2021 (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range (MMT CO_2 Eq.)		Relative to Flux Estimate (%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Biomass C Stock Flux	(0.1)	(0.12)	(0.08)	-20.0%	20.0%
Dead Organic Matter C Stock Flux	0	0	0	-25.8%	25.8%
Soil C Stock Flux	(0.007)	(0.008)	(0.005)	-18.78%	18.1%
Total Flux	**(0.1)**	**(0.14)**	**(0.07)**	**-33.8%**	**33.8%**

Notes: Parentheses indicate net sequestration. Totals may not sum due to independent rounding.

QA/QC and Verification

NOAA provided data (i.e., National LiDAR Dataset, NOS Tide Data, and C-CAP land cover and land cover change mapping), which undergo internal agency QA/QC assessment procedures. Acceptance of final datasets into the archive for dissemination are contingent upon assurance that the product is compliant with mandatory NOAA QA/QC requirements (McCombs et al. 2016). QA/QC and Verification of soil C stock dataset has been provided by the Smithsonian Environmental Research Center and Coastal Wetlands project team leads who reviewed the summary tables against primary scientific literature. Aboveground biomass C reference stocks are derived from an analysis by the Blue Carbon Monitoring project and reviewed by U.S. Geological Survey prior to publishing, the peer-review process during publishing, and the Coastal Wetland Inventory team leads before inclusion in the inventory. Root to shoot ratios and DOM data are derived from peer-reviewed literature and undergo review as

per IPCC methodology. Land cover estimates were assessed to ensure that the total land area did not change over the time series in which the inventory was developed and verified by a second QA team. A team of two evaluated and verified there were no computational errors within calculation worksheets. Two biogeochemists at the USGS, also members of the NASA Carbon Monitoring System Science Team, corroborated the simplifying assumption that where salinities are unchanged CH_4 emissions are constant with conversion of Unvegetated Open Water Coastal Wetlands to Vegetated Coastal Wetlands.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since those wetlands fall under Forests Remaining Forests. The resulting change in emissions and removals was negligible (±0.0001 MMT CO_2 Eq.) and did not affect whether a given year was a source or sink.

Planned Improvements

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of published data quantifying soil C stock and biomass in coastal wetlands. Reference values for soil and biomass C stocks will be updated as new data emerge. Refined error analysis combining land cover change, soil and biomass C stock estimates will be updated at those times.

The USGS is investigating higher resolution mapping approaches to quantify conversion of coastal wetlands. Such approaches may form the basis for a full Approach 3 land representation assessment in future years. C-CAP data harmonization with the National Land Cover Dataset (NLCD) will be incorporated into a future iteration of the inventory.

N_2O Emissions from Aquaculture in Coastal Wetlands

Shrimp and fish cultivation in coastal areas increases nitrogen loads resulting in direct emissions of N_2O. Nitrous oxide is generated and emitted as a byproduct of the conversion of ammonia (contained in fish urea) to nitrate through nitrification and nitrate to N_2 gas through denitrification (Hu et al. 2012). Nitrous oxide emissions can be readily estimated from data on fish production (IPCC 2014).

Aquaculture production in the United States has fluctuated slightly from year to year, with resulting N_2O emissions between 0.1 and 0.2 MMT CO_2 Eq. between 1990 and 2021 (Table 6-71). Aquaculture production data were updated through 2019; data through 2021 are not yet available and in this analysis are held constant with 2019 emissions of 0.2 MMT CO_2 Eq. (0.5 Kt N_2O).

Table 6-71: N_2O Emissions from Aquaculture in Coastal Wetlands (MMT CO_2 Eq. and kt N_2O)

Year	1990	2005	2017	2018	2019	2020	2021
Emissions (MMT CO_2 Eq.)	0.1	0.2	0.1	0.1	0.1	0.1	0.1
Emissions (kt N_2O)	0.4	0.6	0.5	0.5	0.5	0.5	0.5

Methodology and Time-Series Consistency

The methodology to estimate N_2O emissions from Aquaculture in Coastal Wetlands follows the Tier 1 guidance in the *Wetlands Supplement* by applying country-specific fisheries production data and the IPCC Tier 1 default emission factor.

Each year NOAA Fisheries document the status of U.S. marine fisheries in the annual report of *Fisheries of the United States* (National Marine Fisheries Service 2022), from which activity data for this analysis is derived.[69] The fisheries report has been produced in various forms for more than 100 years, primarily at the national level, on U.S. recreational catch and commercial fisheries landings and values. In addition, data are reported on U.S. aquaculture production, the U.S. seafood processing industry, imports and exports of fish-related products, and domestic supply and per capita consumption of fisheries products. Within the aquaculture chapter, the mass of production for catfish, striped bass, tilapia, trout, crawfish, salmon and shrimp are reported. While some of these fisheries are produced on land and some in open water cages within coastal wetlands, all have data on the quantity of food stock produced, which is the activity data that is applied to the IPCC Tier 1 default emissions factor to estimate emissions of N_2O from aquaculture. It is not apparent from the data as to the amount of aquaculture occurring above the extent of high tides on river floodplains. While some aquaculture occurs on coastal lowland floodplains, this is likely a minor component of tidal aquaculture production because of the need for a regular source of water for pond flushing. The estimation of N_2O emissions from aquaculture is not sensitive to salinity using IPCC approaches, and as such, the location of aquaculture ponds within the boundaries of coastal wetlands does not influence the calculations.

Other open water shellfisheries for which no food stock is provided, and thus no additional N inputs, are not applicable for estimating N_2O emissions (e.g., clams, mussels, and oysters) and have not been included in the analysis. The IPCC Tier 1 default emissions factor of 0.00169 kg N_2O-N per kg of fish/shellfish produced is applied to the activity data to calculate total N_2O emissions.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Uncertainty

Uncertainty estimates are based upon the Tier 1 default 95 percent confidence interval provided in Table 4.15, chapter 4 of the *Wetlands Supplement* for N_2O emissions and on expert judgment of the NOAA *Fisheries of the United States* fisheries production data. Given the overestimate of fisheries production from coastal wetland areas due to the inclusion of fish production in non-coastal wetland areas, this is a reasonable initial first approximation for an uncertainty range.

Uncertainty estimates for N_2O emissions from aquaculture production are presented in Table 6-72 for N_2O emissions. The combined uncertainty is 116 percent above and below the estimate of 0.13 MMT CO_2 Eq. In 2021, the total flux was 0.13 MMT CO_2 Eq., with lower and upper estimates of 0.00 and 0.29 MMT CO_2 Eq.

Table 6-72: Approach 1 Quantitative Uncertainty Estimates for N_2O Emissions from Aquaculture Production in Coastal Wetlands in 2021 (MMT CO_2 Eq. and Percent)

Source	2021 Emissions Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emissions Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Combined Uncertainty for N_2O Emissions for Aquaculture Production in Coastal Wetlands	0.13	0.00	0.29	-116%	116%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

[69] See https://www.fisheries.noaa.gov/resource/document/fisheries-united-states-2019-report; accessed August 2021.

QA/QC and Verification

NOAA provided internal QA/QC review of reported fisheries data. The Coastal Wetlands Inventory team consulted with the Coordinating Lead Authors of the Coastal Wetlands chapter of the *Wetlands Supplement* to assess which fisheries production data to include in estimating emissions from aquaculture. It was concluded that N_2O emissions estimates should be applied to any fish production to which food supplement is supplied be they pond or coastal open water and that salinity conditions were not a determining factor in production of N_2O emissions.

Recalculations Discussion

A NOAA report was released in 2022 that contains updated fisheries data through 2019 and the 2019 production estimate was revised from 308,550 to 298,336 MT, although it did not affect the resulting emissions (National Marine Fisheries Service 2022). The updated production value was applied for 2019, and the 2019 value was applied in 2020 and 2021. This resulted in a slight reduction of N_2O emissions by 0.01 MMT CO_2 Eq. (0.02 kt N_2O), a 3.3 percent decrease, for 2018 and 2019 compared to the previous Inventory.

In addition, the EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of N_2O (from 298 to 265) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. The net result of this change was an average annual decrease of 0.02 MMT CO_2 Eq.in N_2O emissions from aquaculture for the 1990-2020 period. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Together, the combined net effect of implementing these two recalculations was an average annual decrease in N_2O emissions from aquaculture of 13.4 percent from 1990 through 2020 compared to the previous Inventory.

Flooded Land Remaining Flooded Land

Flooded lands are defined as water bodies where human activities have 1) caused changes in the amount of surface area covered by water, typically through water level regulation (e.g., constructing a dam), 2) waterbodies where human activities have changed the hydrology of existing natural waterbodies thereby altering water residence times and/or sedimentation rates, in turn causing changes to the natural emission of greenhouse gases, and 3) waterbodies that have been created by excavation, such as canals, ditches and ponds (IPCC 2019). Flooded lands include waterbodies with seasonally variable degrees of inundation, but these waterbodies would be expected to retain some inundated area throughout the year under normal conditions.

Flooded lands are broadly classified as “reservoirs” or “other constructed waterbodies” (IPCC 2019). Other constructed waterbodies include canals/ditches and ponds (flooded land <8 ha surface area). Reservoirs are defined as flooded land greater than 8 ha. IPCC guidance (IPCC 2019) provides default emission factors for reservoirs, ponds, and canals/ditches.

Land that has been flooded for greater than 20 years is defined as Flooded Land Remaining Flooded Land and land flooded for 20 years or less is defined as Land Converted to Flooded Land. The distinction is based on literature reports that CH_4 and CO_2 emissions are high immediately following flooding, but decline to a steady background level approximately 20 years after flooding (Abril et al. 2005, Barros et al. 2011, Teodoru et al. 2012). Emissions of CH_4 are estimated for Flooded Land Remaining Flooded Land, but CO_2 emissions are not included as they are primarily the result of decomposition of organic matter entering the waterbody from the catchment or contained in inundated soils and are captured in Chapter 6, Land Use, Land-Use Change, and Forestry.

Nitrous oxide emissions from flooded lands are largely related to input of organic or inorganic nitrogen from the watershed. These inputs from runoff/leaching/deposition are largely driven by anthropogenic activities such as land-use change, wastewater disposal or fertilizer application in the watershed or application of fertilizer or feed in aquaculture. These emissions are not included here to avoid double-counting of N_2O emissions which are captured

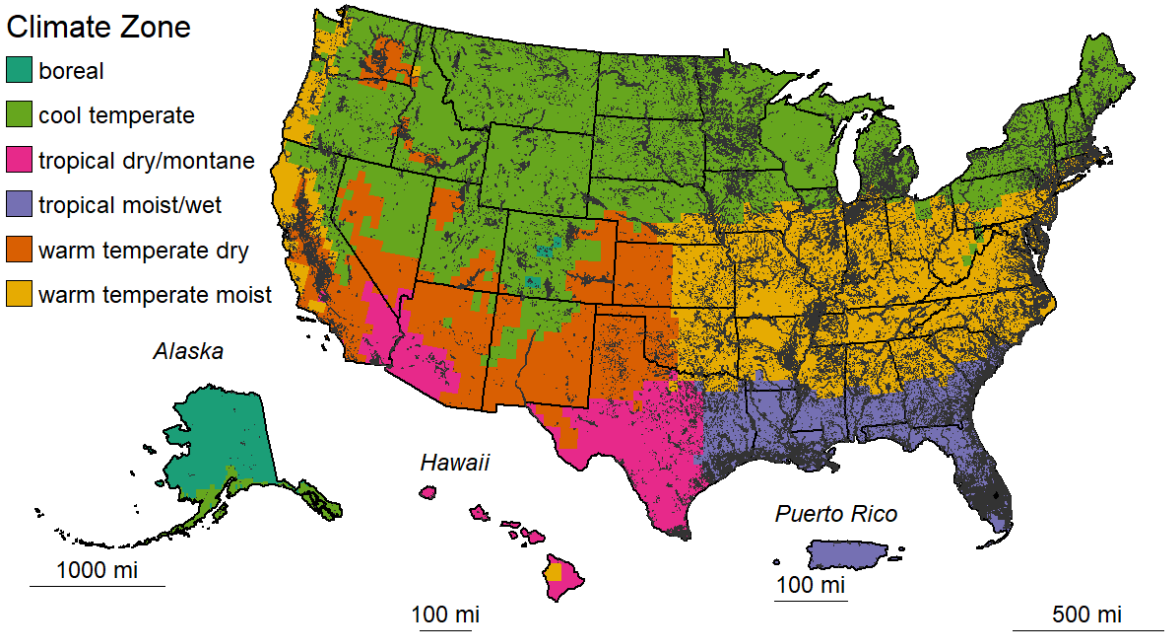
in other source categories, such as indirect N_2O emissions from managed soils (Section 5.4, Agricultural Soil Management)) and wastewater management (Section 7.2, Wastewater Treatment and Discharge).

Emissions from Flooded Land Remaining Flooded Land–Reservoirs

Reservoirs are designed to store water for a wide range of purposes including hydropower, flood control, drinking water, and irrigation. The permanently wetted portion of reservoirs are typically surrounded by periodically inundated land referred to as a "drawdown zone" or "inundation area." Greenhouse gas emissions from inundation areas are considered significant and similar per unit area to the emissions from the water surface and are therefore included in the total reservoir surface area when estimating greenhouse gas emissions from flooded land. Lakes converted into reservoirs without substantial changes in water surface area or water residence times are not considered to be managed flooded land (see Area Estimates below) (IPCC 2019).

In 2021, the United States and Puerto Rico hosted 9.7 million hectares of reservoir surface area in the Flooded Land Remaining Flooded Land category (see Methodology and Time-Series Consistency below for calculation details). These reservoirs are distributed across all six of the aggregated climate zones used to define flooded land emission factors (Figure 6-10) (IPCC 2019).

Figure 6-10: U.S. Reservoirs (black polygons) in the Flooded Land Remaining Flooded Land Category in 2021.



Note: Colors represent climate zone used to derive IPCC default emission factors.

Methane is produced in reservoirs through the microbial breakdown of organic matter. Per unit area, CH_4 emission rates tend to scale positively with temperature and system productivity (i.e., abundance of algae), but negatively with system size (i.e., depth, surface area). Methane produced in reservoirs can be emitted from the reservoir surface or exported from the reservoir when CH_4-rich water passes through the dam. This exported CH_4 can be released to the atmosphere as the water passes through hydropower turbines or the downstream river channel. Methane emitted to the atmosphere via this pathway is referred to as "downstream emissions."

Table 6-73 and Table 6-74 below summarize nationally aggregated CH_4 emissions from reservoirs. The increase in CH_4 emissions through the time series is attributable to reservoirs matriculating from the Land Converted to Flooded Land category into the Flooded Land Remaining Flooded Land category.

Table 6-73: CH_4 Emissions from Flooded Land Remaining Flooded Land—Reservoirs (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emission	25.9	26.4	26.5	26.5	26.5	26.5	26.5
Downstream Emission	2.3	2.4	2.4	2.4	2.4	2.4	2.4
Total	**28.2**	**28.8**	**28.9**	**28.9**	**28.9**	**28.9**	**28.9**

Note: Totals may not sum to due independent rounding.

Table 6-74: CH_4 Emissions from Flooded Land Remaining Flooded Land—Reservoirs (kt CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emission	924	943	946	946	946	948	948
Downstream Emission	83	85	85	85	85	85	85
Total	**1,007**	**1,028**	**1,032**	**1,032**	**1,032**	**1,033**	**1,033**

Note: Totals may not sum to due independent rounding.

Methane emissions from reservoirs in Texas, Florida, and Louisiana (Figure 6-11, Table 6-75) compose 33 percent of national CH_4 emissions from reservoirs in 2021. Emissions from these states are particularly high due to 1) the large expanse of reservoirs in these states (Table 6-78) and 2) the high CH_4 emission factor for the tropical dry/montane and topical moist climate zones which encompass a majority of the flooded land area in these states (Figure 6-11, Table 6-76).

Methane emissions from reservoirs in Flooded Land Remaining Flooded Land increased 2.5 percent from 1990 to 2021 due to the matriculation of reservoirs in Land Converted to Flooded Land to Flooded Land Remaining Flooded Land.

Figure 6-11: Total CH_4 Emissions (Downstream + Surface) from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH_4)

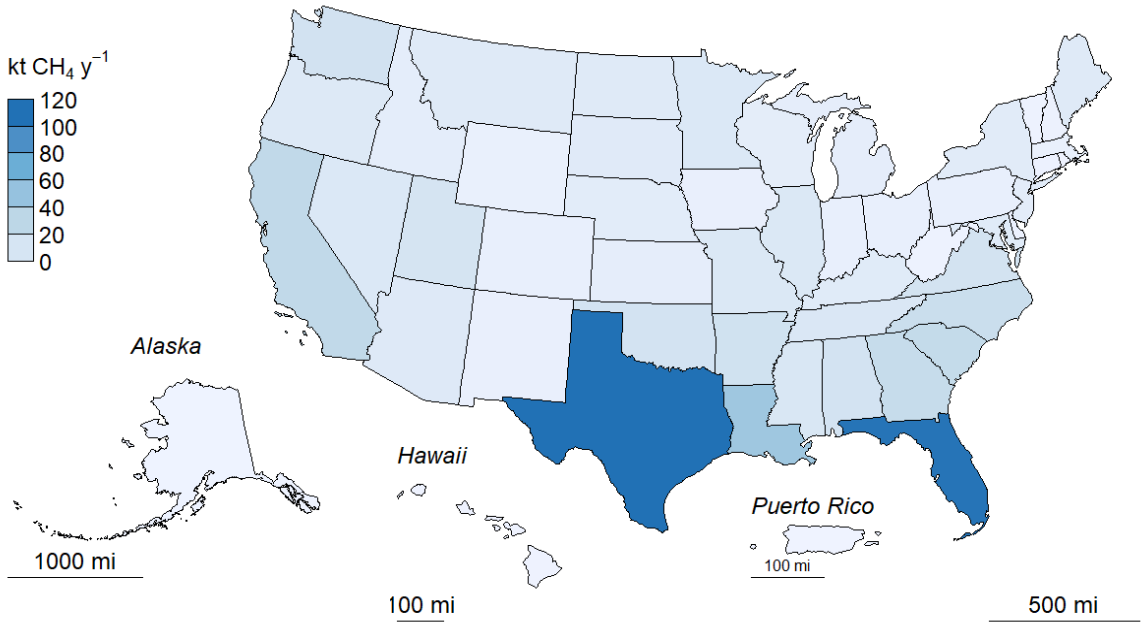


Table 6-75: Surface and Downstream CH_4 Emissions from Reservoirs in Flooded Land Remaining Flooded Land in 2021 (kt CH_4)

State	Surface	Downstream	Total
Alabama	24	2	26
Alaska	1	+	1
Arizona	15	1	16
Arkansas	26	2	28
California	39	4	43
Colorado	6	1	7
Connecticut	3	+	3
Delaware	3	+	3
District of Columbia	+	+	+
Florida	126	11	137
Georgia	35	3	38
Hawaii	1	+	1
Idaho	10	1	10
Illinois	17	2	19
Indiana	6	1	6
Iowa	6	1	6
Kansas	9	1	9
Kentucky	13	1	14
Louisiana	59	5	65
Maine	13	1	15
Maryland	13	1	14
Massachusetts	5	+	5
Michigan	9	1	9
Minnesota	17	2	18
Mississippi	19	2	20
Missouri	17	2	19
Montana	14	1	15
Nebraska	11	1	12
Nevada	17	2	18
New Hampshire	3	+	3
New Jersey	11	1	12
New Mexico	5	+	6
New York	12	1	14
North Carolina	32	3	35
North Dakota	14	1	15
Ohio	6	1	7
Oklahoma	24	2	26
Oregon	16	1	17
Pennsylvania	6	1	6
Puerto Rico	+	+	+
Rhode Island	1	+	1
South Carolina	37	3	40
South Dakota	13	1	14
Tennessee	18	2	20
Texas	128	11	139
Utah	22	2	24
Vermont	2	+	2
Virginia	24	2	26
Washington	25	2	27
West Virginia	2	+	2
Wisconsin	10	1	11
Wyoming	5	+	5

+ Indicates values less than 0.5 kt

Methodology and Time-Series Consistency

Estimates of CH_4 emission for reservoirs in Flooded Land Remaining Flooded Land follow the Tier 1 methodology in the *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019). Methane emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and a climate-specific emission factor (Table 6-76). Downstream emissions are calculated as 9 percent of the surface emission (Tier 1 default). Total CH_4 emissions from reservoirs are calculated as the sum of surface and downstream emissions. National emissions are calculated as the sum of state emissions.

The IPCC default surface emission factors used in the Tier 1 methodology are derived from model-predicted (G-res model, Prairie et al. 2017) emission rates for all reservoirs in the Global Reservoir and Dam (GRanD) database (Lehner et al. 2011). Predicted emission rates were aggregated by the 11 IPCC climate zones (IPCC 2019, Table 7A.2) which were collapsed into six climate zones using a regression tree approach. All six aggregated climate zone are present in the United States.

Table 6-76: IPCC (2019) Default CH_4 Emission Factors for Surface Emission from Reservoirs in Flooded Land Remaining Flooded Land

Climate	Surface emission factor (MT CH_4 ha^{-1} y^{-1})
Boreal	0.0136
Cool Temperate	0.054
Warm Temperate Dry	0.1509
Warm Temperate Moist	0.0803
Tropical Dry/Montane	0.2837
Tropical Moist/Wet	0.1411

Note: downstream CH_4 emissions are calculated as 9 percent of surface emissions. Downstream emissions are not calculated for CO_2.

Area estimates

U.S. reservoirs were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD)[70], the National Inventory of Dams (NID)[71], the National Wetlands Inventory (NWI)[72], and the Navigable Waterways (NW) network[73]. The NHD only covers the conterminous U.S., whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico.

Waterbodies in the NHDWaterbody layer that were greater than or equal to 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered reservoirs: 1) the waterbody was classified as "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to a nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW network are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. Navigable Waterway features greater than 8 ha in surface area are defined as reservoirs.

NWI features were considered "managed" if they had a Special Modifier value indicating the presence of management activities (Figure 6-12). To be included in the flooded lands inventory, the managed flooded land had

[70] See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

[71] See https://nid.sec.usace.army.mil.

[72] See https://www.fws.gov/program/national-wetlands-inventory/data-download

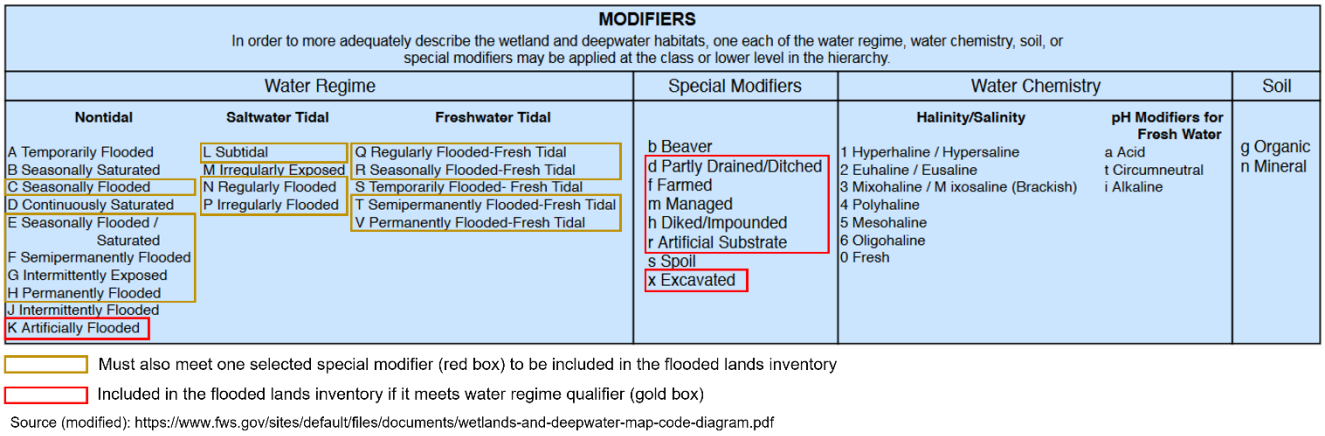
[73] See https://hifld-geoplatform.opendata.arcgis.com/maps/aaa3767c7d2b41f69e7528f99cf2fb76_0/about

to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-12). NWI features that met these criteria, were greater than 8 ha in surface area, and were not a canal/ditch (see Emissions from Land Converted to Flooded Land – Other Constructed Waterbodies) were defined as reservoirs.

Surface areas for identified flooded lands were taken from the NHD, NWI or NW. If features from the NHD, NWI, or NW datasets overlapped, duplicated areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

Reservoir age was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series.

Figure 6-12: Selected Features from NWI that Meet Flooded Lands Criteria



IPCC (2019) allows for the exclusion of managed waterbodies from the inventory if the water surface area or residence time was not substantially changed by the construction of the dam. The guidance does not quantify what constitutes a "substantial" change, but here EPA excludes the U.S. Great Lakes from the inventory based on expert judgment that neither the surface area nor water residence time was substantially altered by their associated dams.

Reservoirs were disaggregated by state (using boundaries from the 2016 U.S. Census Bureau[74]) and climate zone. Downstream and surface emissions for cross-state reservoirs were allocated to states based on the surface area that the reservoir occupied in each state. Only the U.S. portion of reservoirs that cross country borders were included in the inventory.

The surface area of reservoirs in Flooded Land Remaining Flooded Land increased by approximately 4 percent from 1990 to 2021 (Table 6-77) due to reservoirs matriculating into Flooded Land Remaining Flooded Land when they reached 20 years of age.

Table 6-77: National Totals of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha)

Surface Area (millions of ha)	1990	2005	2017	2018	2019	2020	2021
Reservoir	9.40	9.61	9.64	9.65	9.65	9.67	9.67

[74] See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

Table 6-78: State Breakdown of Reservoir Surface Area in Flooded Land Remaining Flooded Land (millions of ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	0.24	0.24	0.24	0.24	0.24	0.24	0.24
Alaska	0.02	0.02	0.02	0.02	0.02	0.02	0.02
Arizona	0.06	0.06	0.06	0.06	0.06	0.06	0.06
Arkansas	0.29	0.30	0.30	0.30	0.30	0.30	0.30
California	0.35	0.36	0.36	0.36	0.36	0.36	0.36
Colorado	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Connecticut	0.03	0.03	0.03	0.03	0.03	0.03	0.03
Delaware	0.03	0.03	0.03	0.03	0.03	0.03	0.03
District of Columbia	+	+	+	+	+	+	+
Florida	0.88	0.89	0.89	0.89	0.89	0.89	0.89
Georgia	0.29	0.30	0.30	0.30	0.30	0.30	0.30
Hawaii	+	+	+	+	+	+	+
Idaho	0.13	0.15	0.15	0.15	0.15	0.15	0.15
Illinois	0.21	0.22	0.22	0.22	0.22	0.23	0.23
Indiana	0.06	0.07	0.07	0.07	0.07	0.07	0.07
Iowa	0.07	0.08	0.08	0.08	0.08	0.08	0.08
Kansas	0.07	0.09	0.09	0.09	0.09	0.09	0.09
Kentucky	0.15	0.16	0.16	0.16	0.16	0.16	0.16
Louisiana	0.41	0.42	0.42	0.42	0.42	0.42	0.42
Maine	0.23	0.24	0.25	0.25	0.25	0.25	0.25
Maryland	0.16	0.16	0.16	0.16	0.16	0.16	0.16
Massachusetts	0.07	0.07	0.07	0.07	0.07	0.07	0.07
Michigan	0.15	0.15	0.15	0.15	0.15	0.15	0.15
Minnesota	0.30	0.31	0.31	0.31	0.31	0.31	0.31
Mississippi	0.18	0.18	0.18	0.18	0.18	0.18	0.18
Missouri	0.20	0.20	0.20	0.20	0.20	0.21	0.21
Montana	0.24	0.26	0.26	0.26	0.26	0.26	0.26
Nebraska	0.13	0.13	0.13	0.13	0.13	0.13	0.13
Nevada	0.09	0.09	0.09	0.09	0.09	0.09	0.09
New Hampshire	0.06	0.06	0.06	0.06	0.06	0.06	0.06
New Jersey	0.13	0.13	0.13	0.13	0.13	0.13	0.13
New Mexico	0.05	0.05	0.05	0.05	0.05	0.05	0.05
New York	0.21	0.21	0.21	0.21	0.21	0.21	0.21
North Carolina	0.40	0.40	0.40	0.40	0.40	0.40	0.40
North Dakota	0.25	0.25	0.25	0.25	0.25	0.25	0.25
Ohio	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Oklahoma	0.27	0.27	0.27	0.27	0.27	0.27	0.27
Oregon	0.21	0.21	0.21	0.21	0.21	0.21	0.21
Pennsylvania	0.08	0.08	0.08	0.08	0.08	0.08	0.08
Puerto Rico	+	+	+	+	+	+	+
Rhode Island	0.02	0.02	0.02	0.02	0.02	0.02	0.02
South Carolina	0.31	0.32	0.33	0.33	0.33	0.33	0.33
South Dakota	0.24	0.24	0.24	0.24	0.24	0.24	0.24
Tennessee	0.22	0.23	0.23	0.23	0.23	0.23	0.23
Texas	0.66	0.67	0.67	0.67	0.67	0.67	0.67
Utah	0.18	0.19	0.19	0.19	0.19	0.19	0.19
Vermont	0.04	0.04	0.04	0.04	0.04	0.04	0.04
Virginia	0.30	0.30	0.30	0.30	0.30	0.30	0.30
Washington	0.26	0.26	0.26	0.26	0.26	0.26	0.26
West Virginia	0.03	0.03	0.03	0.03	0.03	0.03	0.03
Wisconsin	0.18	0.18	0.18	0.18	0.18	0.18	0.18
Wyoming	0.09	0.09	0.09	0.09	0.09	0.09	0.09
Total	**9.40**	**9.61**	**9.64**	**9.65**	**9.65**	**9.67**	**9.67**

+ Indicates values less than 0.005 million Ha
Note: Totals may not sum due to independent rounding.

Uncertainty

Uncertainty in estimates of CH_4 emissions from reservoirs in Flooded Land Remaining Flooded Land (Table 6-79) are developed using the IPCC Approach 2 and include uncertainty in the default emission factors and land areas. Uncertainty ranges for the emission factors are provided in the *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be ± 10 - 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of ± 15 percent for the reservoir area estimates is assumed and is based on expert judgment.

Table 6-79: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Reservoirs in Flooded Land Remaining Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate[a]			
		(MMT CO_2 Eq.)	(MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Reservoir						
Surface	CH_4	26.5	26.2	26.8	-1.2%	1.1%
Downstream	CH_4	2.39	2.32	2.7	-3%	13%
Total	**CH_4**	**28.9**	**28.6**	**29.4**	**-1%**	**1.7%**

[a] Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration with many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI is far more detailed than the NHD, resulting in increased

emission estimates across the time series. The NWI also includes Alaska, Hawaii, and Puerto Rico which were not estimated in the 1990 through 2020 Inventory.

Emissions from reservoirs in Flooded Land Remaining Flooded Land were further increased by correcting the creation date of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. These reservoirs were incorrectly classified as Land Converted to Flooded Land for a portion of the 1990-2020 time series, but are classified as Flooded Land Remaining Flooded Land throughout the 1990 through 2021 Inventory time series.

The 1990 through 2020 Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but doesn't consistently discriminate between them, therefore inundation areas and reservoirs are consolidated into reservoirs for the 1990 through 2021 Inventory.

In addition, the EPA updated the global warming potential (GWP) for CH_4 (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations was an average annual increase in CH_4 emission estimates from reservoirs of 10.3 MMT CO_2 Eq., or 56 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

The EPA is currently measuring greenhouse gas emissions from 108 reservoirs in the conterminous United States. The survey will be complete in September 2023 and the data will be used to develop country-specific emission factors for U.S. reservoirs. At the earliest, these emission factors will be used in the 2025 Inventory submission. EPA received public comment during the Public Review period of the 1990-2021 Inventory focused on peer-review literature of surface emission rates, adjustments for trophic status/class, decommissioned dams, missing reservoirs, and other factors to consider incorporating into the analysis. As noted above, EPA's current plan is to move toward the use of country specific EFs which EPA anticipates will address some of the comments, but as an interim measure, EPA will further review and consider updates for a future Inventory based on public comment.

Emissions from Flooded Land Remaining Flooded Land–Other Constructed Waterbodies

The IPCC (IPCC 2019) provides emission factors for several types of "other constructed waterbodies" including freshwater ponds and canals/ditches. IPCC (2019) describes ponds as waterbodies that are "…constructed by excavation and/or construction of walls to hold water in the landscape for a range of uses, including agricultural water storage, access to water for livestock, recreation, and aquaculture." Furthermore, the IPCC "Decision tree for types of Flooded Land" (IPCC 2019, Fig. 7.2) defines a size threshold of 8 ha to distinguish reservoirs from "other constructed waterbodies." For this Inventory, ponds are defined as managed flooded land that are 1) less than 8 ha in surface area, and 2) not categorized as canals/ditches. IPCC (2019) further distinguishes saline versus brackish ponds, with the former supporting lower CH_4 emissions than the latter. Activity data on pond salinity are not uniformly available for the conterminous United States and all ponds in the inventory are assumed to be freshwater. Ponds often receive high organic matter and nutrient loadings, may have low oxygen levels, and are often sites of substantial CH_4 emissions from anaerobic sediments.

Canals and ditches (terms are used interchangeably) are linear water features constructed to transport water (i.e., stormwater drainage, aqueduct), to irrigate or drain land, to connect two or more bodies of water, or to serve as a waterway for watercraft. The geometry and construction of canals and ditches varies widely and includes narrow earthen channels (<1 m wide) and concrete lined aqueducts in excess of 50 m wide. Canals and ditches can be

extensive in many agricultural, forest and settlement areas, and may also be significant sources of emissions in some circumstances.

Methane emissions from freshwater ponds in Flooded Land Remaining Flooded Land increased by less than 1 percent from 1990 to 2021. Methane emissions from canals and ditches have remained constant throughout the time series because age data are not available for canals and ditches, thus they are assumed to be greater than 20-years old in 1990 and are included in Flooded Land Remaining Flooded Land throughout the time series. Overall, CH_4 emissions from other constructed waterbodies have remained fairly constant since 1990 (Table 6-80 and Table 6-81).

Table 6-80: CH_4 Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Other Constructed Waterbodies							
Canals and Ditches	2.3	2.3	2.3	2.3	2.3	2.3	2.3
Freshwater Ponds	14.1	14.2	14.2	14.2	14.2	14.2	14.2
Total	**16.4**	**16.5**	**16.5**	**16.5**	**16.5**	**16.5**	**16.5**

Note: Totals may not sum due to independent rounding.

Table 6-81: CH_4 Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land (kt CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Other Constructed Waterbodies							
Canals and Ditches	80.9	80.9	80.9	80.9	80.9	80.9	80.9
Freshwater Ponds	505.2	507.8	508.3	508.3	508.4	508.4	508.5
Total	**586.0**	**588.7**	**589.2**	**589.2**	**589.3**	**589.3**	**589.3**

Note: Totals may not sum due to independent rounding.

Florida and Louisiana have the greatest methane emissions from canals and ditches in the United States (Figure 6-13, Table 6-82). Presumably, most of these canals serve to drain the extensive wetland complexes in these states (Davis, 1973). California has the third greatest methane emissions from canals and ditches. Canals and ditches in California primarily serve to convey water from the mountains to urban and agricultural areas. Michigan and Minnesota have the fourth and fifth largest methane emissions from canals and ditches. These systems serve to drain historic wetlands to facilitate row-crop agriculture. Florida, Texas, and Georgia have the greatest methane emissions from freshwater ponds, although states throughout the eastern United States make significant contributions to the national total. These patterns of emissions are in accordance with the distribution of other constructed waterbodies in the United States.

Table 6-82: CH_4 Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land in 2021 (kt CH_4)

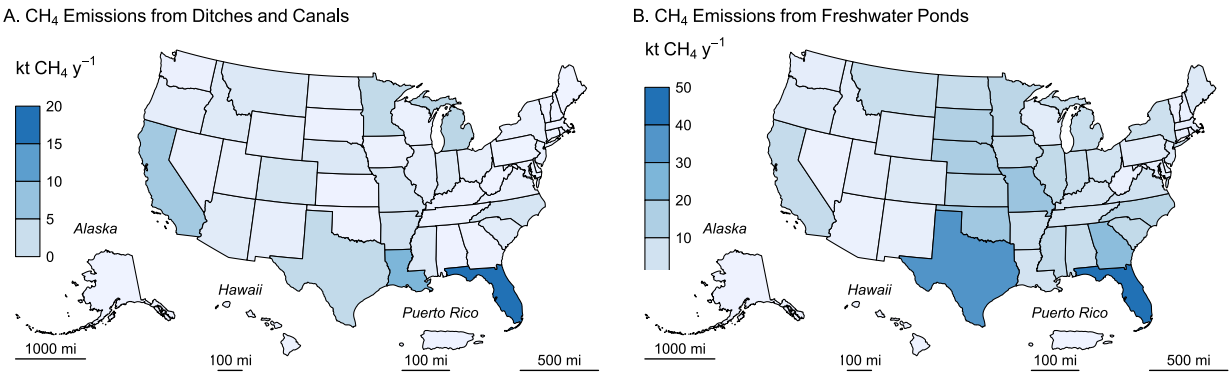
State	Canals and Ditches	Freshwater Ponds	Total
Alabama	+	12.4	12.5
Alaska	+	+	+
Arizona	1.5	1.1	2.6
Arkansas	3.1	11.4	14.5
California	7.0	13.5	20.4
Colorado	2.9	5.7	8.6
Connecticut	+	2.4	2.4
Delaware	+	1.3	1.3
District of Columbia	+	+	+
Florida	15.6	47.8	63.4
Georgia	+	26.0	26.2
Hawaii	+	+	0.6

Idaho	1.7	3.8	5.5
Illinois	1.0	14.3	15.3
Indiana	1.7	11.7	13.4
Iowa	+	13.0	13.4
Kansas	+	16.3	16.4
Kentucky	+	8.3	8.5
Louisiana	9.4	8.9	18.3
Maine	+	5.6	5.6
Maryland	+	2.7	3.1
Massachusetts	+	3.2	3.2
Michigan	5.4	12.1	17.5
Minnesota	4.7	16.2	20.9
Mississippi	1.6	14.0	15.6
Missouri	2.4	23.1	25.4
Montana	2.0	12.0	14.0
Nebraska	2.0	19.6	21.6
Nevada	0.7	1.0	1.7
New Hampshire	+	1.6	1.6
New Jersey	+	4.7	5.1
New Mexico	0.8	2.4	3.2
New York	+	10.9	11.3
North Carolina	2.6	16.8	19.4
North Dakota	0.8	13.1	13.9
Ohio	0.8	9.2	10.0
Oklahoma	+	21.8	21.9
Oregon	1.0	5.5	6.5
Pennsylvania	+	4.5	4.6
Puerto Rico	+	+	+
Rhode Island	+	+	+
South Carolina	1.3	14.5	15.8
South Dakota	+	18.4	18.7
Tennessee	+	8.7	8.9
Texas	4.6	38.6	43.2
Utah	0.8	3.3	4.1
Vermont	+	1.0	1.1
Virginia	0.5	9.6	10.1
Washington	+	3.1	3.6
West Virginia	+	1.6	1.6
Wisconsin	+	4.1	4.4
Wyoming	0.9	6.0	6.8
Total	**80.9**	**508.5**	**589.3**

+ Indicates values less than 0.5 kt

Note: Totals may not sum due to independent rounding.

Figure 6-13: 2021 CH_4 Emissions from A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (kt CH_4)



Methodology and Time-Series Consistency

Estimates of CH_4 emissions for other constructed waterbodies in Flooded Land Remaining Flooded Land follow the Tier 1 methodology in IPCC (2019). All calculations are performed at the state level and summed to obtain national estimates. Based on IPCC guidance, methane emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and an emission factor (Table 6-83). Although literature data on greenhouse gas emissions from canals and ditches is relatively sparse, they have the highest default emission factor of all flooded land types (Table 6-83). Default emission factors for freshwater ponds are on the higher end of those for reservoirs. There are insufficient data to support climate-specific emission factors for ponds or canals and ditches. Downstream emissions are not inventoried for other constructed waterbodies because 1) many of these systems are not associated with dams (e.g., excavated ponds and ditches), and 2) there are insufficient data to derive downstream emission factors for other constructed waterbodies that are associated with dams (IPCC 2019).

Table 6-83: IPCC (2019) Default CH_4 Emission Factors for Surface Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land

Other Constructed Waterbody	Surface emission factor (MT CH_4 ha^{-1} y^{-1})
Freshwater ponds	0.183
Canals and ditches	0.416

Area estimates

Other constructed waterbodies were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD)[75], the National Inventory of Dams (NID)[76], the National Wetlands Inventory (NWI)[77], and the Navigable Waterways (NW) network.[78] The NHD only covers the conterminous US, whereas the NID, NW and NWI also include Alaska, Hawaii, District of Columbia, and Puerto Rico. The following paragraphs present the criteria used to identify other constructed waterbodies in the NHD, NW, and NWI.

[75] See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

[76] See https://nid.sec.usace.army.mil.

[77] See https://www.fws.gov/program/national-wetlands-inventory/data-download

[78] See https://hifld-geoplatform.opendata.arcgis.com/maps/aaa3767c7d2b41f69e7528f99cf2fb76_0/about

Waterbodies in the NHDWaterbody layer that were greater than 20-years old, less than 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered freshwater ponds in Flooded Land Remaining Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features that were less than 8 ha in surface area and not identified as canals/ditch (see below) were considered freshwater ponds. Only 2.1 percent of NW features met these criteria, and they were primarily associated with larger navigable waterways, such as lock chambers on impounded rivers.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-12). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-12). NWI features that met these criteria, were less than 8 ha in surface area, and were not a canal/ditch (see below) were defined as freshwater ponds.

Canals and ditches, a subset of other constructed waterbodies, were identified in the NWI by their morphology. Unlike a natural water body, canals and ditches are typically narrow, linear features with abrupt angular turns. Figure 6-14 contrasts the unique shape of ditches/canals vs more natural water features.

Figure 6-14: Left: NWI Features Identified as Canals/Ditches (pink) by Unique Narrow, Linear/Angular Morphology. Right: Non-Canal/Ditches with More Natural Morphology (blue)



This morphology was identified systematically using shape attributes in a decision tree model. A training set of 752 features were identified as either "ditch" or "not ditch" using expert judgment. The training set was used to train a decision tree which was used to categorize millions of NWI features based on three shape attribute ratios (Figure 6-12).

Table 6-84: Predictors used in Decision Tree to Identify Canal/Ditches

Shape Length : # of Shape Vertices
Shape Area : Shape Length
Shape Area : # of Shape Vertices

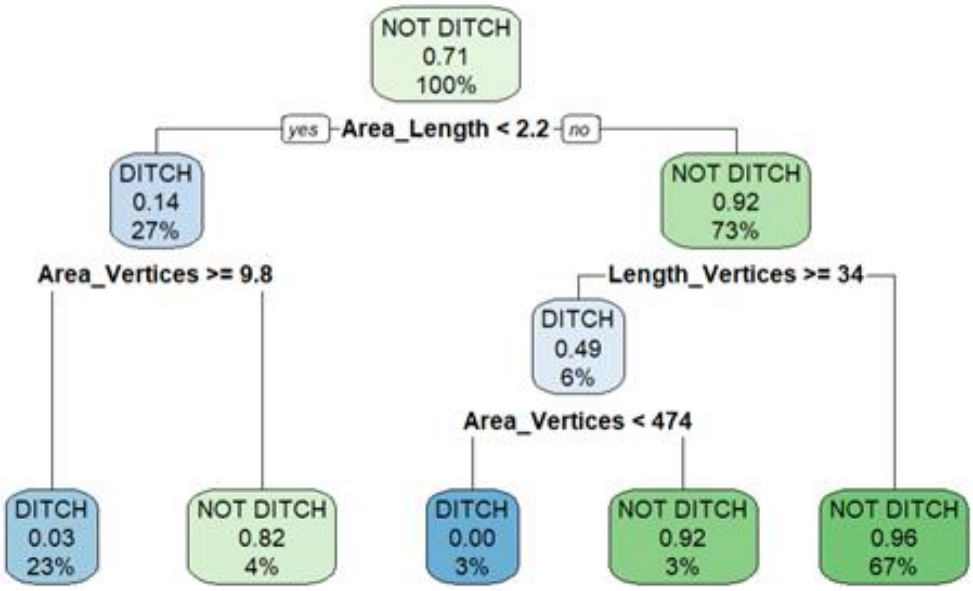
The decision tree built a model using 80 percent of the 752 training features and used the 20 percent to validate the model. The model was 93.1 percent accurate. Below are the validation results (Table 6-85).

Table 6-85: Validation Results for Ditch/Canal Classification Decision Tree

	Truth	
Prediction	Ditch/Canal	Not Ditch/Canal
Ditch/Canal	49	5
Not Ditch/Canal	8	27

The decision tree model was then applied to the entire NWI dataset using the following shape attribute ratios (Figure 6-15).

Figure 6-15: Structure of Decision Tree Used to Identify Canals/Ditches



Surface areas for other constructed waterbodies were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, these areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

The age of other constructed waterbody features was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series. No canal/ditch features were associated with a nearby dam, therefore all canal/ditch features were assumed to be greater than 20-years old through the time series.

For the year 2021, this Inventory contains 2,778,529 ha of freshwater ponds and 194,412 ha of canals and ditches in Flooded Land Remaining Flooded Land (Table 6-86). The surface area of freshwater ponds increased by 18,069 Ha (0.6 percent) from 1990 to 2021 due to flooded lands matriculating from Land Converted to Flooded Land to Flooded Land Remaining Flooded Land. All canals and ditches were assumed to be greater than 20-years old throughout the time series, thus the surface area of these flooded lands is constant throughout the time series.

Table 6-86: National Surface Area Totals in Flooded Land Remaining Flooded Land - Other Constructed Waterbodies (ha)

	1990	2005	2017	2018	2019	2020	2021
Canals and ditches	194,412	194,412	194,412	194,412	194,412	194,412	194,412
Freshwater ponds	2,760,460	2,775,096	2,777,613	2,777,854	2,778,136	2,778,394	2,778,529
Total	**2,954,871**	**2,969,508**	**2,972,024**	**2,972,266**	**2,972,548**	**2,972,805**	**2,972,941**

Note: Totals may not sum due to independent rounding.

Canals and ditches in the conterminous United States are most abundant in the Gulf Coast states and California (Figure 6-16A, Table 6-87). Florida contains 20 percent of all U.S. canal and ditch surface area, most of which were constructed in the early 1900s for drainage, flood protection, and water storage purposes. Freshwater ponds are more widely distributed across the United States (Figure 6-16B, Table 6-88). Florida also has the greatest surface area of freshwater ponds, equivalent to 9 percent of all freshwater pond surface area in the United States.

Figure 6-16: 2021 Surface Area of A) Ditches and Canals and B) Freshwater Ponds in Flooded Land Remaining Flooded Land (hectares)

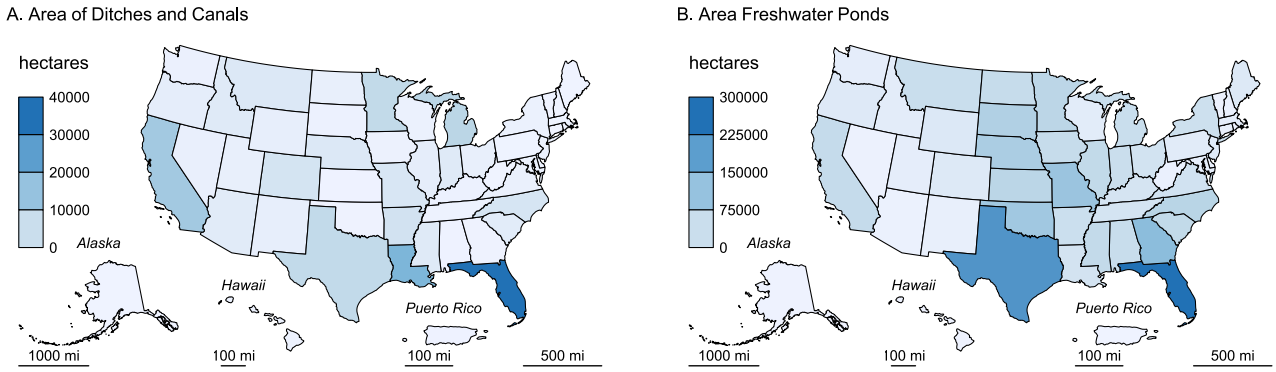


Table 6-87: State Totals of Surface Area in Flooded Land Remaining Flooded Land— Canals and Ditches (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	228	228	228	228	228	228	228
Alaska	115	115	115	115	115	115	115
Arizona	3,536	3,536	3,536	3,536	3,536	3,536	3,536
Arkansas	7,349	7,349	7,349	7,349	7,349	7,349	7,349
California	16,725	16,725	16,725	16,725	16,725	16,725	16,725
Colorado	6,874	6,874	6,874	6,874	6,874	6,874	6,874
Connecticut	28	28	28	28	28	28	28
Delaware	130	130	130	130	130	130	130
District of Columbia	1	1	1	1	1	1	1
Florida	37,482	37,482	37,482	37,482	37,482	37,482	37,482
Georgia	352	352	352	352	352	352	352
Hawaii	538	538	538	538	538	538	538
Idaho	4,027	4,027	4,027	4,027	4,027	4,027	4,027
Illinois	2,489	2,489	2,489	2,489	2,489	2,489	2,489
Indiana	4,064	4,064	4,064	4,064	4,064	4,064	4,064
Iowa	867	867	867	867	867	867	867
Kansas	258	258	258	258	258	258	258
Kentucky	672	672	672	672	672	672	672
Louisiana	22,565	22,565	22,565	22,565	22,565	22,565	22,565
Maine	56	56	56	56	56	56	56
Maryland	967	967	967	967	967	967	967

Massachusetts	132	132	132	132	132	132	132
Michigan	12,897	12,897	12,897	12,897	12,897	12,897	12,897
Minnesota	11,235	11,235	11,235	11,235	11,235	11,235	11,235
Mississippi	3,936	3,936	3,936	3,936	3,936	3,936	3,936
Missouri	5,670	5,670	5,670	5,670	5,670	5,670	5,670
Montana	4,740	4,740	4,740	4,740	4,740	4,740	4,740
Nebraska	4,864	4,864	4,864	4,864	4,864	4,864	4,864
Nevada	1,587	1,587	1,587	1,587	1,587	1,587	1,587
New Hampshire	103	103	103	103	103	103	103
New Jersey	944	944	944	944	944	944	944
New Mexico	2,002	2,002	2,002	2,002	2,002	2,002	2,002
New York	925	925	925	925	925	925	925
North Carolina	6,321	6,321	6,321	6,321	6,321	6,321	6,321
North Dakota	1,819	1,819	1,819	1,819	1,819	1,819	1,819
Ohio	1,819	1,819	1,819	1,819	1,819	1,819	1,819
Oklahoma	278	278	278	278	278	278	278
Oregon	2,498	2,498	2,498	2,498	2,498	2,498	2,498
Pennsylvania	143	143	143	143	143	143	143
Puerto Rico	249	249	249	249	249	249	249
Rhode Island	1	1	1	1	1	1	1
South Carolina	3,226	3,226	3,226	3,226	3,226	3,226	3,226
South Dakota	703	703	703	703	703	703	703
Tennessee	442	442	442	442	442	442	442
Texas	11,152	11,152	11,152	11,152	11,152	11,152	11,152
Utah	1,875	1,875	1,875	1,875	1,875	1,875	1,875
Vermont	95	95	95	95	95	95	95
Virginia	1,306	1,306	1,306	1,306	1,306	1,306	1,306
Washington	1,125	1,125	1,125	1,125	1,125	1,125	1,125
West Virginia	28	28	28	28	28	28	28
Wisconsin	887	887	887	887	887	887	887
Wyoming	2,086	2,086	2,086	2,086	2,086	2,086	2,086
Total	**194,412**	**194,412**	**194,412**	**194,412**	**194,412**	**194,412**	**194,412**

Table 6-88: State Totals of Surface Area in Flooded Land Remaining Flooded Land—Freshwater Ponds (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	67,304	67,639	67,655	67,658	67,658	67,658	67,658
Alaska	2,449	2,456	2,456	2,456	2,456	2,456	2,456
Arizona	6,153	6,199	6,208	6,211	6,211	6,215	6,215
Arkansas	62,194	62,510	62,510	62,510	62,510	62,510	62,510
California	73,388	73,589	73,647	73,647	73,653	73,659	73,660
Colorado	30,871	31,143	31,157	31,167	31,167	31,168	31,168
Connecticut	13,001	13,055	13,058	13,058	13,058	13,058	13,058
Delaware	7,006	7,010	7,010	7,010	7,010	7,010	7,010
District of Columbia	22	22	22	22	22	22	22
Florida	261,027	261,150	261,191	261,191	261,195	261,195	261,195
Georgia	140,246	142,014	142,090	142,090	142,093	142,099	142,099
Hawaii	2,229	2,236	2,238	2,238	2,238	2,238	2,238
Idaho	20,678	20,780	20,781	20,781	20,781	20,781	20,781
Illinois	77,370	77,913	77,985	78,001	78,006	78,016	78,016
Indiana	63,427	63,918	64,003	64,006	64,011	64,011	64,011
Iowa	67,833	69,748	70,668	70,749	70,911	71,023	71,096
Kansas	87,134	89,134	89,189	89,202	89,209	89,215	89,231
Kentucky	44,788	45,164	45,189	45,189	45,189	45,189	45,189
Louisiana	48,756	48,884	48,889	48,889	48,889	48,894	48,894

Maine	30,645	30,694	30,703	30,703	30,703	30,703	30,703
Maryland	14,739	14,890	14,942	14,942	14,942	14,944	14,945
Massachusetts	17,327	17,386	17,425	17,432	17,438	17,444	17,446
Michigan	66,159	66,310	66,342	66,347	66,347	66,355	66,355
Minnesota	88,283	88,509	88,585	88,592	88,599	88,622	88,634
Mississippi	76,062	76,212	76,230	76,230	76,235	76,240	76,241
Missouri	125,673	125,955	125,970	125,970	125,971	125,972	125,972
Montana	65,130	65,484	65,506	65,506	65,510	65,510	65,510
Nebraska	105,741	106,970	107,124	107,177	107,189	107,211	107,219
Nevada	5,641	5,644	5,680	5,690	5,690	5,694	5,694
New Hampshire	8,744	8,769	8,780	8,780	8,780	8,780	8,781
New Jersey	25,780	25,782	25,782	25,782	25,782	25,782	25,782
New Mexico	13,020	13,025	13,025	13,025	13,025	13,025	13,025
New York	59,452	59,707	59,811	59,811	59,813	59,813	59,816
North Carolina	91,555	91,608	91,613	91,613	91,613	91,613	91,613
North Dakota	71,758	71,763	71,784	71,784	71,784	71,784	71,784
Ohio	49,844	50,177	50,340	50,351	50,365	50,391	50,406
Oklahoma	119,199	119,310	119,310	119,310	119,312	119,313	119,313
Oregon	29,950	29,958	29,960	29,967	29,967	29,967	29,967
Pennsylvania	24,724	24,740	24,749	24,749	24,749	24,749	24,749
Puerto Rico	851	851	851	851	851	851	851
Rhode Island	2,521	2,529	2,536	2,536	2,536	2,536	2,536
South Carolina	78,075	78,748	78,960	78,961	78,972	78,976	78,976
South Dakota	100,444	100,661	100,713	100,714	100,732	100,733	100,736
Tennessee	46,824	47,525	47,546	47,555	47,560	47,567	47,567
Texas	210,149	210,711	210,721	210,721	210,721	210,721	210,721
Utah	17,817	17,871	17,882	17,882	17,882	17,884	17,884
Vermont	5,692	5,705	5,709	5,709	5,709	5,709	5,709
Virginia	52,327	52,327	52,327	52,327	52,327	52,327	52,327
Washington	17,013	17,058	17,081	17,081	17,081	17,081	17,081
West Virginia	8,902	8,932	8,938	8,938	8,938	8,938	8,938
Wisconsin	22,037	22,181	22,189	22,189	22,189	22,189	22,189
Wyoming	32,508	32,540	32,554	32,554	32,554	32,554	32,554
Total	**2,760,460**	**2,775,096**	**2,777,613**	**2,777,854**	**2,778,136**	**2,778,394**	**2,778,529**

Uncertainty

Uncertainty in estimates of CH_4 emissions from other constructed waterbodies (ponds, canals/ditches) in Flooded Land Remaining Flooded Land (Table 6-89) are estimated using IPCC Approach 2 and include uncertainty in the default emission factors and the flooded land area inventory. Uncertainty in default emission factors is provided in the *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be ± 10 - 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of ± 15 percent for the flooded land area estimates is assumed and is based on expert judgment.

Table 6-89: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Other Constructed Waterbodies in Flooded Land Remaining Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate[a]			
		(MMT CO_2 Eq.)	(MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Canals and ditches	CH_4	2.3	2.1	2.4	-5.3%	7%
Freshwater pond	CH_4	14.2	14.2	14.2	-0.04%	0.04%
Total	**CH_4**	**16.5**	**16.4**	**16.7**	**-0.7%**	**1%**

[a]Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID.[79] The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory used the National Hydrography Data (NHD as the primary geospatial data source. The NWI is far more detailed than the NHD and also includes Alaska, Hawaii, and Puerto Rico which were missing from 1990 through 2020 Inventory.

In addition, the EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations was an average annual increase in CH_4 emission estimates from constructed waterbodies of 15.4 MMT CO_2 Eq., or a factor of 15.3, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

Default emission factors for canals/ditches were derived from a global dataset that include few measurements from U.S. systems. The EPA plans to conduct a literature survey to determine if sufficient data are available to derive a country-specific emission factor.

Canal and ditch surface area included here may overlap with ditches and canals included in CH_4 emission estimates for ditches draining inland organic soils (IPCC 2013, section 2.2.2.1). EPA plans to reconcile ditch/canal surface areas between the two managed land types (flooded land vs. drained inland organic soils) in the next (i.e., 1990 through 2022) Inventory.

[79] See https://www.epa.gov/national-aquatic-resource-surveys/national-lakes-assessment-2017-quality-assurance-project-plan.

Features less than 8 ha in the NW that were not identified as Canal/Ditch were defined as freshwater ponds. Many of these features are lock chambers connected to an upstream reservoir. These systems likely have emission rates more similar to a reservoir than freshwater pond. In the 1990 through 2022 Inventory these systems will be classified as reservoirs.

6.9 Land Converted to Wetlands (CRF Source Category 4D2)

Emissions and Removals from Land Converted to Vegetated Coastal Wetlands

Land Converted to Vegetated Coastal Wetlands occurs as a result of inundation of unprotected low-lying coastal areas with gradual sea-level rise, flooding of previously drained land behind hydrological barriers, and through active restoration and creation of coastal wetlands through removal of hydrological barriers. Based upon NOAA C-CAP, wetlands are subdivided into freshwater (Palustrine) and saline (Estuarine) classes and further subdivided into emergent marsh, scrub shrub and forest classes All other land categories (i.e., Forest Land, Cropland, Grassland, Settlements and Other Lands) are identified as having some area converting to Vegetated Coastal Wetlands. This inventory does not include Land Converted to Unvegetated Open Water Coastal Wetlands (see Planned Improvements section below). Between 1990 and 2021 the rate of annual transition for Land Converted to Vegetated Coastal Wetlands ranged from 0 to 2,650 ha per year, depending on the type of land converted.[80] Conversion rates from Forest Land were relatively consistent between 1990 and 2010 (ranging between 2,409 and 2,650 ha) and decreased to 625 ha starting in 2011; the majority of these conversions resulted in increases in the area of palustrine wetlands, which also initiates CH_4 emissions when lands are inundated with fresh water.[81] Little to no conversion of Cropland, Grassland, Settlement, or Other Lands to vegetated coastal wetlands occurred during the reporting period, with converted areas ranging from 0 to 25 ha per year.[82]

Conversion to coastal wetlands resulted in a biomass C stock loss of 0.1 MMT CO_2 Eq. (0.03 MMT C) in 2021 (Table 6-90 and Table 6-91). Loss of forest biomass through conversion of Forest Lands to Vegetated Coastal Wetlands is the primary driver behind biomass C stock change being a source rather than a sink across the time series. Conversion of Cropland, Grassland, Settlement and Other Lands result in a net increase in biomass stocks. Conversion of lands to vegetated coastal wetlands resulted in a DOM loss of 0.03 MMT CO_2 Eq. (0.008 MMT C) in 2021 (Table 6-90 and Table 6-91), which is driven by the loss of DOM when Forest Land is converted to Vegetated Coastal Wetlands. This is likely an overestimate of loss because wetlands inherently preserve dead organic material. Conversion of Cropland, Grassland, Settlement and Other Land results in a net increase in DOM Across all time periods, soil C accumulation resulting from Lands Converted to Vegetated Coastal Wetlands is a carbon sink and has ranged between -0.15 and -0.3 MMT CO_2 Eq. (-0.04 and -0.07 MMT C; Table 6-90 and Table 6-91). Conversion of lands to coastal wetlands resulted in CH_4 emissions of 0.18 MMT CO_2 Eq. (6.4 kt CH_4) in 2021 (Table

[80] Data from C-CAP; see https://coast.noaa.gov/digitalcoast/tools/. Accessed September 2022.

[81] Currently, the C-CAP dataset categorizes coastal wetlands as either palustrine (fresh water) or estuarine (presence of saline water). This classification does not differentiate between estuarine wetlands with salinity ≤ 18 ppt (when methanogenesis begins to occur) and those that are >18 ppt (where negligible to no CH_4 is produced); therefore, it is not possible at this time to account for CH_4 emissions from estuarine wetlands in the Inventory.

[82] At the present stage of Inventory development, Coastal Wetlands are not explicitly shown in the Land Representation analysis while work continues harmonizing data from NOAA's Coastal Change Analysis Program (C-CAP) with NRI, FIA and NLDC data used to compile the Land Representation (NOAA OCM 2020).

6-92). Methane emissions due to the conversion of Lands to Vegetated Coastal Wetlands are largely the result of Forest Land converting to palustrine emergent and scrub shrub coastal wetlands in warm temperate climates. Emissions were the highest between 1990 and 2001 (0.28 MMT CO_2 Eq., 10.0 kt CH_4) and have continually decreased to current levels. This decrease was driven by a reduction in the rate of conversion of forest land to palustrine scrub-shrubs and emergent wetlands.

Table 6-90: Net CO_2 Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT CO_2 Eq.)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Forest Land Converted to Vegetated Coastal Wetlands	**0.49**	**0.50**	**(0.01)**	**+**	**0.01**	**0.02**	**0.03**
Biomass C Stock	0.62	0.62	0.13	0.13	0.13	0.13	0.13
Dead Organic Matter C Flux	0.11	0.12	0.03	0.03	0.03	0.03	0.03
Soil C Stock	(0.23)	(0.24)	(0.17)	(0.16)	(0.15)	(0.14)	(0.13)
Grassland Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Other Land Converted to Vegetated Coastal Wetlands	**(0.03)**	**(0.03)**	**(0.02)**	**(0.02)**	**(0.02)**	**(0.02)**	**(0.02)**
Biomass C Stock	(0.01)	(0.02)	(0.01)	(0.01)	(0.01)	(0.01)	(0.01)
Soil C Stock	(0.01)	(0.02)	(0.02)	(0.02)	(0.02)	(0.02)	(0.02)
Settlements Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total Biomass Flux	**0.60**	**0.60**	**0.12**	**0.12**	**0.12**	**0.12**	**0.12**
Total Dead Organic Matter Flux	**0.11**	**0.12**	**0.03**	**0.03**	**0.03**	**0.03**	**0.03**
Total Soil C Flux	**(0.25)**	**(0.25)**	**(0.18)**	**(0.18)**	**(0.17)**	**(0.16)**	**(0.15)**
Total Flux	**0.46**	**0.47**	**(0.03)**	**(0.02)**	**(0.01)**	**(+)**	**0.01**

+ Absolute value does not exceed 0.005 MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-91: Net CO_2 Flux from C Stock Changes in Land Converted to Vegetated Coastal Wetlands (MMT C)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Forest Land Converted to Vegetated Coastal Wetlands	**0.13**	**0.14**	**(+)**	**+**	**+**	**0.006**	**0.01**
Biomass C Stock	0.17	0.17	0.04	0.04	0.04	0.04	0.04
Dead Organic Matter C Flux	0.03	0.03	0.01	0.01	0.01	0.01	0.01
Soil C Stock	(0.06)	(0.06)	(0.05)	(0.04)	(0.04)	(0.04)	(0.04)
Grassland Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Other Land Converted to Vegetated Coastal Wetlands	**(0.01)**	**(0.01)**	**(0.01)**	**(0.01)**	**(0.01)**	**(0.01)**	**(0.01)**

Biomass C Stock	(+)	(0.005)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Settlements Converted to Vegetated Coastal Wetlands	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Biomass C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Soil C Stock	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Total Biomass Flux	**0.16**	**0.16**	**0.03**	**0.03**	**0.03**	**0.03**	**0.03**
Total Dead Organic Matter Flux	**0.03**	**0.03**	**0.01**	**0.01**	**0.01**	**0.01**	**0.01**
Total Soil C Flux	**(0.07)**	**(0.07)**	**(0.05)**	**(0.05)**	**(0.05)**	**(0.04)**	**(0.04)**
Total Flux	**0.13**	**0.13**	**(0.01)**	**(0.01)**	**(+)**	**(+)**	**+**

+ Absolute value does not exceed 0.005 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-92: CH_4 Emissions from Land Converted to Vegetated Coastal Wetlands (MMT CO_2 Eq. and kt CH_4)

Land Use/Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Vegetated Coastal Wetlands							
CH_4 Emissions (MMT CO_2 Eq.)	+	+	+	+	+	+	+
CH_4 Emissions (kt CH_4)	+	0.01	0.04	0.04	0.04	0.05	0.05
Forest Land Converted to Vegetated Coastal Wetlands							
CH_4 Emissions (MMT CO_2 Eq.)	0.28	0.27	0.20	0.19	0.18	0.17	0.16
CH_4 Emissions (kt CH_4)	9.88	9.74	7.22	6.85	6.48	6.10	5.76
Grassland Converted to Vegetated Coastal Wetlands							
CH_4 Emissions (MMT CO_2 Eq.)	+	+	+	+	+	+	+
CH_4 Emissions (kt CH_4)	0.01	0.01	0.06	0.07	0.07	0.08	0.08
Other Land Converted to Vegetated Coastal Wetlands							
CH_4 Emissions (MMT CO_2 Eq.)	+	+	0.01	0.01	0.01	0.01	0.01
CH_4 Emissions (kt CH_4)	0.08	0.14	0.40	0.43	0.47	0.50	0.52
Settlements Converted to Vegetated Coastal Wetlands							
CH_4 Emissions (MMT CO_2 Eq.)	+	+	+	+	+	+	+
CH_4 Emissions (kt CH_4)	0.01	+	+	+	+	+	+
Total CH_4 Emissions (MMT CO_2 Eq.)	**0.28**	**0.28**	**0.22**	**0.21**	**0.20**	**0.19**	**0.18**
Total CH_4 Emissions (kt CH_4)	**9.98**	**9.91**	**7.72**	**7.39**	**7.06**	**6.73**	**6.41**

+ Absolute value does not exceed 0.005 MMT CO_2 Eq. or 0.005 kt CH_4.

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

The following section provides a description of the methodology used to estimate changes in biomass, dead organic matter and soil C stocks and CH_4 emissions for Land Converted to Vegetated Coastal Wetlands. Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021.

Biomass Carbon Stock Changes

Biomass C stocks for Land Converted to Vegetated Coastal Wetlands are estimated for palustrine and estuarine marshes for land below the elevation of high tides (taken to be mean high water spring tide elevation) and as far seawards as the extent of intertidal vascular plants within the U.S. Land Representation according to the national LiDAR dataset, the national network of tide gauges and land use histories recorded in the 1996, 2001, 2005, 2011, and 2016 NOAA C-CAP surveys (NOAA OCM 2020). Both federal and non-federal lands are represented.

Delineating Vegetated Coastal Wetlands from ephemerally flooded upland Grasslands represents a particular challenge in remote sensing. Moreover, at the boundary between wetlands and uplands, which may be gradual on low lying coastlines, the presence of wetlands may be ephemeral depending upon weather and climate cycles and as such, impacts on the emissions and removals will vary over these time frames. Trends in land cover change are extrapolated to 1990 and 2021 from these datasets using the C-CAP change data closest in date to a given year. Biomass is not sensitive to soil organic content. Aboveground biomass C stocks for non-forested coastal wetlands are derived from a national assessment combining field plot data and aboveground biomass mapping by remote sensing (Byrd et al. 2017; Byrd et al. 2018; Byrd et al. 2020). Aboveground biomass C removal data for all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment to a disaggregation of a community class. The aboveground biomass C stock for estuarine forested wetlands (dwarf mangroves that are not classified as forests due to their stature) is derived from a meta-analysis by Lu and Megonigal (2017[83]). Root to shoot ratios from the *Wetlands Supplement* were used to account for belowground biomass, which were multiplied by the aboveground C stock (IPCC 2014) and summed with aboveground biomass to obtain total biomass carbon stocks. Aboveground biomass C stocks for Forest Land, Cropland, and Grassland that are lost with the conversion to Vegetated Coastal Wetlands were derived from Tier 1 default values (IPCC 2006; IPCC 2019). Biomass C stock changes are calculated by subtracting the biomass C stock values of each land-use category (i.e., Forest Land, Cropland, and Grassland) from those of Vegetated Coastal Wetlands in each climate zone and multiplying that value by the corresponding C-CAP derived area gained that year in each climate zone. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. The total coastal wetland biomass C stock change is accounted for during the year of conversion; therefore, no interannual changes are calculated during the remaining years it is in the category.

Dead Organic Matter

Dead organic matter (DOM) C stocks, which include litter and dead wood stocks, are accounted for in subtropical estuarine forested wetlands for Lands Converted to Vegetated Coastal Wetlands across all years. Tier 1 estimates of mangrove DOM C stocks were used for subtropical estuarine forested wetlands (IPCC 2014). Neither Tier 1 or 2 data on DOM are currently available for either palustrine or estuarine scrub/shrub wetlands for any climate zone or estuarine forested wetlands in climates other than subtropical climates. Tier 1 DOM C stocks for Forest Land converted to Vegetated Coastal Wetlands were derived from IPCC (2019) to account for the loss of DOM that occurs with conversion. Changes in DOM are assumed to be negligible for other land-use conversions (i.e., other than Forest Land) to coastal wetlands based on the Tier 1 method in IPCC (2006). Trends in land cover change are derived from the NOAA C-CAP dataset and extrapolated to cover the entire 1990 through 2021 time series. Dead organic matter removals are calculated by multiplying the C-CAP derived area gained that year by the difference between Tier 1 DOM C stocks for Vegetated Coastal Wetlands and Forest Land. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion. The coastal wetland DOM stock is assumed to be in steady state once established in the year of conversion; therefore, no interannual changes are calculated.

Soil Carbon Stock Changes

Soil C removals are estimated for Land Converted to Vegetated Coastal Wetlands across all years. Soil C stock changes, stratified by climate zones and wetland classes, are derived from a synthesis of peer-reviewed literature (Lynch 1989; Orson et al. 1990; Kearny & Stevenson 1991; Roman et al. 1997; Craft et al. 1998; Orson et al. 1998; Merrill 1999; Hussein et al. 2004; Church et al. 2006; Koster et al. 2007; Callaway et al. 2012 a & b; Bianchi et al. 2013; Crooks et al. 2014; Weston et al. 2014; Villa & Mitsch 2015; Marchio et al. 2016; Noe et al. 2016). To estimate soil C stock changes, no differentiation is made for soil type (i.e., mineral, organic). Soil C removal data for

[83] See https://github.com/Smithsonian/Coastal-Wetland-NGGI-Data-Public; accessed October 2021.

all subcategories are not available and thus assumptions were applied using expert judgment about the most appropriate assignment to a disaggregation of a community class.

As per IPCC (2014) guidance, Land Converted to Vegetated Coastal Wetlands is assumed to remain in this category for up to 20 years before transitioning to Vegetated Coastal Wetlands Remaining Vegetated Coastal Wetlands. Tier 2 level estimates of soil C stock changes associated with annual soil C accumulation from Land Converted to Vegetated Coastal Wetlands were developed using country-specific soil C removal factors multiplied by activity data of land area for Land Converted to Vegetated Coastal Wetlands for a given year in addition to the previous 19-year cumulative area. Guidance from the *Wetlands Supplement* allows for the rate of soil C accumulation to be instantaneously equivalent to that in natural settings and that soil C accumulation is initiated when natural vegetation becomes established; this is assumed to occur in the first year of conversion. No loss of soil C as a result of land conversion to coastal wetlands is assumed to occur. Since the C-CAP coastal wetland area dataset begins in 1996, the area converted prior to 1996 is assumed to be the same as in 1996. Similarly, the coastal wetland area data for 2017 through 2021 is assumed to be the same as in 2016. The methodology follows Eq. 4.7, Chapter 4 of the *IPCC Wetlands Supplement* (IPCC 2014) and is applied to the area of Land Converted to Vegetated Coastal Wetlands on an annual basis.

Soil Methane Emissions

Tier 1 estimates of CH_4 emissions for Land Converted to Vegetated Coastal Wetlands are derived from the same wetland map used in the analysis of wetland soil C fluxes for palustrine wetlands, and are produced from C-CAP, LiDAR and tidal data, in combination with default CH_4 emission factors provided in Table 4.14 of the *IPCC Wetlands Supplement.* The methodology follows Eq. 4.9, Chapter 4 of the *IPCC Wetlands Supplement*. Because Land Converted to Vegetated Coastal Wetlands is held in this category for up to 20 years before transitioning to Vegetated Coastal Wetlands Remaining to Vegetated Coastal Wetlands, CH_4 emissions in a given year represent the cumulative area held in this category for that year and the prior 19 years.

Uncertainty

Underlying uncertainties in estimates of soil C removal factors, biomass change, DOM, and CH_4 emissions include error in uncertainties associated with Tier 2 literature values of soil C removal estimates, biomass stocks, DOM, and IPCC default CH_4 emission factors, uncertainties linked to interpretation of remote sensing data, as well as assumptions that underlie the methodological approaches applied.

Uncertainty specific to coastal wetlands include differentiation of palustrine and estuarine community classes, which determines what flux is applied. Because mean soil and biomass C removal for each available community class are in a fairly narrow range, the same overall uncertainty was assigned to each, respectively (i.e., applying approach for asymmetrical errors, the largest uncertainty for any soil C stock value should be applied in the calculation of error propagation; IPCC 2000). Uncertainties for CH_4 flux are the Tier 1 default values reported in the *Wetlands Supplement*. Overall uncertainty of the NOAA C-CAP remote sensing product is 15 percent. This is in the range of remote sensing methods (±10 to 15 percent; IPCC 2003). However, there is significant uncertainty in salinity ranges for tidal and non-tidal estuarine wetlands and activity data used to estimate the CH_4 flux (e.g., delineation of an 18 ppt boundary), which will need significant improvement to reduce uncertainties. The combined uncertainty was calculated by summing the squared uncertainty for each individual source (C-CAP, soil, biomass, and DOM) and taking the square root of that total.

Uncertainty estimates are presented in Table 6-93 for each carbon pool and the CH_4 emissions. The combined uncertainty is 42.6 percent above and below the estimate of 0.17 MMT CO_2 Eq. In 2021, the total flux was 0.17 MMT CO_2 Eq., with lower and upper estimates of 0.10 and 0.24 MMT CO_2 Eq.

Table 6-93: Approach 1 Quantitative Uncertainty Estimates for C Stock Changes occurring within Land Converted to Vegetated Coastal Wetlands in 2021 (MMT CO_2 Eq. and Percent)

Source	2021 Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Biomass C Stock Flux	0.12	0.1	0.15	-20.0%	20.0%
Dead Organic Matter Flux	0.03	0.02	0.03	-25.8%	25.8%
Soil C Stock Flux	(0.15)	(0.2)	(0.1)	-18.7%	18.7%
Methane Emissions	0.18	0.13	0.18	-29.9%	29.9%
Total Uncertainty	**0.18**	**0.11**	**0.26**	**-42.6%**	**42.6%**

[a] Range of flux estimates based on error propagation at 95 percent confidence interval.

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

QA/QC and Verification

NOAA provided National LiDAR Dataset, tide data, and C-CAP land cover and land cover change mapping, all of which are subject to agency internal mandatory QA/QC assessment (McCombs et al. 2016). QA/QC and verification of soil C stock dataset has been provided by the Smithsonian Environmental Research Center and Coastal Wetland Inventory team leads. Biomass C stocks are derived from peer-review literature, reviewed by U.S. Geological Survey prior to publishing, by the peer-review process during publishing, and by the Coastal Wetland Inventory team leads prior to inclusion in the inventory and from IPCC reports. As a QC step, a check was undertaken confirming that Coastal Wetlands recognized by C-CAP represent a subset of Wetlands recognized by the NRI for marine coastal states. A team of two evaluated and verified there were no computational errors within the calculation worksheets. Soil C stock, emissions/removals data are based upon peer-reviewed literature and CH_4 emission factors are derived from the *Wetlands Supplement*.

Recalculations Discussion

An update was made to the activity data to remove any estuarine forested wetland areas that were located outside of states classified as subtropical since, states classified as wet temperate, cold temperate and mediterranean climate zones fall under the category of *Land Converted to Forest Land*.

In addition, EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWP values provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used 100-year GWP values provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

As a result of these changes, the recalculations resulted in net average increases to emissions totals ranging from 0.03 MMT CO_2 Eq. to 0.02 MMT CO_2 Eq. across the 1990 through 2020 time series compared to the previous Inventory.

Planned Improvements

Administered by the Smithsonian Environmental Research Center, the Coastal Wetland Carbon Research Coordination Network has established a U.S. country-specific database of soil C stocks and biomass for coastal wetlands.[84] This dataset will be updated periodically. Refined error analysis combining land cover change and C

[84] See https://serc.si.edu/coastalcarbon; accessed August 2021.

stock estimates will be provided as new data are incorporated. Through this work, a model is in development to represent changes in soil C stocks and will be incorporated into the next (i.e., 2024) Inventory submission.

Currently, the only coastal wetland conversion that is reported in the Inventory is Lands Converted to Vegetated Coastal Wetlands. The next (2024) submission will include C stock change data for Lands Converted to Unvegetated Open Water Coastal Wetlands.

Land Converted to Flooded Land

Flooded lands are defined as water bodies where human activities have 1) caused changes in the amount of surface area covered by water, typically through water level regulation (e.g., constructing a dam), 2) waterbodies where human activities have changed the hydrology of existing natural waterbodies thereby altering water residence times and/or sedimentation rates, in turn causing changes to the natural production of greenhouse gases, and 3) waterbodies that have been created by excavation, such as canals, ditches and ponds (IPCC 2019). Flooded lands include waterbodies with seasonally variable degrees of inundation but would be expected to retain some inundated area throughout the year under normal conditions.

Flooded lands are broadly classified as "reservoirs" or "other constructed waterbodies" (IPCC 2019). Reservoirs are defined as flooded land greater than 8 ha and includes the seasonally flooded land on the perimeter of permanently flooded land (i.e., inundation areas). IPCC guidance (IPCC 2019) provides default emission factors for reservoirs and several types of "other constructed waterbodies" including freshwater ponds and canals/ditches.

Land that has been flooded for 20 years or greater is defined as Flooded Land Remaining Flooded Land and land flooded for less than 20 years is defined as Land Converted to Flooded Land. The distinction is based on literature reports that CO_2 and CH_4 emissions are high immediately following flooding as labile organic matter is rapidly degraded but decline to a steady background level approximately 20 years after flooding (Abril et al. 2005, Barros et al. 2011, Teodoru et al. 2012). Both CO_2 and CH_4 emissions are estimated for Land Converted to Flooded Land.

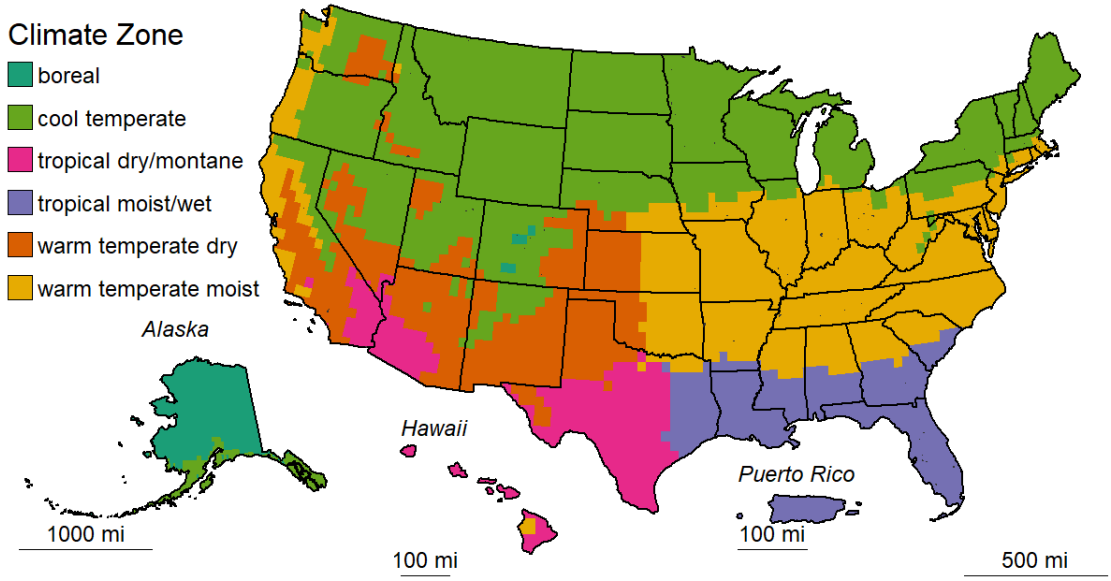
Nitrous oxide emissions from flooded lands are largely related to inputs of organic or inorganic nitrogen from the watershed. These inputs from runoff/leaching/deposition are largely driven by anthropogenic activities such as land-use change, wastewater disposal or fertilizer application in the watershed or application of fertilizer or feed in aquaculture. These emissions are not included here to avoid double-counting N_2O emissions which are captured in other source categories, such as indirect N_2O emissions from managed soils (Section 5.4, Agricultural Soil Management) and wastewater management (Section 7.2, Wastewater Treatment and Discharge).

Emissions from Land Converted to Flooded Land–Reservoirs

Reservoirs are designed to store water for a wide range of purposes including hydropower, flood control, drinking water, and irrigation. The permanently wetted portion of reservoirs are typically surrounded by periodically inundated land referred to as a "drawdown zone" or "inundation area." Greenhouse gas emissions from inundation areas are considered significant and similar per unit area to the emissions from the water surface and are therefore included in the total reservoir surface area when estimating greenhouse gas emissions from flooded land. Lakes converted into reservoirs without substantial changes in water surface area or water residence times are not considered to be managed flooded land (see Area Estimates below) (IPCC 2019).

In 2021, the United States and Puerto Rico contained 63,804 hectares of reservoir surface area in Land Converted to Flooded Land (see Methodology and Time-Series Consistency below for calculation details) distributed across all six of the aggregated climate zones used to define flooded land emission factors (Figure 6-17) (IPCC 2019).

Figure 6-17: U.S. Reservoirs (black polygons) in the Land Converted to Flooded Land Category in 2021



Note: Colors represent climate zone used to derive IPCC default emission factors. Reservoirs (indicated by black polygons) are sparsely distributed across United States, but can be seen in IL, IN, and OH in this image.

Methane and CO_2 are produced in reservoirs through the natural breakdown of organic matter. Per unit area emission rates tend to scale positively with temperature and system productivity (i.e., abundance of algae). Greenhouse gases produced in reservoirs can be emitted directly from the water surface and inundation areas or as greenhouse gas-enriched water passes through the dam and the downstream river. Sufficient information exists to estimate downstream CH_4 emissions using Tier 1 IPCC guidance (IPCC 2019), but no guidance is provided for downstream CO_2 emissions. Table 6-94 and Table 6-95 below summarize nationally aggregated CH_4 and CO_2 emissions from reservoirs in Land Converted to Flooded Land. The decrease in CO_2 and CH_4 emissions through the time series is attributable to reservoirs matriculating from the Land Converted to Flooded Land category into the Flooded Land Remaining Flooded Land Category. Emissions have been stable since 2005, reflecting the low rate of new flooded land creation over the past 16 years.

Table 6-94: CH_4 Emissions from Land Converted to Flooded Land - Reservoirs (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emissions	0.9	0.2	0.2	0.2	0.2	0.2	0.2
Downstream Emissions	0.1	+	+	+	+	+	+
Total	**1.0**	**0.2**	**0.3**	**0.3**	**0.3**	**0.2**	**0.2**

+Indicates values less than 0.05 MMT CO_2

Note: Totals may not sum due to independent rounding

Table 6-95: CH_4 Emissions from Land Converted to Flooded Land—Reservoirs (kt CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoirs							
Surface Emissions	34	8	8	8	8	6	6
Downstream Emissions	3	1	1	1	1	1	1
Total	**37**	**9**	**9**	**9**	**9**	**6**	**6**

Table 6-96: CO_2 Emissions from Land Converted to Flooded Land—Reservoirs (MMT CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoir	1.3	0.3	0.4	0.4	0.4	0.2	0.2

Table 6-97: CO_2 Emissions from Land Converted to Flooded Land—Reservoirs (MMT C)

Source	1990	2005	2017	2018	2019	2020	2021
Reservoir	0.4	0.1	0.1	0.1	0.1	0.1	0.1

Methane and CO_2 emissions from reservoirs in Minnesota were 8-fold greater than from any other state (Figure 6-18 and Table 6-98). This is attributed to ten reservoirs created in Minnesota after 2001 which impound 52,252 ha of water, 99 percent of which is located in Mille Lacs Lake. North Dakota is the second largest source of CO_2 and CH_4 from reservoirs in Land Converted to Flooded Land. Ninety-five percent of Land Converted to Flooded Land reservoir surface area in North Dakota is attributed to Devils Lake. Both Mille Lacs and Devils Lakes are natural waterbodies provisioned with dams for water level management.

Figure 6-18: 2021 A) CH_4 and B) CO_2 Emissions from U.S. Reservoirs in Land Converted to Flooded Land

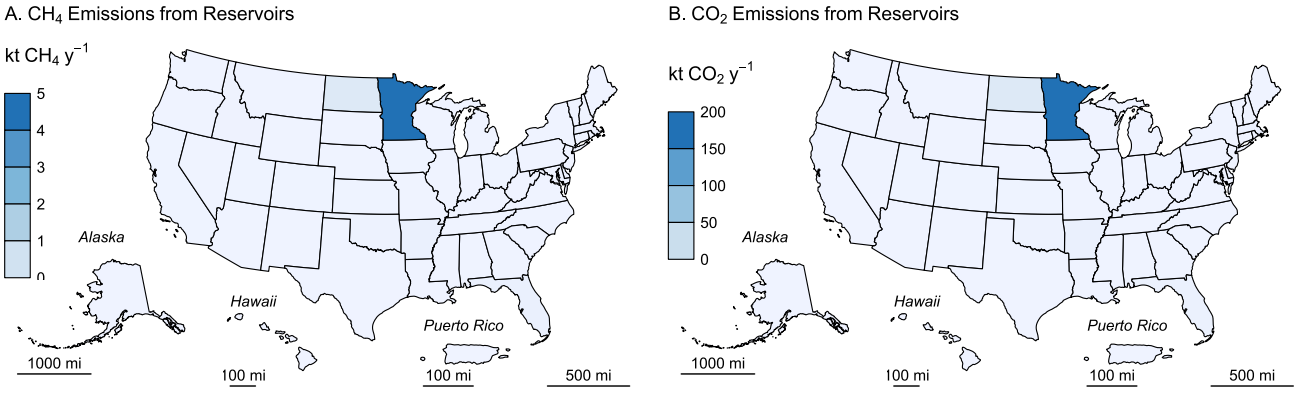


Table 6-98: Methane and CO_2 Emissions from Reservoirs in Land Converted to Flooded Land in 2021 (kt CH_4; kt CO_2)

	CH_4			CO_2[a]
State	Surface	Downstream	Total	Surface
Alabama	0	0	0	0
Alaska	0	0	0	0
Arizona	0	0	0	0
Arkansas	+	+	+	6
California	+	+	+	+
Colorado	+	+	+	1
Connecticut	+	+	+	+
Delaware	0	0	0	0
District of Columbia	0	0	0	0
Florida	+	+	+	5
Georgia	+	+	+	+
Hawaii	0	0	0	0
Idaho	+	+	+	2

Illinois	+	+	+	+
Indiana	+	+	+	+
Iowa	+	+	+	1
Kansas	+	+	+	1
Kentucky	0	0	0	0
Louisiana	0	0	0	0
Maine	+	+	+	+
Maryland	+	+	+	+
Massachusetts	+	+	+	4
Michigan	+	+	+	+
Minnesota	4	+	5	195
Mississippi	0	0	0	0
Missouri	0	0	0	0
Montana	+	+	+	+
Nebraska	+	+	+	+
Nevada	+	+	+	+
New Hampshire	0	0	0	0
New Jersey	0	0	0	0
New Mexico	+	+	+	+
New York	+	+	+	+
North Carolina	0	0	0	0
North Dakota	1	+	1	23
Ohio	+	+	+	1
Oklahoma	+	+	+	2
Oregon	0	0	0	0
Pennsylvania	+	+	+	+
Puerto Rico	0	0	0	0
Rhode Island	0	0	0	0
South Carolina	0	0	0	0
South Dakota	+	+	+	+
Tennessee	+	+	+	1
Texas	+	+	+	+
Utah	+	+	+	1
Vermont	0	0	0	0
Virginia	0	0	0	0
Washington	+	+	+	+
West Virginia	0	0	0	0
Wisconsin	+	+	+	+
Wyoming	+	+	+	+

+ Indicates values greater than zero and less than 0.5 kt

[a]CO_2: Only surface CO_2 emissions are included in the Inventory

Methodology and Time-Series Consistency

Estimates of CH_4 and CO_2 emissions for reservoirs in Land Converted to Flooded Land follow the Tier 1 methodology in the IPCC guidance (IPCC 2019). All calculations are performed at the state level and summed to obtain national estimates. Emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and a climate-specific emission factor (Table 6-99). Downstream CH_4 emissions are calculated as 9 percent of the surface CH_4 emission (Tier 1 default). The IPCC guidance (IPCC 2019) does not address downstream CO_2 emissions, presumably because there are insufficient data in the literature to estimate this emission pathway.

The IPCC default surface emission factors are derived from model-predicted (G-res model, Prairie et al. 2017) emission rates for all reservoirs in the Global Reservoir and Dam (GRanD) database (Lehner et al. 2011). Predicted emission rates were aggregated by the 11 IPCC climate zones (IPCC 2019, Table 7A.2) which were collapsed into six climate zones using a regression tree approach. All six aggregated climate zone are present in the United States.

Table 6-99: IPCC (2019) Default CH_4 and CO_2 Emission Factors for Surface Emissions from Reservoirs in Land Converted to Flooded Land

	Surface emission factor	
Climate	**MT CH_4 ha^{-1} y^{-1}**	**MT CO_2 ha^{-1} y^{-1}**
Boreal	0.0277	3.45
Cool Temperate	0.0847	3.74
Warm Temperate Dry	0.1956	6.23
Warm Temperate Moist	0.1275	5.35
Tropical Dry/Montane	0.3923	10.82
Tropical Moist/Wet	0.2516	10.16

Note: downstream CH_4 emissions are calculated as 9 percent of surface emissions. Downstream emissions are not calculated for CO_2.

Area Estimates

U.S. reservoirs were identified from the NHDWaterbody layer in the National Hydrography Dataset Plus V2 (NHD),[85] the National Inventory of Dams (NID),[86] the National Wetlands Inventory (NWI)[87], and the Navigable Waterways (NW) network[88]. The NHD only covers the conterminous U.S., whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico. The following paragraphs present the criteria used to identify other constructed waterbodies in the NHD, NW, and NWI.

Waterbodies in the NHDWaterbody layer that were less than or equal to 20-years old, greater than or equal to 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered reservoirs in Land Converted to Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features greater than 8 ha in surface area are defined as reservoirs.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-19). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-19). NWI features that met these criteria, were greater than 8 Ha in surface area, and were not a canal/ditch (see Emissions from Land Converted to Flooded Land – Other Constructed Waterbodies) were defined as reservoirs.

Surface areas for identified flooded lands were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, duplicate areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

Reservoir age was determined by assuming they were created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the feature was greater than 20-years old

[85] See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

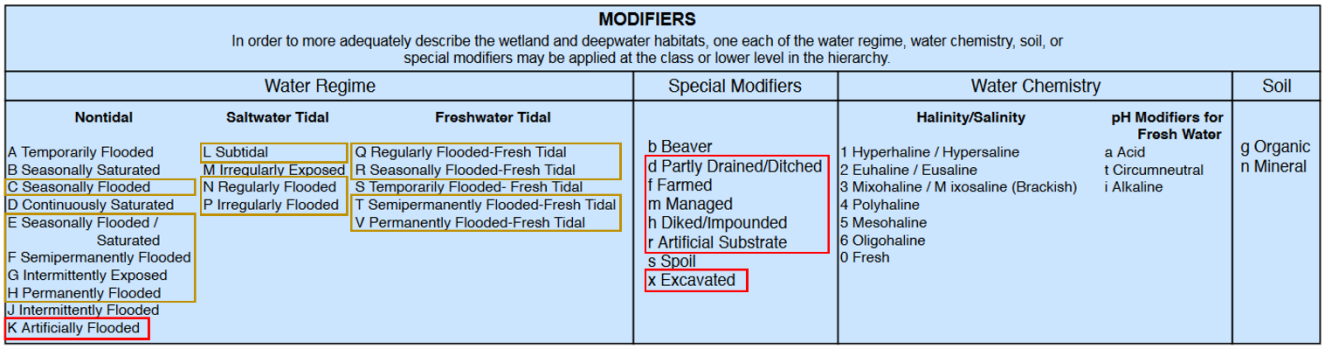
[86] See https://nid.sec.usace.army.mil.

[87] See https://www.fws.gov/program/national-wetlands-inventory/data-download.

[88] See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

throughout the time series. Only reservoirs less than or equal to 20-years old are included in Land Converted to Flooded Land.

Figure 6-19: Selected Features from NWI that meet Flooded Lands Criteria



Source (modified): https://www.fws.gov/sites/default/files/documents/wetlands-and-deepwater-map-code-diagram.pdf

IPCC (2019) allows for the exclusion of managed waterbodies from the inventory if the water surface area or residence time was not substantially changed by the construction of the dam. The guidance does not quantify what constitutes a "substantial" change, but here EPA excludes the U.S. Great Lakes from the inventory based on expert judgment that neither the surface area nor water residence time was substantially altered by their associated dams.

Reservoirs were disaggregated by state (using boundaries from the 2016 U.S. Census Bureau[89]) and climate zone. Downstream and surface emissions for cross-state reservoirs were allocated to states based on the surface area that the reservoir occupied in each state. Only the U.S. portion of reservoirs that cross country borders were included in the inventory.

The surface area of reservoirs in Land Converted to Flooded Land decreased by approximately 70 percent from 1990 to 2021 (Table 6-100). This is due to reservoirs that were less than 20-years old at the beginning of time series entering the Flooded Land Remaining Flooded Land category when they exceeded 20 years of age. The rate at which flooded land has aged out of the Land Converted to Flooded Land category has outpaced the rate of new dam construction. New dam construction has slowed considerably during the time series with only four new dams constructed in 2021,[90] versus 538 in 1990 (Figure 6-20).

Table 6-100: National Totals of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha)

Surface Area (thousands of ha)	1990	2005	2017	2018	2019	2020	2021
Reservoir	234	63	85	84	84	64	64

[89] See https://www.census.gov/geographies/mapping-files/time-series/geo/carto-boundary-file.html.

[90] See https://nid.sec.usace.army.mil.

Figure 6-20: Number of Dams Built per Year from 1990 through 2021

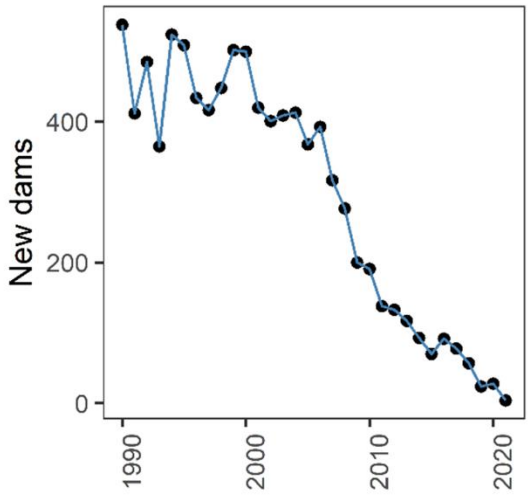


Table 6-101: State Breakdown of Reservoir Surface Area in Land Converted to Flooded Land (thousands of ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	5.4	0.0	0.0	0.0	0.0	0.0	0.0
Alaska	0.6	0.0	0.0	0.0	0.0	0.0	0.0
Arizona	0.0	0.1	0.0	0.0	0.0	0.0	0.0
Arkansas	9.6	0.9	1.2	1.2	1.2	1.2	1.2
California	16.2	1.0	0.1	0.1	0.1	0.1	0.1
Colorado	3.7	1.1	0.2	0.2	0.2	0.3	0.2
Connecticut	0.0	0.1	0.0	0.0	0.0	0.0	0.0
Delaware	0.0	0.0	0.0	0.0	0.0	0.0	0.0
District of Columbia	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Florida	14.1	2.1	1.1	0.8	0.8	0.8	0.5
Georgia	9.7	3.7	0.1	0.1	0.0	0.0	0.0
Hawaii	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Idaho	18.1	0.8	0.4	0.4	0.4	0.4	0.4
Illinois	8.8	10.5	9.5	9.5	9.5	0.1	0.1
Indiana	10.0	0.2	0.1	0.1	0.1	0.1	0.1
Iowa	6.6	2.0	0.4	0.1	0.2	0.2	0.2
Kansas	18.9	0.3	0.2	0.2	0.1	0.1	0.1
Kentucky	4.7	0.0	0.0	0.0	0.0	0.0	0.0
Louisiana	5.8	3.2	0.2	0.0	0.0	0.0	0.0
Maine	12.5	4.2	0.0	0.0	0.0	0.0	0.0
Maryland	0.5	0.0	0.1	0.1	0.1	0.1	0.1
Massachusetts	1.1	0.2	0.9	0.9	0.9	0.8	0.8
Michigan	8.5	0.9	0.1	0.1	0.1	0.1	0.1
Minnesota	6.1	4.5	52.4	52.4	52.4	52.3	52.3
Mississippi	2.2	0.0	0.0	0.0	0.0	0.0	0.0
Missouri	0.2	9.7	9.7	9.7	9.7	0.0	0.0
Montana	13.4	1.2	0.1	0.1	0.1	0.1	0.1
Nebraska	5.3	1.3	0.1	0.1	0.1	0.0	0.0
Nevada	1.3	0.9	0.1	0.0	0.0	0.0	0.0
New Hampshire	0.3	0.0	0.0	0.0	0.0	0.0	0.0
New Jersey	0.0	0.0	0.0	0.0	0.0	0.0	0.0
New Mexico	0.1	0.0	0.0	0.0	0.0	0.0	0.0
New York	1.9	0.5	0.1	0.1	0.1	0.1	0.1

North Carolina	0.6	0.1	0.1	0.1	0.0	0.0	0.0
North Dakota	0.0	0.9	6.2	6.2	6.2	6.2	6.2
Ohio	6.4	0.4	0.2	0.2	0.2	0.2	0.1
Oklahoma	3.0	0.0	0.4	0.4	0.4	0.4	0.4
Oregon	1.5	0.0	0.0	0.0	0.0	0.0	0.0
Pennsylvania	1.2	0.0	0.0	0.0	0.0	0.0	0.0
Puerto Rico	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Rhode Island	0.1	0.0	0.0	0.0	0.0	0.0	0.0
South Carolina	14.0	6.2	0.0	0.0	0.0	0.0	0.0
South Dakota	0.4	3.3	0.8	0.8	0.8	0.0	0.0
Tennessee	3.0	0.0	0.1	0.1	0.1	0.1	0.1
Texas	10.1	0.0	0.0	0.0	0.0	0.0	0.0
Utah	1.6	0.0	0.2	0.2	0.2	0.2	0.2
Vermont	0.1	0.0	0.0	0.0	0.0	0.0	0.0
Virginia	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Washington	2.7	0.2	0.0	0.0	0.0	0.0	0.0
West Virginia	1.9	1.6	0.0	0.0	0.0	0.0	0.0
Wisconsin	1.7	0.3	0.0	0.0	0.1	0.1	0.1
Wyoming	0.2	0.2	0.1	0.1	0.1	0.1	0.1
Total	**234.4**	**62.9**	**85.3**	**84.4**	**84.3**	**64.1**	**63.8**

Uncertainty

Uncertainty in estimates of CH_4 and CO_2 emissions from reservoirs on Land Converted to Flooded Land were developed using IPCC Approach 2 and include uncertainty in the default emission factors and the flooded land area inventory (Table 6-102). Uncertainty in emission factors is provided in the *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD, NWI, and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in these spatial datasets are unknown, but uncertainty for remote sensing products is assumed to be ± 10 to 15 percent based on IPCC guidance (IPCC 2003). An uncertainty range of ± 15 percent for the flooded land area estimates is assumed and is based on expert judgment.

Table 6-102: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Reservoirs in Land Converted to Flooded Land

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Reservoir						
Surface	CH_4	0.16	0.14	0.18	-13.3%	13.4%
Surface	CO_2	0.25	0.21	0.28	-13.9%	15.0%
Downstream	CH_4	+	+	0.05	-62.8%	221.0%
Total		**0.42**	**0.36**	**0.49**	**-14.9%**	**16.8%**

+ Indicates values less than 0.05 MMT CO_2 Eq.

[a] Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS in collaboration many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation

Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory (NWI). Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. Inventory QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

The 1990 through 2021 Inventory uses the National Wetland Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI includes Alaska, Hawaii, and Puerto Rico, which were missing from 1990 through 2020 Inventory, but this had little effect on the emission estimates as Hawaii and Puerto Rico had no reservoirs in Land Converted to Flooded Land. In 1990, Alaska had 637 ha of reservoirs in Land Converted to Flooded Land, but all reservoirs in Alaska matriculated to Flooded Land Remaining Flooded Land by 2004.

The 1990 through 2020 Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but does not consistently discriminate between them, therefore inundation areas and reservoirs are lumped into reservoirs for the 1990 through 2021 Inventory.

The 1990 though 2021 Inventory includes corrections to the age of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. As result, these flooded lands are now included in Flooded Land Remaining Flooded Land throughout the time series, whereas they were misclassified as Land Converted to Flooded Land for a portion of the time series in the 1990 through 2020 Inventory. For the year 1990, these corrections reduced the surface area, methane emissions, and carbon dioxide emissions of reservoirs in Land Converted to Flooded Land by 138,375 ha, 18.8 kt CH_4, and 0.7 MMT CO_2, respectively.

Overall, the recalculations resulted in substantial reductions in methane and carbon dioxide emissions in the first few years of the time series (e.g., decrease of 4.1 MMT CO_2 Eq. in 1990), but the differences were minor by 2005 through 2020 (0.1 MMT CO_2 Eq.).

In addition, the EPA updated the global warming potential (GWP) for CH_4 (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations for CH_4 emissions from reservoirs was an average annual decrease of 0.3 MMT CO_2 Eq., or 49 percent, over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

The EPA is currently measuring greenhouse gas emissions from 108 reservoirs in the conterminous United States. The survey will be complete in September 2023 and the data will be used to develop country-specific emission factors for U.S. reservoirs. At the earliest, these emission factors will be used in the 2025 Inventory submission.

Emissions from Land Converted to Flooded Land–Other Constructed Waterbodies

Freshwater ponds are the only type of flooded lands within the "other constructed waterbodies" subcategory of Land Converted to Flooded Land that are included in this Inventory (see Methodology for details) because age data are not available for canals and ditches. All canals and ditches are assumed to be greater than 20-years old throughout the time series and are included in Flooded Land Remaining Flooded Land.

IPCC (2019) describes ponds as waterbodies that are "…constructed by excavation and/or construction of walls to hold water in the landscape for a range of uses, including agricultural water storage, access to water for livestock, recreation, and aquaculture." The IPCC "Decision tree for types of Flooded Land" (IPCC 2019, Fig. 7.2) elaborates on this description by defining waterbodies less than 8 ha as a subset of "other constructed waterbodies." For this Inventory, ponds are defined as managed flooded land not identified as "canal/ditch" (see Methods below) with surface area less than 8 ha. IPCC (2019) further distinguishes saline versus brackish ponds, with the former supporting lower CH_4 emission rates than the latter. Activity data on pond salinity is not uniformly available for the United States and all ponds in Land Converted to Flooded Land are assumed to be freshwater. Ponds often receive high organic matter and nutrient loadings, may have low oxygen levels, and are sites of substantial CH_4 and CO_2 emissions from anaerobic sediments.

Methane and CO_2 emissions from freshwater ponds decreased 95 percent from 1990 to 2021 due to flooded land matriculating from Land Converted to Flooded Land to Flooded Land Remaining Flooded Land. In 2021, Nebraska, Montana, and Iowa had the greatest CO_2 and CH_4 emissions for freshwater ponds in Land Converted to Flooded Land (Table 6-103 through Table 6-107, Figure 6-21).

Table 6-103: CH_4 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO_2 Eq.)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.1	+	+	+	+	+	+

+ Indicates values less than 0.05 MMT CO_2 Eq.

Table 6-104: CH_4 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (kt CH_4)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	3	1	+	+	+	+	+

+ Indicates values less than 0.5 kt

Table 6-105: CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT CO_2)

Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.1	+	+	+	+	+	+

+ Indicates values less than 0.05 MMT CO_2 Eq.

Table 6-106: CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land (MMT C)

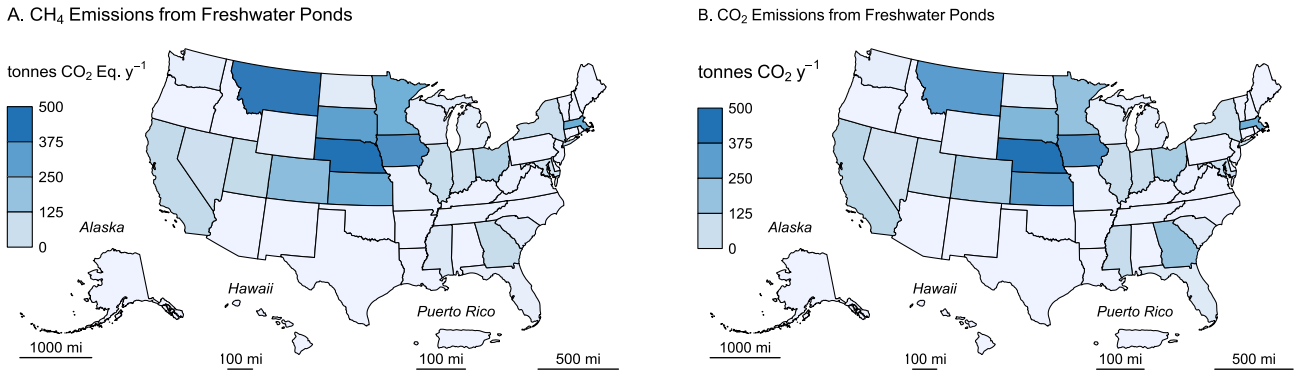
Source	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	0.02	0.01	+	+	+	+	+

+ Indicates values less than 0.005 MMT C

Table 6-107: CH_4 and CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land in 2021 (MT CO_2 Eq.)

	Freshwater Ponds		
State	**CH_4**	**CO_2**	**Total**
Alabama	0	0	0
Alaska	0	0	0
Arizona	0	0	0
Arkansas	1	1	3
California	151	162	313
Colorado	278	202	480
Connecticut	0	0	0
Delaware	0	0	1
District of Columbia	0	0	0
Florida	25	50	76
Georgia	134	234	368
Hawaii	0	0	0
Idaho	1	0	1
Illinois	130	121	251
Indiana	111	116	227
Iowa	425	393	818
Kansas	353	369	722
Kentucky	4	4	8
Louisiana	3	6	10
Maine	1	1	2
Maryland	100	104	204
Massachusetts	342	311	654
Michigan	37	27	64
Minnesota	330	241	570
Mississippi	65	127	191
Missouri	13	14	27
Montana	491	359	850
Nebraska	514	471	985
Nevada	113	93	206
New Hampshire	1	0	1
New Jersey	0	0	0
New Mexico	0	0	0
New York	121	96	217
North Carolina	6	6	11
North Dakota	47	34	82
Ohio	195	200	396
Oklahoma	0	0	0
Oregon	0	0	0
Pennsylvania	0	0	0
Puerto Rico	0	0	0
Rhode Island	0	0	0
South Carolina	46	48	94
South Dakota	378	276	655
Tennessee	13	13	26
Texas	0	0	0
Utah	146	107	253
Vermont	0	0	0
Virginia	0	0	0
Washington	23	28	50
West Virginia	15	16	31
Wisconsin	34	25	59
Wyoming	29	21	51
TOTAL	**4,677**	**4,277**	**8,954**

Figure 6-21: 2021 A) CH_4 and B) CO_2 Emissions from Other Constructed Waterbodies (Freshwater Ponds) in Land Converted to Flooded Land (MT CO_2 Eq.)



Methodology and Time-Series Consistency

Estimates of CH_4 and CO_2 emissions for other constructed waterbodies in Land Converted to Flooded Land follow the Tier 1 methodology in IPCC (2019). All calculations are performed at the state level and summed to obtain national estimates. Greenhouse gas emissions from the surface of these flooded lands are calculated as the product of flooded land surface area and an emission factor (Table 6-108). Due to a lack of empirical data on CO_2 emissions from recently created ponds, IPCC (2019) states "For all types of ponds created by damming, the methodology described above to estimate CO_2 emissions from land converted to reservoirs may be used." This Inventory uses IPCC default CO_2 emission factors for land converted to reservoirs when estimating CO_2 emissions from land converted to freshwater ponds. IPCC guidance also states that "there is insufficient information available to derive separate CH_4 emission factors for recently constructed ponds…" and allows for the use of IPCC default CH_4 emission factors for land remaining flooded land. Downstream emissions are not inventoried for other constructed waterbodies because 1) many of these systems are not associated with dams (e.g., excavated ponds and ditches), and 2) there are insufficient data to derive downstream emission factors for other constructed waterbodies that are associated with dams (IPCC 2019).

Table 6-108: IPCC Default Methane and CO_2 Emission Factors for Other Constructed Waterbodies in Land Converted to Flooded Land

		Emission Factor	
Other Constructed Waterbody	**Climate Zone**	**MT CH_4 ha^{-1} y^{-1}**	**MT CO_2 ha^{-1} y^{-1}**
Freshwater ponds	Boreal	0.183	3.45
Freshwater ponds	Cool Temperate	0.183	3.74
Freshwater ponds	Warm Temperate Dry	0.183	6.23
Freshwater ponds	Warm Temperate Moist	0.183	5.35
Freshwater ponds	Tropical Dry/Montane	0.183	10.82
Freshwater ponds	Tropical Moist/Wet	0.183	10.16

Area Estimates

Other constructed waterbodies were identified from the NHDWaterbody layer in the National Hydrography

Dataset Plus V2 (NHD),[91] the National Inventory of Dams (NID),[92] the National Wetlands Inventory (NWI),[93] and the Navigable Waterways (NW) network.[94] The NHD only covers the conterminous United States, whereas the NID, NW and NWI also include Alaska, Hawaii, and Puerto Rico.

Waterbodies in the NHDWaterbody layer that were less than or equal to 20-years old, less than 8 ha in surface area, not identified as canal/ditch in NHD, and met any of the following criteria were considered freshwater ponds in Land Converted to Flooded Land: 1) the waterbody was classified "Reservoir" in the NHDWaterbody layer, 2) the waterbody name in the NHDWaterbody layer included "Reservoir", 3) the waterbody in the NHDWaterbody layer was located in close proximity (up to 100 m) to a dam in the NID, 4) the NHDWaterbody GNIS name was similar to nearby NID feature (between 100 m to 1000 m).

EPA assumes that all features included in the NW are subject to water-level management to maintain minimum water depths required for navigation and are therefore managed flooded lands. NW features that were less than 8 ha in surface area and not identified as canals/ditch (see below) were considered freshwater ponds. Only 2.1 percent of NW features met these criteria, and they were primarily associated with larger navigable waterways, such as lock chambers on impounded rivers.

NWI features were considered "managed" if they had a special modifier value indicating the presence of management activities (Figure 6-19). To be included in the flooded lands inventory, the managed flooded land had to be wet or saturated for at least one season per year (see 'Water Regime' in Figure 6-19). NWI features that met these criteria, were less than 8 Ha in surface area, and were not a canal/ditch were defined as freshwater ponds.

Surface areas for other constructed waterbodies were taken from NHD, NWI or the NW. If features from the NHD, NWI, or the NW datasets overlapped, duplicate areas were erased. The first step was to take the final NWI Flooded Lands features and use it to identify overlapping NHD features. If the NHD feature had its center in a NWI feature, it was removed from analysis. Next, remaining NHD features were erased from any remaining overlapping NWI features. Final selections of NHD and NWI features were used to erase any overlapping NW waterbodies.

The age of other constructed waterbody features was determined by assuming the waterbody was created the same year as a nearby (up to 100 m) NID feature. If no nearby NID feature was identified, it was assumed the waterbody was greater than 20-years old throughout the time series. No canal/ditch features were associated with a nearby dam, therefore all canal/ditch features were assumed to be greater than 20-years old through the time series.

For the year 2021, this Inventory contains 913 ha of freshwater ponds in Land Converted to Flooded Land. The surface area of freshwater ponds decreased by 94 percent from 1990 to 2021 due to flooded lands aging out of Land Converted to Flooded Land more quickly than new flooded lands entered the category. The greatest reduction in freshwater pond surface area occurred in Iowa, Kansas, and Georgia (Table 6-110). Freshwater ponds in the 2021 inventory are most abundant in Nebraska, Montana, and Kansas (Figure 6-22).

Table 6-109: National Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

Other Constructed Waterbodies	1990	2005	2017	2018	2019	2020	2021
Freshwater Ponds	15,572	3800	1805	1574	1299	1041	913

[91] See https://www.usgs.gov/core-science-systems/ngp/national-hydrography.

[92] See https://nid.sec.usace.army.mil.

[93] See https://www.fws.gov/program/national-wetlands-inventory/data-download.

[94] See https://hifld-geoplatform.opendata.arcgis.com/datasets/geoplatform::navigable-waterway-network-lines-1/about.

Figure 6-22: Surface Area of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

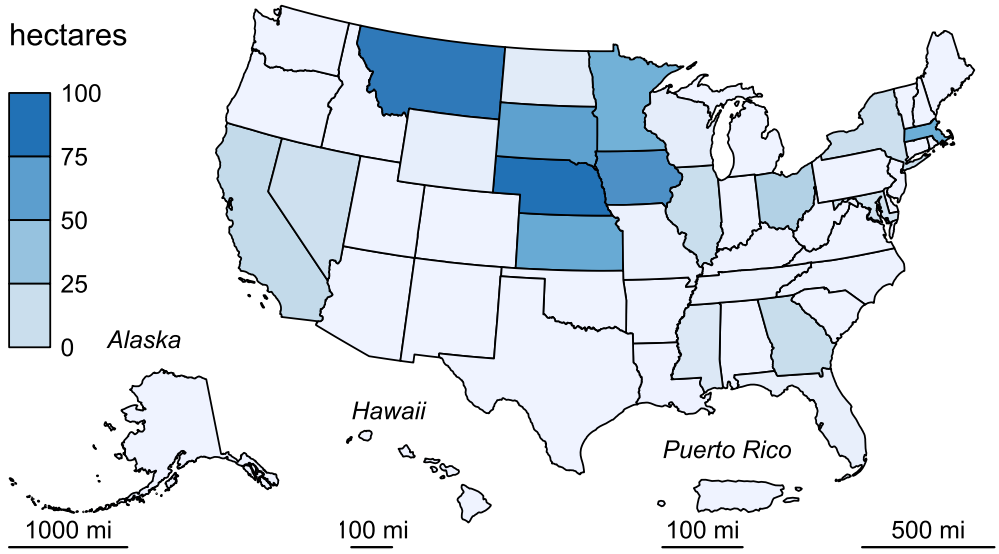


Table 6-110: State Surface Area Totals of Other Constructed Waterbodies in Land Converted to Flooded Land (ha)

State	1990	2005	2017	2018	2019	2020	2021
Alabama	344	19	3	0	0	0	0
Alaska	6	0	0	0	0	0	0
Arizona	46	16	7	4	4	0	0
Arkansas	316	0	0	0	0	0	0
California	241	86	43	42	37	30	29
Colorado	276	45	60	50	52	51	54
Connecticut	54	3	0	0	0	0	0
Delaware	4	0	0	0	0	0	0
District of Columbia	0	0	0	0	0	0	0
Florida	128	50	10	9	5	5	5
Georgia	1,804	87	35	35	32	26	26
Hawaii	7	2	0	0	0	0	0
Idaho	102	1	0	0	0	0	0
Illinois	556	115	56	41	36	26	25
Indiana	510	115	30	27	22	22	22
Iowa	2,227	1,403	511	430	268	156	83
Kansas	2,017	127	111	98	91	85	69
Kentucky	390	25	2	1	1	1	1
Louisiana	133	10	5	5	5	1	1
Maine	54	8	0	0	0	0	0
Maryland	177	57	17	22	22	21	19
Massachusetts	66	70	88	80	74	68	67
Michigan	158	45	19	15	15	7	7
Minnesota	263	133	110	103	96	73	64
Mississippi	160	34	23	23	18	13	13
Missouri	285	17	4	4	3	3	3
Montana	368	108	100	100	96	96	96

Nebraska	1,271	274	191	142	130	108	100
Nevada	13	57	36	26	25	22	22
New Hampshire	35	12	1	1	1	1	0
New Jersey	1	0	0	0	0	0	0
New Mexico	6	0	0	0	0	0	0
New York	287	120	29	29	27	27	24
North Carolina	53	7	1	1	1	1	1
North Dakota	11	21	9	9	9	9	9
Ohio	389	250	104	93	79	53	38
Oklahoma	111	3	3	3	0	0	0
Oregon	8	9	7	0	0	0	0
Pennsylvania	19	9	0	0	0	0	0
Puerto Rico	0	0	0	0	0	0	0
Rhode Island	9	7	0	0	0	0	0
South Carolina	819	228	25	24	13	9	9
South Dakota	232	94	97	95	78	77	74
Tennessee	712	42	23	14	9	3	2
Texas	565	9	0	0	0	0	0
Utah	55	20	30	30	30	29	29
Vermont	17	4	0	0	0	0	0
Virginia	0	0	0	0	0	0	0
Washington	54	23	0	0	4	4	4
West Virginia	31	6	3	3	3	3	3
Wisconsin	146	9	7	7	7	7	7
Wyoming	39	16	5	6	6	6	6
TOTAL	**15,572**	**3,800**	**1,805**	**1,574**	**1,299**	**1,041**	**913**

Uncertainty

Uncertainty in estimates of CO_2 and CH_4 emissions from Land Converted to Flooded Land–Other Constructed Water Bodies include uncertainty in the default emission factors and the flooded land area inventory. Uncertainty in emission factors is provided in the *2019 Refinement to the 2006 IPCC Guidelines* (IPCC 2019). Uncertainties in the spatial data include 1) uncertainty in area estimates from the NHD and NW, and 2) uncertainty in the location of dams in the NID. Overall uncertainties in the NHD, NWI, NID, and NW are unknown, but uncertainty for remote sensing products is ± 10 - 15 percent (IPCC 2003). EPA assumes an uncertainty of ± 15 percent for the flooded land area inventory based on expert judgment. These uncertainties do not include the underestimate of pond surface area discussed above.

Table 6-111: Approach 2 Quantitative Uncertainty Estimates for CH_4 and CO_2 Emissions from Other Constructed Waterbodies in Land Converted to Flooded Land

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate[a]			
		(kt CO_2 Eq.)	(kt CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Freshwater ponds	CH_4	4.70	4.60	4.80	-2.7%	3.2%
Freshwater ponds	CO_2	4.28	4.18	4.37	-2.2%	2.2%
Total		**8.95**	**8.77**	**9.19**	**-2.1%**	**2.6%**

[a] Range of emission estimates predicted by Monte Carlo stochastic simulation for a 95 percent confidence interval.
Note: Totals may not sum due to independent rounding.

QA/QC and Verification

The National Hydrography Data (NHD) is managed by the USGS with collaboration from many other federal, state, and local entities. Extensive QA/QC procedures are incorporated into the curation of the NHD. The National

Inventory of Dams (NID) is maintained by the U.S. Army Corps of Engineers (USACE) in collaboration with the Federal Emergency Management Agency (FEMA) and state regulatory offices. USACE resolves duplicative and conflicting data from 68 data sources, which helps obtain the more complete, accurate, and updated NID. The Navigable Waterways (NW) dataset is part of the U.S. Department of Transportation (USDOT)/Bureau of Transportation Statistics (BTS) National Transportation Atlas Database (NTAD). The NW is a comprehensive network database of the nation's navigable waterways updated on a continuing basis. U.S. Fish and Wildlife Service is the principal agency in charge of wetland mapping including the National Wetlands Inventory. Quality and consistency of the Wetlands Layer is supported by federal wetlands mapping and classification standards, which were developed under the oversight of the Federal Geographic Data Committee (FGDC) with input by the FGDC Wetlands Subcommittee. This dataset is part of the FGDC Water-Inland Theme, which is co-chaired by the FWS and the U.S. Geological Survey.

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. Inventory QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). All calculations were executed independently in Excel and R. Ten percent of state and national totals were randomly selected for comparison between the two approaches to ensure there were no computational errors.

Recalculations Discussion

Methane and carbon dioxide emissions from other constructed waterbodies in Land Converted to Flooded Land were recalculated using updated geospatial data in the 1990 through 2021 Inventory. The updated geospatial data is more detailed than what was used for the 1990 through 2020 Inventory, and includes Alaska, Hawaii, and Puerto Rico, which were not included in the 1990 through 2020 Inventory. Despite these recalculations, CO_2 emission estimates agreed to within 0.005 MMT CO_2 between the previous (i.e., 1990 through 2020) and current (i.e., 1990 through 2021) Inventories.

In addition, the EPA updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of CH_4 (from 25 to 28) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

The net effect of these recalculations for CH_4 emissions from constructed waterbodies was an increase in emissions amounting to an average annual 11 percent increase over the time series from 1990 to 2020 compared to the previous Inventory.

Planned Improvements

Features < 8 ha in the NW that were not identified as Canal/Ditch were defined as freshwater ponds. Many of these features are lock chambers connected to an upstream reservoir. These systems likely have emission rates more similar to a reservoir than freshwater pond. In the next Inventory (i.e., 1990 through 2022) these systems will be classified as reservoirs.

6.10 Settlements Remaining Settlements (CRF Category 4E1)

Soil Carbon Stock Changes (CRF Category 4E1)

Soil organic C stock changes for Settlements Remaining Settlements occur in both mineral and organic soils. However, the United States does not estimate changes in soil organic C stocks for mineral soils in Settlements Remaining Settlements. This approach is consistent with the assumption of the Tier 1 method in the *2006 IPCC Guidelines* (IPCC 2006) that inputs equal outputs, and therefore the soil organic C stocks do not change. This assumption may be re-evaluated in the future if funding and resources are available to conduct an analysis of soil organic C stock changes for mineral soils in Settlements Remaining Settlements.

Drainage of organic soils is common when wetland areas have been developed for settlements. Organic soils, also referred to as *Histosols*, include all soils with more than 12 to 20 percent organic C by weight, depending on clay content (NRCS 1999; Brady and Weil 1999). The organic layer of these soils can be very deep (i.e., several meters), and form under inundated conditions that results in minimal decomposition of plant residues. Drainage of organic soils leads to aeration of the soil that accelerates decomposition rate and CO_2 emissions.[95] Due to the depth and richness of the organic layers, C loss from drained organic soils can continue over long periods of time, which varies depending on climate and composition (i.e., decomposability) of the organic matter (Armentano and Menges 1986).

Settlements Remaining Settlements includes all areas that have been settlements for a continuous time period of at least 20 years according to the 2015 United States Department of Agriculture (USDA) National Resources Inventory (NRI) (USDA-NRCS 2018)[96] or according to the National Land Cover Dataset (NLCD) for federal lands (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015). There are discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the Inventory for Settlements Remaining Settlements. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Settlements Remaining Settlements Inventory. Second, Alaska and the small amount of settlements on federal lands are not included in this Inventory even though these areas are part of the U.S. managed land base. These differences lead to discrepancies between the managed area in Settlements Remaining Settlements and the settlement area included in the Inventory analysis (Table 6-113). There is a planned improvement to include CO_2 emissions from drainage of organic soils in settlements of Alaska and federal lands as part of a future Inventory (See Planned Improvements Section).

CO_2 emissions from drained organic soils in settlements are 15.9 MMT CO_2 Eq. (4.3 MMT C) in 2021 (See Table 6-112 and Table 6-113). Although the flux is relatively small, the amount has increased by over 40 percent since 1990 due to an increase in area of drained organic soils in settlements.

Table 6-112: Net CO_2 Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT CO_2 Eq.)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Organic Soils	11.3	12.2	16.0	15.9	15.9	15.9	15.9

[95] N_2O emissions from soils are included in the N_2O Emissions from Settlement Soils section.

[96] NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an overestimation of Settlements Remaining Settlements in the early part of the time series to the extent that some areas are converted to settlements between 1971 and 1978.

Table 6-113: Net CO_2 Flux from Soil C Stock Changes in Settlements Remaining Settlements (MMT C)

Soil Type	1990	2005	2017	2018	2019	2020	2021
Organic Soils	3.1	3.3	4.4	4.3	4.3	4.3	4.3

Methodology and Time-Series Consistency

An IPCC Tier 2 method is used to estimate soil organic C stock changes for organic soils in Settlements Remaining Settlements (IPCC 2006). Organic soils in Settlements Remaining Settlements are assumed to be losing C at a rate similar to croplands due to deep drainage, and therefore emission rates are based on country-specific values for cropland (Ogle et al. 2003).

The land area designated as settlements is based primarily on the 2018 NRI (USDA-NRCS 2018) with additional information from the NLCD (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015). It is assumed that all settlement area on organic soils is drained, and those areas are provided in Table 6-114 (See Section 6.1, Representation of the U.S. Land Base for more information). The area of drained organic soils is estimated from the NRI spatial weights and aggregated to the country (Table 6-114). The area of land on organic soils in Settlements Remaining Settlements has increased from 220 thousand hectares in 1990 to over 303 thousand hectares in 2015. The area of land on organic soils have been incorporated into the inventory analysis for Settlements Remaining Settlements through 2015.

Table 6-114: Thousands of Hectares of Drained Organic Soils in Settlements Remaining Settlements

Year	Area (Thousand Hectares)
1990	220
2005	235
2014	291
2015	303
2016	*
2017	*
2018	*
2019	*
2020	*
2021	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

To estimate CO_2 emissions from drained organic soils across the time series from 1990 to 2015, the area of organic soils by climate (i.e., cool temperate, warm temperate, subtropical) in Settlements Remaining Settlements is multiplied by the appropriate country-specific emission factors for Cropland Remaining Cropland under the assumption that there is deep drainage of the soils. The emission factors are 11.2 MT C per ha in cool temperate regions, 14.0 MT C per ha in warm temperate regions, and 14.3 MT C per ha in subtropical regions (see Annex 3.12 for more information).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 in Cropland Remaining Cropland). The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing

emissions data in a time series (IPCC 2006). The Tier 2 method described previously will be applied in future Inventories to recalculate the estimates beyond 2015 as new activity data are integrated into the analysis.

Uncertainty

Uncertainty for the Tier 2 approach is derived using a Monte Carlo approach, along with additional uncertainty propagated through the Monte Carlo Analysis for 2016 to 2021 based on the linear time series model. The results of the Approach 2 Monte Carlo uncertainty analysis are summarized in Table 6-115. Soil C losses from drained organic soils in Settlements Remaining Settlements for 2021 are estimated to be between 7.3 and 24.4 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 54 percent below and 54 percent above the 2021 emission estimate of 15.9 MMT CO_2 Eq.

Table 6-115: Uncertainty Estimates for CO_2 Emissions from Drained Organic Soils in Settlements Remaining Settlements (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Organic Soils	CO_2	15.9	7.3	24.4	-54%	54%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. No errors were found in this Inventory.

Recalculations Discussion

There were no recalculations to the 1990 through 2020 time series in this Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) estimating CO_2 emissions from drainage of organic soils in settlements of Alaska and federal lands in order to provide a complete inventory of emissions for this category. These improvements will resolve most of the differences between the managed land base for Settlements Remaining Settlements and amount of area currently included in Settlements Remaining Settlements Inventory (See Table 6-116). These improvements will be made as funding and resources are available to expand the inventory for this source category.

Table 6-116: Area of Managed Land in Settlements Remaining Settlements that is not included in the current Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	SRS Managed Land Area (Section 6.1)	SRS Area Included in Inventory	Difference
1990	30,561	30,425	136
1991	30,559	30,430	129
1992	30,556	30,434	123
1993	30,483	30,346	138
1994	30,398	30,264	135
1995	30,336	30,206	130
1996	30,276	30,157	119
1997	30,207	30,105	101
1998	30,141	30,041	99
1999	30,087	29,992	95
2000	30,029	29,949	80
2001	29,976	29,889	87
2002	29,969	29,882	87
2003	30,493	30,378	115
2004	30,986	30,859	127
2005	31,445	31,370	75
2006	31,953	31,812	140
2007	32,410	32,317	93
2008	33,028	32,922	106
2009	33,604	33,494	111
2010	34,179	34,069	111
2011	34,744	34,662	82
2012	35,315	35,215	100
2013	36,238	36,156	81
2014	37,172	37,129	43
2015	38,040	38,058	-18
2016	38,952	*	*
2017	39,875	*	*
2018	40,771	*	*
2019	41,617	*	*
2020	42,467	*	*
2021	43,189	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

Changes in Carbon Stocks in Settlement Trees (CRF Source Category 4E1)

Settlements are land uses where human populations and activities are concentrated. In these areas, the anthropogenic impacts on tree growth, stocking and mortality are particularly pronounced (Nowak 2012) in comparison to forest lands where non-anthropogenic forces can have more significant impacts. Estimates included in this section include net CO_2 and C flux from trees on Settlements Remaining Settlements and Land Converted to Settlements as it is not possible to report on these separately at this time.

Trees in settlement areas of the United States are estimated to account for an average annual net sequestration of 117.2 MMT CO_2 Eq. (32.0 MMT C) over the period from 1990 through 2021. Net C sequestration from settlement trees in 2021 is estimated to be 137.8 MMT CO_2 Eq. (37.6 MMT C) (Table 6-117). Dominant factors affecting C flux trends for settlement trees are changes in the amount of settlement area (increasing sequestration due to more

land and trees) and net changes in tree cover (e.g., tree losses vs tree gains through planting and natural regeneration), with percent tree cover trending downward recently. In addition, changes in species composition, tree sizes and tree densities affect base C flux estimates. Annual sequestration increased by 43 percent between 1990 and 2021 due to increases in settlement area and changes in total tree cover.

Trees in settlements often grow faster than forest trees because of their relatively open structure (Nowak and Crane 2002). Because tree density in settlements is typically much lower than in forested areas, the C storage per hectare of land is in fact smaller for settlement areas than for forest areas. Also, percent tree cover in settlement areas are less than in forests and this tree cover varies significantly across the United States (e.g., Nowak and Greenfield 2018a). To quantify the C stored in settlement trees, the methodology used here requires analysis per unit area of tree cover, rather than per unit of total land area (as is done for Forest Lands).

Table 6-117: Net Flux from Trees in Settlements Remaining Settlements (MMT CO_2 Eq. and MMT C)[a]

Year	1990	2005	2017	2018	2019	2020	2021
MMT CO_2 Eq.	(96.4)	(117.4)	(129.6)	(129.5)	(129.3)	(136.7)	(137.8)
MMT C	(26.3)	(32.0)	(35.4)	(35.3)	(35.3)	(37.3)	(37.6)

[a] These estimates include net CO_2 and C flux from trees on Settlements Remaining Settlements and Land Converted to Settlements as it is not possible to report on these separately at this time.

Note: Parentheses indicate net sequestration.

Methodology and Time-Series Consistency

To estimate net carbon sequestration in settlement areas, three types of data are required for each state:

1. Settlement area
2. Percent tree cover in settlement areas
3. Carbon sequestration density per unit of tree cover

Settlement Area

Settlement area is defined in Section 6.1 Representation of the U.S. Land Base as a land-use category representing developed areas. The data used to estimate settlement area within Section 6.1 comes from the latest NRI as updated through 2017, with the extension of the time series through 2021 based on assuming the settlement area is the same as 2017. NRI data is also harmonized with the FIA dataset, which are available through 2021, and the NLCD dataset, which is available through 2019. This process of combining the datasets extends the time series to ensure that there is a complete and consistent representation of land use data for all source categories in the LULUCF sector. Annual estimates of CO_2 flux (Table 6-117) were developed based on estimates of annual settlement area and tree cover derived from NLCD developed lands. Developed land, which was used to estimate tree cover in settlement areas, is about six percent higher than the area categorized as *Settlements* in the Representation of the U.S. Land Base developed for this report.

Percent Tree Cover in Settlement Areas

Percent tree cover in settlement area by state is needed to convert settlement land area to settlement tree cover area. Converting to tree cover area is essential as tree cover, and thus C estimates, can vary widely among states in settlement areas due to variations in the amount of tree cover (e.g., Nowak and Greenfield 2018a). However, since the specific geography of settlement area is unknown because they are based on NRI sampling methods, NLCD developed land was used to estimate the percent tree cover to be used in settlement areas. NLCD developed land cover classes 21-24 (developed, open space (21), low intensity (22), medium intensity (23), and high intensity (24)) were used to estimate percent tree cover in settlement area by state (U.S. Department of Interior 2018; MRLC 2013).

a) "Developed, Open Space – areas with a mixture of some constructed materials, but mostly vegetation in the form of lawn grasses. Impervious surfaces account for less than 20 percent of total cover. These areas most commonly include large-lot single-family housing units, parks, golf courses, and vegetation planted in developed settings for recreation, erosion control, or aesthetic purposes." Plots designated as either park, recreation, cemetery, open space, institutional or vacant land were classified as Developed Open Space.

b) "Developed, Low Intensity – areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20 to 49 percent of total cover. These areas most commonly include single-family housing units." Plots designated as single family or low-density residential land were classified as Developed, Low Intensity.

c) "Developed, Medium Intensity – areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50 to 79 percent of the total cover. These areas most commonly include single-family housing units." Plots designated as medium density residential, other urban or mixed urban were classified as Developed, Medium Intensity.

d) "Developed High Intensity – highly developed areas where people reside or work in high numbers. Examples include apartment complexes, row houses and commercial/industrial. Impervious surfaces account for 80 to 100 percent of the total cover." Plots designated as either commercial, industrial, high density residential, downtown, multi-family residential, shopping, transportation or utility were classified as Developed, High Intensity.

As NLCD is known to underestimate tree cover (Nowak and Greenfield 2010), photo-interpretation of tree cover within NLCD developed lands was conducted for the years of c. 2011 and 2016 using 1,000 random points to determine an average adjustment factor for NLCD tree cover estimates in developed land and determine recent tree cover changes. This photo-interpretation of change followed methods detailed in Nowak and Greenfield (2018b). Percent tree cover (%TC) in settlement areas by state was estimated as:

%TC in state = state NLCD %TC x national photo-interpreted %TC / national NLCD %TC

Percent tree cover in settlement areas by year was set as follows:

- 1990 to 2011: used 2011 NLCD tree cover adjusted with 2011 photo-interpreted values
- 2012 to 2015: used 2011 NLCD tree cover adjusted with photo-interpreted values, which were interpolated from values between 2011 and 2016
- 2016 to 2020: used 2011 NLCD tree cover adjusted with 2016 photo-interpreted values

Carbon Sequestration Density per Unit of Tree Cover

Methods for quantifying settlement tree biomass, C sequestration, and C emissions from tree mortality and decomposition were taken directly from Nowak et al. (2013), Nowak and Crane (2002), and Nowak (1994). In general, net C sequestration estimates followed three steps, each of which is explained further in the paragraphs below. First, field data from cities and urban areas within entire states were used to estimate C in tree biomass from field data on measured tree dimensions. Second, estimates of annual tree growth and biomass increment were generated from published literature and adjusted for tree condition, crown competition, and growing season to generate estimates of gross C sequestration in settlement trees for all 50 states and the District of Columbia. Third, estimates of C emissions due to mortality and decomposition were subtracted from gross C sequestration estimates to obtain estimates of net C sequestration. Carbon storage, gross and net sequestration estimates were standardized per unit tree cover based on tree cover in the study area.

Settlement tree carbon estimates are based on published literature (Nowak et al. 2013; Nowak and Crane 2002; Nowak 1994) as well as newer data from the i-Tree database[97] and U.S. Forest Service urban forest inventory data (e.g., Nowak et al. 2016, 2017) (Table 6-118). These data are based on collected field measurements in several U.S. cities between 1989 and 2017. Carbon storage and sequestration in these cities were estimated using the U.S. Forest Service's i-Tree Eco model (Nowak et al. 2008). This computer model uses standardized field data from randomly located plots, along with local hourly air pollution and meteorological data, to quantify urban forest structure, monetary values of the urban forest, and environmental effects, including total C stored and annual C sequestration (Nowak et al. 2013).

In each city, a random sample of plots were measured to assess tree stem diameter, tree height, crown height and crown width, tree location, species, and canopy condition. The data for each tree were used to estimate total dry-weight biomass using allometric models, a root-to-shoot ratio to convert aboveground biomass estimates to whole tree biomass, and wood moisture content. Total dry weight biomass was converted to C by dividing by two (50 percent carbon content). An adjustment factor of 0.8 was used for open grown trees to account for settlement trees having less aboveground biomass for a given stem diameter than predicted by allometric models based on forest trees (Nowak 1994). Carbon storage estimates for deciduous trees include only C stored in wood. Estimated C storage was divided by tree cover in the area to estimate carbon storage per square meter of tree cover.

Table 6-118: Carbon Storage (kg C/m^2 tree cover), Gross and Net Sequestration (kg C/m^2 tree cover/year) and Tree Cover (percent) among Sampled U.S. Cities (see Nowak et al. 2013)

			Sequestration						
City	Storage	SE	Gross	SE	Net	SE	Ratio[a]	Tree Cover	SE
Adrian, MI	12.17	1.88	0.34	0.04	0.13	0.07	0.36	22.1	2.3
Albuquerque, NM	5.61	0.97	0.24	0.03	0.20	0.03	0.82	13.3	1.5
Arlington, TX	6.37	0.73	0.29	0.03	0.26	0.03	0.91	22.5	0.3
Atlanta, GA	6.63	0.54	0.23	0.02	0.18	0.03	0.76	53.9	1.6
Austin, TX	3.57	0.25	0.17	0.01	0.13	0.01	0.73	30.8	1.1
Baltimore, MD	10.30	1.24	0.33	0.04	0.20	0.04	0.59	28.5	1.0
Boise, ID	7.33	2.16	0.26	0.04	0.16	0.06	0.64	7.8	0.2
Boston, MA	7.02	0.96	0.23	0.03	0.17	0.02	0.73	28.9	1.5
Camden, NJ	11.04	6.78	0.32	0.20	0.03	0.10	0.11	16.3	9.9
Casper, WY	6.97	1.50	0.22	0.04	0.12	0.04	0.54	8.9	1.0
Chester, PA	8.83	1.20	0.39	0.04	0.25	0.05	0.64	20.5	1.7
Chicago (region), IL	9.38	0.59	0.38	0.02	0.26	0.02	0.70	15.5	0.3
Chicago, IL	6.03	0.64	0.21	0.02	0.15	0.02	0.70	18.0	1.2
Corvallis, OR	10.68	1.80	0.22	0.03	0.20	0.03	0.91	32.6	4.1
El Paso, TX	3.93	0.86	0.32	0.05	0.23	0.05	0.72	5.9	1.0
Freehold, NJ	11.50	1.78	0.31	0.05	0.20	0.05	0.64	31.2	3.3
Gainesville, FL	6.33	0.99	0.22	0.03	0.16	0.03	0.73	50.6	3.1
Golden, CO	5.88	1.33	0.23	0.05	0.18	0.04	0.79	11.4	1.5
Grand Rapids, MI	9.36	1.36	0.30	0.04	0.20	0.05	0.65	23.8	2.0
Hartford, CT	10.89	1.62	0.33	0.05	0.19	0.05	0.57	26.2	2.0
Houston, TX	4.55	0.48	0.31	0.03	0.25	0.03	0.83	18.4	1.0
Indiana[b]	8.80	2.68	0.29	0.08	0.27	0.07	0.92	20.1	3.2
Jersey City, NJ	4.37	0.88	0.18	0.03	0.13	0.04	0.72	11.5	1.7
Kansas[b]	7.42	1.30	0.28	0.05	0.22	0.04	0.78	14.0	1.6
Kansas City (region), MO/KS	7.79	0.85	0.39	0.04	0.26	0.04	0.67	20.2	1.7
Lake Forest Park, WA	12.76	2.63	0.49	0.07	0.42	0.07	0.87	42.4	0.8

[97] See http://www.itreetools.org.

Las Cruces, NM	3.01	0.95	0.31	0.14	0.26	0.14	0.86	2.9	1.0
Lincoln, NE	10.64	1.74	0.41	0.06	0.35	0.06	0.86	14.4	1.6
Los Angeles, CA	4.59	0.51	0.18	0.02	0.11	0.02	0.61	20.6	1.3
Milwaukee, WI	7.26	1.18	0.26	0.03	0.18	0.03	0.68	21.6	1.6
Minneapolis, MN	4.41	0.74	0.16	0.02	0.08	0.05	0.52	34.1	1.6
Moorestown, NJ	9.95	0.93	0.32	0.03	0.24	0.03	0.75	28.0	1.6
Morgantown, WV	9.52	1.16	0.30	0.04	0.23	0.03	0.78	39.6	2.2
Nebraska[b]	6.67	1.86	0.27	0.07	0.23	0.06	0.84	15.0	3.6
New York, NY	6.32	0.75	0.33	0.03	0.25	0.03	0.76	20.9	1.3
North Dakota[b]	7.78	2.47	0.28	0.08	0.13	0.08	0.48	2.7	0.6
Oakland, CA	5.24	0.19	NA	NA	NA	NA	NA	21.0	0.2
Oconomowoc, WI	10.34	4.53	0.25	0.10	0.16	0.06	0.65	25.0	7.9
Omaha, NE	14.14	2.29	0.51	0.08	0.40	0.07	0.78	14.8	1.6
Philadelphia, PA	8.65	1.46	0.33	0.05	0.29	0.05	0.86	20.8	1.8
Phoenix, AZ	3.42	0.50	0.38	0.04	0.35	0.04	0.94	9.9	1.2
Roanoke, VA	9.20	1.33	0.40	0.06	0.27	0.05	0.67	31.7	3.3
Sacramento, CA	7.82	1.57	0.38	0.06	0.33	0.06	0.87	13.2	1.7
San Francisco, CA	9.18	2.25	0.24	0.05	0.22	0.05	0.92	16.0	2.6
Scranton, PA	9.24	1.28	0.40	0.05	0.30	0.04	0.74	22.0	1.9
Seattle, WA	9.59	0.98	0.67	0.06	0.55	0.05	0.82	27.1	0.4
South Dakota[b]	3.14	0.66	0.13	0.03	0.11	0.02	0.87	16.5	2.2
Syracuse, NY	9.48	1.08	0.30	0.03	0.22	0.04	0.72	26.9	1.3
Tennessee[b]	6.47	0.50	0.34	0.02	0.30	0.02	0.89	37.7	0.8
Washington, DC	8.52	1.04	0.26	0.03	0.21	0.03	0.79	35.0	2.0
Woodbridge, NJ	8.19	0.82	0.29	0.03	0.21	0.03	0.73	29.5	1.7

SE (Standard Error)

NA (Not Available)

[a] Ratio of net to gross sequestration

[b] Statewide assessment of urban areas

To determine gross sequestration rates, tree growth rates need to be estimated. Base growth rates were standardized for open-grown trees in areas with 153 days of frost-free length based on measured data on tree growth (Nowak et al. 2013). These growth rates were adjusted to local tree conditions based on length of frost-free season, crown competition (as crown competition increased, growth rates decreased), and tree condition (as tree condition decreased, growth rates decreased). Annual growth rates were applied to each sampled tree to estimate gross annual sequestration–that is, the difference in C storage estimates between year 1 and year (x + 1) represents the gross amount of C sequestered. These annual gross C sequestration rates for each tree were then scaled up to city estimates using tree population information. Total C sequestration was divided by total tree cover to estimate a gross carbon sequestration density (kg C/m^2 of tree cover/year). The area of assessment for each city or state was defined by its political boundaries; parks and other forested urban areas were thus included in sequestration estimates.

Where gross C sequestration accounts for all C sequestered, net C sequestration for settlement trees considers C emissions associated with tree death and removals. The third step in the methodology estimates net C emissions from settlement trees based on estimates of annual mortality, tree condition, and assumptions about whether dead trees were removed from the site. Estimates of annual mortality rates by diameter class and condition class were obtained from a study of street-tree mortality (Nowak 1986). Different decomposition rates were applied to dead trees left standing compared with those removed from the site. For removed trees, different rates were applied to the removed/aboveground biomass in contrast to the belowground biomass (Nowak et al. 2002). The estimated annual gross C emission rates for each plot were then scaled up to city estimates using tree population information.

The full methodology development is described in the underlying literature, and key details and assumptions were made as follows. The allometric models applied to the field data for the Nowak methodology for each tree were taken from the scientific literature (see Nowak 1994, Nowak et al. 2002), but if no allometric model could be found

for the particular species, the average result for the genus or botanical relative was used. The adjustment (0.8) to account for less live tree biomass in open-grown urban trees was based on information in Nowak (1994). Measured tree growth rates for street (Frelich 1992; Fleming 1988; Nowak 1994), park (deVries 1987), and forest (Smith and Shifley 1984) trees were standardized to an average length of growing season (153 frost free days) and adjusted for site competition and tree condition. Standardized growth rates of trees of the same species or genus were then compared to determine the average difference between standardized street tree growth and standardized park and forest growth rates. Crown light exposure (CLE) measurements (number of sides and/or top of tree exposed to sunlight) were used to represent forest, park, and open (street) tree growth conditions. Local tree base growth rates were then calculated as the average standardized growth rate for open-grown trees multiplied by the number of frost-free days divided by 153. Growth rates were then adjusted for CLE. The CLE-adjusted growth rate was then adjusted based on tree condition to determine the final growth rate. Assumptions for which dead trees would be removed versus left standing were developed specific to each land use and were based on expert judgment of the authors. Decomposition rates were based on literature estimates (Nowak et al. 2013).

Estimates of gross and net sequestration rates for each of the 50 states and the District of Columbia (Table 6-119) were compiled in units of C sequestration per unit area of tree canopy cover. These rates were used in conjunction with estimates of state settlement area and developed land percent tree cover data to calculate each state's annual net C sequestration by urban trees. This method was described in Nowak et al. (2013) and has been modified here to incorporate developed land percent tree cover data.

Net annual C sequestration estimates were obtained for all 50 states and the District of Columbia by multiplying the gross annual emission estimates by 0.73, the average ratio for net/gross sequestration (Table 6-119). However, state specific ratios were used where available.

State Carbon Sequestration Estimates

The gross and net annual C sequestration values for each state were multiplied by each state's settlement area of tree cover, which was the product of the state's settlement area and the state's tree cover percentage based on NLCD developed land. The model used to calculate the total carbon sequestration amounts for each state, can be written as follows:

Equation 6-1: Net State Annual Carbon Sequestration

$$\text{Net state annual C sequestration (t C/yr)} = \text{Gross state sequestration rate (t C/ha/yr)} \times \text{Net to Gross state sequestration ratio} \times \text{state settlement Area (ha)} \times \%\ \text{state tree cover in settlement area}$$

The results for all 50 states and the District of Columbia are given in Table 6-119. This approach is consistent with the default IPCC Gain-Loss methodology in IPCC (2006), although sufficient field data are not yet available to separately determine interannual gains and losses in C stocks in the living biomass of settlement trees. Instead, the methodology applied here uses estimates of net C sequestration based on modeled estimates of decomposition, as given by Nowak et al. (2013).

Table 6-119: Estimated Annual C Sequestration, Tree Cover, and Annual C Sequestration per Area of Tree Cover for settlement areas in the United States by State and the District of Columbia (2021)

State	Gross Annual Sequestration (Metric Tons C/Year)	Net Annual Sequestration (Metric Tons C/Year)	Tree Cover (Percent)	Gross Annual Sequestration per Area of Tree Cover (kg C/m²/Year)	Net Annual Sequestration per Area of Tree Cover (kg C/m²/Year)	Net: Gross Annual Sequestration Ratio
Alabama	2,237,744	1,630,587	53.2	0.376	0.274	0.73
Alaska	147,132	107,212	47.1	0.169	0.123	0.73
Arizona	165,651	120,706	4.5	0.388	0.283	0.73
Arkansas	1,311,140	955,394	48.6	0.362	0.264	0.73

California	2,015,600	1,468,717	16.8	0.426	0.311	0.73
Colorado	142,617	103,922	7.9	0.216	0.157	0.73
Connecticut	645,185	470,130	58.3	0.262	0.191	0.73
Delaware	101,454	73,927	24.3	0.366	0.267	0.73
DC	12,936	9,426	24.9	0.366	0.267	0.73
Florida	4,611,318	3,360,150	40.0	0.520	0.379	0.73
Georgia	3,855,749	2,809,586	56.0	0.387	0.282	0.73
Hawaii	302,417	220,363	41.4	0.637	0.464	0.73
Idaho	59,784	43,563	7.4	0.201	0.146	0.73
Illinois	670,100	488,285	15.4	0.310	0.226	0.73
Indiana	478,924	442,841	17.0	0.274	0.254	0.92
Iowa	177,970	129,682	8.5	0.263	0.191	0.73
Kansas	288,544	224,536	10.7	0.310	0.241	0.78
Kentucky	983,018	716,300	36.5	0.313	0.228	0.73
Louisiana	1,579,396	1,150,865	46.7	0.435	0.317	0.73
Maine	441,832	321,952	55.2	0.242	0.176	0.73
Maryland	852,295	621,045	39.8	0.353	0.257	0.73
Massachusetts	1,087,795	792,648	56.9	0.278	0.203	0.73
Michigan	1,405,750	1,024,334	34.4	0.241	0.175	0.73
Minnesota	324,971	236,798	13.0	0.251	0.183	0.73
Mississippi	1,619,525	1,180,107	56.9	0.377	0.275	0.73
Missouri	876,489	638,675	23.0	0.313	0.228	0.73
Montana	45,227	32,956	4.8	0.201	0.147	0.73
Nebraska	97,883	82,600	7.3	0.261	0.220	0.84
Nevada	35,830	26,108	4.8	0.226	0.165	0.73
New Hampshire	389,857	284,079	58.9	0.238	0.174	0.73
New Jersey	958,420	698,376	40.5	0.321	0.234	0.73
New Mexico	189,487	138,075	10.1	0.288	0.210	0.73
New York	1,601,568	1,167,022	39.7	0.263	0.192	0.73
North Carolina	3,423,492	2,494,611	53.8	0.341	0.249	0.73
North Dakota	18,755	8,912	1.7	0.244	0.116	0.48
Ohio	1,275,219	929,220	28.1	0.271	0.198	0.73
Oklahoma	721,283	525,580	21.9	0.364	0.265	0.73
Oregon	674,215	491,283	39.6	0.265	0.193	0.73
Pennsylvania	1,896,783	1,382,137	39.9	0.267	0.195	0.73
Rhode Island	126,971	92,521	49.6	0.283	0.206	0.73
South Carolina	2,027,815	1,477,617	53.4	0.370	0.269	0.73
South Dakota	29,388	25,485	2.8	0.258	0.224	0.87
Tennessee	1,673,175	1,496,015	40.8	0.332	0.297	0.89
Texas	4,403,317	3,208,585	28.3	0.403	0.294	0.73
Utah	119,889	87,360	11.6	0.235	0.172	0.73
Vermont	186,736	136,070	50.2	0.234	0.170	0.73
Virginia	2,095,911	1,527,237	52.5	0.321	0.234	0.73
Washington	1,133,393	825,874	37.3	0.282	0.206	0.73
West Virginia	769,654	560,827	63.7	0.264	0.192	0.73
Wisconsin	711,367	518,355	25.7	0.246	0.180	0.73
Wyoming	29,597	21,566	4.7	0.199	0.145	0.73
Total	**51,030,569**	**37,580,224**				

Uncertainty

Uncertainty associated with changes in C stocks in settlement trees includes the uncertainty associated with settlement area, percent tree cover in developed land and how well it represents percent tree cover in settlement areas, and estimates of gross and net C sequestration for each of the 50 states and the District of Columbia. A 10

percent uncertainty was associated with settlement area estimates based on expert judgment. Uncertainty associated with estimates of percent settlement tree coverage for each of the 50 states was based on standard error associated with the photo-interpretation of national tree cover in developed lands. Uncertainty associated with estimates of gross and net C sequestration for each of the 50 states and the District of Columbia was based on standard error estimates for each of the state-level sequestration estimates (Table 6-120). These estimates are based on field data collected in each of the 50 states and the District of Columbia, and uncertainty in these estimates increases as they are scaled up to the national level.

Additional uncertainty is associated with the biomass models, conversion factors, and decomposition assumptions used to calculate C sequestration and emission estimates (Nowak et al. 2002). These results also exclude changes in soil C stocks, and there is likely some overlap between the settlement tree C estimates and the forest tree C estimates (e.g., Nowak et al. 2013). Due to data limitations, settlement soil flux is not quantified as part of this analysis, while reconciliation of settlement tree and forest tree estimates will be addressed through the land-representation effort described in the Planned Improvements section of this chapter.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the overall uncertainty of the sequestration estimate in 2021. The results of this quantitative uncertainty analysis are summarized in Table 6-120. The change in C stocks in Settlement Trees in 2021 was estimated to be between -208.1 and -66.95 MMT CO_2 Eq. at a 95 percent confidence level. This analysis indicates a range of 51 percent more sequestration to 51 percent less sequestration than the 2021 flux estimate of -137.79 MMT CO_2 Eq.

Table 6-120: Approach 2 Quantitative Uncertainty Estimates for Net CO_2 Flux from Changes in C Stocks in Settlement Trees (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		Uncertainty Range Relative to Flux Estimate[a] (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Changes in C Stocks in Settlement Trees	CO_2	(137.8)	(208.1)	(67.0)	-51%	51%

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation with a 95 percent confidence interval.

Note: Parentheses indicate negative values or net sequestration.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for settlement trees included checking input data, documentation, and calculations to ensure data were properly handled through the inventory process. Errors that were found during this process were corrected as necessary.

Recalculations Discussion

The compilation methods remained the same in the latest inventory relative to the previous Inventory. New data from the NRI and NLCD resulted in an increase in the settlement area for 2020, leading to a 5 percent increase in the net C sequestration (Table 6-121).

Table 6-121: Recalculations of the Settlement Tree Categories

Category	*Previous Estimate 2020, 2022 Inventory*	Current Estimate 2020, 2023 Inventory	Current Estimate 2021, 2023 Inventory
Settlement Area (km^2)	*447,973*	466,511	469,705
Settlement Tree Coverage (km^2)	*143,019*	150,541	151,694

Net C Flux (MMT C)	*(35.4)*	(37.3)	(37.6)
Net CO_2 Flux MMT CO_2 Eq.	*(129.8)*	(136.7)	(137.8)

Planned Improvements

A consistent representation of the managed land base in the United States is discussed in Section 6.1 Representation of the U.S. Land Base, and discusses a planned improvement by the USDA Forest Service to reconcile the overlap between Settlement Trees and the forest land categories. Estimates for Settlement Trees are based on tree cover in settlement areas. Work is needed to clarify how much of this settlement area tree cover may also be accounted for in "forest" area assessments as some of these forests may be adjacent to settlement areas. For example, "forest" as defined by the USDA Forest Service Forest Inventory and Analysis (FIA) program fall within urban areas. Nowak et al. (2013) estimates that 1.5 percent of forest plots measured by the FIA program fall within land designated as Census urban, suggesting that approximately 1.5 percent of the C reported in the Forest source category might also be counted in the urban areas. The potential overlap with settlement areas is unknown at this time but research is underway to develop spatially explicit and spatially continuous land representation products which will eliminate the potential for double counting. Future research may also enable more complete coverage of changes in the C stock of trees for all settlements land.

To provide more accurate emissions estimates in the future, the following actions will be taken:

a) Photo-interpret settlement tree cover in 2021 to update tree cover estimates and trends
b) Update photo-interpretation for settlement areas using 2016 NLCD developed land information
c) Develop spatially explicit and spatially continuous representations of land to eliminate the overlap between forest and settlement areas, as well as allow for improved estimates in "settlement areas."

N_2O Emissions from Settlement Soils (CRF Source Category 4E1)

Of the synthetic N fertilizers applied to soils in the United States, approximately 1 to 2 percent are currently applied to lawns, golf courses, and other landscaping within settlement areas, and contributes to soil N_2O emissions. The area of settlements is considerably smaller than other land uses that are managed with fertilizer, particularly cropland soils, and therefore, settlements account for a smaller proportion of total synthetic fertilizer application in the United States. In addition to synthetic N fertilizers, a portion of surface applied biosolids (i.e., treated sewage sludge) is used as an organic fertilizer in settlement areas, and drained organic soils (i.e., soils with high organic matter content, known as *histosols*) also contribute to emissions of soil N_2O.

N additions to soils result in direct and indirect N_2O emissions. Direct emissions occur on-site due to the N additions in the form of synthetic fertilizers and biosolids as well as enhanced mineralization of N in drained organic soils. Indirect emissions result from fertilizer and biosolids N that is transformed and transported to another location in a form other than N_2O (i.e., ammonia [NH_3] and nitrogen oxide [NO_x] volatilization, nitrate [NO_3^-] leaching and runoff), and later converted into N_2O at the off-site location. The indirect emissions are assigned to settlements because the management activity leading to the emissions occurred in settlements.

Total N_2O emissions from soils in Settlements Remaining Settlements[98] are 2.1 MMT CO_2 Eq. (8 kt of N_2O) in 2021. There is an overall increase of 15 percent from 1990 to 2021 due to an expanding settlement area leading to more synthetic N fertilizer applications that peaked in the mid-2000s. Inter-annual variability in these emissions is directly attributable to variability in total synthetic fertilizer consumption, area of drained organic soils, and biosolids applications in the United States. Emissions from this source are summarized in Table 6-122.

[98] Estimates of Soil N_2O for Settlements Remaining Settlements include emissions from Land Converted to Settlements because it was not possible to separate the activity data.

Table 6-122: N_2O Emissions from Soils in Settlements Remaining Settlements (MMT CO_2 Eq. and kt N_2O)

	1990	2005	2017	2018	2019	2020	2021
MMT CO_2 Eq.							
Direct N_2O Emissions from Soils	**1.5**	**2.2**	**1.6**	**1.7**	**1.7**	**1.7**	**1.7**
Synthetic Fertilizers	0.8	1.5	0.7	0.8	0.8	0.8	0.8
Biosolids	0.2	0.1	0.1	0.1	0.1	0.1	0.1
Drained Organic Soils	0.5	0.6	0.7	0.7	0.7	0.7	0.7
Indirect N_2O Emissions from Soils	**0.3**	**0.5**	**0.3**	**0.3**	**0.3**	**0.3**	**0.3**
Total	**1.8**	**2.8**	**1.9**	**2.0**	**2.0**	**2.0**	**2.1**
kt N_2O							
Direct N_2O Emissions from Soils	**6**	**8**	**6**	**6**	**6**	**6**	**6**
Synthetic Fertilizers	3	5	3	3	3	3	3
Biosolids	1	1	1	1	1	1	1
Drained Organic Soils	2	2	3	3	3	3	3
Indirect N_2O Emissions from Soils	**1**	**2**	**1**	**1**	**1**	**1**	**1**
Total	**7**	**10**	**7**	**7**	**8**	**8**	**8**

Note: Totals may not sum due to independent rounding.

Methodology and Time-Series Consistency

For settlement soils, the IPCC Tier 1 approach is used to estimate soil N_2O emissions from synthetic N fertilizer, biosolids additions, and drained organic soils. Estimates of direct N_2O emissions from soils in settlements are based on the amount of N in synthetic commercial fertilizers applied to settlement soils, the amount of N in biosolids applied to non-agricultural land and surface disposal (see Section 7.2—Wastewater Treatment and Discharge for a detailed discussion of the methodology for estimating biosolids available for non-agricultural land application), and the area of drained organic soils within settlements.

Nitrogen applications to settlement soils are estimated using data compiled by the USGS (Brakebill and Gronberg 2017). The USGS estimated on-farm and non-farm fertilizer use is based on sales records at the county level from 1987 through 2012 (Brakebill and Gronberg 2017). Non-farm N fertilizer is assumed to be applied to settlements and forest lands; values for 2013 through 2017 are based on 2012 values adjusted for total annual total N fertilizer sales in the United States (AAPFCO 2016 through 2022) because there are no activity data on non-farm application after 2012. Settlement application is calculated by subtracting forest application from total non-farm fertilizer use. The amount of synthetic fertilization from 2018 to 2021 is determined using a linear extrapolation method (See Box 6-4 in Cropland Remaining Cropland). This method is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2017 fertilization data, and linear extrapolation. The total amount of fertilizer N applied to settlements is multiplied by the IPCC default emission factor (1 percent) to estimate direct N_2O emissions (IPCC 2006) for 1990 to 2021.

Biosolids applications are derived from national data on biosolids generation, disposition, and N content (see Section 7.2, Wastewater Treatment for further detail). The total amount of N resulting from these sources is multiplied by the IPCC default emission factor for applied N (one percent) to estimate direct N_2O emissions (IPCC 2006) for 1990 to 2021.

The IPCC (2006) Tier 1 method is also used to estimate direct N_2O emissions due to drainage of organic soils in settlements at the national scale. Estimates of the total area of drained organic soils are obtained from the 2015 NRI (USDA-NRCS 2018) using soils data from the Soil Survey Geographic Database (SSURGO) (Soil Survey Staff 2011). To estimate annual emissions from 1990 to 2015, the total area is multiplied by the IPCC default emission factor for temperate regions (IPCC 2006). This Inventory does not include soil N_2O emissions from drainage of organic soils in Alaska and federal lands, although this is a planned improvement for a future Inventory.

For indirect emissions, the total N applied from fertilizer and biosolids is multiplied by the IPCC default factors of 10 percent for volatilization and 30 percent for leaching/runoff to calculate the amount of N volatilized and the

amount of N leached/runoff. The amount of N volatilized is multiplied by the IPCC default factor of one percent for the portion of volatilized N that is converted to N_2O off-site and the amount of N leached/runoff is multiplied by the IPCC default factor of 0.075 percent for the portion of leached/runoff N that is converted to N_2O off-site. The resulting estimates are summed to obtain total indirect emissions from 1990 to 2021 for biosolids and synthetic fertilization.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 for biosolids. For synthetic fertilizer, a linear extrapolation method is used to approximate fertilizer application for the remainder of the 2018 to 2021 time series and then used to estimate emissions. For drainage of organic soils, the methods described above are applied for 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 in Cropland Remaining Cropland). The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). The time series will be recalculated in a future Inventory with the methods described previously for drainage of organic soils.

Uncertainty

The amount of N_2O emitted from settlement soils depends not only on N inputs and area of drained organic soils, but also on a large number of variables that can influence rates of nitrification and denitrification, including organic C availability; rate, application method, and timing of N input; oxygen gas partial pressure; soil moisture content; pH; temperature; and irrigation/watering practices. The effect of the combined interaction of these variables on N_2O emissions is complex and highly uncertain. The IPCC default methodology does not explicitly incorporate these variables, except variation in the total amount of fertilizer N and biosolids application, which leads to uncertainty in the results.

Uncertainties exist in both the fertilizer N and biosolids application rates in addition to the emission factors. Uncertainty in fertilizer N application is assigned a default level of ±50 percent.[99] Uncertainty in the area of drained organic soils is based on the estimated variance from the NRI survey (USDA-NRCS 2018). There is also additional uncertainty associated with the fit of the linear regression model for the data splicing methods that was used to estimate emissions associated with drainage of organic soils.

Uncertainty is propagated through the calculations of N_2O emissions from fertilizer N and drainage of organic soils based on a Monte Carlo analysis. The results are combined with the uncertainty in N_2O emissions from the biosolids application using simple error propagation methods (IPCC 2006). The results are summarized in Table 6-123. Direct N_2O emissions from soils in Settlements Remaining Settlements in 2021 are estimated to be between 0.7 and 3.1 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 57 percent below to 85 percent above the 2021 emission estimate of 1.7 MMT CO_2 Eq. Indirect N_2O emissions in 2021 are between 0.1 and 1.0 MMT CO_2 Eq., ranging from 78 percent below to 223 percent above the estimate of 0.3 MMT CO_2 Eq.

Table 6-123: Quantitative Uncertainty Estimates of N_2O Emissions from Soils in Settlements Remaining Settlements (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emissions (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Settlements Remaining Settlements						
Direct N_2O Emissions from Soils	N_2O	1.7	0.7	3.1	-57%	85%

[99] No uncertainty is provided with the USGS fertilizer consumption data (Brakebill and Gronberg 2017) so a conservative ±50 percent is used in the analysis. Biosolids data are also assumed to have an uncertainty of ±50 percent.

Indirect N_2O Emissions from Soils	N_2O	0.3	0.1	1.0	-78%	223%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.
Note: These estimates include direct and indirect N_2O emissions from Settlements Remaining Settlements and Land Converted to Settlements because it was not possible to separate the activity data.

QA/QC and Verification

The spreadsheet containing fertilizer, drainage of organic soils, and biosolids applied to settlements and calculations for N_2O and uncertainty ranges have been checked. An error was found in the uncertainty calculation and also some links in the spreadsheets that were causing errors. These errors were corrected.

Recalculations Discussion

Recalculations are associated with updated estimates for total fertilizers sales in a new AAPFCO report (AAPFCO 2022), along with revisions to the estimates derived from the linear extrapolation method.

EPA also updated the global warming potential (GWP) for calculating CO_2-equivalent emissions of N_2O (from 298 to 265) to reflect the 100-year GWP provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). The previous Inventory used the 100-year GWP provided in the IPCC *Fourth Assessment Report* (AR4). This update was applied across the entire time series.

As a result, calculated CO_2-equivalent total N_2O emissions from settlement soils have decreased by an average value of 0.3 MMT CO_2 Eq. across the time series. This represents a 12 percent decrease in emissions compared to the previous Inventory.

Further discussion on this update and the overall impacts of updating the inventory GWP values to reflect the AR5 can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

This source will be extended to include soil N_2O emissions from drainage of organic soils in settlements of Alaska and federal lands in order to provide a complete inventory of emissions for this category. In addition, this Inventory needs to be updated with the latest land use data from the USDA National Resources Inventory (See Planned Improvements in Settlements Remaining Settlements). Data on fertilizer amounts from 2018 to 2021 and latest area data on drained organic soils will be incorporated into a future Inventory and used to recalculate the time series.

Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (CRF Category 4E1)

In the United States, yard trimmings (i.e., grass clippings, leaves, and branches) and food scraps account for a significant portion of the municipal waste stream, and a large fraction of the collected yard trimmings and food scraps are put in landfills. A portion of the carbon (C) contained in landfilled yard trimmings and food scraps can be stored for very long periods.

Carbon storage estimates within the Inventory are associated with particular land uses. For example, harvested wood products are reported under Forest Land Remaining Forest Land because these wood products originated from the forest ecosystem. Similarly, C stock changes in yard trimmings and food scraps are reported under Settlements Remaining Settlements because the bulk of the C, which comes from yard trimmings, originates from settlement areas. While the majority of food scraps originate from cropland and grassland, in this Inventory they are reported with the yard trimmings in the Settlements Remaining Settlements section. Additionally, landfills are considered part of the managed land base under settlements (see Section 6.1 Representation of the U.S. Land

Base), and reporting these C stock changes that occur entirely within landfills fits most appropriately within the Settlements Remaining Settlements section. The CH_4 emissions resulting from anaerobic decomposition of yard trimmings and food scraps in landfills are reported in the Waste chapter, see Section 7.1—Landfills.

The estimated amount of yard trimmings collected annually has stagnated since 1990 and the fraction that is landfilled has been declining since 1990. From 1970 to 1990, yard trimmings collected for disposal increased by about 51 percent. In 1990, over 53 million metric tons (wet weight) of yard trimmings and food scraps are estimated to have been generated (i.e., put at the curb for collection to be taken to disposal sites or to composting facilities) (EPA 2020). Since then, programs banning or discouraging yard trimmings disposal to landfills have led to an increase in backyard composting and the use of mulching mowers, and consequently a slowing of year-over-year increases in the tonnage of yard trimmings generated. From 1990 to 2021, yard trimmings collected for disposal are estimated to have increased 1.1. percent. At the same time, an increase in the number of municipal composting facilities has reduced the proportion of collected yard trimmings that are discarded in landfills per year—from 72 percent in 1990 to 30 percent in 2021. The net effect of the slight increase in generation and the increase in composting is a 58 percent decrease in the quantity of yard trimmings disposed of in landfills since 1990. Composting trends and emissions estimations are presented in the Waste chapter, Section 7.3 Composting.

Food scrap generation has grown by an estimated 165 percent since 1990. Though the proportion of total food scraps generated that are eventually discarded in landfills has decreased from an estimated 82 percent in 1990 to 55 percent in 2020, the tonnage disposed of in landfills has increased considerably (by an estimated 78 percent) due to the increase in food scrap generation. Although the total tonnage of food scraps disposed of in landfills has increased from 1990 to 2021, the difference in the amount of food scraps added from one year to the next generally decreased, and consequently the annual carbon stock *net changes* from food scraps have generally decreased as well (as shown in Table 6-124 and Table 6-125). Landfilled food scraps decompose over time, producing CH_4 and CO_2. Decomposition happens at a higher rate initially, then decreases. As decomposition decreases, the carbon stock becomes more stable. Because the cumulative carbon stock left in the landfill from previous years is (1) not decomposing as much as the carbon introduced from food scraps in a single more recent year; and (2) is much larger than the carbon introduced from food scraps in a single more recent year, the total carbon stock in the landfill is primarily driven by the more stable "older" carbon stock, thus resulting in decreasing annual changes in later years.

Overall, the decrease in the landfill disposal rate of yard trimmings has more than compensated for the increase in food scrap disposal in landfills, and the net result is a decrease in the annual net change in landfill C storage from 24.5 MMT CO_2 Eq. (6.7 MMT C) in 1990 to 12.6 MMT CO_2 Eq. (3.4 MMT C) in 2021 (Table 6-124 and Table 6-125), a decrease of 51 percent over the time series.

Table 6-124: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT CO_2 Eq.)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Yard Trimmings	**(20.1)**	**(7.5)**	**(8.3)**	**(8.3)**	**(8.2)**	**(8.2)**	**(8.1)**
Grass	(1.7)	(0.6)	(0.8)	(0.8)	(0.8)	(0.8)	(0.7)
Leaves	(8.7)	(3.4)	(3.8)	(3.8)	(3.8)	(3.8)	(3.7)
Branches	(9.8)	(3.4)	(3.7)	(3.7)	(3.7)	(3.7)	(3.6)
Food Scraps	**(4.4)**	**(3.9)**	**(5.6)**	**(5.2)**	**(4.8)**	**(4.5)**	**(4.5)**
Total Net Flux	**(24.5)**	**(11.4)**	**(13.8)**	**(13.4)**	**(13.1)**	**(12.8)**	**(12.6)**

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Table 6-125: Net Changes in Yard Trimmings and Food Scrap Carbon Stocks in Landfills (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021
Yard Trimmings	**(5.5)**	**(2.0)**	**(2.3)**	**(2.3)**	**(2.2)**	**(2.2)**	**(2.2)**
Grass	(0.5)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Leaves	(2.4)	(0.9)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)

Branches	(2.7)	(0.9)	(1.0)	(1.0)	(1.0)	(1.0)	(1.0)
Food Scraps	**(1.2)**	**(1.1)**	**(1.5)**	**(1.4)**	**(1.3)**	**(1.2)**	**(1.2)**
Total Net Flux	**(6.7)**	**(3.1)**	**(3.8)**	**(3.7)**	**(3.6)**	**(3.5)**	**(3.4)**

Notes: Totals may not sum due to independent rounding. Parentheses indicate net sequestration.

Methodology and Time-Series Consistency

When wastes of biogenic origin (such as yard trimmings and food scraps) are landfilled and do not completely decompose, the C that remains is effectively removed from the C cycle. Empirical evidence indicates that yard trimmings and food scraps do not completely decompose in landfills (Barlaz 1998, 2005, 2008; De la Cruz and Barlaz 2010), and thus the stock of C in landfills can increase, with the net effect being a net atmospheric removal of C. Estimates of net C flux resulting from landfilled yard trimmings and food scraps were developed by estimating the change in landfilled C stocks between inventory years and uses a country-specific methodology based on the methodology for estimating the amount of harvested wood products stored in solid waste disposal systems that is provided in the *Land Use, Land-Use Change, and Forestry* sector in IPCC (2003) and the *2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2006). Carbon stock estimates were calculated by determining the mass of landfilled C resulting from yard trimmings and food scraps discarded in a given year; adding the accumulated landfilled C from previous years; and subtracting the mass of C that was landfilled in previous years and has since decomposed and been emitted as CO_2 and CH_4.

To determine the total landfilled C stocks for a given year, the following data and factors were assembled:

(1) The composition of the yard trimmings (i.e., the proportion of grass, leaves and branches);

(2) The mass of yard trimmings and food scraps discarded in landfills;

(3) The C storage factor of the landfilled yard trimmings and food scraps; and

(4) The rate of decomposition of the degradable C.

The composition of yard trimmings was assumed to be 30 percent grass clippings, 40 percent leaves, and 30 percent branches on a wet weight basis (Oshins and Block 2000). The yard trimmings were subdivided, because each component has its own unique adjusted C storage factor (i.e., moisture content and C content) and rate of decomposition. The mass of yard trimmings and food scraps disposed of in landfills was estimated by multiplying the quantity of yard trimmings and food scraps discarded by the proportion of discards managed in landfills. Data on discards (i.e., the amount generated minus the amount diverted to centralized composting facilities) for both yard trimmings and food scraps were taken primarily from *Advancing Sustainable Materials Management: Facts and Figures 2018* (EPA 2020), which provides data for 1960, 1970, 1980, 1990, 2000, 2005, 2010, 2015, 2017 and 2018. To provide data for some of the missing years, detailed backup data were obtained from the 2012, 2013, and 2014, 2015, and 2017 versions of the *Advancing Sustainable Materials Management: Facts and Figures* reports (EPA 2019), as well as historical data tables that EPA developed for 1960 through 2012 (EPA 2016). Remaining years in the time series for which data were not provided were estimated using linear interpolation. Since the *Advancing Sustainable Materials Management: Facts and Figures* reports for 2019, 2020, and 2021 were unavailable, landfilled material generation, recovery, and disposal data for 2019, 2020, and 2021 were proxied equal to 2018 values.

The amount of C disposed of in landfills each year, starting in 1960, was estimated by converting the discarded landfilled yard trimmings and food scraps from a wet weight to a dry weight basis, and then multiplying by the initial (i.e., pre-decomposition) C content (as a fraction of dry weight). The dry weight of landfilled material was calculated using dry weight to wet weight ratios (Tchobanoglous et al. 1993, cited by Barlaz 1998) and the initial C contents and the C storage factors were determined by Barlaz (1998, 2005, 2008).

The amount of C remaining in the landfill for each subsequent year was tracked based on a simple model of C fate based on a laboratory experiment simulating decomposition of landfilled biogenic materials by methanogenic microbes (Barlaz 1998, 2005, 2008). Carbon remaining in landfilled materials is expressed as a proportion of initial C content, shown in the row labeled "C Storage Factor, Proportion of Initial C Stored (%)" in Table 6-126.

The modeling approach applied to simulate U.S. landfill C flows builds on the findings of Barlaz (1998, 2005, 2008). The proportion of C stored is assumed to persist in landfills. The remaining portion is assumed to degrade over time, resulting in emissions of CH_4 and CO_2.[100] The degradable portion of the C is assumed to decay according to first-order kinetics. The decay rates for each of the materials are shown in Table 6-126.

The first-order decay rates, *k*, for each waste component are derived from De la Cruz and Barlaz (2010):

- De la Cruz and Barlaz (2010) calculate first-order decay rates using laboratory data published in Eleazer et al. (1997), and a correction factor, *f*, is calculated so that the weighted average decay rate for all components is equal to the EPA AP-42 default decay rate (0.04) for mixed MSW for regions that receive more than 25 inches of rain annually (EPA 1995). Because AP-42 values were developed using landfill data from approximately 1990, De la Cruz and Barlaz used 1990 waste composition for the United States from EPA's *Characterization of Municipal Solid Waste in the United States: 1990 Update* (EPA 1991) to calculate *f*. De la Cruz and Barlaz multiplied this correction factor by the Eleazer et al. (1997) decay rates of each waste component to develop field-scale first-order decay rates.
- De la Cruz and Barlaz (2010) also use other assumed initial decay rates for mixed MSW in place of the AP-42 default value based on different types of environments in which landfills in the United States are located, including dry conditions (less than 25 inches of rain annually, *k*=0.02) and bioreactor landfill conditions (moisture is controlled for rapid decomposition, *k*=0.12).

Similar to the methodology in the Landfills section of the Inventory (Section 7.1), which estimates CH_4 emissions, the overall MSW decay rate is estimated by partitioning the U.S. landfill population into three categories based on annual precipitation ranges of: (1) Less than 20 inches of rain per year, (2) 20 to 40 inches of rain per year, and (3) greater than 40 inches of rain per year. These correspond to overall MSW decay rates of 0.020, 0.038, and 0.057 $year^{-1}$, respectively. De la Cruz and Barlaz (2010) calculate component-specific decay rates corresponding to the first value (0.020 $year^{-1}$), but not for the other two overall MSW decay rates.

To maintain consistency between landfill-related methodologies across the Inventory, EPA developed correction factors (*f*) for decay rates of 0.038 and 0.057 $year^{-1}$ through linear interpolation. A weighted national average component-specific decay rate is calculated by assuming that waste generation is proportional to population (the same assumption used in the landfill methane emission estimate), based on population data from the 2000 U.S. Census. The percent of census population is calculated for each of the three categories of annual precipitation (noted in the previous paragraph); the population data are used as a surrogate for the number of landfills in each annual precipitation category. Precipitation range percentages weighted by population are updated over time as new Census data are available, to remain consistent with percentages used in the Waste chapter, Section 7.1 Landfills. The component-specific decay rates are shown in Table 6-126.

De la Cruz and Barlaz (2010) also use other assumed initial decay rates for mixed MSW in place of the AP-42 default value based on different types of environments in which landfills in the United States are located, including dry conditions (less than 25 inches of rain annually, *k*=0.02) and bioreactor landfill conditions (moisture is controlled for rapid decomposition, *k*=0.12).

For each of the four materials (grass, leaves, branches, food scraps), the stock of C in landfills for any given year is calculated according to Equation 6-2:

Equation 6-2: Total C Stock for Yard Trimmings and Food Scraps in Landfills

$$LFC_{i,t} = \sum_{n}^{t} W_{i,n} \times (1 - MC_i) \times ICC_i \times \left\{[CS_i \times ICC_i] + \left[\left(1 - (CS_i \times ICC_i)\right) \times e^{-k(t-n)}\right]\right\}$$

[100] The CH_4 emissions resulting from anaerobic decomposition of yard trimmings and food scraps in landfills are reported in the Waste chapter, Section 7.1 Landfills.

where,

t	=	Year for which C stocks are being estimated (year),
i	=	Waste type for which C stocks are being estimated (grass, leaves, branches, food scraps),
$LFC_{i,t}$	=	Stock of C in landfills in year t, for waste i (metric tons),
$W_{i,n}$	=	Mass of waste i disposed of in landfills in year n (metric tons, wet weight),
n	=	Year in which the waste was disposed of (year, where $1960 < n < t$),
MC_i	=	Moisture content of waste i (percent of water),
CS_i	=	Proportion of initial C that is stored for waste i (percent),
ICC_i	=	Initial C content of waste i (percent),
e	=	Natural logarithm, and
k	=	First-order decay rate for waste i, (year^{-1}).

For a given year t, the total stock of C in landfills ($TLFC_t$) is the sum of stocks across all four materials (grass, leaves, branches, food scraps). The annual flux of C in landfills (F_t) for year t is calculated in as the change in C stock compared to the preceding year according to Equation 6-3:

Equation 6-3: C Stock Annual Flux for Yard Trimmings and Food Scraps in Landfills

$$F_t = TLFC_t - TLFC_{(t-1)}$$

Thus, as seen in Equation 6-2, the C placed in a landfill in year n is tracked for each year t through the end of the inventory period. For example, disposal of food scraps in 1960 resulted in depositing about 1,135,000 metric tons of C in landfills. Of this amount, 16 percent (179,000 metric tons) is persistent; the remaining 84 percent (956,000 metric tons) is degradable. By 1965, more than half of the degradable portion (507,000 metric tons) decomposes, leaving a total of 628,000 metric tons (the persistent portion, plus the remainder of the degradable portion).

Continuing the example, by 2021, the total food scraps C originally disposed of in 1960 had declined to 179,000 metric tons (i.e., virtually all degradable C had decomposed). By summing the C remaining from 1960 with the C remaining from food scraps disposed of in subsequent years (1961 through 2021), the total landfill C from food scraps in 2021 was 50.9 million metric tons. This value is then added to the C stock from grass, leaves, and branches to calculate the total landfill C stock in 2021, yielding a value of 289.2 million metric tons (as shown in Table 6-127). In the same way total net flux is calculated for forest C and harvested wood products, the total net flux of landfill C for yard trimmings and food scraps for a given year (Table 6-125) is the difference in the landfill C stock for the following year and the stock in the current year. For example, the net change in 2021 shown in Table 6-125 (3.4 MMT C) is equal to the stock in 2022 (292.7 MMT C) minus the stock in 2021 (289.2 MMT C). The C stocks calculated through this procedure are shown in Table 6-127.

To develop the 2022 C stock estimate, estimates of yard trimming and food scrap carbon stocks were forecasted for 2022, based on data from 1990 through 2021. These forecasted values were used to calculate net changes in carbon stocks for 2021. Excel's FORECAST.ETS function was used to predict a 2022 value using historical data via an algorithm called "Exponential Triple Smoothing." This method determined the overall trend and provided appropriate carbon stock estimates for 2022.

Table 6-126: Moisture Contents, C Storage Factors (Proportions of Initial C Sequestered), Initial C Contents, and Decay Rates for Yard Trimmings and Food Scraps in Landfills

Variable	Yard Trimmings			Food Scraps
	Grass	Leaves	Branches	
Moisture Content (% H_2O)	70	30	10	70

C Storage Factor, Proportion of Initial C Stored (%)	53	85	77	16
Initial C Content (%)	45	46	49	51
Decay Rate (year^{-1})	0.313	0.179	0.015	0.151

Note: The decay rates are presented as weighted averages based on annual precipitation categories and population residing in each precipitation category.

Table 6-127: C Stocks in Yard Trimmings and Food Scraps in Landfills (MMT C)

Carbon Pool	1990	2005	2017	2018	2019	2020	2021	2022[a]
Yard Trimmings	**156.0**	**203.1**	**229.4**	**231.6**	**233.9**	**236.1**	**238.4**	**240.6**
Branches	14.6	18.1	20.5	20.7	20.9	21.1	21.3	21.5
Leaves	66.7	87.4	99.4	100.4	101.5	102.5	103.6	104.6
Grass	74.7	97.7	109.5	110.5	111.5	112.5	113.5	114.4
Food Scraps	**17.9**	**33.2**	**45.4**	**46.9**	**48.3**	**49.6**	**50.9**	**52.1**
Total Carbon Stocks	**173.9**	**236.3**	**274.8**	**278.5**	**282.2**	**285.7**	**289.2**	**292.7**

[a] 2022 C stock estimate was forecasted using 1990 to 2021 data.

Note: Totals may not sum due to independent rounding.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021. When available, the same data source was used across the entire time series for the analysis. When data were unavailable, missing values were estimated using linear interpolation or forecasting, as noted above.

Uncertainty

The uncertainty analysis for landfilled yard trimmings and food scraps includes an evaluation of the effects of uncertainty for the following data and factors: disposal in landfills per year (tons of C), initial C content, moisture content, decay rate, and proportion of C stored. The C storage landfill estimates are also a function of the composition of the yard trimmings (i.e., the proportions of grass, leaves and branches in the yard trimmings mixture). There are respective uncertainties associated with each of these factors.

A Monte Carlo (Approach 2) uncertainty analysis was applied to estimate the overall uncertainty of the sequestration estimate for 2021. The results of the Approach 2 quantitative uncertainty analysis are summarized in Table 6-128. Total yard trimmings and food scraps CO_2 flux in 2021 was estimated to be between -21.6 and -5.5 MMT CO_2 Eq. at a 95 percent confidence level. This indicates a range of 72 percent below to 56 percent above the 2021 flux estimate of -12.6 MMT CO_2 Eq.

Table 6-128: Approach 2 Quantitative Uncertainty Estimates for CO_2 Flux from Yard Trimmings and Food Scraps in Landfills (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Yard Trimmings and Food Scraps	CO_2	(12.6)	(21.6)	(5.5)	-72%	56%

[a] Range of flux estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Note: Parentheses indicate negative values or net C sequestration.

QA/QC and Verification

Tier 1 and Tier 2 QA/QC activities were conducted consistent with the U.S. QA/QC plan. Source-specific quality control measures for Landfilled Yard Trimmings and Food Scraps included checking that input data were properly

transposed within the spreadsheet, checking calculations were correct, and confirming that all activity data and calculations documentation was complete and updated to ensure data were properly handled through the inventory process.

Order of magnitude checks and checks of time-series consistency were performed to ensure data were updated correctly and any changes in emissions estimates were reasonable and reflected changes in activity data. An annual change trend analysis was also conducted to ensure the validity of the emissions estimates. Errors that were found during this process were corrected as necessary.

To ensure consistency across the LULUCF and Waste sectors, and the accuracy of emissions, EPA plans to perform a comparison of the activity data used and carbon inputs between the Landfilled Yard Trimmings and Food Scraps, and the Waste chapter, Section 7.1—Landfills categories.

Recalculations Discussion

No recalculations were performed for the 1990-2021 inventory, as the *Advancing Sustainable Materials Management: Facts and Figures* report for 2019, 2020, and 2021 were not yet available.

Planned Improvements

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

- MSW data more recent than 2018 have not been released through the *Advancing Sustainable Materials Management* reports. EPA will monitor the release schedule for these data and evaluate data for integration into the Inventory when released. Six new food waste management pathways were introduced in the 2018 *Advancing Sustainable Materials Management* report. Time series data for all of these pathways are not provided prior to 2018 but EPA plans to investigate potential data sources and/or methods to address time-series consistency and apply these data to the time series.
- EPA has been made aware of inconsistencies in landfilled food scraps data reported to the EPA Greenhouse Gas Reporting Program (GHGRP) and will evaluate changes to how landfilled and energy recovery values for yard trimmings and food scraps are calculated.

EPA notes the following improvements will continued to be investigated as time and resources allow, but there are no immediate plans to implement these improvements until data are available or identified:

- EPA also plans to continue to investigate updates to the decay rate estimates for food scraps, leaves, grass, and branches, as well as evaluate using decay rates that vary over time based on Census population and climate data changes over time. Currently the inventory calculations use 2010 U.S. Census data, but 2020 U.S. Census data may be available.
- Other improvements include investigation into yard waste composition to determine if changes need to be made based on changes in residential practices. A review of available literature will be conducted to determine if there are changes in the allocation of yard trimmings. For example, leaving grass clippings in place is becoming a more common practice, thus reducing the percentage of grass clippings in yard trimmings disposed in landfills. In addition, agronomists may be consulted for determining the mass of grass per acre on residential lawns to provide an estimate of total grass generation for comparison with Inventory estimates.
- EPA will continue to evaluate data from recent peer-reviewed literature that may modify the default C storage factors, initial C contents, and decay rates for yard trimmings and food scraps in landfills – particularly updates to population precipitation ranges used to calculate k values. Based upon this evaluation, changes may be made to the default values.

- Finally, EPA plans to review available data to ensure all types of landfilled yard trimmings and food scraps are being included in the Inventory estimates, such as debris from road construction and commercial food waste not included in other Inventory estimates.

6.11 Land Converted to Settlements (CRF Category 4E2)

Land Converted to Settlements includes all settlements in an Inventory year that had been in another land use(s) during the previous 20 years (USDA-NRCS 2015).[101] For example, cropland, grassland or forest land converted to settlements during the past 20 years would be reported in this category. Converted lands are retained in this category for 20 years as recommended by IPCC (2006).

Land use change can lead to large losses of carbon (C) to the atmosphere, particularly conversions from forest land (Houghton et al. 1983). Moreover, conversion of forest to another land use (i.e., deforestation) is one of the largest anthropogenic sources of emissions to the atmosphere globally (Schimel 1995), although this source may be declining globally (Tubiello et al. 2015). IPCC (2006) recommends reporting changes in biomass, dead organic matter, and soil organic C stocks due to land-use change. All soil organic C stock changes are estimated and reported for Land Converted to Settlements, but there is limited reporting of other pools in this Inventory. Loss of aboveground and belowground biomass, dead wood and litter C are reported for Forest Land Converted to Settlements and Woodlands associated with Grasslands Converted to Settlements, but not for other land-use conversions to settlements.

There are discrepancies between the current land representation (See Section 6.1) and the area data that have been used in the inventory for Land Converted to Settlements. First, the current land representation is based on the latest NRI dataset, which includes data through 2017, but these data have not been incorporated into the Land Converted to Settlements Inventory. Second, this Inventory includes all settlements in the conterminous United States and Hawaii, but does not include settlements in Alaska. Areas of drained organic soils in settlements on federal lands are also not included in this Inventory. These differences lead to discrepancies between the managed area in Land Converted to Settlements and the settlement area included in the Inventory analysis (Table 6-128). There is a planned improvement to include CO_2 emissions from drainage of organic soils in settlements of Alaska and federal lands as part of a future Inventory (See Planned Improvements Section).

Forest Land Converted to Settlements is the largest source of emissions from 1990 to 2021, accounting for approximately 75 percent of the average total loss of C among all of the land-use conversions in Land Converted to Settlements. Total losses of aboveground and belowground biomass, dead wood and litter C losses in 2021 for all conversions are 38.9, 7.4, 6.6, and 9.7 MMT CO_2 Eq., respectively (10.6, 2.0, 1.8, and 2.6 MMT C). Mineral and organic soils also lost 16.1 and 2.4 MMT CO_2 Eq. in 2021 (4.4 and 0.6 MMT C). The total net flux is 81.0 MMT CO_2 Eq. in 2021 (22.1 MMT C), which is a 30 percent increase in CO_2 emissions compared to the emissions in the initial reporting year of 1990 (Table 6-129 and Table 6-130). The main driver of net emissions for this source category is the conversion of forest land to settlements, with large losses of biomass, deadwood and litter C.

[101] NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 2001. This may have led to an underestimation of Land Converted to Settlements in the early part of the time series to the extent that some areas are converted to settlements from 1971 to 1978.

Table 6-129: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT CO_2 Eq.)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Settlements	**3.4**	**9.8**	**6.0**	**5.9**	**5.9**	**5.9**	**5.9**
Mineral Soils	2.8	8.4	5.2	5.2	5.1	5.1	5.1
Organic Soils	0.6	1.3	0.8	0.8	0.8	0.8	0.8
Forest Land Converted to Settlements	**53.4**	**59.0**	**63.5**	**63.7**	**63.8**	**63.7**	**63.7**
Aboveground Live Biomass	32.5	35.3	38.1	38.3	38.3	38.3	38.3
Belowground Live Biomass	6.2	6.8	7.3	7.3	7.3	7.3	7.3
Dead Wood	5.4	5.9	6.4	6.4	6.4	6.4	6.4
Litter	8.0	8.7	9.5	9.5	9.5	9.5	9.5
Mineral Soils	1.1	2.0	1.9	1.9	1.9	1.9	1.9
Organic Soils	0.2	0.3	0.3	0.3	0.3	0.3	0.3
Grassland Converted to Settlements	**6.0**	**17.1**	**12.3**	**12.2**	**12.2**	**12.2**	**12.2**
Aboveground Live Biomass	0.4	0.5	0.5	0.5	0.5	0.5	0.5
Belowground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Dead Wood	0.1	0.1	0.2	0.2	0.2	0.2	0.2
Litter	0.2	0.2	0.2	0.2	0.2	0.2	0.2
Mineral Soils	4.6	14.9	10.4	10.4	10.4	10.3	10.3
Organic Soils	0.6	1.4	0.9	0.9	0.9	0.9	0.9
Other Lands Converted to Settlements	**(0.4)**	**(1.4)**	**(1.2)**	**(1.2)**	**(1.2)**	**(1.2)**	**(1.2)**
Mineral Soils	(0.4)	(1.6)	(1.3)	(1.3)	(1.3)	(1.3)	(1.3)
Organic Soils	+	0.2	0.1	0.1	0.1	0.1	0.1
Wetlands Converted to Settlements	**+**	**0.5**	**0.4**	**0.4**	**0.4**	**0.3**	**0.3**
Mineral Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Organic Soils	+	0.4	0.3	0.3	0.3	0.3	0.3
Total Aboveground Biomass Flux	**32.9**	**35.8**	**38.7**	**38.8**	**38.9**	**38.9**	**38.9**
Total Belowground Biomass Flux	**6.3**	**6.8**	**7.4**	**7.4**	**7.4**	**7.4**	**7.4**
Total Dead Wood Flux	**5.5**	**6.0**	**6.5**	**6.5**	**6.6**	**6.6**	**6.6**
Total Litter Flux	**8.2**	**8.9**	**9.7**	**9.7**	**9.7**	**9.7**	**9.7**
Total Mineral Soil Flux	**8.1**	**23.8**	**16.2**	**16.2**	**16.2**	**16.2**	**16.1**
Total Organic Soil Flux	**1.4**	**3.6**	**2.4**	**2.4**	**2.4**	**2.4**	**2.4**
Total Net Flux	**62.5**	**85.0**	**80.9**	**81.0**	**81.1**	**81.0**	**81.0**

+ Absolute value does not exceed 0.05 MMT CO_2 Eq.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Table 6-130: Net CO_2 Flux from Soil, Dead Organic Matter and Biomass C Stock Changes for Land Converted to Settlements (MMT C)

	1990	2005	2017	2018	2019	2020	2021
Cropland Converted to Settlements	**0.9**	**2.7**	**1.6**	**1.6**	**1.6**	**1.6**	**1.6**
Mineral Soils	0.8	2.3	1.4	1.4	1.4	1.4	1.4
Organic Soils	0.2	0.4	0.2	0.2	0.2	0.2	0.2
Forest Land Converted to Settlements	**14.6**	**16.1**	**17.3**	**17.4**	**17.4**	**17.4**	**17.4**
Aboveground Live Biomass	8.9	9.6	10.4	10.4	10.5	10.5	10.5
Belowground Live Biomass	1.7	1.8	2.0	2.0	2.0	2.0	2.0
Dead Wood	1.5	1.6	1.7	1.7	1.7	1.7	1.7
Litter	2.2	2.4	2.6	2.6	2.6	2.6	2.6
Mineral Soils	0.3	0.5	0.5	0.5	0.5	0.5	0.5

Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Grassland Converted to Settlements	**1.6**	**4.7**	**3.3**	**3.3**	**3.3**	**3.3**	**3.3**
Aboveground Live Biomass	0.1	0.1	0.1	0.1	0.1	0.1	10.0
Belowground Live Biomass	+	+	+	+	+	+	+
Dead Wood	+	+	+	+	+	+	+
Litter	+	0.1	0.1	0.1	0.1	0.1	0.1
Mineral Soils	1.3	4.1	2.8	2.8	2.8	2.8	2.8
Organic Soils	0.2	0.4	0.2	0.2	0.2	0.2	0.2
Other Lands Converted to Settlements	**(0.1)**	**(0.4)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**	**(0.3)**
Mineral Soils	(0.1)	(0.4)	(0.4)	(0.4)	(0.3)	(0.3)	(0.3)
Organic Soils	+	+	+	+	+	+	+
Wetlands Converted to Settlements	**+**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**	**0.1**
Mineral Soils	+	+	+	+	+	+	+
Organic Soils	+	0.1	0.1	0.1	0.1	0.1	0.1
Total Aboveground Biomass Flux	**9.0**	**9.8**	**10.5**	**10.6**	**10.6**	**10.6**	**10.6**
Total Belowground Biomass Flux	**1.7**	**1.9**	**2.0**	**2.0**	**2.0**	**2.0**	**2.0**
Total Dead Wood Flux	**1.5**	**1.6**	**1.8**	**1.8**	**1.8**	**1.8**	**1.8**
Total Litter Flux	**2.2**	**2.4**	**2.6**	**2.6**	**2.6**	**2.6**	**2.6**
Total Mineral Soil Flux	**2.2**	**6.5**	**4.4**	**4.4**	**4.4**	**4.4**	**4.4**
Total Organic Soil Flux	**0.4**	**1.0**	**0.7**	**0.6**	**0.6**	**0.6**	**0.6**
Total Net Flux	**17.0**	**23.2**	**22.1**	**22.1**	**22.1**	**22.1**	**22.1**

+ Absolute value does not exceed 0.05 MMT C.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

Methodology and Time-Series Consistency

The following section includes a description of the methodology used to estimate C stock changes for Land Converted to Settlements, including (1) loss of aboveground and belowground biomass, dead wood and litter C with conversion to settlements from forest lands and woodlands designated in the grassland, as well as (2) the impact from all land-use conversions to settlements on soil organic C stocks in mineral and organic soils.

Biomass, Dead Wood, and Litter Carbon Stock Changes

A Tier 2 method is applied to estimate biomass, dead wood, and litter C stock changes for Forest Land Converted to Settlements and woodlands associated with Grassland Converted to Settlements. Estimates are calculated in the same way as those in the Forest Land Remaining Forest Land category using data from the USDA Forest Service, Forest Inventory and Analysis (FIA) program (USDA Forest Service 2022), however there is no country-specific data for settlements so the biomass, litter, and dead wood carbon stocks on these converted lands were assumed to be zero. The difference between the stocks is reported as the stock change under the assumption that the change occurred in the year of the conversion.

If FIA plots include data on individual trees, aboveground and belowground C density estimates are based on Woodall et al. (2011). Aboveground and belowground biomass estimates also include live understory, which is a minor component of biomass defined as all biomass of undergrowth plants in a forest, including woody shrubs and trees less than 2.54 cm dbh. For this Inventory, it was assumed that 10 percent of total understory C mass is belowground (Smith et al. 2006). Estimates of C density are based on information in Birdsey (1996) and biomass estimates from Jenkins et al. (2003).

This inventory also includes estimates of change in dead organic matter for standing dead, deadwood and litter. If FIA plots include data on standing dead trees, standing dead tree C density is estimated following the basic method applied to live trees (Woodall et al. 2011) with additional modifications to account for decay and structural loss (Domke et al. 2011; Harmon et al. 2011). If FIA plots include data on downed dead wood, downed dead wood C

density is estimated based on measurements of a subset of FIA plots for downed dead wood (Domke et al. 2013; Woodall and Monleon 2008). Downed dead wood is defined as pieces of dead wood greater than 7.5 cm diameter, at transect intersection, that are not attached to live or standing dead trees. This includes stumps and roots of harvested trees. To facilitate the downscaling of downed dead wood C estimates from the state-wide population estimates to individual plots, downed dead wood models specific to regions and forest types within each region are used. Litter C is the pool of organic C (also known as duff, humus, and fine woody debris) above the mineral soil and includes woody fragments with diameters of up to 7.5 cm. A subset of FIA plots is measured for litter C. If FIA plots include litter material, a modeling approach using litter C measurements from FIA plots is used to estimate litter C density (Domke et al. 2016).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2021 so that changes reflect anthropogenic activity and not methodological adjustments. See Annex 3.13 for more information about reference C density estimates for forest land and the compilation system used to estimate carbon stock changes from forest land.

Soil Carbon Stock Changes

Soil organic C stock changes are estimated for Land Converted to Settlements according to land use histories recorded in the 2015 USDA NRI survey for non-federal lands (USDA-NRCS 2018). Land use and some management information were originally collected for each NRI survey location on a 5-year cycle beginning in 1982. In 1998, the NRI program began collecting annual data, and the annual data have been incorporated from the NRI into the inventory analysis through 2015 (USDA-NRCS 2018).

NRI survey locations are classified as Land Converted to Settlements in a given year between 1990 and 2015 if the land use is settlements but had been classified as another use during the previous 20 years. NRI survey locations are classified according to land use histories starting in 1979, and consequently the classifications are based on less than 20 years from 1990 to 1998. This may have led to an underestimation of Land Converted to Settlements in the early part of the time series to the extent that some areas are converted to settlement between 1971 and 1978. For federal lands, the land use history is derived from land cover changes in the National Land Cover Dataset (Yang et al. 2018; Fry et al. 2011; Homer et al. 2007, 2015).

Mineral Soil Carbon Stock Changes

An IPCC Tier 2 method (Ogle et al. 2003) is applied to estimate C stock changes for Land Converted to Settlements on mineral soils from 1990 to 2015. Data on climate, soil types, land use, and land management activity are used to classify land area and apply appropriate stock change factors (Ogle et al. 2003, 2006). Reference C stocks are estimated using the National Soil Survey Characterization Database (USDA-NRCS 1997) with cultivated cropland as the reference condition, rather than native vegetation as used in IPCC (2006). Soil measurements under agricultural management are much more common and easily identified in the National Soil Survey Characterization Database (USDA-NRCS 1997) than are soils under a native condition, and therefore cultivated cropland provide a more robust sample for estimating the reference condition. Country-specific C stock change factors are derived from published literature to determine the impact of management practices on soil organic C storage (Ogle et al. 2003, Ogle et al. 2006). However, there are insufficient data to estimate a set of land use, management, and input factors for settlements. Moreover, the 2015 NRI survey data (USDA-NRCS 2018) do not provide the information needed to assign different land use subcategories to settlements, such as turf grass and impervious surfaces, which is needed to apply the Tier 1 factors from the IPCC guidelines (2006). Therefore, the United States has adopted a land use factor of 0.7 to represent a net loss of soil organic C with conversion to settlements under the assumption that there are additional soil organic C losses with land clearing, excavation and other activities associated with development. More specific factor values can be derived in future Inventories as data become available. See Annex 3.12 for additional discussion of the Tier 2 methodology for mineral soils.

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015 so that changes reflect anthropogenic activity and not methodological adjustments. Soil organic C stock changes from 2016 to 2021

are estimated using a linear extrapolation method described in Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). The Tier 2 method described previously will be applied to recalculate the 2016 to 2021 emissions in a future Inventory.

Organic Soil Carbon Stock Changes

Annual C emissions from drained organic soils in Land Converted to Settlements are estimated using the Tier 2 method provided in IPCC (2006). The Tier 2 method assumes that organic soils are losing C at a rate similar to croplands, and therefore uses the country-specific values for cropland (Ogle et al. 2003). To estimate CO_2 emissions from 1990 to 2015, the area of organic soils in Land Converted to Settlements is multiplied by the Tier 2 emission factor, which is 11.2 MT C per ha in cool temperate regions, 14.0 MT C per ha in warm temperate regions and 14.3 MT C per ha in subtropical regions (See Annex 3.12 for more information).

In order to ensure time-series consistency, the same methods are applied from 1990 to 2015, and a linear extrapolation method is used to approximate emissions for the remainder of the 2016 to 2021 time series (See Box 6-4 of the Methodology section in Cropland Remaining Cropland. The extrapolation is based on a linear regression model with moving-average (ARMA) errors using the 1990 to 2015 emissions data, and is a standard data splicing method for imputing missing emissions data in a time series (IPCC 2006). Estimates will be recalculated in future Inventories when new NRI data are incorporated into the inventory.

Uncertainty

The uncertainty analysis for C losses with Forest Land Converted to Settlements is conducted in the same way as the uncertainty assessment for forest ecosystem C flux in the Forest Land Remaining Forest Land category. Sample and model-based error are combined using simple error propagation methods provided by the IPCC (2006), i.e., by taking the square root of the sum of the squares of the standard deviations of the uncertain quantities. For additional details, see the Uncertainty Analysis in Annex 3.13. The uncertainty analysis for mineral soil organic C stock changes and annual C emission estimates from drained organic soils in Land Converted to Settlements is estimated using a Monte Carlo approach, which is described in the Cropland Remaining Cropland section.

Uncertainty estimates are presented in Table 6-131 for each subsource (i.e., biomass C, dead wood, litter, soil organic C in mineral soils and organic soils) and the method applied in the inventory analysis (i.e., Tier 2 and Tier 3). Uncertainty estimates from the Tier 2 and 3 approaches are combined using the simple error propagation methods provided by the IPCC (2006), i.e., as described in the previous paragraph. There are also additional uncertainties propagated through the analysis associated with the data splicing methods applied to estimate soil organic C stock changes from 2016 to 2021. The combined uncertainty for total C stocks in Land Converted to Settlements ranges from 34 percent below to 34 percent above the 2021 stock change estimate of 81.0 MMT CO_2 Eq.

Table 6-131: Approach 2 Quantitative Uncertainty Estimates for Soil, Dead Organic Matter and Biomass C Stock Changes occurring within Land Converted to Settlements (MMT CO_2 Eq. and Percent)

Source	2021 Flux Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Flux Estimate[a] (MMT CO_2 Eq.)		(%)	
		Lower Bound	Upper Bound	Lower Bound	Upper Bound
Cropland Converted to Settlements	**5.9**	**1.8**	**10.0**	**-69%**	**69%**
Mineral Soil C Stocks	5.1	1.1	9.2	-79%	79%
Organic Soil C Stocks	0.8	0.1	1.5	-90%	90%
Forest Land Converted to Settlements	**63.7**	**38.4**	**89.0**	**-40%**	**40%**
Aboveground Biomass C Stocks	38.3	14.5	62.2	-62%	62%

Belowground Biomass C Stocks	7.3	2.8	11.9	-62%	62%
Dead Wood	6.4	2.4	10.4	-62%	62%
Litter	9.5	3.6	15.4	-62%	62%
Mineral Soil C Stocks	1.9	1.2	2.5	-35%	35%
Organic Soil C Stocks	0.3	0.1	0.5	-74%	74%
Grassland Converted to Settlements	**11.2**	**5.6**	**16.8**	**-50%**	**50%**
Aboveground Biomass C Stocks	0.5	0.2	0.8	-65%	63%
Belowground Biomass C Stocks	0.1	+	0.1	-49%	54%
Dead Wood	0.2	0.1	0.3	-53%	65%
Litter	0.2	0.1	0.3	-65%	56%
Mineral Soil C Stocks	10.3	4.8	15.9	-54%	54%
Organic Soil C Stocks	0.9	+	1.7	-95%	95%
Other Lands Converted to Settlements	**-1.2**	**(2.0)**	**(0.3)**	**-73%**	**73%**
Mineral Soil C Stocks	-1.3	(2.1)	(0.4)	-66%	66%
Organic Soil C Stocks	0.1	(0.1)	0.3	-175%	175%
Wetlands Converted to Settlements	**0.3**	**(0.2)**	**0.9**	**-157%**	**157%**
Mineral Soil C Stocks	0.1	+	0.1	-110%	110%
Organic Soil C Stocks	0.3	(0.3)	0.8	-191%	191%
Total: Land Converted to Settlements	**81.0**	**53.4**	**108.6**	**-34%**	**34%**
Aboveground Biomass C Stocks	**38.9**	**14.5**	**62.2**	**-62%**	**62%**
Belowground Biomass C Stocks	**7.4**	**2.8**	**11.9**	**-62%**	**62%**
Dead Wood	**6.6**	**2.4**	**10.4**	**-62%**	**62%**
Litter	**9.7**	**3.6**	**15.4**	**-62%**	**62%**
Mineral Soil C Stocks	**16.1**	**9.2**	**23.1**	**-43%**	**43%**
Organic Soil C Stocks	**2.4**	**(6.3)**	**11.0**	**-366%**	**366%**

+ Does not exceed 0.05 MMT CO_2 Eq.

[a] Range of C stock change estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

Note: Totals may not sum due to independent rounding. Parentheses indicate negative values or net sequestration.

QA/QC and Verification

Quality control measures included checking input data, model scripts, and results to ensure data are properly handled throughout the inventory process. Inventory reporting forms and text are reviewed and revised as needed to correct transcription errors. No errors were found in this Inventory.

Recalculations Discussion

Recalculations are associated with new FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Settlements and woodland conversion associated with Grassland Converted to Settlements, and updated estimates for mineral and organic soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Settlements has an estimated larger C loss of 2.3 MMT CO_2 Eq. on average over the time series. This represents a 2.9 percent increase in C stock changes for Land Converted to Settlements compared to the previous Inventory.

Planned Improvements

There are two key improvements planned for the inventory, including a) incorporating the latest land use data from the USDA National Resources Inventory, and b) develop an inventory of mineral soil organic C stock changes in Alaska and losses of C from drained organic soils in federal lands. These improvements will resolve most of the differences between the managed land base for Land Converted to Settlements and amount of area currently included in Land Converted to Settlements Inventory (See Table 6-113).

There are plans to improve classification of trees in settlements and to include transfer of biomass from forest land to those areas in this category. There are also plans to extend the Inventory to included C losses associated with drained organic soils in settlements occurring on federal lands.

These improvements will be made as funding and resources are available to expand the inventory for this source category.

Table 6-132: Area of Managed Land in Land Converted to Settlements that is not included in the current Inventory (Thousand Hectares)

	Area (Thousand Hectares)		
Year	LCS Managed Land Area (Section 6.1)	LCS Area Included in Inventory	LCS Area Not Included in Inventory
1990	2,865	2,861	5
1991	3,213	3,238	-25
1992	3,575	3,592	-17
1993	4,147	4,107	40
1994	4,712	4,630	82
1995	5,271	5,161	110
1996	5,844	5,658	186
1997	6,421	6,174	247
1998	6,938	6,650	288
1999	7,451	7,116	336
2000	7,981	7,568	413
2001	8,386	7,947	439
2002	8,722	8,284	437
2003	8,738	8,335	403
2004	8,755	8,345	410
2005	8,765	8,341	425
2006	8,740	8,352	387
2007	8,722	8,295	427
2008	8,546	8,111	434
2009	8,351	7,930	420
2010	8,157	7,725	432
2011	7,953	7,498	455
2012	7,744	7,298	446
2013	7,342	6,932	410
2014	6,952	6,586	366
2015	6,542	6,165	377
2016	6,122	*	*
2017	5,720	*	*
2018	5,201	*	*
2019	4,690	*	*
2020	4,188	*	*
2021	3,781	*	*

NRI data have not been incorporated into the inventory after 2015, designated with asterisks (*).

6.12 Other Land Remaining Other Land (CRF Category 4F1)

Land use is constantly occurring, and areas under a number of differing land-use types remain in their respective land-use type each year, just as other land can remain as other land. While the magnitude of Other Land Remaining Other Land is known (see Table 6-4), research is ongoing to track C pools in this land use. Until such time that reliable and comprehensive estimates of C for Other Land Remaining Other Land can be produced, it is not possible to estimate CO_2, CH_4 or N_2O fluxes on Other Land Remaining Other Land at this time.

6.13 Land Converted to Other Land (CRF Category 4F2)

Land-use change is constantly occurring, and areas under a number of differing land-use types are converted to other land each year, just as other land is converted to other uses. While the magnitude of these area changes is known (see Table 6-4), research is ongoing to track C across Other Land Remaining Other Land and Land Converted to Other Land. Until such time that reliable and comprehensive estimates of C across these land-use and land-use change categories can be produced, it is not possible to separate CO_2, CH_4 or N_2O fluxes on Land Converted to Other Land from fluxes on Other Land Remaining Other Land at this time.

7. Waste

Waste management and treatment activities are sources of greenhouse gas emissions (see Figure 7-1 and Figure 7-2). Landfills accounted for approximately 16.9 percent of total U.S. anthropogenic methane (CH_4) emissions in 2021, the third largest source of CH_4 in the United States. Additionally, wastewater treatment and discharge, composting of organic waste, and anaerobic digestion at biogas facilities accounted for approximately 2.9 percent, 0.4 percent, and less than 0.1 percent of U.S. CH_4 emissions, respectively. Nitrous oxide (N_2O) emissions resulted from the discharge of wastewater treatment effluents into aquatic environments were estimated, the wastewater treatment process itself, and composting. Together, these waste activities account for 5.8 percent of total U.S. N_2O emissions. Nitrogen oxides (NO_x), carbon monoxide (CO), and non-CH_4 volatile organic compounds (NMVOCs) are emitted by waste activities and are addressed separately at the end of this chapter. A summary of greenhouse gas emissions from the Waste chapter is presented in Table 7-1 and Table 7-2. Overall, in 2021, waste activities generated emissions of 169.2 MMT CO_2 Eq., or 2.7 percent of total U.S. greenhouse gas emissions.

Emissions from landfills contributed 72.5 percent of waste sector emissions in 2021 and are primarily comprised of CH_4 emissions from municipal solid waste landfills (see Figure 7-1). Landfill emissions decreased by 2.2 MMT CO_2 Eq. (1.7 percent) since 2020. Emissions from wastewater treatment were the second largest source of waste-related emissions in 2021, accounting for 24.8 percent of sector emissions. The remaining two sources of emissions, composting and anaerobic digestion at biogas facilities, account for 2.6 percent and 0.1 percent of waste sector emissions in 2021, respectively.

Figure 7-1: 2021 Waste Sector Greenhouse Gas Sources

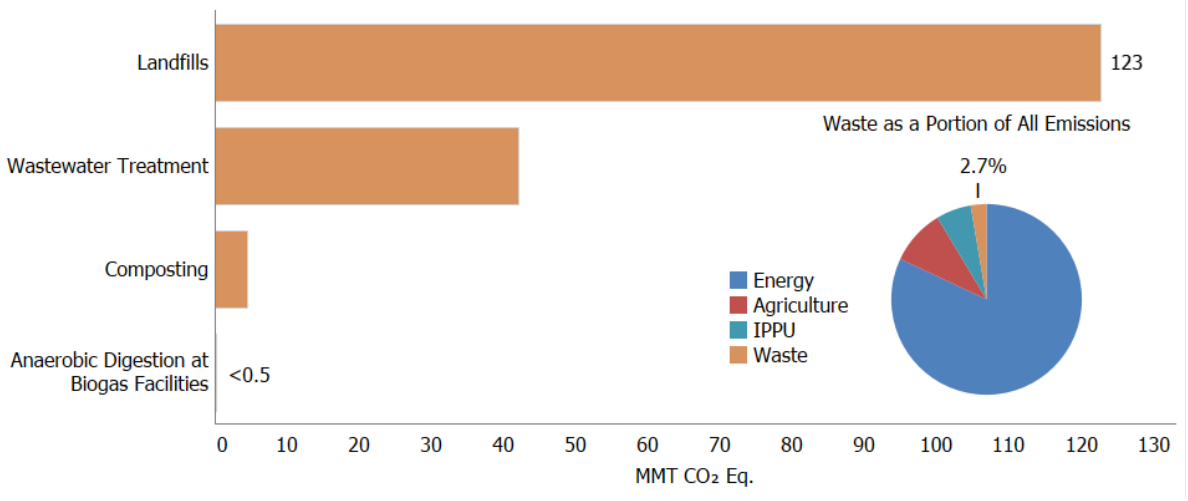


Figure 7-2: Trends in Waste Sector Greenhouse Gas Sources

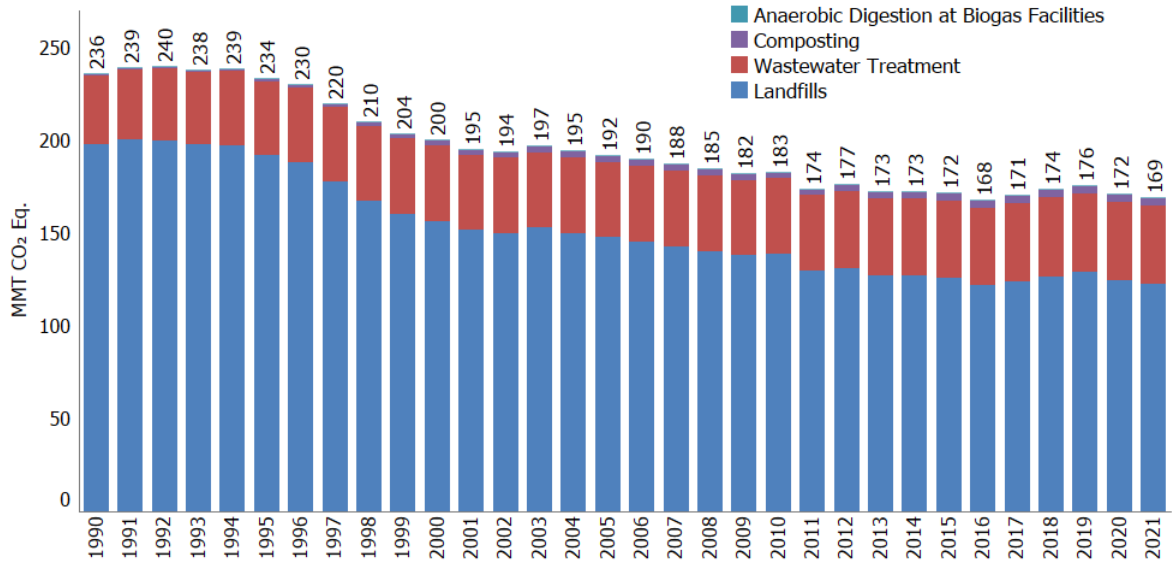


Table 7-1: Emissions from Waste (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH_4	**220.9**	**172.5**	**148.3**	**150.8**	**152.9**	**148.8**	**146.4**
Landfills	197.8	147.7	123.9	126.7	129.0	124.8	122.6
Wastewater Treatment	22.7	22.7	21.5	21.4	21.2	21.3	21.1
Composting	0.4	2.1	2.7	2.5	2.5	2.6	2.6
Anaerobic Digestion at Biogas Facilities	+	+	0.2	0.2	0.2	0.2	0.2
N_2O	**15.1**	**19.5**	**22.6**	**22.9**	**23.1**	**22.7**	**22.7**
Wastewater Treatment	14.8	18.1	20.6	21.2	21.3	20.9	20.9
Composting	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	**236.0**	**192.1**	**170.9**	**173.7**	**176.0**	**171.5**	**169.2**

+ Does not exceed 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Table 7-2: Emissions from Waste (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
CH_4	**7,889**	**6,161**	**5,297**	**5,384**	**5,460**	**5,315**	**5,230**
Landfills	7,063	5,275	4,424	4,525	4,607	4,456	4,379
Wastewater Treatment	811	809	770	763	755	761	753
Composting	15	75	98	90	91	92	92
Anaerobic Digestion at Biogas Facilities	1	2	6	6	6	6	6
N_2O	**57**	**74**	**85**	**87**	**87**	**86**	**86**
Wastewater Treatment	56	68	78	80	80	79	79
Composting	1	6	7	7	7	7	7

Note: Totals by gas may not sum due to independent rounding.

Carbon dioxide (CO_2), CH_4, and N_2O emissions from the incineration of waste are accounted for in the Energy sector rather than in the Waste sector because almost all incineration of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The incineration of waste in the United States in 2021 resulted in 12.8 MMT CO_2 Eq. emissions, more than half of which is attributable to the combustion of plastics. For more details on emissions from the incineration of waste, see Section 7.5. Greenhouse gas precursor emissions from the waste sector are presented in Section 7.6.

Each year, some emission and sink estimates in the Inventory are recalculated and revised with improved methods and/or data. In general, recalculations are made to the U.S. greenhouse gas emission estimates either to incorporate new methodologies or, most commonly, to update recent historical data. These improvements are implemented consistently across the previous Inventory's time series (i.e., 1990 to 2020) to ensure that the trend is accurate. For the current Inventory, minor improvements were implemented beyond routine activity data updates, including revising the industrial food waste disposal factor for estimating emissions from industrial landfills. In total, the methodological and historic data improvements made to the Waste sector in this Inventory resulted in an average increase in greenhouse gas emissions across the time series by 0.7 MMT CO_2 Eq. (0.4 percent). In addition, estimates of CO_2-equivalent emissions totals of CH_4 and N_2O have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013).[1] AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). For more information on specific methodological updates, please see the Recalculations Discussion for each category in this chapter. In total, the methodological and historic data improvements in addition to the change to AR5 GWP values, the Waste sector emissions increased 17.3 MMT CO_2 Eq. (9.6 percent) across the time series.

Due to lack of data availability, EPA is not able to estimate emissions associated with sludge generated from the treatment of industrial wastewater or the amount of CH_4 flared at composting sites. Emissions reported in the Waste chapter for landfills, wastewater treatment, and anaerobic digestion at biogas facilities include those from all 50 states, including Hawaii and Alaska, the District of Columbia, and U.S. Territories. Emissions from landfills include modern, managed sites in most U.S. Territories except for outlying Pacific Islands. Emissions from domestic wastewater treatment include most U.S. Territories except for outlying Pacific Islands. Those emissions are likely insignificant as those outlying Pacific Islands (e.g., Baker Island) have no permanent population. No industrial wastewater treatment emissions are estimated for U.S. Territories, due to lack of data availability. However, industrial wastewater treatment emissions are not expected for outlying Pacific Islands and assumed to be small for other U.S. Territories. Emissions for composting include Puerto Rico and all states except Alaska. Some composting operations in Alaska are known, but these consist of aerated composting facilities. Composting emissions are not included from the remaining U.S. Territories, and these are assumed to be small. Similarly, EPA is not aware of any anerobic digestion at biogas facilities in U.S. Territories but will review this on an ongoing basis to include these emissions if they are occurring. See Annex 5 for more information on EPA's assessment of the sources not included in this Inventory.

Box 7-1: Methodological Approach for Estimating and Reporting U.S. Emissions and Removals, including Relationship to Greenhouse Gas Reporting Data

In following the United Nations Framework Convention on Climate Change (UNFCCC) requirement under Article 4.1 to develop and submit national greenhouse gas emission inventories, the emissions and removals presented in this report and this chapter are organized by source and sink categories and calculated using internationally-accepted methods provided by the Intergovernmental Panel on Climate Change (IPCC) in the *2006 IPCC Guidelines for National Greenhouse Gas Inventories (2006 IPCC Guidelines)* and its supplements and

[1] As specified in UNFCCC reporting guidelines, the GWPs used are those listed in table 8.A.1 in Annex 8.A of Chapter 8 of the *Fifth Assessment Report* of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane.

refinements. Additionally, the calculated emissions and removals in a given year for the United States are presented in a common format in line with the UNFCCC reporting guidelines for the reporting of inventories under this international agreement. The use of consistent methods to calculate emissions and removals by all nations providing their inventories to the UNFCCC ensures that these reports are comparable. The presentation of emissions and sinks provided in the Waste chapter do not preclude alternative examinations, but rather, this chapter presents emissions and removals in a common format consistent with how countries are to report Inventories under the UNFCCC. The report itself, and this chapter, follows this standardized format, and provides an explanation of the application of methods used to calculate emissions and removals from waste management and treatment activities.

EPA also collects greenhouse gas emissions data from individual facilities and suppliers of certain fossil fuels and industrial gases through its Greenhouse Gas Reporting Program (GHGRP). The GHGRP applies to direct greenhouse gas emitters, fossil fuel suppliers, industrial gas suppliers, and facilities that inject CO_2 underground for sequestration or other reasons and requires reporting by sources or suppliers in 41 industrial categories. Annual reporting is at the facility level, except for certain suppliers of fossil fuels and industrial greenhouse gases. In general, the threshold for reporting is 25,000 metric tons or more of CO_2 Eq. per year. See Annex 9 "Use of EPA Greenhouse Gas Reporting Program in Inventory" for more information.

Waste Data from EPA's Greenhouse Gas Reporting Program

EPA uses annual GHGRP facility-level data in the Landfills category to compile the national estimate of emissions from Municipal Solid Waste (MSW) landfills (see Section 7.1 of this chapter for more information). EPA uses directly reported GHGRP data for net CH_4 emissions from MSW landfills for the years 2010 to 2021 of the Inventory. MSW landfills subject to the GHGRP began collecting data in 2010. These data are also used to recalculate emissions from MSW landfills for the years 2005 to 2009 to ensure time-series consistency.

7.1 Landfills (CRF Source Category 5A1)

In the United States, solid waste is managed by landfilling, recovery through recycling or composting, and combustion through waste-to-energy facilities. Disposing of solid waste in modern, managed landfills is the most used waste management technique in the United States. More information on how solid waste data are collected and managed in the United States is provided in Box 7-3. The municipal solid waste (MSW) and industrial waste landfills referred to in this section are all modern landfills that must comply with a variety of regulations as discussed in Box 7-2. Disposing of waste in illegal dumping sites is not considered to have occurred in years later than 1980 and these sites are not considered to contribute to net emissions in this section for the timeframe of 1990 to the current Inventory year. MSW landfills, or sanitary landfills, are sites where MSW is managed to prevent or minimize health, safety, and environmental impacts. Waste is deposited in different cells and covered daily with soil; many have environmental monitoring systems to track performance, collect leachate, and collect landfill gas. Industrial waste landfills are constructed in a similar way as MSW landfills but are used to dispose of industrial solid waste, such as RCRA Subtitle D wastes (e.g., non-hazardous industrial solid waste defined in Title 40 of the Code of Federal Regulations [CFR] in section 257.2), commercial solid wastes, or conditionally exempt small-quantity generator wastes (EPA 2016a).

After being placed in a landfill, organic waste (such as paper, food scraps, and yard trimmings) is initially decomposed by aerobic bacteria. After the oxygen has been depleted, typically within less than one year, the remaining waste is available for consumption by anaerobic bacteria, which break down organic matter into substances such as cellulose, amino acids, and sugars. These substances are further broken down through fermentation into gases and short-chain organic compounds that form the substrates for the growth of methanogenic bacteria. These methane (CH_4) producing anaerobic bacteria convert the fermentation products

into stabilized organic materials and biogas consisting of approximately 50 percent biogenic carbon dioxide (CO_2) and 50 percent CH_4, by volume. Landfill biogas also contains trace amounts of non-methane organic compounds (NMOC) and volatile organic compounds (VOC) that either result from decomposition byproducts or volatilization of biodegradable wastes (EPA 2008).

Box 7-2: Description of a Modern, Managed Landfill in the United States

Modern, managed landfills are well-engineered facilities that are located, designed, operated, and monitored to ensure compliance with federal, state, and tribal regulations. A modern, managed landfill is EPA's interpretation of the IPCC's terminology of a managed solid waste disposal site. Municipal solid waste (MSW) landfills must be designed to protect the environment from contaminants which may be present in the solid waste stream. Additionally, many new landfills collect and destroy landfill gas through flares or landfill gas-to-energy projects. Requirements for affected MSW landfills may include:

- Siting requirements to protect sensitive areas (e.g., airports, floodplains, wetlands, fault areas, seismic impact zones, and unstable areas);
- Design requirements for new landfills to ensure that Maximum Contaminant Levels (MCLs) will not be exceeded in the uppermost aquifer (e.g., composite liners and leachate collection systems);
- Leachate collection and removal systems;
- Operating practices (e.g., daily and intermediate cover, receipt of regulated hazardous wastes, use of landfill cover material, access options to prevent illegal dumping, use of a collection system to prevent stormwater run-on/run-off, record-keeping);
- Air monitoring requirements (explosive gases);
- Groundwater monitoring requirements;
- Closure and post-closure care requirements (e.g., final cover construction); and
- Corrective action provisions.

Specific federal regulations that affected MSW landfills must comply with include the 40 CFR Part 258 (Subtitle D of RCRA), or equivalent state regulations and the NSPS 40 CFR Part 60 Subpart WWW and XXX.[2] Additionally, state and tribal requirements may exist.

Methane and CO_2 are the primary constituents of landfill gas generation and emissions. Net carbon dioxide flux from carbon stock changes of materials of biogenic origin in landfills are estimated and reported under the Land Use, Land-Use Change, and Forestry (LULUCF) sector (see Chapter 6 of this Inventory). Nitrous oxide (N_2O) emissions from the disposal and application of sewage sludge on landfills are also not explicitly modeled as part of greenhouse gas emissions from landfills. Nitrous oxide emissions from sewage sludge applied to landfills as a daily cover or for disposal are expected to be relatively small because the microbial environment in an anaerobic landfill is not very conducive to the nitrification and denitrification processes that result in N_2O emissions. Furthermore, the *2006 IPCC Guidelines* did not include a methodology for estimating N_2O emissions from solid waste disposal sites "because they are not significant." Therefore, only CH_4 generation and emissions are estimated for landfills under the Waste sector.

Methane generation and emissions from landfills are a function of several factors, including: (1) the total amount and composition of waste-in-place, which is the total waste landfilled annually over the operational lifetime of a landfill; (2) the characteristics of the landfill receiving waste (e.g., size, climate, cover material); (3) the amount of CH_4 that is recovered and either flared or used for energy purposes; and (4) the amount of CH_4 oxidized as the landfill gas – that is not collected by a gas collection system – passes through the cover material into the

[2] For more information regarding federal MSW landfill regulations, see https://www.epa.gov/regulatory-information-topic/regulatory-and-guidance-information-topic-waste.

atmosphere. Each landfill has unique characteristics, but all managed landfills employ similar operating practices, including the application of a daily and intermediate cover material over the waste being disposed of in the landfill to prevent odor and reduce risks to public health. Based on recent literature, the specific type of cover material used can affect the rate of oxidation of landfill gas (RTI 2011). The most used cover materials are soil, clay, and sand. Some states also permit the use of green waste, tarps, waste derived materials, sewage sludge or biosolids, and contaminated soil as a daily cover. Methane production typically begins within the first year after the waste is disposed of in a landfill and will continue for 10 to 50 or more years as the degradable waste decomposes over time.

In 2021, landfill CH_4 emissions were approximately 122.6 MMT CO_2 Eq. (4,379 kt), representing the third largest source of CH_4 emissions in the United States, behind enteric fermentation and natural gas systems. Emissions from MSW landfills accounted for approximately 85 percent of total landfill emissions (103.7 MMT CO_2 Eq.), while industrial waste landfills accounted for the remainder (18.9 MMT CO_2 Eq.). Nationally, there are significantly less industrial waste landfills (hundreds) compared to MSW landfills (thousands), which contributes to the lower national estimate of CH_4 emissions for industrial waste landfills. Additionally, the average organic content of waste streams disposed in industrial waste landfills is lower than MSW landfills. Recent estimates of currently operational MSW landfills (those accepting waste) in the United States have ranged from 1,270 to 1,670 facilities (EPA 2022a; EPA 2022b; EPA 2019; Waste Business Journal [WBJ] 2020). The Environment Research & Education Foundation (EREF) conducted a nationwide analysis of MSW management and counted 1,540 operational MSW landfills in 2013 (EREF 2016). Conversely, there are approximately 3,200 MSW landfills in the United States that have been closed since 1980 (for which a closure data is known, (EPA 2022b; WBJ 2010). While the number of active MSW landfills has decreased significantly over the past 20 years, from approximately 6,326 in 1990 to as few as 1,540 in 2013, the average landfill size has increased (EPA 2022a; EREF 2016; BioCycle 2010). Larger landfills may have deeper cells where a greater amount of area will be anaerobic (more CH_4 is generated in anaerobic versus aerobic areas) and larger landfills tend to generate more CH_4 compared to a smaller landfill (assuming the same waste composition and age of waste). Regarding industrial waste landfills, the WBJ database includes approximately 1,200 landfills accepting industrial and/or construction and demolition debris for 2016 (WBJ 2016). Only 169 facilities with industrial waste landfills met the reporting threshold under Subpart TT (Industrial Waste Landfills) in the first year (2011) of EPA's Greenhouse Gas Reporting Program for this subpart (GHGRP codified in 40 CFR part 98), indicating that there may be several hundred industrial waste landfills that are not required to report under EPA's GHGRP. Less industrial waste landfills meet the GHGRP eligibility threshold because they typically accept waste streams with low to no organic content, which will not decompose and generate CH_4 when disposed.

The annual amount of MSW generated and subsequently disposed in MSW landfills varies annually and depends on several factors (e.g., the economy, consumer patterns, recycling and composting programs, inclusion in a garbage collection service). The estimated annual quantity of waste placed in MSW landfills increased 10 percent from approximately 205 MMT in 1990 to 226 MMT in 2000, then decreased by 11 percent to 202 MMT in 2010, and then increased by 7 percent to approximately 216 MMT in 2021 (see Annex 3.14, Table A-206). Emissions decreased between 1990 to 2021 largely because of increased use of landfill gas collection and control systems, closure of older landfills, better management practices, and increased diversion of organics through state and local policy and regulations. The total amount of MSW generated is expected to increase as the U.S. population continues to grow. The impacts of the coronavirus (COVID-19) pandemic with respect to landfilled waste cannot be quantified as data sources such as the EPA's *Advancing Sustainable Materials Management: Facts and Figures* report have not been published for 2019 through 2021. The quantities of waste landfilled for 2014 to 2021 (presented in Annex 3.14) are extrapolated based on population growth and the last national assessment of MSW landfilled from 2013 (EREF 2016). Net CH_4 emissions from MSW landfills have decreased since 1990 (see Table 7-3 and Table 7-4).

The estimated quantity of waste placed in industrial waste landfills (from the pulp and paper, and food processing sectors) has remained relatively steady since 1990, ranging from 9.7 MMT in 1990 to 11.2 MMT in 2021 (see Annex 3.14, Table A-206). CH_4 emissions from industrial waste landfills have also remained at similar levels recently, ranging from 16.1 MMT CO_2 Eq. in 2005 to 18.9 MMT CO_2 Eq. in 2021 when accounting for both CH_4 generation and oxidation. The EPA has focused the industrial waste landfills source category on industrial sectors known to

generate and dispose of by-products that are organic and contribute to CH_4 generation, which are the pulp and paper and food processing sectors. Construction and demolition (C&D) landfills, another type of industrial waste landfill, may accept waste that could degrade (e.g., treated wood), but these waste streams are unlikely to generate significant amounts of CH_4 and are therefore not as relevant to the purpose of national greenhouse gas emissions estimate. There is also a general lack of data on annual quantities of waste disposed in industrial waste landfills and the GHGRP Subpart TT (Industrial Waste Landfills) dataset has confirmed C&D landfills, for example, are insignificant CH_4 generators.

EPA's Landfill Methane Outreach Program (LMOP) collects information on landfill gas energy projects currently operational or under construction throughout the United States. LMOP's Landfill and Landfill Gas Energy Database contains certain information on the gas collection and control systems in place at landfills provided by organizations that are a part of the program, which can include the amount of landfill gas collected and flared. In 2021, LMOP identified 10 new landfill gas-to-energy (LFGE) projects (EPA 2022b) that began operation.

Landfill gas collection and control is not accounted for at industrial waste landfills in this chapter (see the Methodology discussion for more information).

Table 7-3: CH_4 Emissions from Landfills (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
MSW CH_4 Generation[a]	230.0	303.7	327.0	332.6	341.4	342.2	334.8
Industrial CH_4 Generation	13.6	17.9	20.4	20.6	20.7	20.9	21.0
MSW CH_4 Recovered[a]	(23.8)	(148.4)	(192.9)	(195.2)	(201.4)	(206.3)	(201.5)
MSW CH_4 Oxidized[a]	(20.6)	(23.6)	(28.6)	(29.2)	(29.6)	(29.9)	(29.6)
Industrial CH_4 Oxidized	(1.4)	(1.8)	(2.0)	(2.1)	(2.1)	(2.1)	(2.1)
MSW net CH_4 Emissions	185.5	131.6	105.5	108.2	110.4	106.0	103.7
Industrial CH_4 Emissions[b]	12.2	16.1	18.4	18.5	18.6	18.8	18.9
Total	**197.8**	**147.7**	**123.9**	**126.7**	**129.0**	**124.8**	**122.6**

[a] For years 1990 to 2004, the Inventory methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2021, directly reported net CH_4 emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. These data incorporate CH_4 recovered and oxidized for MSW landfills. As such, CH_4 generation, CH_4 oxidation, and CH_4 recovery are not calculated separately and totaled to net CH_4 emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

[b] Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 1 landfill of 167 that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2021 (EPA 2022a).

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Table 7-4: CH_4 Emissions from Landfills (kt CH_4)

Activity	1990	2005	2017	2018	2019	2020	2021
MSW CH_4 Generation[a]	8,214	10,845	11,680	11,878	12,193	12,222	11,958
Industrial CH_4 Generation	484	638	729	734	739	745	750
MSW CH_4 Recovered[a]	(851)	(5,301)	(6,891)	(6,970)	(7,193)	(7,367)	(7,195)
MSW CH_4 Oxidized[a]	(736)	(843)	(1,021)	(1,044)	(1,058)	(1,069)	(1,059)
Industrial CH_4 Oxidized	(48)	(64)	(73)	(73)	(74)	(75)	(75)
MSW net CH_4 Emissions	6,627	4,701	3,768	3,864	3,942	3,786	3,704
Industrial net CH_4 Emissions[b]	436	575	656	661	665	671	675
Total	**7,063**	**5,275**	**4,424**	**4,525**	**4,607**	**4,456**	**4,379**

[a] For years 1990 to 2004, the Inventory methodology for MSW landfills uses the first order decay methodology. A methodological change occurs in year 2005. For years 2005 to 2021, directly reported net CH_4 emissions from the GHGRP data plus a scale-up factor are used to account for emissions from landfill facilities that are not subject to

the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. These data incorporate CH_4 recovered and oxidized for MSW landfills. As such, CH_4 generation, CH_4 oxidation, and CH_4 recovery are not calculated separately and totaled to net CH_4 emissions. See the Methodology and Time-Series Consistency section of this chapter for more information.

[b] Methane recovery is not calculated for industrial landfills because this is not a common practice in the United States. Only 1 landfill of 167 that report to Subpart TT (Industrial Waste Landfills) of the GHGRP had an active gas collection and control system during the year 2021 (EPA 2022a).

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Methodology and Time-Series Consistency

Methodology Applied for MSW Landfills

A combination of IPCC Tier 2 and 3 approaches (IPCC 2006) are used over the reported timeseries to calculate emissions from MSW Landfills, using two primary methods. The first method uses the first order decay (FOD) model as described by the *2006 IPCC Guidelines* to estimate CH_4 generation. The amount of CH_4 recovered and combusted from MSW landfills is subtracted from the CH_4 generation and is then adjusted with an oxidation factor. The oxidation factor represents the amount of CH_4 in a landfill that is oxidized to CO_2 as it passes through the landfill cover (e.g., soil, clay, geomembrane). This method is presented below and is similar to Equation HH-6 in 40 CFR Part 98.343 for MSW landfills, and Equation TT-6 in 40 CFR Part 98.463 for industrial waste landfills.

Equation 7-1: Landfill Methane Generation

$$\mathrm{CH}_{4,\mathrm{MSW}} = (G_{CH4} - \sum_{n-1}^{N} R_n) * (1 - OX)$$

where,

$CH_{4,MSW}$	=	Net CH_4 emissions from solid waste
$G_{CH4,MSW}$	=	CH_4 generation from MSW landfills, using emission factors for DOC, k, MCF, F from IPCC (2006) and other peer-reviewed sources
R	=	CH_4 recovered and combusted
Ox	=	CH_4 oxidized from MSW landfills before release to the atmosphere, using Ox values from IPCC (2006) and other peer-reviewed or scientifically validated literature (40 CFR Part 98)

The second method used to calculate CH_4 emissions from landfills, also called the back-calculation method, is based on directly measured amounts of recovered CH_4 from the landfill gas and is expressed below and by Equation HH-8 in 40 CFR Part 98.343. The two parts of the equation consider the portion of CH_4 in the landfill gas that is not collected by the landfill gas collection system, and the portion that is collected. First, the recovered CH_4 is adjusted with the collection efficiency of the gas collection and control system and the fraction of hours the recovery system operated in the calendar year. This quantity represents the amount of CH_4 in the landfill gas that is not captured by the collection system; this amount is then adjusted for oxidation. The second portion of the equation adjusts the portion of CH_4 in the collected landfill gas with the efficiency of the destruction device(s), and the fraction of hours the destruction device(s) operated during the year.

The current Inventory uses both methods to estimate CH_4 emissions across the time series within EPA's Waste Model, as summarized in Figure 7-3 below. This chapter provides a summary of the methods, activity data, and parameters used. Additional step-wise explanations to generate the net emissions are provided in Annex 3.14.

Equation 7-2: Net Methane Emissions from MSW Landfills

$$\mathrm{CH}_{4,\mathrm{Solid\ Waste}} = [\left(\frac{R}{CE\ x\ f_{REC}} - R\right) x(1 - OX) + R\ x\ \left(1 - (DE\ x\ f_{Dest})\right)]$$

where,

$CH_{4,Solid\ Waste}$	=	Net CH_4 emissions from solid waste
R	=	Quantity of recovered CH_4 from Equation HH-4 of EPA's GHGRP

CE = Collection efficiency estimated at the landfill, considering system coverage, operation, and cover system materials from Table HH-3 of EPA's GHGRP. If area by soil cover type information is not available, the default value of 0.75 should be used (percent)

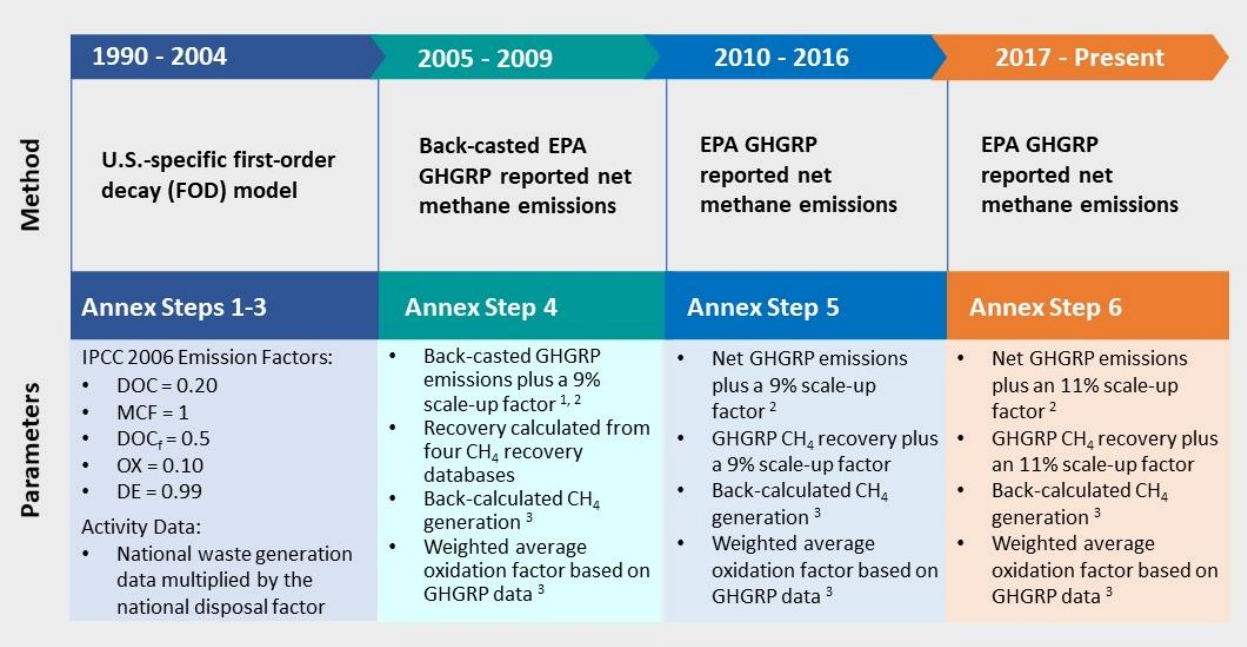
f_{REC} = fraction of hours the recovery system was operating (percent)

OX = oxidation factor (percent)

DE = destruction efficiency (percent)

f_{Dest} = fraction of hours the destruction device was operating (fraction)

Figure 7-3: Methodologies Used Across the Time Series to Compile the U.S. Inventory of Emission Estimates for MSW Landfills



[1] The intent of the scale-up factor is to estimate emissions from landfills that do not report to the GHGRP. More details on the scale-up factor and how it was developed can be found in Annex 3.14. The back-casted emissions are calculated using directly reported net methane emissions for GHGRP reporting years 2010 to 2016. The back-casted emissions are subject to change in each Inventory based on new reporting year reports and resubmitted greenhouse gas reports for previous years. This method is compatible with the *2006 IPCC Guidelines* because facilities reporting to the GHGRP either use the FOD method, or directly measured methane recovery data with default emission factors either directly included in the *2006 IPCC Guidelines* or scientifically validated through peer review.

[2] Emission factors used by facilities reporting to GHGRP Subpart HH are facility-specific defaults derived from peer-reviewed literature and the *2006 IPCC Guidelines*.

[3] Methane generation is back-calculated from the net MSW emissions, estimated methane recovery data, and the weighted average oxidation factor based on GHGRP Subpart HH reported data of 0.18 between 2010 to 2015, and 0.21 between 2016 to 2019, and 0.22 in 2020 and 2021.

The Waste Model is a spreadsheet developed by the IPCC for purposes of estimating methane emissions from solid waste disposal sites, adapted to the United States by the inclusion and usage of U.S.-specific parameters. The Waste Model contains activity and waste generation information from both the MSW and Industrial landfill sectors and estimates the amount of CH_4 emissions from each sector for each year of the time series, using both methods. Prior to the 1990 through 2015 Inventory, only the FOD method was used. Methodological changes were made to the 1990 through 2015 Inventory to incorporate higher tier data (i.e., CH_4 emissions as directly reported to EPA's GHGRP), which cannot be directly applied to earlier years in the time series without significant bias. The technique used to merge the directly reported GHGRP data with the previous methodology is described as the overlap

technique in the Time-Series Consistency chapter of the *2006 IPCC Guidelines*. Additional details on the technique used is included in Annex 3.14, and a technical memorandum (RTI 2017).

A summary of the methodology used to generate the current 1990 to 2021 Inventory estimates for MSW landfills is as follows and is also illustrated in Annex Figure A-19:

- **1940 to 1989:** These years are included for historical waste disposal amounts. Estimates of the annual quantity of waste landfilled for 1960 through 1988 were obtained from EPA's Anthropogenic Methane Emissions in the United States, Estimates for 1990: Report to Congress (EPA 1993) and an extensive landfill survey by the EPA's Office of Solid Waste in 1986 (EPA 1988). Although waste placed in landfills in the 1940s and 1950s contributes very little to current CH_4 generation, estimates for those years were included in the FOD model for completeness in accounting for CH_4 generation rates and are based on the population in those years and the per capita rate for land disposal for the 1960s. For the Inventory calculations, wastes landfilled prior to 1980 were broken into two groups: wastes disposed in managed, anaerobic landfills (Methane Conversion Factor, MCF, of 1) and those disposed in uncategorized solid waste disposal waste sites (MCF of 0.6) (IPCC 2006). Uncategorized sites represent those sites for which limited information is known about the management practices. All calculations after 1980 assume waste is disposed in managed, anaerobic landfills. The FOD method was applied to estimate annual CH_4 generation. Methane recovery amounts were then subtracted, and the result was then adjusted with a 10 percent oxidation factor to derive the net emissions estimates. A detailed explanation of the methods used are presented in Annex 3.14 Step 1.
- **1990 to 2004:** The Inventory time series begins in 1990. The FOD method is exclusively used for this group of years. The national total of waste generated (based on state-specific landfill waste generation data) and a national average disposal factor for 1989 through 2004 were obtained from the State of Garbage (SOG) survey every two years (i.e., 2002, 2004 as published in BioCycle 2006). In-between years were interpolated based on population growth. For years 1989 to 2000, directly reported total MSW generation data were used; for other years, the estimated MSW generation (excluding construction and demolition waste and inerts) were presented in the reports and used in the Inventory. The FOD method was applied to estimate annual CH_4 generation. Landfill-specific CH_4 recovery amounts (calculated from four CH_4 recovery databases) were then subtracted from CH_4 generation and the result was adjusted with a 10 percent oxidation factor to derive the net emissions estimates. A detailed explanation of the methods used are presented in Annex 3.14 Steps 1 through 3.
- **2005 to 2009:** Emissions for these years are estimated using net CH_4 emissions that are reported by landfill facilities under EPA's GHGRP. Because not all landfills in the United States are required to report to EPA's GHGRP, a 9 percent scale-up factor is applied to the GHGRP emissions for completeness. The intent of the scale-up factor is to account for emissions from landfills that do not report to the GHGRP. Supporting information, including details on the technique used to estimate emissions for 2005 to 2009, to develop the scale-up factor, and to ensure time-series consistency by incorporating the directly reported GHGRP emissions is presented in Annex 3.14 Step 4 and in RTI 2018a. Separate estimates of CH_4 generation, CH_4 recovery, and oxidation are calculated from the net CH_4 emissions. Landfill-specific CH_4 recovery is calculated from four CH_4 recovery databases. A single oxidation factor is not applied to the annual CH_4 generated as is done for 1990 to 2004 because the GHGRP emissions data are used, which already take oxidation into account. The GHGRP allows facilities to use varying oxidation factors (i.e., 0, 10, 25, or 35 percent) depending on their facility-specific calculated CH_4 flux rate. The effectively applied average oxidation factor between 2005 to 2009 averages to 0.14. Methane generation is then back-calculated using net CH_4 emissions, CH_4 recovery, and oxidation. A detailed explanation of the methods used to develop the back-casted emissions and revised scale-up factor are presented in Annex 3.14 Step 4.
- **2010 to 2016:** Net CH_4 emissions as directly reported to the GHGRP are used with a 9 percent scale-up factor to account for landfills that are not required to report to the GHGRP. A combination of the FOD method and the back-calculated CH_4 emissions were used by the facilities reporting to the GHGRP.

Landfills reporting to the GHGRP without gas collection and control apply the FOD method, while most landfills with landfill gas collection and control apply the back-calculation method. Methane recovery is calculated using reported GHGRP recovery data plus a 9 percent scale-up factor. Methane generation and oxidation are back-calculated from the net GHGRP CH_4 emissions applied and estimated CH_4 recovery. The average oxidation factor effectively applied is 0.18 percent. A detailed explanation of the methods used to develop the revised scale-up factor are presented in Annex 3.14 Step 5.

- **2017 to 2021:** The same methodology is applied as for 2010 through 2016 where a scale-up factor is applied to account for landfills that are not required to report to the GHGRP. The scale-up factor was revised for the 1990 to 2020 Inventory to change the methodology from total waste-in-place to only considering waste disposed for non-reporting landfills in the past 50 years (i.e., since 1970). Additional revisions made included incorporating facilities that have stopped reporting to the GHGRP, new additions to the 2021 LMOP Database (EPA 2022b), corrections to the underlying database of non-reporting landfills used to develop the 9 percent scale-up factor that were identified. For 2017 to 2021, a scale-up factor of 11 percent is applied annually to the GHGRP net reported CH_4 emissions. Methane recovery is calculated using reported GHGRP recovery data plus an 11 percent scale-up factor. Separate estimates of CH_4 generation and oxidation are calculated from the net CH_4 emissions applied. The average oxidation factor effectively applied is 0.22 percent. A detailed explanation of the methods used to develop the revised scale-up factor are presented in Annex 3.14 Step 6.

With regard to the time series and as stated in *2006 IPCC Guidelines Volume 1: Chapter 5 Time-Series Consistency* (IPCC 2006), "the time series is a central component of the greenhouse gas inventory because it provides information on historical emissions trends and tracks the effects of strategies to reduce emissions at the national level. All emissions in a time series should be estimated consistently, which means that as far as possible, the time series should be calculated using the same method and data sources in all years" (IPCC 2006). In some cases, it may not be possible to use the same methods and consistent data sets for all years because of limited data (activity data, emission factors, or other parameters) directly used in the calculation of emission estimates for some historical years. In such cases, emissions or removals may need to be recalculated using alternative methods. In this case, this chapter provides guidance on techniques to splice, or join methodologies together instead of back-casting emissions back to 1990. One of those techniques is referred to as the overlap technique. The overlap technique is recommended when new data becomes available for multiple years. This was the case with EPA's GHGRP data for MSW landfills, where directly reported CH_4 emissions data became available for more than 1,200 MSW landfills beginning in 2010. The GHGRP emissions data had to be merged with emissions from the FOD method to avoid a drastic change in emissions in 2010, when the datasets were combined. EPA also had to consider that according to IPCC's good practice, efforts should be made to reduce uncertainty in Inventory calculations and that, when compared to the GHGRP data, the FOD method presents greater uncertainty.

In evaluating the best way to combine the two datasets, EPA considered either using the FOD method from 1990 to 2009, or using the FOD method for a portion of that time and back-casting the GHGRP emissions data to a year where emissions from the two methodologies aligned. Plotting the back-casted GHGRP emissions against the emissions estimates from the FOD method showed an alignment of the data in 2004 and later years which facilitated the use of the overlap technique while also reducing uncertainty. A detailed explanation and a chart showing the estimates across the time series considering the two method options is included in Annex 3.14. EPA ultimately decided to back-cast the GHGRP emissions from 2009 to 2005 only, to merge the datasets and adhere to the IPCC *Good Practice Guidance* for ensuring time-series consistency.

Supporting information, including details on the techniques used to ensure time-series consistency by incorporating the directly-reported GHGRP emissions is presented in Annex 3.14.

Methodology Applied for Industrial Waste Landfills

Emissions from industrial waste landfills are estimated using a Tier 2 approach (IPCC 2006) and a tailored (country-specific) IPCC waste model. Activity data used are industrial production data (ERG 2021) for two sectors (pulp and

paper manufacturing, and food and beverage manufacturing) to which country-specific default waste disposal factors are applied (a separate disposal factor for each sector). The disposal factors, as described below, are based on scientifically reviewed data, and are the same across the entire time series. The emission factors are based on those recommended by the *2006 IPCC Guidelines* and are the same across the entire time series.

The FOD equation from IPCC 2006 is used via the waste model to estimate methane emissions:

Equation 7-3: Net Methane Emissions from Industrial Waste Landfills

$$\mathrm{CH}_{4,\mathrm{IND}} = (G_{CH4} - \sum_{n-1}^{N} R_n) * (1 - OX)$$

where,

$CH_{4,Solid\ Waste}$	=	Net CH_4 emissions from solid waste
$G_{CH4,Ind}$	=	CH_4 generation from industrial waste landfills, using production data multiplied by a disposal factor and emission factors for DOC, k, MCF, F (IPCC 2006)
R	=	CH_4 recovered and combusted (no recovery is assumed for industrial waste landfills)
OX	=	CH_4 oxidized from industrial waste landfills before release to the atmosphere (using the *2006 IPCC Guidelines* value for OX of 0.10)

The activity data used in the emission calculations are production data (e.g., the amount of meat, poultry, vegetables processed; the amount of paper produced) versus disposal data. There are currently no facility-specific data sources that track and report the amount and type of waste disposed of in the universe of industrial waste landfills in the United States. EPA's GHGRP provides some insight into waste disposal in industrial waste landfills but is not comprehensive. Data reported to the GHGRP on industrial waste landfills suggests that most of the organic waste which would result in methane emissions is disposed at pulp and paper and food processing facilities. Of the 168 facilities that reported to Subpart TT of the GHGRP in 2019, 92 (54 percent) are in the North American Industrial Classification System (NAICS) for Pulp, Paper, and Wood Products (NAICS 321 and 322) and 12 (7 percent) are in Food Manufacturing (NAICS 311).

Based on this limited information, the Inventory methodology assumes most of the organic waste placed in industrial waste landfills originates from the food processing (meat, vegetables, fruits) and pulp and paper sectors, thus estimates of industrial landfill emissions focused on these two sectors. EPA validated this assumption through an analysis of the Subpart TT of the GHGRP in the 2016 reporting year (RTI 2018b). The Subpart TT waste disposal information for pulp and paper facilities correlates well with the activity data currently used to estimate Inventory emissions; however, the waste disposal information in Subpart TT related to food and beverage facilities are approximately an order of magnitude different than the Inventory disposal estimates for the entire time series.

EPA conducted a literature review between 2020 and 2022 to investigate other sources of industrial food waste and annual waste disposal quantities. As a result of this effort, EPA decided to revise the food waste disposal factor in the 1990 to 2021 Inventory for select years. A waste disposal factor of 4.86 percent is used for 1990 to 2009 and a revised factor of 6 percent is used for 2010 to the current year. The 6 percent waste disposal factor is derived from recent surveys of the food and beverage industry where approximately 94 percent of food waste generated is repurposed (FWRA 2016). The 4.86% disposal factor is based on available data from a 1993 Report to Congress (EPA 1993).

The composition of waste disposed of in industrial waste landfills is expected to be more consistent in terms of composition and quantity than that disposed of in MSW landfills. The amount of waste landfilled is assumed to be a fraction of production that is held constant over the time series as explained in Annex 3.14.

Landfill CH_4 recovery is not accounted for in industrial waste landfills and is believed to be minimal based on available data collected under EPA's GHGRP for industrial waste landfills (Subpart TT), which shows that only one of the 167 facilities, or 1 percent of facilities, have active gas collection systems (EPA 2022a). However, because EPA's GHGRP is not a national database and comprehensive data regarding gas collection systems have not been published for industrial waste landfills, assumptions regarding a percentage of landfill gas collection systems, or a

total annual amount of landfill gas collected for the non-reporting industrial waste landfills have not been made for the Inventory methodology.

The amount of CH_4 oxidized by the landfill cover at industrial waste landfills was assumed to be 10 percent of the CH_4 generated (IPCC 2006; Mancinelli and McKay 1985; Czepiel et al. 1996) for all years.

Box 7-3: Nationwide Municipal Solid Waste Data Sources

Municipal solid waste (MSW) generated in the United States can be managed through a variety of methods. MSW that is not recycled, composted, combusted with energy recovery, or digested is assumed to be landfilled. In addition to these management pathways, waste or excess food from the food manufacturing and processing sector may be disposed through the sewerage network, used for animal feed, land application, donated for human consumption, and rendered or recycled into biofuels in the case of animal by-products, fats, oils and greases.

There have been three main sources for nationwide solid waste management data in the United States that the Inventory has used (see Annex 3.14, Box A-3 for comparison of estimates from these data sources):

- The *BioCycle* and Earth Engineering Center of Columbia University's SOG in America surveys [no longer published];
- The EPA's *Advancing Sustainable Materials Management: Facts and Figures* reports; and
- The EREF's *MSW Generation in the United States* reports.

The SOG surveys and, most recently EREF, collected state-reported data on the amount of waste generated and the amount of waste managed via different management options: landfilling, recycling, composting, and combustion. These data sources used a 'bottom-up' method. The survey asked for actual tonnages instead of percentages in each waste category (e.g., residential, commercial, industrial, construction and demolition, organics, tires) for each waste management option. If such a breakdown was not available, the survey asked for total tons landfilled. The data were adjusted for imports and exports across state lines so that the principles of mass balance were adhered to for completeness, whereby the amount of waste managed did not exceed the amount of waste generated. The SOG and EREF reports present survey data aggregated to the state level.

The EPA *Advancing Sustainable Materials Management: Facts and Figures* report characterizes national post-consumer municipal solid waste (MSW) generation and management using a top-down materials flow (mass balance) methodology. It captures an annual snapshot of MSW generation and management in the United States for specific products. Data are gathered from U.S. Government (e.g., U.S. Census Bureau and U.S. Department of Commerce), state environmental agencies, industry and trade groups, and sampling studies. The materials flow methodology develops MSW waste generation estimates of quantities of MSW products in the marketplace (using product sales and replacement data) and assessing waste generation by component material based on product lifespans. The data are used to estimate tons of materials and products generated, recycled, combusted with energy recovery, managed via other food waste management pathways, or landfilled nationwide. MSW that is not recycled or composted is assumed to be combusted or landfilled, except for wasted food, which uses a different methodology and includes nine different management pathways. The 2018 Facts and Figures Report (EPA 2020) uses a methodology that expanded the number of management pathways to include: animal feed; bio-based materials/biochemical processing (i.e., rendering); co-digestion/anaerobic digestion; composting/aerobic processes; combustion; donation; land application; landfill; and sewer/wastewater treatment.

In this Inventory, emissions from solid waste management are presented separately by waste management option, except for recycling of waste materials. Emissions from recycling are attributed to the stationary combustion of fossil fuels that may be used to power on-site recycling machinery and are presented in the stationary combustion chapter in the Energy sector, although the emissions estimates are not called out separately. Emissions from solid waste disposal in landfills and the composting of solid waste materials are presented in the Landfills and Composting sections in the Waste sector of this report. Emissions from anaerobic

digesters are presented in three different sections depending on the digester category. Emissions from on-farm digesters are included in the Agriculture sector; emissions from digesters at wastewater treatment plants and emissions from stand-alone digesters are presented in separate sections in the Waste sector of this report. In the United States, almost all incineration of MSW occurs at waste-to-energy (WTE) facilities or industrial facilities where useful energy is recovered, and thus emissions from waste incineration are accounted for in the Incineration chapter of the Energy sector of this report.

Uncertainty

Several types of uncertainty are associated with the estimates of CH_4 emissions from MSW and industrial waste landfills when the FOD method is applied directly for 1990 to 2004 in the Waste Model and, to some extent, in the GHGRP methodology. The approach used in the MSW emission estimates assumes that the CH_4 generation potential (L_o) and the rate of decay that produces CH_4 from MSW, as determined from several studies of CH_4 recovery at MSW landfills, are representative of conditions at U.S. MSW landfills. When this top-down approach is applied at the nationwide level, the uncertainties are assumed to be less than when applying this approach to individual landfills and then aggregating the results to the national level. In other words, the FOD method as applied in this Inventory is not facility-specific modeling and while this approach may over- or underestimate CH_4 generation at some landfills if used at the facility-level, the result is expected to balance out because it is being applied nationwide.

There is a high degree of uncertainty associated with the FOD model, particularly when a homogeneous waste composition and hypothetical decomposition rates are applied to heterogeneous landfills (IPCC 2006). There is less uncertainty in EPA's GHGRP data because this methodology is facility-specific, uses directly measured CH_4 recovery data (when applicable), and allows for a variety of landfill gas collection efficiencies, destruction efficiencies, and/or oxidation factors to be used.

Uncertainty also exists in the scale-up factors (both 9 percent and 11 percent) applied for years 2005 to 2016 and 2017 to 2021, respectively, and in the back-casted emissions estimates for 2005 to 2009. As detailed in RTI (2018a), limited information is available for landfills that do not report to the GHGRP. RTI developed an initial list of landfills that do not report to the GHGRP with the intent of quantifying the total waste-in-place for these landfills that would add up to the scale-up factor. Input was provided by industry, LMOP, and additional EPA support. However, many gaps existed in the initial development of this Non-Reporting Landfills Database. Assumptions were made for hundreds of landfills to estimate their waste-in-place and the subsequent scale-up factors. The waste-in-place estimated for each landfill is likely not 100 percent accurate and should be considered a reasonable estimate. Additionally, a simple methodology was used to back-cast emissions for 2005 to 2009 using the GHGRP-reported emissions from 2010 to 2021. This methodology does not factor in annual landfill to landfill changes in landfill CH_4 generation and recovery. Because of this, an uncertainty factor of 25 percent is applied to the scale-up factor and years (emission estimates) the scale-up factor is applied to.

Aside from the uncertainty in estimating landfill CH_4 generation, uncertainty also exists in the estimates of the landfill gas oxidized at MSW landfills. Facilities directly reporting to EPA's GHGRP can use oxidation factors ranging from 0 to 35 percent, depending on their facility-specific CH_4 flux. As recommended by the *2006 IPCC Guidelines* for managed landfills, a 10 percent default oxidation factor is applied in the Inventory for both MSW landfills (those not reporting to the GHGRP and for the years 1990 to 2004 when GHGRP data are not available) and industrial waste landfills regardless of climate, the type of cover material, and/or presence of a gas collection system.

Another significant source of uncertainty lies with the estimates of CH_4 recovered by flaring and gas-to-energy projects at MSW landfills that are sourced from the Inventory's CH_4 recovery databases (used for years 1990 to 2004). Four CH_4 recovery databases are used to estimate nationwide CH_4 recovery for MSW landfills for 1990 to 2009. The GHGRP MSW landfills database was added as a fourth recovery database starting with the 1990 to 2013

Inventory report (two years before the full GHGRP data set started being used for net CH_4 emissions for the Inventory). Relying on multiple databases for a complete picture introduces uncertainty because the coverage and characteristics of each database differs, which increases the chance of double counting avoided emissions. The methodology and assumptions that go into each database differ. For example, the flare database assumes the midpoint of each flare capacity at the time it is sold and installed at a landfill; the flare may be achieving a higher capacity, in which case the flare database would underestimate the amount of CH_4 recovered. Additionally, two databases, the EIA database and flare vendor database, could no longer be updated for the entire time series due to external factors. For example, the EIA database has not been updated since 2006 because the EIA stopped collected landfill recovery data. The EIA database has, for the most part, been replaced by the GHGRP MSW landfills database. The flare database was populated annually until 2015, but decreasing, voluntary participation from flare vendors sharing their flare sales data for several years prior to 2015.

To avoid double counting and to use the most relevant estimate of CH_4 recovery for a given landfill, a hierarchical approach is used among the four databases. GHGRP data and the EIA data are given precedence because facility data were directly reported; the LFGE data are given second priority because CH_4 recovery is estimated from facility-reported LFGE system characteristics; and the flare data are given the lowest priority because this database contains minimal information about the flare, no site-specific operating characteristics, and includes smaller landfills not included in the other three databases (Bronstein et al. 2012). The coverage provided across the databases most likely represents the complete universe of landfill CH_4 gas recovery; however, the number of unique landfills between the four databases does differ.

The *2006 IPCC Guidelines* default value of 10 percent for uncertainty in recovery estimates was used for two of the four recovery databases in the uncertainty analysis where metering of landfill gas was in place (for about 64 percent of the CH_4 estimated to be recovered). This 10 percent uncertainty factor applies to the LFGE database; 12 percent to the EIA database; and 1 percent for the GHGRP MSW landfills dataset because of the supporting information provided and rigorous verification process. For flaring without metered recovery data (the flare database), a much higher uncertainty value of 50 percent is used. The compounding uncertainties associated with the four databases in addition to the uncertainties associated with the FOD method and annual waste disposal quantities leads to the large upper and lower bounds for MSW landfills presented in Table 7-5.

The lack of landfill-specific information regarding the number and type of industrial waste landfills in the United States is a primary source of uncertainty with respect to the industrial waste generation and emission estimates. The approach used here assumes that most of the organic waste disposed of in industrial waste landfills that would result in CH_4 emissions consists of waste from the pulp and paper and food processing sectors. However, because waste generation and disposal data are not available in an existing data source for all U.S. industrial waste landfills, a straight disposal factor is applied over the entire time series to the amount produced to determine the amounts disposed. Industrial waste facilities reporting under EPA's GHGRP do report detailed waste stream information, and these data have been used to improve, for example, the DOC value used in the Inventory methodology for the pulp and paper sector. A 10 percent oxidation factor is also applied to CH_4 generation estimates for industrial waste landfills and carries the same amount of uncertainty as with the factor applied to CH_4 generation for MSW landfills.

The results of the *2006 IPCC Guidelines* Approach 2 quantitative uncertainty analysis are summarized in Table 7-5. There is considerable uncertainty for the MSW landfills estimates due to the many data sources used, each with its own uncertainty factor.

Table 7-5: Approach 2 Quantitative Uncertainty Estimates for CH_4 Emissions from Landfills (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate	Uncertainty Range Relative to Emission Estimate[a]			
		(MMT CO_2 Eq.)	(MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Total Landfills	CH_4	**122.6**	**98.9**	**154.4**	**-19%**	**26%**

MSW	CH_4	103.7	83.2	137.5	-20%	33%
Industrial	CH_4	18.9	15.9	25.8	-16%	36%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval. Individual uncertainty factors are applied to activity data and emission factors in the Monte Carlo analysis.

QA/QC and Verification

General quality assurance/quality control (QA/QC) procedures were applied consistent with the *U.S. Inventory* QA/QC plan, which is in accordance with Vol. 1, Chapter 6 of *2006 IPCC Guidelines* (see Annex 8 for more details). QA/QC checks are performed for the transcription of the published data set (e.g., EPA's GHGRP dataset) used to populate the Inventory data set in terms of completeness and accuracy against the reference source. Additionally, all datasets used for this category have been checked to ensure they are of appropriate quality and are representative of U.S. conditions. The primary calculation spreadsheet is tailored from the *2006 IPCC Guidelines* waste model and has been verified previously using the original, peer-reviewed IPCC waste model. All model input values and calculations were verified by secondary QA/QC review. Stakeholder engagements sessions in 2016 and 2017 were used to gather input on methodological improvements and facilitate an external expert review on the methodology, activity data, and emission factors.

Category-specific checks include the following:

- Evaluation of the secondary data sources used as inputs to the Inventory dataset to ensure they are appropriately collected and are reliable;
- Cross-checking the data (activity data and emissions estimates) with previous years to ensure the data are reasonable, and that any significant variation can be explained through the activity data;
- Conducting literature reviews to evaluate the appropriateness of country-specific emission factors (e.g., DOC values, precipitation zones with respect to the application of the k values) given findings from recent peer-reviewed studies; and
- Reviewing secondary datasets to ensure they are nationally complete and supplementing where necessary (e.g., using a scale-up factor to account for emissions from landfills that do not report to EPA's GHGRP).

A primary focus of the QA/QC checks in past Inventories was to ensure that CH_4 recovery estimates were not double-counted and that all LFGE projects and flares were included in the respective project databases. QA/QC checks performed in the past for the recovery databases were not performed in this Inventory, because new data were not added to the recovery databases in this Inventory year.

For the GHGRP data, EPA verifies annual facility-level reports through a multi-step process (e.g., combination of electronic checks and manual reviews by staff) to identify potential errors and ensure that data submitted to EPA are accurate, complete, and consistent.[3] Based on the results of the verification process, EPA follows up with facilities to resolve mistakes that may have occurred. The post-submittals checks are consistent with several general and category-specific QC procedures, including range checks, statistical checks, algorithm checks, and year-to-year checks of reported data and emissions. For the MSW Landfills sector, under Subpart HH of the GHGRP, MSW Landfills with gas collection are required to report emissions from their site using both a forward- (using a first order decay model as a basis) and back-calculating (using parameters specific to the landfill itself, such as measured recovery and collection efficiency of the landfill gas) methodology. Details on the forward- and back-calculation approach can be found in Annex 3.14 and 40 CFR Subpart HH of Part 98. Reporters can choose which of these two methodologies they believe best represents the emissions at their landfill and are required to submit that value as their total Subpart HH emissions. Facilities are generally not expected to switch between the two

[3] See https://www.epa.gov/sites/production/files/2015-07/documents/ghgrp_verification_factsheet.pdf.

equations each year, as the emissions calculated using each method can vary greatly and can have a significant effect on emission trends for that landfill, and potentially the entire MSW Landfill sector under the GHGRP. Key checks are in place to assure that emissions are trending in a sensible way year over year for each reporting landfill.

Recalculations Discussion

Revisions to the individual facility reports submitted to EPA's GHGRP can be made at any time and a portion of facilities have revised their reports since 2010 for various reasons, resulting in changes to the total net CH_4 emissions for MSW landfills. Each Inventory year, the back-casted emissions for 2005 to 2009 will be recalculated using the most recently verified data from the GHGRP. Changes in these data result in changes to the back-casted emissions. The impact of the revisions to the GHGRP Subpart HH annual greenhouse gas reports resubmitted for 2010 to 2021 slightly increased or decreased total Subpart HH reported net emissions up to 0.5 percent in the years the Subpart HH data are applied (i.e., 2005 to 2020). The resubmissions resulted in annual increases ranging from 0.1 percent to 0.3 percent to the net MSW emissions between 2005 to 2009, no net emission changes for 2010 to 2015, and a slight decrease averaging -0.15 percent of emissions is observed between 2016 to 2019. A 0.5 percent increase is observed for 2020. Between 2005 to 2020, on average, the impact or change was very small (less than 0.1% percent) in emissions across all reporters. A change in net Subpart HH reported emissions results in the same percentage change in the Inventory emissions for that year.

The revision to the industrial food waste disposal factor from 4.86 percent to 6 percent increased net industrial emissions between 2010 to 2020 from a low of 2.1 percent in 2011 to a high of 10.9 percent in 2020. Combined, these two recalculations increased net landfill emissions for all years between 2005 to 2020. Emissions increased by less than 1 percent between 2005 to 2014 (low of 0.3 percent in 2005 and a high of 0.8 percent in 2014) and up to 1.9 percent between 2015 to 2020 (low of 1.0 percent in 2015 to a high of 1.9 percent in 2020).

In addition, for the current Inventory, estimates of CO_2 equivalent emissions totals of CH_4 emissions from landfills have been revised to apply the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The GWP of CH_4 has increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions. The AR5 GWPs have been applied across the entire time series for consistency. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CH_4 emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA received recommendations from industry stakeholders regarding the DOC values and decay rates (k values) required to be used in the GHGRP calculations. Stakeholders have suggested that newer, more up-to-date default values considering recent trends in the composition of waste disposed in MSW landfills for both k and DOC in the GHGRP should be developed and reflected in the 2005 and later years of the Inventory. In response, EPA developed a multivariate analysis using publicly available Subpart HH GHGRP data, solving for optimized DOC and k values across the more than 1,100 landfills reporting to the program. The results of this analysis could help inform a current GHGRP rulemaking (87 FR 36920) where changes could be made to the default DOC and k values contained within Subpart HH, which could then be carried over to the Inventory emissions estimates for MSW landfills upon promulgation of any revisions to 40 CFR part 98. This potential improvement may be long-term.

With respect to the scale-up factor, EPA received comments on revisions made to the scale-up for the 1990 to 2020 inventory from a total waste-in-place approach to a time-based threshold of 50 years. Commenters noted that this time-based threshold approach does not adjust for the non-linearity of methane production of landfill gas. In response, EPA will further investigate how best to account for emissions from MSW landfills that do not

report to the GHGRP, including using the FOD model for these landfills based on estimated annual waste disposed for this subset of landfills between 2005 to 2021, reverting to the total waste-in-place approach, or modifying the time-based threshold approach. Any methodological revisions to accounting for emissions from this subset of landfills will be made in the future (1990 to 2022) Inventory.

Relatedly, EPA will periodically assess the impact to the waste-in-place and emissions data from GHGRP facilities that have resubmitted annual reports during any reporting years, are new reporting facilities, and from facilities that have stopped reporting to the GHGRP to ensure national estimates are as complete as possible. Facilities may stop reporting to the GHGRP when they meet the "off-ramp" provisions (reported less than 15,000 metric tons of CO_2 equivalent emissions for 3 consecutive years or less than 25,000 metric tons of CO_2 equivalent emissions for 5 consecutive years). If warranted, EPA will revise the scale-up factor to reflect newly acquired information to ensure completeness of the Inventory. EPA considered public comments received on the 1990-2019 Inventory specific to using a time-based threshold to calculate the scale-up factor instead of a total waste-in-place approach. The rationale supporting the comments was that older, closed landfills with large quantities of waste-in-place are driving up the scale-up factor but have little impact on total methane generation. EPA assessed two time-based scenarios for developing the scale-up factor – one scenario looking at the past 30 years of waste disposed, and the second looking at the past 50 years of waste disposed. The 50-year time-based threshold was applied and resulted in the 11 percent scale-up factor used between 2017 and 2021.

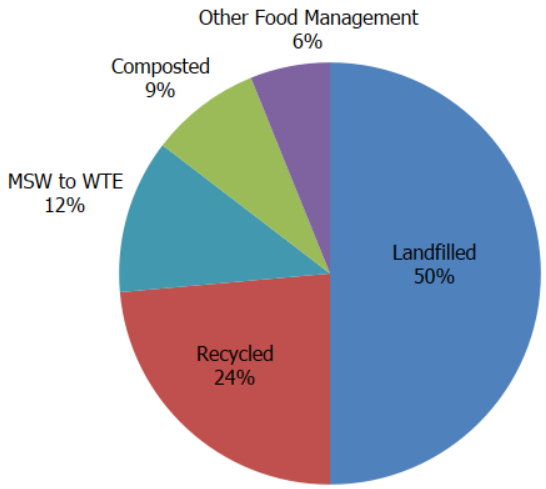
EPA is planning to account for unmanaged landfills in Puerto Rico and other U.S. Territories to the landfill emissions estimates. Data limitations for historical waste received at these sites make this challenging. Presently, emissions from managed sites in Puerto Rico and Guam are accounted for in 2005 to present as part of the GHGRP Subpart HH dataset.

Additionally, with the recent publication of the *2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories* (IPCC 2019), EPA will begin to update applicable emission factors, methodologies, and assumptions underlying emission estimates for landfills and make any applicable changes during the next (1990 to 2022) Inventory cycle per the *2019 Refinement*.

Box 7-4: Overview of U.S. Solid Waste Management Trends

As shown in Figure 7-4 and Figure 7-5 landfilling of MSW is currently and has been the most common waste management practice. A large portion of materials in the waste stream are recovered for recycling and composting, which is becoming an increasingly prevalent trend throughout the country. Materials that are composted and recycled would have previously been disposed in a landfill.

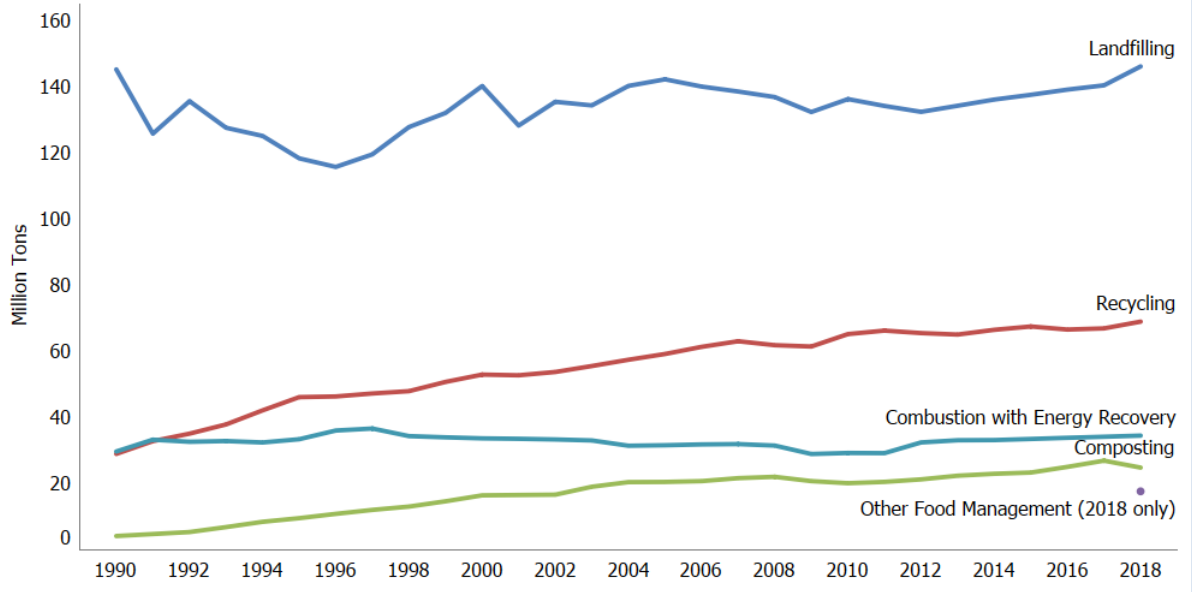
Figure 7-4: Management of Municipal Solid Waste in the United States, 2018



Note: 2018 is the latest year of available data. Data taken from Table 35 of EPA (2020a). MSW to WTE is combustion with energy recovery (WTE = waste-to-energy).

Source: EPA (2020b)

Figure 7-5: MSW Management Trends from 1990 to 2018



Note: 2018 is the latest year of available data. Only one year of data (2018) is available for the "Other Food Management" category.

Source: EPA (2020b). The EPA Advancing Sustainable Materials Management reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA 2020b for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA

(2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request but are no longer on the EPA's Advancing Sustainable Materials Management web site.[4]

Table 7-6 presents the national-level material composition of waste disposed across typical MSW landfills in the United States over time. It is important to note that the actual composition of waste entering each landfill will vary from that presented in Table 7-6.

Understanding how the waste composition changes over time, specifically for the degradable waste types (i.e., those types known to generate CH_4 as they break down in a modern MSW landfill), is important for estimating greenhouse gas emissions. Increased diversion of degradable materials so that they are not disposed of in landfills reduces the CH_4 generation potential and CH_4 emissions from landfills. For certain degradable waste types (i.e., paper and paperboard), the amounts discarded have decreased over time due to an increase in waste diversion through recycling and composting (see Table 7-6 and Figure 7-6). As shown in Figure 7-6, the diversion of food scraps has been consistently low since 1990 because most cities and counties do not practice curbside collection of these materials, although the quantity has been slowly increasing in recent years. Neither Table 7-6 nor Figure 7-6 reflect the frequency of backyard composting of yard trimmings and food waste because this information is largely not collected nationwide and is hard to estimate.

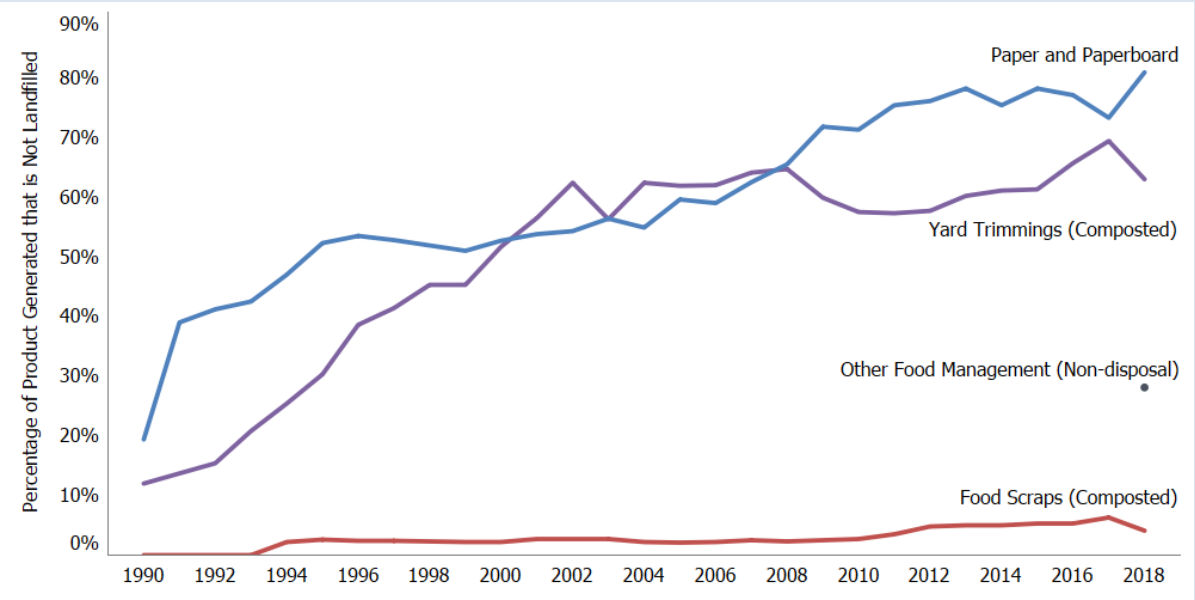
Table 7-6: Materials Discarded in the Municipal Waste Stream by Waste Type from 1990 to 2018 (Percent)

Waste Type	1990	2005	2015	2016	2017	2018
Paper and Paperboard	30.0%	24.7%	13.3%	12.7%	13.1%	11.8%
Glass	6.0%	5.8%	5.0%	4.9%	4.9%	5.2%
Metals	7.2%	7.9%	9.5%	9.8%	9.9%	9.5%
Plastics	9.5%	16.4%	18.9%	18.9%	19.2%	18.5%
Rubber and Leather	3.2%	2.9%	3.3%	3.4%	3.5%	3.4%
Textiles	2.9%	5.3%	7.7%	8.0%	8.0%	7.7%
Wood	6.9%	7.5%	8.0%	8.8%	8.7%	8.3%
Other	1.4%	1.8%	2.2%	2.2%	2.2%	2.0%
Food Scraps	13.6%	18.5%	22.0%	22.1%	22.0%	24.1%
Yard Trimmings	17.6%	7.0%	7.8%	6.9%	6.2%	7.2%
Miscellaneous Inorganic Wastes	1.7%	2.2%	2.3%	2.3%	2.3%	2.3%

Source: EPA (2020b)

[4] See https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management.

Figure 7-6: Percent of Degradable Materials Diverted from Landfills from 1990 to 2018 (Percent)



Note: The data shown in this chart are for recycling of paper and paperboard, composting of food scraps and yard trimmings, and alternative management pathways for the Other Food Management (non-disposal) category. The Other Food Management (non-disposal) category is a new addition and only one year of data are available for 2018 (28 percent of the food waste generated was beneficially reused or managed using a method that was not landfilling, recycling, or composting). The Other Food Management pathways include animal feed, bio-based materials/biochemical processing, co-digestion/anaerobic digestion, donation, land application, and sewer/wastewater treatment.

Source: EPA (2020b). The EPA Advancing Sustainable Materials reports only present data for select years, thus several reports were used in the compilation of this figure. All data were taken from Table 35 in EPA (2020b) for 1990, 2000, 2015, 2017 and 2018. Data were taken from Table 35 in EPA (2019) for 2010 and 2016. Data were taken from EPA (2018) for 2014. Data were taken from Table 35 of EPA (2016b) for 2012 and 2013. Data were taken from Table 30 of EPA (2014) for 2008 and 2011. The reports with data available for years prior to EPA (2012) can be provided upon request, but are not longer on the EPA's Advancing Sustainable Materials Management website.[5]

[5] See https://www.epa.gov/facts-and-figures-about-materials-waste-and-recycling/advancing-sustainable-materials-management.

7.2 Wastewater Treatment and Discharge (CRF Source Category 5D)

Wastewater treatment and discharge processes are sources of anthropogenic methane (CH_4) and nitrous oxide (N_2O) emissions. Wastewater from domestic and industrial sources is treated to remove soluble organic matter, suspended solids, nutrients, pathogenic organisms, and chemical contaminants.[6] Treatment of domestic wastewater may either occur on site, most commonly through septic systems, or off site at centralized treatment systems, most commonly at publicly owned treatment works (POTWs). In the United States, approximately 17 percent of domestic wastewater is treated in septic systems or other on-site systems, while the rest is collected and treated centrally (U.S. Census Bureau 2019). Treatment of industrial wastewater may occur at the industrial plant using package or specially designed treatment plants or be collected and transferred off site for co-treatment with domestic wastewater in centralized treatment systems.

Centralized Treatment. Centralized wastewater treatment systems use sewer systems to collect and transport wastewater to the treatment plant. Sewer collection systems provide an environment conducive to the formation of CH_4, which can be substantial depending on the configuration and operation of the collection system (Guisasola et al. 2008). Recent research has shown that at least a portion of CH_4 formed within the collection system enters the centralized system where it contributes to CH_4 emissions from the treatment system (Foley et al. 2015).

The treatment plant may include a variety of processes, ranging from physical separation of material that readily settles out (typically referred to as primary treatment), to treatment operations that use biological processes to convert and remove contaminants (typically referred to as secondary treatment), to advanced treatment for removal of targeted pollutants, such as nutrients (typically referred to as tertiary treatment). Not all wastewater treatment plants conduct primary treatment prior to secondary treatment, and not all plants conduct advanced or tertiary treatment (EPA 1998a).

Soluble organic matter is generally removed using biological processes in which microorganisms consume the organic matter for maintenance and growth. Microorganisms can biodegrade soluble organic material in wastewater under aerobic or anaerobic conditions, where the latter condition produces CH_4. The resulting biomass (sludge) is removed from the effluent prior to discharge to the receiving stream and may be further biodegraded under aerobic or anaerobic conditions, such as anaerobic sludge digestion. Sludge can be produced from both primary and secondary treatment operations. Some wastewater may also be treated using constructed (or semi-natural) wetland systems, though this is much less common in the United States and represents a relatively small portion of wastewater treated centrally (<0.1 percent) (ERG 2016). Constructed wetlands are a coupled anaerobic-aerobic system and may be used as the primary method of wastewater treatment, or are more commonly used as a final treatment step following settling and biological treatment. Constructed wetlands develop natural processes that involve vegetation, soil, and associated microbial assemblages to trap and treat incoming contaminants (IPCC 2014). Constructed wetlands do not produce secondary sludge (sewage sludge).

The generation of N_2O may also result from the treatment of wastewater during both nitrification and denitrification of the nitrogen (N) present, usually in the form of urea, proteins, and ammonia. Ammonia N is converted to nitrate (NO_3) through the aerobic process of nitrification. Denitrification occurs under anoxic/anaerobic conditions, whereby anaerobic or facultative organisms reduce oxidized forms of nitrogen (e.g., nitrite, nitrate) in the absence of free oxygen to produce nitrogen gas (N_2). Nitrous oxide is generated as a by-product of nitrification, or as an intermediate product of denitrification. No matter where N_2O is formed it is

[6] Throughout the Inventory, emissions from domestic wastewater also include any commercial and industrial wastewater collected and co-treated with domestic wastewater.

typically stripped (i.e., transferred from the liquid stream to the air) in aerated parts of the treatment process. Stripping also occurs in non-aerated zones at rates lower than in aerated zones.

On-site Treatment. The vast majority of on-site systems in the United States are septic systems composed of a septic tank, generally buried in the ground, and a soil dispersion system. Solids and dense materials contained in the incoming wastewater (influent) settle in the septic tank as sludge. Floatable material (scum) is also retained in the tank. The sludge that settles on the bottom of the tank undergoes anaerobic digestion. Partially treated water is discharged in the soil dispersal system. The solid fraction accumulates and remains in the tank for several years, during which time it degrades anaerobically. The gas produced from anaerobic sludge digestion (mainly CH_4 and biogenic CO_2) rises to the liquid surface and is typically released through vents. The gas produced in the effluent dispersal system (mainly N_2O and biogenic CO_2) is released through the soil.

Discharge. Dissolved CH_4 and N_2O that is present in wastewater discharges to aquatic environments has the potential to be released (Short et al. 2014; Short et al. 2017), and the presence of organic matter or nitrogen in wastewater discharges is generally expected to increase CH_4 and N_2O emissions from these aquatic environments. Where organic matter is released to slow-moving aquatic systems, such as lakes, estuaries, and reservoirs, CH_4 emissions are expected to be higher. Similarly, in the case of discharge to nutrient-impacted or hypoxic waters, N_2O emissions can be significantly higher.

In summary, the principal factor in determining the CH_4 generation potential of wastewater is the amount of degradable organic material in the wastewater. Common parameters used to measure the organic component of the wastewater are the biochemical oxygen demand (BOD) and chemical oxygen demand (COD). Under the same conditions, wastewater with higher COD (or BOD) concentrations will generally yield more CH_4 than wastewater with lower COD (or BOD) concentrations. BOD represents the amount of oxygen that would be required to completely consume the organic matter contained in the wastewater through aerobic decomposition processes, while COD measures the total material available for chemical oxidation (both biodegradable and non-biodegradable). The BOD value is most commonly expressed in milligrams of oxygen consumed per liter of sample during 5 days of incubation at 20°C, or BOD_5. Throughout the rest of this chapter, the term "BOD" refers to BOD_5. Because BOD is an aerobic parameter, it is preferable to use COD to estimate CH_4 production, since CH_4 is produced only in anaerobic conditions. Where present, biogas recovery and flaring operations reduce the amount of CH_4 generated that is actually emitted. Per IPCC guidelines (IPCC 2019), emissions from anaerobic sludge digestion, including biogas recovery and flaring operations, where the digester's primary use is for treatment of wastewater treatment solids, are reported under Wastewater Treatment. The principal factor in determining the N_2O generation potential of wastewater is the amount of N in the wastewater. The variability of N in the influent to the treatment system, as well as the operating conditions of the treatment system itself, also impact the N_2O generation potential. The methods and underlying data sources to estimate emissions from are described in further detail in the "Methodology and Time Series Consistency" section below for treatment of domestic and industrial wastewater.

Overall, treatment of wastewater emitted 42.0 MMT CO_2 Eq. in 2021. Methane (CH_4) emissions from domestic wastewater treatment and discharge were estimated to be 11.9 MMT CO_2 Eq. (424 kt CH_4) and 2.0 MMT CO_2 Eq. (72 kt CH_4), respectively, totaling 13.9 MMT CO_2 Eq. (496 kt CH_4) in 2021. Emissions remained fairly steady from 1990 through 2002 but have decreased since that time due to decreasing percentages of wastewater being treated in anaerobic systems, generally including reduced use of on-site septic systems and central anaerobic treatment systems (EPA 1992, 1996, 2000, and 2004; U.S. Census Bureau 2019). In 2021, CH_4 emissions from industrial wastewater treatment and discharge were estimated to be 6.6 MMT CO_2 Eq. (237 kt CH_4) and 0.5 MMT CO_2 Eq. (19 kt CH_4), respectively, totaling 7.2 MMT CO_2 Eq. (256 kt CH_4). Industrial emissions from wastewater treatment have generally increased across the time series through 1999 and then fluctuated up and correspond with production changes from the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and brewery industries. Industrial wastewater emissions have generally seen an uptick since 2016. Table 7-7 and Table 7-8 provide CH_4 emission estimates from domestic and industrial wastewater treatment.

With respect to N_2O, emissions from domestic wastewater treatment and discharge in 2021 were estimated to be 16.2 MMT CO_2 Eq. (61 kt N_2O) and 4.2 MMT CO_2 Eq. (16 kt N_2O), respectively, totaling 20.4 MMT CO_2 Eq. (77 kt N_2O). Nitrous oxide emissions from wastewater treatment processes gradually increased across the time series because of increasing U.S. population and protein consumption. In 2021, N_2O emissions from industrial wastewater treatment and discharge were estimated to be 0.4 MMT CO_2 Eq. (1.5 kt N_2O) and 0.1 MMT CO_2 Eq. (0.3 kt N_2O), respectively, totaling 0.5 MMT CO_2 Eq. (1.7 kt N_2O). Industrial emission sources have gradually increased across the time series with production changes associated with the treatment of wastewater from the pulp and paper manufacturing, meat and poultry processing, petroleum refining, and brewery industries. Table 7-7 and Table 7-8 provide N_2O emission estimates from domestic wastewater treatment.

Table 7-7: CH_4 and N_2O Emissions from Domestic and Industrial Wastewater Treatment (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4	**22.7**	**22.7**	**21.5**	**21.4**	**21.2**	**21.3**	**21.1**
Domestic Treatment	15.1	14.6	12.6	12.3	11.9	12.1	11.9
Domestic Effluent	1.4	1.4	2.0	2.0	2.0	2.0	2.0
Industrial Treatment[a]	5.5	6.1	6.4	6.5	6.6	6.6	6.6
Industrial Effluent[a]	0.7	0.6	0.6	0.6	0.6	0.5	0.5
N_2O	**14.8**	**18.1**	**20.6**	**21.2**	**21.3**	**20.9**	**20.9**
Domestic Treatment	10.5	13.7	15.7	16.2	16.4	16.1	16.2
Domestic Effluent	3.9	3.9	4.4	4.5	4.5	4.3	4.2
Industrial Treatment[b]	0.3	0.4	0.4	0.4	0.5	0.4	0.4
Industrial Effluent[b]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total	**37.5**	**40.7**	**42.2**	**42.5**	**42.5**	**42.2**	**42.0**

[a] Industrial activity for CH_4 includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

[b] Industrial activity for N_2O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

Note: Totals may not sum due to independent rounding.

Table 7-8: CH_4 and N_2O Emissions from Domestic and Industrial Wastewater Treatment (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4	**811**	**809**	**770**	**763**	**755**	**761**	**753**
Domestic Treatment	539	521	449	438	426	433	424
Domestic Effluent	49	49	72	73	73	72	72
Industrial Treatment[a]	196	216	229	232	236	237	237
Industrial Effluent[a]	27	22	20	20	20	19	19
N_2O	**56**	**68**	**78**	**80**	**80**	**79**	**79**
Domestic Treatment	40	52	59	61	62	61	61
Domestic Effluent	15	15	17	17	17	16	16
Industrial Treatment[b]	1	1	1	2	2	1	1
Industrial Effluent[b]	+	+	+	+	+	+	+

+ Does not exceed 0.5 kt.

[a] Industrial activity for CH_4 includes the pulp and paper manufacturing, meat and poultry processing, fruit and vegetable processing, starch-based ethanol production, petroleum refining, and breweries industries.

[b] Industrial activity for N_2O includes the pulp and paper manufacturing, meat and poultry processing, starch-based ethanol production, and petroleum refining.

Note: Totals by gas may not sum due to independent rounding.

Methodology and Time-Series Consistency

The methodologies presented in IPCC (2019) form the basis of the CH_4 and N_2O emission estimates for both domestic and industrial wastewater treatment and discharge.[7] Domestic wastewater treatment follows the IPCC Tier 2 methodology for key pathways, while domestic wastewater discharge follows IPCC Tier 2 discharge methodology and emission factors. Default factors from IPCC (2019) or IPCC (2006) are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor, though IPCC default factors are often based in part on data from or representative of U.S. wastewater treatment systems. Industrial wastewater treatment follows IPCC Tier 1 and wastewater treatment discharge follows Tier 1 or Tier 2 methodologies, depending on the industry. EPA will continue to implement the Tier 2 discharge methodology for more industries as data are investigated and time and resource constraints allow (see the Planned Improvements section below). Similar to domestic wastewater, IPCC default factors are used when there are insufficient U.S.-specific data to develop a U.S.-specific factor.

Methodological approaches were applied to the entire time series to ensure consistency in emissions from 1990 through 2021. In the following cases, the source used to capture activity data changed over the time series. EPA transitioned to these newer data sources to continue estimating emissions in a way that ensured both accuracy and continuity. For example:

- Starch-based ethanol production data: the source used for 1990 to 2017 production was no longer available after 2017. A new, publicly available source was identified and is used for production in 2015-2021. However, this source does not have sufficient data for the earlier timeseries. EPA confirmed with experts familiar with the sources that combining these two sources to populate the time series was accurate (ERG 2019; Lewis 2019) and does not present any significant discontinuities in the time series.
- Brewery production data: the source used for production changed in 2007 to publish craft brewery production broken out by size but does not include data prior to 2007. Therefore, rather than estimating total production data prior to 2007 with this source, another data source was used to ensure accuracy of production data through the time series (ERG 2018b).

Refer to the Recalculations section below for details on updates implemented to improve accuracy, consistency and/or completeness of the time series.

Domestic Wastewater CH_4 Emission Estimates

Domestic wastewater CH_4 emissions originate from both septic systems and from centralized treatment systems. Within these centralized systems, CH_4 emissions can arise from aerobic systems that liberate dissolved CH_4 that formed within the collection system or that are designed to have periods of anaerobic activity (e.g., constructed wetlands and facultative lagoons), anaerobic systems (anaerobic lagoons and anaerobic reactors), and from anaerobic sludge digesters when the captured biogas is not completely combusted. Emissions will also result from the discharge of treated effluent from centralized wastewater plants to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries). The systems with emissions estimates are:

- Septic systems (A);
- Centralized treatment aerobic systems (B), including aerobic systems (other than constructed wetlands) (B1), constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);

[7] IPCC (2019) updates, supplements, and elaborates the *2006 IPCC Guidelines* where gaps or out-of-date science have been identified. EPA used these methodologies to improve completeness and include sources of greenhouse gas emissions that have not been estimated prior to the 1990-2019 Inventory, such as N_2O emissions from industrial wastewater treatment, and to improve emission estimates for other sources, such as emissions from wastewater discharge and centralized wastewater treatment.

- Centralized anaerobic systems (C);
- Anaerobic sludge digesters (D); and
- Centralized wastewater treatment effluent (E).

Methodological equations for each of these systems are presented in the subsequent subsections; total domestic CH_4 emissions are estimated as follows:

Equation 7-4: Total Domestic CH_4 Emissions from Wastewater Treatment and Discharge

$$\text{Total Domestic } CH_4 \text{ Emissions from Wastewater Treatment and Discharge (kt)} = A + B + C + D + E$$

Table 7-9 presents domestic wastewater CH_4 emissions for both septic and centralized systems, including anaerobic sludge digesters and emissions from centralized wastewater treatment effluent, in 2021.

Table 7-9: Domestic Wastewater CH_4 Emissions from Septic and Centralized Systems (2021, kt, MMT CO_2 Eq. and Percent)

	CH_4 Emissions (kt)	CH_4 Emissions (MMT CO_2 Eq.)	% of Domestic Wastewater CH_4
Septic Systems (A)	223	6.2	45.0
Centrally-Treated Aerobic Systems (B)	74	2.1	14.8
Centrally-Treated Anaerobic Systems (C)	119	3.3	24.1
Anaerobic Sludge Digesters (D)	8	0.2	1.6
Centrally-Treated Wastewater Effluent (E)	72	2.0	14.5
Total	**496**	**13.9**	**100**

Emissions from Septic Systems:

Methane emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems (about 17 percent in 2021; U.S. Census Bureau 2019) and an emission factor and then converting the result to kt/year.

U.S. population data were taken from historic U.S. Census Bureau national population totals data and include the populations of the United States and Puerto Rico (U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau 2021a and 2021b; Instituto de Estadísticas de Puerto Rico 2021). Population data for American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands were taken from the U.S. Census Bureau International Database (U.S. Census Bureau 2022). Table 7-12 presents the total U.S. population for 1990 through 2021. The fraction of the U.S. population using septic systems or centralized treatment systems is based on data from the *American Housing Surveys* (U.S. Census Bureau 2019).

Methane emissions for septic systems are estimated as follows:

Equation 7-5: CH_4 Emissions from Septic Systems

$$Emissions\ from\ Septic\ Systems\ (\text{U.S. Specific}) = A$$
$$= US_{POP} \times (T_{SEPTIC}) \times (EF_{SEPTIC}) \times 1/10^9 \times 365.25$$

Table 7-10: Variables and Data Sources for CH_4 Emissions from Septic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
US_{POP}	U.S. population[a]	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau (2011)

Variable	Variable Description	Units	Inventory Years: Source of Value
			2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
T_{SEPTIC}	Percent treated in septic systems[a]	%	Odd years from 1989 through 2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
EF_{SEPTIC}	Methane emission factor – septic systems (10.7)	g CH_4/capita/day	1990-2021: Leverenz et al. (2010)
$1/10^9$	Conversion factor	g to kt	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion

[a] Value of activity data varies over the Inventory time series.

Emissions from Centrally Treated Aerobic and Anaerobic Systems:

Methane emissions from POTWs depend on the total organics in wastewater. Table 7-12 presents the total organically degradable material in wastewater, or TOW, for 1990 through 2021. The TOW was determined using BOD generation rates per capita weighted average both with and without kitchen scraps as well as an estimated percent of housing units that utilize kitchen garbage disposals. Households with garbage disposals (with kitchen scraps or ground up food scraps) typically have wastewater with higher BOD than households without garbage disposals due to increased organic matter contributions (ERG 2018a). The equations are as follows:

Equation 7-6: Total Wastewater BOD5 Produced per Capita (U.S.-Specific [ERG 2018a])

$$\mathrm{BOD}_{\text{gen rate}}\ (\mathrm{kg/capita/day}) = \mathrm{BOD}_{\text{without scrap}} \times (1 - \%\text{kitchen disposal}) + \mathrm{BOD}_{\text{with scraps}} \times (\%\text{kitchen disposal})$$

Equation 7-7: Total Organically Degradable Material in Domestic Wastewater (IPCC 2019 [Eq. 6.3])

$$\mathrm{TOW}\left(\frac{\mathrm{Gg\ BOD}}{\mathrm{year}}\right) = \mathrm{US}_{POP} \times \mathrm{BOD}_{gen\ rate} \times 365.25 \times \frac{1}{10^6}$$

Table 7-11: Variables and Data Sources for Organics in Domestic Wastewater

Variable	Variable Description	Units	Inventory Years: Source of Value
$BOD_{gen\ rate}$	Total wastewater BOD produced per capita	kg/capita/day	1990-2021: Calculated
$BOD_{without\ scrap}$	Wastewater BOD produced per capita without kitchen scraps[a]	kg/capita/day	1990-2003: Metcalf & Eddy (2003) 2004-2013: Linear interpolation 2014-2021: Metcalf & Eddy (2014)
$BOD_{with\ scraps}$	Wastewater BOD produced per capita with kitchen scraps[a]	kg/capita/day	
% kitchen disposal	Percent of housing units with kitchen	%	1990-2013: U.S. Census

	kitchen disposal[a]		Bureau (2013) 2014-2021: Forecasted from the rest of the time series
TOW	Total wastewater BOD Produced per Capita[a]	Gg BOD/year	1990-2021: Calculated, ERG (2018a)
US_{POP}	U.S. population[a]	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau (2011) 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
365.25	Conversion factor	Days in a year	Standard conversion
$1/10^6$	Conversion factor	kg to Gg	Standard conversion

[a] Value of activity data varies over the Inventory time series.

Table 7-12: U.S. Population (Millions) and Domestic Wastewater TOW (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Population	253	300	329	330	332	335	336
TOW	8,131	9,624	9,894	9,958	10,019	10,132	10,159

Sources: U.S. Census Bureau (2002); U.S. Census Bureau (2011); U.S. Census Bureau (2021a and 2021b); Instituto de Estadísticas de Puerto Rico (2021); U.S. Census Bureau (2022); ERG (2018a).

Methane emissions from POTWs were estimated by multiplying the total organics in centrally treated wastewater (total BOD_5) produced per capita in the United States by the percent of wastewater treated centrally, or percent collected (about 83 percent in 2021), the correction factor for additional industrial BOD discharged to the sewer system, the relative percentage of wastewater treated by aerobic systems (other than constructed wetlands), constructed wetlands only, and anaerobic systems, and the emission factor[8] for aerobic systems, constructed wetlands only, and anaerobic systems. Methane emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow from treatment to constructed wetlands, wastewater BOD concentration entering tertiary treatment, constructed wetlands emission factor, and then converting to kt/year.

In the United States, the removal of sludge[9] from wastewater reduces the biochemical oxygen demand of the wastewater that undergoes aerobic treatment. The amount of this reduction (S) is estimated using the default IPCC (2019) methodology and multiplying the amount of sludge removed from wastewater treatment in the United States by the default factors in IPCC (2019) to estimate the amount of BOD removed based on whether the treatment system has primary treatment with no anaerobic sludge digestion (assumed to be zero by expert

[8] Emission factors are calculated by multiplying the maximum CH_4-producing capacity of domestic wastewater (B_0, 0.6 kg CH_4/kg BOD) and the appropriate methane correction factors (MCF) for aerobic (0.03) and anaerobic (0.8) systems (IPCC 2019, Table 6.3) and constructed wetlands (0.4) (IPCC 2014, Table 6.4).

[9] Throughout this document, the term "sludge" refers to the solids separated during the treatment of municipal wastewater. The definition includes domestic septage. "Biosolids" refers to treated sewage sludge that meets the EPA pollutant and pathogen requirements for land application and surface disposal.

judgment), primary treatment with anaerobic sludge digestion, or secondary treatment without primary treatment. The organic component removed from anaerobic wastewater treatment and the amount of CH_4 recovered or flared from both aerobic and anaerobic wastewater treatment were set equal to the IPCC default of zero.

The methodological equations for CH_4 emissions from aerobic and anaerobic systems are:

Equation 7-8: Total Domestic CH_4 Emissions from Centrally Treated Aerobic Systems

$$Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (other\ than\ Constructed\ Wetlands)(B1) + Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (Constructed\ Wetlands\ Only)(B2) + Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (Constructed\ Wetlands\ used\ as\ Tertiary\ Treatment)(B3) = B$$

where,

Equation 7-9: Total Organics in Centralized Wastewater Treatment [IPCC 2019 (Eq. 6.3A)]

$$TOW_{CENTRALIZED}\left(\frac{\text{Gg BOD}}{\text{year}}\right) = \text{TOW} \times \text{T}_{\text{CENTRALIZED}} \times \text{I}_{\text{COLLECTED}}$$

Table 7-13: Variables and Data Sources for Organics in Centralized Domestic Wastewater

Variable	Variable Description	Units	Inventory Years: Source of Value
Centrally Treated Organics (Gg BOD/year)			
$TOW_{CENTRALIZED}$	Total organics in centralized wastewater treatment[a]	Gg BOD/year	1990-2021: Calculated
TOW	Total wastewater BOD Produced per Capita[a]	Gg BOD/capita/year	1990-2021: Calculated, ERG (2018a)
$T_{CENTRALIZED}$	Percent collected[a]	%	1990-2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
$I_{COLLECTED}$	Correction factor for additional industrial BOD discharged (1.25)	No units	1990-2021: IPCC (2019) Eq. 6.3a

[a] Value of this activity data varies over the time series.

Equation 7-10: Organic Component Removed from Aerobic Wastewater Treatment (IPCC 2019 [Eq. 6.3B])

$$\text{S}_{\text{aerobic}}\left(\frac{\text{Gg}}{\text{year}}\right) = \text{S}_{\text{mass}} \times \left[\left(\%\ \text{aerobic}\frac{\text{w}}{\text{primary}} \times \text{K}_{\text{rem,aer}_{\text{prim}}}\right) + \left(\%\ \text{aerobic}\frac{\text{w}}{\text{out}}\text{primary} \times \text{K}_{\text{rem,aer}_{\text{noprim}}}\right) + \left(\%\text{aerobic + digestion} \times \text{K}_{\text{rem,aer}_{\text{digest}}}\right)\right] \times 1000$$

Equation 7-11: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC 2019 [Eq. 6.1])

$$\text{B1}(\text{kt CH}_4/\text{year}) = [(\text{TOW}_{\text{CENTRALIZED}}) \times (\%\ \text{aerobic}_{\text{OTCW}}) - \text{S}_{\text{aerobic}}] \times \text{EF}_{\text{aerobic}} - \text{R}_{\text{aerobic}}$$

Table 7-14: Variables and Data Sources for CH_4 Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands) (kt CH_4/year)			
$S_{aerobic}$	Organic component removed from aerobic wastewater treatment[a]	Gg BOD/year	1990-2021: Calculated
S_{mass}	Raw sludge removed from wastewater treatment as dry mass[a]	Tg dry weight/year	1988: EPA (1993c); EPA (1999) 1990-1995: Calculated based on sewage sludge production change

Variable	Variable Description	Units	Inventory Years: Source of Value
			per year EPA (1993c); EPA (1999); Beecher et al. (2007) 1996: EPA (1999) 2004: Beecher et al. (2007) Data for intervening years obtained by linear interpolation 2005-2017: Interpolated 2018: NEBRA (2022), as described in ERG (2022) 2019-2021: Forecasted from the rest of the time series. Methodology for estimating sludge generated from the U.S. territories provided in ERG (2022).
% aerobic$_{OTCW}$	Percent of flow to aerobic systems, other than wetlands[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
% aerobic w/primary	Percent of aerobic systems with primary treatment and no anaerobic sludge digestion (0)	%	
% aerobic w/out primary	Percent of aerobic systems without primary treatment[a]	%	
%aerobic+digestion	Percent of aerobic systems with primary and anaerobic sludge digestion[a]	%	
K_{rem,aer_prim}	Sludge removal factor for aerobic treatment plants with primary treatment (mixed primary and secondary sludge, untreated or treated aerobically) (0.8)	kg BOD/kg sludge	1990-2021: IPCC (2019) Table 6.6a
K_{rem,aer_noprim}	Sludge removal factor for aerobic wastewater treatment plants without separate primary treatment (1.16)	kg BOD/kg sludge	
K_{rem,aer_digest}	Sludge removal factor for aerobic treatment plants with primary treatment and anaerobic sludge digestion (mixed primary and secondary sludge, treated anaerobically) (1)	kg BOD/kg sludge	
$EF_{aerobic}$	Emission factor – aerobic systems (0.018)	kg CH_4/kg BOD	1990-2021: IPCC (2019) Table 6.3
$R_{aerobic}$	Amount CH_4 recovered or flared from aerobic wastewater treatment (0)	kg CH_4/year	1990-2021: IPCC (2019) Eq. 6.1
1000	Conversion factor	metric tons to kilograms	Standard conversion

[a] Value of this activity data varies over the time series.

Constructed wetlands exhibit both aerobic and anaerobic treatment (partially anaerobic treatment) but are referred to in this chapter as aerobic systems. Constructed wetlands may be used as the sole treatment unit at a centralized wastewater treatment plant or may serve as tertiary treatment after simple settling and biological treatment. Emissions from all constructed wetland systems were included in the estimates of emissions from centralized wastewater treatment plant processes and effluent from these plants. Methane emissions equations from constructed wetlands used as sole treatment were previously described. Methane emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow from treatment to constructed wetlands, wastewater BOD concentration entering tertiary treatment, constructed wetlands emission factor, and then converting to kt/year.

For constructed wetlands, an IPCC default emission factor for surface flow wetlands was used. This is the most conservative factor for constructed wetlands and was recommended by IPCC (2014) when the type of constructed wetland is not known. A median BOD_5 concentration of 9.1 mg/L was used for wastewater entering constructed wetlands used as tertiary treatment based on U.S. secondary treatment standards for POTWs. This median value is based on plants generally utilizing simple settling and biological treatment (EPA 2013). Constructed wetlands do not have secondary sludge removal.

Equation 7-12: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) [IPCC 2014 (Eq. 6.1)]

$$\text{B2}\left(\frac{\text{kt CH}_4}{\text{year}}\right) = [(\text{TOW}_{\text{CENTRALIZED}}) \times (\%\ \text{aerobic}_{\text{CW}})] \times (EF_{\text{CW}})$$

Equation 7-13: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.S. Specific)

$$\text{B3}\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{POTW}_{\text{flow}_{\text{CW}}}\right) \times \left(\text{BOD}_{\text{CW,INF}}\right) \times 3.785 \times (\text{EF}_{\text{CW}})\right] \times \frac{1}{10^6} \times 365.25$$

Table 7-15: Variables and Data Sources for CH_4 Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Constructed Wetlands Only (kt CH_4/year)			
$TOW_{CENTRALIZED}$	Total organics in centralized wastewater treatment[a]	Gg BOD/year	1990-2021: Calculated
% $aerobic_{CW}$	Flow to aerobic systems, constructed wetlands used as sole treatment / total flow to POTWs.[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
EF_{CW}	Emission factor for constructed wetlands (0.24)	kg CH_4/kg BOD	1990-2021: IPCC (2014)
Emissions from Constructed Wetlands used as Tertiary Treatment (kt CH_4/year)			
POTW_flow_CW	Wastewater flow to POTWs that use constructed wetlands as tertiary treatment[a]	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
$BOD_{CW,INF}$	BOD concentration in wastewater entering the constructed wetland (9.1)	mg/L	1990-2021: EPA (2013)
3.785	Conversion factor	liters to gallons	Standard conversion
EF_{CW}	Emission factor for constructed wetlands (0.24)	kg CH_4/kg BOD	1990-2021: IPCC (2014)
$1/10^6$	Conversion factor	kg to kt	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion

[a] Value of this activity data varies over the time series.

Data sources and methodologies for centrally treated anaerobic systems are similar to those described for aerobic systems, other than constructed wetlands. See discussion above.

Equation 7-14: Emissions from Centrally Treated Anaerobic Systems [IPCC 2019 (Eq. 6.on)]

$$C\left(\frac{\text{kt CH}_4}{\text{year}}\right) = [(\text{TOW}_{\text{CENTRALIZED}}) \times (\%\ \text{anaerobic}) - S_{\text{anaerobic}}] \times EF_{\text{anaerobic}} - R_{\text{anaerobic}}$$

Table 7-16: Variables and Data Sources for CH_4 Emissions from Centrally Treated Anaerobic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Treated Anaerobic Systems (kt CH_4/year)			
$TOW_{CENTRALIZED}$	Total organics in centralized wastewater treatment[a]	Gg BOD/year	1990-2021: Calculated
% anaerobic	Percent centralized wastewater that is anaerobically treated[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004a), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
$S_{anaerobic}$	Organic component removed from anaerobic wastewater treatment (0)	Gg/year	1990-2021: IPCC (2019) Table 6.3
$EF_{anaerobic}$	Emission factor for anaerobic reactors/deep lagoons (0.48)	kg CH_4/kg BOD	
$R_{anaerobic}$	Amount CH_4 recovered or flared from anaerobic wastewater treatment (0)	kg CH_4/year	

[a] Value of this activity data varies over the time series.

Emissions from Anaerobic Sludge Digesters:

Total CH_4 emissions from anaerobic sludge digesters were estimated by multiplying the wastewater influent flow to POTWs with anaerobic sludge digesters, the cubic feet of digester gas generated per person per day divided by the flow to POTWs, the fraction of CH_4 in biogas, the density of CH_4, one minus the destruction efficiency from burning the biogas in an energy/thermal device and then converting the results to kt/year.

Equation 7-15: Emissions from Anaerobic Sludge Digesters (U.S. Specific)

$$D\left(\frac{\text{kt CH}_4}{\text{year}}\right) = \left[\left(\text{POTW}_{\text{flow}_{\text{AD}}}\right) \times \frac{\text{biogas gen}}{100}\right] \times 0.0283 \times \left(\text{FRAC}_{\text{CH}_4}\right) \times 365.25 \times (662) \times (1 - \text{DE}) \times \frac{1}{10^9}$$

Table 7-17: Variables and Data Sources for Emissions from Anaerobic Sludge Digesters

Variable	Variable Description	Units	Inventory years: Source of Value
Emissions from Anaerobic Sludge Digesters (kt CH_4/year)			
POTW_flow_AD	POTW Flow to Facilities with Anaerobic Sludge Digesters[a]	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, and 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
biogas gen	Gas Generation Rate (1.0)	ft^3/capita/day	1990-2021: Metcalf & Eddy (2014)

Variable	Variable Description	Units	Inventory years: Source of Value
100	Per Capita POTW Flow (100)	gal/capita/day	1990-2021: Ten-State Standards (2004)
0.0283	Conversion factor	ft^3 to m^3	Standard Conversion
$FRAC_{CH4}$	Proportion of Methane in Biogas (0.65)	No units	1990-2021: Metcalf & Eddy (2014)
365.25	Conversion factor	Days in a year	Standard conversion
662	Density of Methane (662)	g CH_4/m^3 CH_4	1990-2021: EPA (1993a)
DE	Destruction Efficiency (99% converted to fraction)	No units	1990-2021: EPA (1998b); CAR (2011); Sullivan (2007); Sullivan (2010); and UNFCCC (2012)
$1/10^9$	Conversion factor	g to kt	Standard conversion

[a] Value of this activity data varies over the time series.

Emissions from Discharge of Centralized Treatment Effluent:

Methane emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total BOD of the discharged wastewater effluent by an emission factor associated with the location of the discharge. The BOD in treated effluent was determined by multiplying the total organics in centrally treated wastewater by the percent of wastewater treated in primary, secondary, and tertiary treatment, and the fraction of organics remaining after primary treatment (one minus the fraction of organics removed from primary treatment, secondary treatment, and tertiary treatment).

Equation 7-16: Emissions from Centrally Treated Systems Discharge (U.S.-Specific)

$$\mathrm{E}\left(\frac{\mathrm{kt\ CH_4}}{\mathrm{year}}\right) = \left(\mathrm{TOW_{RLE}} \times \mathrm{EF_{RLE}}\right) + \left(\mathrm{TOW_{Other}} \times \mathrm{EF_{Other}}\right)$$

where,

Equation 7-17: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.3D])

$$\mathrm{TOW_{EFFtreat,CENTRALIZED}}\left(\frac{\mathrm{Gg\ BOD}}{\mathrm{year}}\right) = \left[\mathrm{TOW_{CENTRALIZED}} \times \%\,\mathrm{primary} \times \left(1 - \mathrm{TOW_{rem,PRIMARY}}\right)\right] + \left[\mathrm{TOW_{CENTRALIZED}} \times \%\,\mathrm{secondary} \times \left(1 - \mathrm{TOW_{rem,SECONDARY}}\right)\right] + \left[\mathrm{TOW_{CENTRALIZED}} \times \%\,\mathrm{tertiary} \times \left(1 - \mathrm{TOW_{rem,TERTIARY}}\right)\right]$$

Equation 7-18: Total Organics in Effluent Discharged to Reservoirs, Lakes, or Estuaries (U.S.-Specific)

$$\mathrm{TOW_{RLE}}\left(\frac{\mathrm{Gg\ BOD}}{\mathrm{year}}\right) = \mathrm{TOW_{EFFtreat,CENTRALIZED}} \times \mathrm{Percent_{RLE}}$$

Equation 7-19: Total Organics in Effluent Discharged to Other Waterbodies (U.S.-Specific)

$$\mathrm{TOW_{Other}}\left(\frac{\mathrm{Gg\ BOD}}{\mathrm{year}}\right) = \mathrm{TOW_{EFFtreat,CENTRALIZED}} \times \mathrm{Percent_{Other}}$$

Table 7-18: Variables and Data Sources for CH_4 Emissions from Centrally Treated Systems Discharge

Variable	Variable Description	Units	Source of Value
$TOW_{EFFtreat,CENTRALIZED}$	Total organics in centralized treatment effluent[a]	Gg BOD/year	1990-2021: Calculated
$TOW_{CENTRALIZED}$	Total organics in centralized wastewater treatment[a]	Gg BOD/year	1990-2021: Calculated
% primary	Percent of primary domestic centralized treatment[a]	%	

Variable	Variable Description	Units	Source of Value
% secondary	Percent of secondary domestic centralized treatment[a]	%	1990,1991: Set equal to 1992. 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012), respectively Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
% tertiary	Percent of tertiary domestic centralized treatment[a]	%	
$TOW_{rem,PRIMARY}$	Fraction of organics removed from primary domestic centralized treatment (0.4)	No units	1990-2021: IPCC (2019) Table 6.6B
$TOW_{rem,SECONDARY}$	Fraction of organics removed from secondary domestic centralized treatment (0.85)	No units	
$TOW_{rem,TERTIARY}$	Fraction of organics removed from tertiary domestic centralized treatment (0.90)	No units	
TOW_{RLE}	Total organics in effluent discharged to reservoirs, lakes, and estuaries[a]	Gg BOD/year	1990-2021: Calculated
TOW_{Other}	Total organics in effluent discharge to other waterbodies[a]	Gg BOD/year	
EF_{RLE}	Emission factor (discharge to reservoirs/lakes/estuaries) (0.114)	kg CH_4/kg BOD	1990-2021: IPCC (2019) Table 6.8
EF_{Other}	Emission factor (discharge to other waterbodies) (0.021)	kg CH_4/kg BOD	
$Percent_{RLE}$	% discharged to reservoirs, lakes, and estuaries[a]	%	1990-2010: Set equal to 2010 2010: ERG (2021a) 2011: Obtained by linear interpolation 2012: ERG (2021a) 2013-2021: Set equal to 2012
$Percent_{Other}$	% discharged to other waterbodies[a]	%	

[a] Value of this activity data varies over the time series.

Industrial Wastewater CH_4 Emission Estimates

Industrial wastewater CH_4 emissions originate from on-site treatment systems, typically comprised of biological treatment operations. The collection systems at an industrial plant are not as extensive as domestic wastewater sewer systems; therefore, it is not expected that dissolved CH_4 will form during collection. However, some treatment systems are designed to have anaerobic activity (e.g., anaerobic reactors or lagoons), or may periodically have anaerobic conditions form (facultative lagoons or large stabilization basins). Emissions will also result from discharge of treated effluent to waterbodies where carbon accumulates in sediments (typically slow-moving systems, such as lakes, reservoirs, and estuaries).

Industry categories that are likely to produce significant CH_4 emissions from wastewater treatment were identified and included in the Inventory. The main criteria used to identify U.S. industries likely to generate CH_4 from wastewater treatment are whether an industry generates high volumes of wastewater, whether there is a high organic wastewater load, and whether the wastewater is treated using methods that result in CH_4 emissions. The

top six industries that meet these criteria are pulp and paper manufacturing; meat and poultry processing; vegetables, fruits, and juices processing; starch-based ethanol production; petroleum refining; and breweries. Wastewater treatment and discharge emissions for these sectors for 2021 are displayed in Table 7-19 below. Further discussion of wastewater treatment for each industry is included below.

Table 7-19: Total Industrial Wastewater CH_4 Emissions by Sector (2021, MMT CO_2 Eq. and Percent)

Industry	CH_4 Emissions (MMT CO_2 Eq.)	% of Industrial Wastewater CH_4
Meat & Poultry	5.7	78.9
Pulp & Paper	0.8	11.6
Fruit & Vegetables	0.2	3.3
Ethanol Refineries	0.2	2.3
Breweries	0.1	2.2
Petroleum Refineries	0.2	1.6
Total	**7.2**	**100**

Note: Totals may not sum due to independent rounding.

Emissions from Industrial Wastewater Treatment Systems:

Equation 7-20 presents the general IPCC equation (Equation 6.4, IPCC 2019) to estimate methane emissions from each type of treatment system used for each industrial category.

Equation 7-20: Total CH_4 Emissions from Industrial Wastewater

$$\mathrm{CH_4\ (industrial\ sector)} = [(\mathrm{TOW}_i - \mathrm{S}_i) \times \mathrm{EF} - \mathrm{R}_i]$$

where,

CH_4 (industrial sector)	=	Total CH_4 emissions from industrial sector wastewater treatment (kg/year)
I	=	Industrial sector
TOW_i	=	Total organics in wastewater for industrial sector *i* (kg COD/year)
S_i	=	Organic component removed from aerobic wastewater treatment for industrial sector *i* (kg COD/year)
EF	=	System-specific emission factor (kg CH_4/kg COD)
R_i	=	Methane recovered for industrial sector *i* (kg CH_4/year)

Equation 7-21 presents the general IPCC equation to estimate the total organics in wastewater (TOW) for each industrial category.

Equation 7-21: TOW in Industry Wastewater Treatment Systems

$$\mathrm{TOW}_i = \mathrm{P}_i \times \mathrm{W}_i \times \mathrm{COD}_i$$

where,

TOW_i	=	Total organically degradable material in wastewater for industry *i* (kg COD/yr)
i	=	Industrial sector
P_i	=	Total industrial product for industrial sector *i* (t/yr)
W_i	=	Wastewater outflow (m^3/t product)
COD_i	=	Chemical oxygen demand (industrial degradable organic component in wastewater) (kg COD/m^3)

The annual industry production is shown in Table 7-20, and the average wastewater outflow and the organics loading in the outflow is shown in Table 7-21.

For some industries, U.S.-specific data on organics loading is reported as BOD rather than COD. In those cases, an industry-specific COD:BOD ratio is used to convert the organics loading to COD.

The amount of organics treated in each type of wastewater treatment system was determined using the percent of wastewater in the industry that is treated on site and whether the treatment system is anaerobic, aerobic or partially anaerobic. Table 7-22 presents the industrial wastewater treatment activity data used in the calculations and described in detail in ERG (2008a), ERG (2013a), ERG (2013b), and ERG (2021a). For CH_4 emissions, wastewater treated in anaerobic lagoons or reactors was categorized as "anaerobic", wastewater treated in aerated stabilization basins or facultative lagoons were classified as "ASB" (meaning there may be pockets of anaerobic activity), and wastewater treated in aerobic systems such as activated sludge systems were classified as "aerobic/other."

The amount of organic component removed from aerobic wastewater treatment as a result of sludge removal ($S_{aerobic}$) was either estimated as an industry-specific percent removal, if available, or as an estimate of sludge produced by the treatment system and IPCC default factors for the amount of organic component removed (K_{rem}), using one of the following equations. Table 7-23 presents the sludge variables used for industries with aerobic wastewater treatment operations (i.e., pulp and paper, fruit/vegetable processing, and petroleum refining).

Equation 7-22: Organic Component Removed from Aerobic Wastewater Treatment – Pulp, Paper, and Paperboard

$$S_{pulp,asb} = TOW_{pulp} \times \%\ \text{removal w/primary}$$

where,

$S_{pulp,asb}$	=	Organic component removed from pulp and paper wastewater during primary treatment before treatment in aerated stabilization basins (Gg COD/yr)
TOW_{pulp}	=	Total organically degradable material in pulp and paper wastewater (Gg COD/yr)
% removal w/primary	=	Percent reduction of organics in pulp and paper wastewater associated with sludge removal from primary treatment (%)

Equation 7-23: Organic Component Removed from Aerobic Treatment Plants

$$S_{aerobic} = S_{mass} \times K_{rem} \times 10^{-6}$$

where,

$S_{aerobic}$	=	Organic component removed from fruit and vegetable or petroleum refining wastewater during primary treatment before treatment in aerated stabilization basins (Gg COD/yr)
S_{mass}	=	Raw sludge removed from wastewater treatment as dry mass (kg sludge/yr)
K_{rem}	=	Sludge factor (kg BOD/kg sludge)
10^{-6}	=	Conversion factor, kilograms to Gigagrams

Equation 7-24: Raw Sludge Removed from Wastewater Treatment as Dry Mass

$$S_{mass} = (S_{prim} + S_{aer}) \times P \times W$$

where,

S_{mass}	=	Raw sludge removed from wastewater treatment as dry mass (kg sludge/yr)
S_{prim}	=	Sludge production from primary sedimentation (kg sludge/m^3)
S_{aer}	=	Sludge production from secondary aerobic treatment (kg sludge/m^3)
P	=	Production (t/yr)
W	=	Wastewater Outflow (m^3/t)

Default emission factors[10] from IPCC (2019) were used. Information on methane recovery operations varied by industry. See industry descriptions below.

Table 7-20: U.S. Pulp and Paper, Meat, Poultry, Vegetables, Fruits and Juices, Ethanol, Breweries, and Petroleum Refining Production (MMT)

Year	Pulp and Paper[a]	Meat (Live Weight Killed)	Poultry (Live Weight Killed)	Vegetables, Fruits and Juices	Ethanol Production	Breweries	Petroleum Refining
1990	83.6	27.3	14.6	40.8	2.5	23.9	702.4
2005	92.4	31.4	25.1	45.3	11.7	23.1	818.6
2017	80.3	35.4	28.9	42.4	47.6	21.8	933.5
2018	78.7	36.4	29.4	42.3	48.1	21.5	951.7
2019	76.3	37.4	30.1	41.8	47.1	21.1	940.0
2020	74.7	37.8	30.5	40.6	41.6	21.1	806.5
2021	73.6	38.1	30.5	39.4	44.8	21.2	857.3

[a] Pulp and paper production is the sum of market pulp production plus paper and paperboard production.

Sources: Pulp and Paper – FAO (2022a) and FAO (2022b); Meat, Poultry, and Fruits and Vegetables – USDA (2022a and 2022b), ERG (2022); Ethanol – Cooper (2018) and RFA (2022a and 2022b); Breweries – Beer Institute (2011) and TTB (2022); Petroleum Refining – EIA (2022).

Table 7-21: U.S. Industrial Wastewater Characteristics Data (2021)

Industry	Wastewater Outflow (m^3/ton)	Wastewater BOD (g/L)	Wastewater COD (kg/m^3)	COD:BOD Ratio
Pulp and Paper	See Table 7-25	0.3	--	2.5
Meat Processing	5.3	2.8	--	3
Poultry Processing	12.5	1.5	--	3
Fruit/Vegetable Processing	See Table 7-26		--	1.5
Ethanol Production – Wet Mill	10[a]	1.5	--	2
Ethanol Production – Dry Mill	1.25[a]	3[b]	--	2
Petroleum Refining	0.8	--	0.45	2.5
Breweries – Craft	3.09	--	17.6	1.67
Breweries – NonCraft	1.94	--	17.6	1.67

[a] Units are gallons per gallons ethanol produced.

[b] Units are COD (g/L).

Sources: Pulp and Paper (BOD, COD:BOD) – Malmberg (2018); Meat and Poultry (Outflow, BOD) – ERG (2006a); Meat and Poultry (COD:BOD) – EPA (1997a); Fruit/Vegetables (Outflow, BOD) – CAST (1995), EPA (1974), EPA (1975); Fruit/Vegetables (COD:BOD) – EPA (1997a); Ethanol Production – Wet Mill (Outflow) – Donovan (1996), NRBP (2001), Ruocco (2006b); Ethanol Production – Wet Mill (BOD) – White and Johnson (2003); Ethanol Production – Dry Mill (Outflow and COD) – Merrick (1998), Ruocco (2006a); Ethanol Production (Dry and Wet, COD:BOD) – EPA (1997a); Petroleum Refining (Outflow) – ERG (2013b); Petroleum Refining (COD) – Benyahia et al. (2006); Petroleum Refining (COD:BOD) – EPA (1982); Breweries – Craft BIER (2017); ERG (2018b); Breweries – NonCraft ERG (2018b); Brewers Association (2016a); Breweries (Craft and NonCraft; COD and COD:BOD) – Brewers Association (2016b).

[10] Emission factors are calculated by multiplying the maximum CH_4-producing capacity of wastewater (B_0, 0.25 kg CH_4/kg COD) and the appropriate methane correction factors (MCF) for aerobic (0), partially anaerobic (0.2), and anaerobic (0.8) systems (IPCC 2019), Table 6.3.

Table 7-22: U.S. Industrial Wastewater Treatment Activity Data

Industry	% Wastewater Treated On Site	% Treated Anaerobically	% Treated Aerobically	% Treated Aerobically	
				% Treated in ASBs	% Treated in Other Aerobic
Pulp and Paper[b]	60	5.2	75.9	38.5	37.4
Meat Processing	33	33[a]	33	0	33
Poultry Processing	25	25[a]	25	0	25
Fruit/Vegetable Processing	11	0	11	5.5	5.5
Ethanol Production – Wet Mill	33.3	33.3	66.7	0	0
Ethanol Production – Dry Mill	75	75	25	0	0
Petroleum Refining	62.1	0	62.1	23.6	38.5
Breweries – Craft	0.5	0.5	0	0	0
Breweries – NonCraft	100	99	1	0	1

[a] Wastewater is pretreated in anaerobic lagoons prior to aerobic treatment.

[b] Remaining onsite treated in other treatment assumed to be non-emissive and not shown here.

Note: Due to differences in data availability and methodology, zero values in the table are for calculation purposes only and may indicate unavailable data.

Sources: ERG (2008a, 2008b); ERG (2013a); ERG (2013b); ERG (2021a).

Table 7-23: Sludge Variables for Aerobic Treatment Systems

Variable	Industry		
	Pulp and Paper	Fruit/Vegetable Processing	Petroleum Refining
Organic reduction associated with sludge removal (%)	58		
Sludge Production (kg/m^3)			
Primary Sedimentation		0.15	
Aerobic Treatment		0.096	0.096
Sludge Factor (kg BOD/kg dry mass sludge)			
Aerobic Treatment w/Primary Sedimentation and No Anaerobic Sludge Digestion		0.8	
Aerobic Treatment w/out Primary Sedimentation			1.16

Sources: Organic reduction (pulp) – ERG (2008a); Sludge production – Metcalf & Eddy (2003); Sludge factors – IPCC (2019), Table 6.6a.

Emissions from Discharge of Industrial Wastewater Treatment Effluent:

Methane emissions from discharge of industrial wastewater treatment effluent are estimated via a Tier 1 method for all industries except for pulp, paper, and paperboard. Emissions from discharge of pulp, paper, and paperboard treatment effluent is estimated via a Tier 2 method and is described in the industry-specific data section. Tier 1 emissions from effluent are estimated by multiplying the total organic content of the discharged wastewater effluent by an emission factor associated with the discharge:

Equation 7-25: CH_4 Emissions from Industrial Wastewater Treatment Discharge

$$\mathrm{CH_4\ Effluent_{IND}} = \mathrm{TOW_{EFFLUENT,IND}} \times \mathrm{EF_{EFFLUENT}}$$

where,

$CH_4\ Effluent_{IND}$ = CH_4 emissions from industrial wastewater discharge for inventory year (kg CH_4/year)

$TOW_{EFFLUENT,IND}$ = Total organically degradable material in wastewater effluent from industry for inventory year (kg COD/year or kg BOD/year)

$EF_{EFFLUENT}$ = Tier 1 emission factor for wastewater discharged to aquatic environments (0.028 kg CH_4/kg COD or 0.068 kg CH_4/kg BOD) (IPCC 2019)

The COD or BOD in industrial treated effluent ($TOW_{EFFLUENT,IND}$) was determined by multiplying the total organics in the industry's untreated wastewater that is treated on site by an industry-specific percent removal where available or a more general percent removal based on biological treatment for other industries. Table 7-22 presents the percent of wastewater treated onsite, while Table 7-24 presents the fraction of TOW removed during treatment.

Equation 7-26: TOW in Industrial Wastewater Effluent

$$\mathrm{TOW_{EFFLUENT,IND}} = \mathrm{TOW_{IND}} \times \%\,\mathrm{onsite} \times (1 - \mathrm{TOW_{REM}})$$

where,

$TOW_{EFFLUENT,IND}$ = Total organically degradable material in wastewater effluent from industry for inventory year (kg COD/year or kg BOD/year)

TOW_{IND} = Total organics in untreated wastewater for industry for inventory year (kg COD/year)

%onsite = Percent of industry wastewater treated on site (%)

TOW_{REM} = Fraction of organics removed during treatment

Table 7-24: Fraction of TOW Removed During Treatment by Industry

Industry	TOW_{REM}	Source
Pulp, Paper, and Paperboard	0.91	Malmberg (2018)
Red Meat and Poultry	0.85	IPCC (2019), Table 6.6b
Fruits and Vegetables	0.85	IPCC (2019), Table 6.6b
Ethanol Production		
Biomethanator Treatment	0.90	ERG (2008a), ERG (2006b)
Other Treatment	0.85	IPCC (2019), Table 6.6b
Petroleum Refining	0.93	Kenari, Sarrafzadeh, and Tavakoli (2010)
Breweries	0.85	IPCC (2019), Table 6.6b

Discussion of Industry-Specific Data:

Pulp, Paper, and Paperboard Manufacturing Wastewater Treatment. Wastewater treatment for the pulp, paper, and paperboard manufacturing (hereinafter referred to as "pulp and paper") industry typically includes neutralization, screening, sedimentation, and flotation/hydrocycloning to remove solids (World Bank 1999; Nemerow and Dasgupta 1991). Secondary treatment (storage, settling, and biological treatment) mainly consists of lagooning. About 60 percent of pulp and paper mills have on-site treatment with primary treatment and about half of these also have secondary treatment (ERG 2008). In the United States, primary treatment is focused on solids removal, equalization, neutralization, and color reduction (EPA 1993b). The vast majority of pulp and paper mills with on-site treatment systems use mechanical clarifiers to remove suspended solids from the wastewater. About 10 percent of pulp and paper mills with treatment systems use settling ponds for primary treatment and these are more likely to be located at mills that do not perform secondary treatment (EPA 1993b).

Approximately 42 percent of the BOD passes on to secondary treatment, which consists of activated sludge, aerated stabilization basins, or non-aerated stabilization basins. Pulp and paper mill wastewater treated using anaerobic ponds or lagoons or unaerated ponds were classified as anaerobic (with an MCF of 0.8). Wastewater flow treated in systems with aerated stabilization basins or facultative lagoons was classified as partially anaerobic (with an MCF of 0.2, which is the *2006 IPCC Guidelines*-suggested MCF for shallow lagoons). Wastewater flow treated in systems with activated sludge systems or similarly aerated biological systems was classified as aerobic.

A time series of CH_4 emissions for 1990 through 2021 was developed based on paper and paperboard production data and market pulp production data. Market pulp production values were available directly for 1998, 2000 through 2003, and 2010 through 2020. Where market pulp data were unavailable, a percent of woodpulp that is market pulp was applied to woodpulp production values from FAOSTAT to estimate market pulp production (FAO 2022a). The percent of woodpulp that is market pulp for 1990 to 1997 was assumed to be the same as 1998, 1999 was interpolated between values for 1998 and 2000, 2000 through 2009 were interpolated between values for 2003 and 2010, and 2021 was forecasted from the rest of the time series. A time series of the overall wastewater outflow in units of cubic meters of wastewater per ton of total production (i.e., market pulp plus woodpulp) is presented in Table 7-25. Data for 1990 through 1994 varies based on data outlined in ERG (2013a) to reflect historical wastewater flow. Wastewater generation rates for 1995, 2000, and 2002 were estimated from the 2014 *American Forest and Paper Association* (AF&PA) *Sustainability Report* (AF&PA 2014). Wastewater generation rates for 2004, 2006, 2008, 2010, 2012, and 2014 were estimated from the 2016 AF&PA Sustainability Report (AF&PA 2016). Data for 2005 and 2016 were obtained from the 2018 AF&PA Sustainability Report (AF&PA 2018), data for 2018 were obtained from the 2020 AF&PA Sustainability Report (AF&PA 2020), and data for 2020 were obtained from a 2022 AF&PA sustainability update (AF&PA 2022). Data for intervening years were obtained by linear interpolation, while 2021 was set equal to 2020. The average BOD concentration in raw wastewater was estimated to be 0.4 grams BOD/liter for 1990 to 1998, while 0.3 grams BOD/liter was estimated for 2014 through 2021 (EPA 1997b; EPA 1993b; World Bank 1999; Malmberg 2018). Data for intervening years were obtained by linear interpolation.

Table 7-25: Wastewater Outflow (m^3/ton) for Pulp, Paper, and Paperboard Mills

Year	Wastewater Outflow (m^3/ton)
1990	68
2005	43
2017	39
2018	40
2019	39
2020	39
2021	39

Sources: ERG (2013a), AF&PA (2014), AF&PA (2016), AF&PA (2018), AF&PA (2020); AF&PA (2022)

Pulp, Paper, and Paperboard Wastewater Treatment Effluent. Methane emissions from pulp, paper, and paperboard wastewater treatment effluent were estimated by multiplying the total BOD of the discharged wastewater effluent by an emission factor associated with the location of the discharge.

Equation 7-27: Emissions from Pulp and Paper Discharge (U.S. Specific)

$$Emissions\ from\ Pulp\ and\ Paper\ Discharge\ \left(\text{U. S. Specific}, \frac{\text{kt CH}_4}{\text{year}}\right) = (\text{TOW}_{\text{RLE,pulp}} \times \text{EF}_{\text{RLE}}) + (\text{TOW}_{\text{Other,pulp}} \times \text{EF}_{\text{Other}})$$

Equation 7-28: Total Organics in Pulp and Paper Effluent Discharged to Reservoirs, Lakes, Or Estuaries (U.S. Specific)

$$\text{TOW}_{\text{RLE,pulp}}\ \left(\frac{\text{Gg BOD}}{\text{year}}\right) = \text{TOW}_{\text{EFFLUENT,IND}} \times \text{Percent}_{\text{RLE,pulp}}$$

Equation 7-29: Total Organics in Pulp and Paper Effluent Discharged to Other Waterbodies (U.S. Specific)

$$\mathrm{TOW}_{\mathrm{Other,pulp}}\left(\frac{\mathrm{Gg\ BOD}}{\mathrm{year}}\right) = \mathrm{TOW}_{\mathrm{EFFLUENT,IND}} \times \mathrm{Percent}_{\mathrm{Other,pulp}}$$

where,

$TOW_{RLE,pulp}$	=	Total organics in pulp, paper, and paperboard manufacturing wastewater treatment effluent discharged to reservoirs, lakes, or estuaries (Gg BOD/year)
EF_{RLE}	=	Emission factor (discharge to reservoirs/lakes/estuaries) (0.114 kg CH_4/kg BOD) (IPCC 2019)
$TOW_{Other,pulp}$	=	Total organics in pulp, paper, and paperboard manufacturing wastewater treatment effluent discharged to other waterbodies (Gg BOD/year)
EF_{Other}	=	Emission factor (discharge to other waterbodies) (0.021 kg CH_4/kg BOD) (IPCC 2019)
$TOW_{EFFLUENT,IND}$	=	Total organically degradable material in pulp, paper, and paperboard manufacturing wastewater effluent for inventory year (Gg BOD/year)
$Percent_{RLE,pulp}$	=	Percent of wastewater effluent discharged to reservoirs, lakes, and estuaries (ERG 2021b)
$Percent_{Other,pulp}$	=	Percent of wastewater effluent discharged to other waterbodies (ERG 2021b)

The percent of pulp, paper, and paperboard wastewater treatment effluent routed to reservoirs, lakes, or estuaries (3 percent) and other waterbodies (97 percent) were obtained from discussions with NCASI (ERG 2021b). Data for 2019 were assumed the same as the rest of the time series due to lack of available data. Default emission factors for reservoirs, lakes, and estuaries (0.114 kg CH_4/kg BOD) and other waterbodies (0.021 kg CH_4/kg BOD) were obtained from IPCC (2019).

Meat and Poultry Processing. The meat and poultry processing industry makes extensive use of anaerobic lagoons in sequence with screening, fat traps, and dissolved air flotation when treating wastewater on site. Although all meat and poultry processing facilities conduct some sort of treatment on site, about 33 percent of meat processing operations (EPA 2002) and 25 percent of poultry processing operations (U.S. Poultry 2006) perform on-site treatment in anaerobic lagoons. The IPCC default emission factor of 0.2 kg CH_4/kg COD for anaerobic lagoons were used to estimate the CH_4 produced from these on-site treatment systems.

Vegetables, Fruits, and Juices Processing. Treatment of wastewater from fruits, vegetables, and juices processing includes screening, coagulation/settling, and biological treatment (lagooning). The flows are frequently seasonal, and robust treatment systems are preferred for on-site treatment. About half of the operations that treat and discharge wastewater use lagoons intended for aerobic operation, but the large seasonal loadings may develop limited anaerobic zones. In addition, some anaerobic lagoons may also be used (Nemerow and Dasgupta 1991). Wastewater treated in partially anaerobic systems were assigned the IPCC default emission factor of 0.12 kg CH_4/kg BOD. Outflow and BOD data, presented in Table 7-26, were obtained from CAST (1995) for apples, apricots, asparagus, broccoli, carrots, cauliflower, cucumbers (for pickles), green peas, pineapples, snap beans, and spinach; EPA (1974) for potato and citrus fruit processing; and EPA (1975) for all other commodities.

Table 7-26: Wastewater Outflow (m^3/ton) and BOD Production (g/L) for U.S. Vegetables, Fruits, and Juices Production

Commodity	Wastewater Outflow (m^3/ton)	Organic Content in Untreated Wastewater (g BOD/L)
Vegetables		
Potatoes	10.27	1.765
Other Vegetables	9.85	0.751
Fruit		
Apples	9.08	8.16
Citrus Fruits	10.11	0.317

Commodity	Wastewater Outflow (m^3/ton)	Organic Content in Untreated Wastewater (g BOD/L)
Non-citrus Fruits	12.59	1.226
Grapes (for wine)	2.78	1.831

Sources: CAST (1995); EPA (1974); EPA (1975).

Ethanol Production. Ethanol, or ethyl alcohol, is produced primarily for use as a fuel component, but is also used in industrial applications and in the manufacture of beverage alcohol. Ethanol can be produced from the fermentation of sugar-based feedstocks (e.g., molasses and beets), starch- or grain-based feedstocks (e.g., corn, sorghum, and beverage waste), and cellulosic biomass feedstocks (e.g., agricultural wastes, wood, and bagasse). Ethanol can also be produced synthetically from ethylene or hydrogen and carbon monoxide. However, synthetic ethanol comprises a very small percent of ethanol production in the United States. Currently, ethanol is mostly made from sugar and starch crops, but with advances in technology, cellulosic biomass is increasingly used as ethanol feedstock (DOE 2013).

Ethanol is produced from corn (or other sugar or starch-based feedstocks) primarily by two methods: wet milling and dry milling. Historically, the majority of ethanol was produced by the wet milling process, but now the majority is produced by the dry milling process. The dry milling process is cheaper to implement and is more efficient in terms of actual ethanol production (Rendleman and Shapouri 2007). The wastewater generated at ethanol production facilities is handled in a variety of ways. Dry milling facilities often combine the resulting evaporator condensate with other process wastewaters, such as equipment wash water, scrubber water, and boiler blowdown and anaerobically treat this wastewater using various types of digesters. Wet milling facilities often treat their steepwater condensate in anaerobic systems followed by aerobic polishing systems. Wet milling facilities may treat the stillage (or processed stillage) from the ethanol fermentation/distillation process separately or together with steepwater and/or wash water. Methane generated in anaerobic sludge digesters is commonly collected and either flared or used as fuel in the ethanol production process (ERG 2006b).

About 33 percent of wet milling facilities and 75 percent of dry milling facilities treat their wastewater anaerobically. A default emission factor of 0.2 kg CH_4/kg COD for anaerobic treatment was used to estimate the CH_4 produced from these on-site treatment systems. The amount of CH_4 recovered through the use of biomethanators was estimated, and a 99 percent destruction efficiency was used. Biomethanators are anaerobic reactors that use microorganisms under anaerobic conditions to reduce COD and organic acids and recover biogas from wastewater (ERG 2006b). For facilities using biomethanators, approximately 90 percent of BOD is removed during on-site treatment (ERG 2006b, 2008a). For all other facilities, the removal of organics was assumed to be equivalent to secondary treatment systems, or 85 percent (IPCC 2019).

Petroleum Refining. Petroleum refining wastewater treatment operations have the potential to produce CH_4 emissions from anaerobic wastewater treatment. EPA's Office of Air and Radiation performed an Information Collection Request (ICR) for petroleum refineries in 2011.[11] Facilities that reported using non-aerated surface impoundments or other biological treatment units (trickling filter, rotating biological contactor), which have the potential to lead to anaerobic conditions, were assigned the IPCC default emission factor of 0.05 kg CH_4/kg COD. In addition, the wastewater generation rate was determined to be 26.4 gallons per barrel of finished product, or 0.8 m^3/ton (ERG 2013b).

Breweries. Since 2010, the number of breweries has increased from less than 2,000 to more than 8,000 (Brewers Association 2021). This increase has primarily been driven by craft breweries, which have increased by over 250 percent during that period. Craft breweries were defined as breweries producing less than six million barrels of

[11] Available online at https://www.epa.gov/stationary-sources-air-pollution/comprehensive-data-collected-petroleum-refining-sector.

beer per year, and non-craft breweries produce greater than six million barrels. With their large amount of water use and high strength wastewater, breweries generate considerable CH_4 emissions from anaerobic wastewater treatment. However, because many breweries recover their CH_4, their emissions are much lower.

The Alcohol and Tobacco Tax and Trade Bureau (TTB) provides total beer production in barrels per year for different facility size categories from 2007 to the present (TTB 2022). For years prior to 2007 where TTB data were not readily available, the Brewers Almanac (Beer Institute 2011) was used, along with an estimated percent of craft and non-craft breweries based on the breakdown of craft and non-craft for the years 2007 through 2020.

To determine the overall amount of wastewater produced, data on water use per unit of production and a wastewater-to-water ratio were used from the Benchmarking Report (Brewers Association 2016a) for both craft and non-craft breweries. Since brewing is a batch process, and different operations have varying organic loads, full-strength brewery wastewater can vary widely on a day-to-day basis. However, the organic content of brewery wastewater does not substantially change between craft and non-craft breweries. Some breweries may collect and discharge high strength wastewater from particular brewing processes (known as "side streaming") to a POTW, greatly reducing the organics content of the wastewater that is treated on site. Subsequently, the MCF for discharge to a POTW was assumed to be zero (ERG 2018b).

Breweries may treat some or all of their wastewater on site prior to discharge to a POTW or receiving water. On-site treatment operations can include physical treatment (e.g., screening, settling) which are not expected to contribute to CH_4 emissions, or biological treatment, which may include aerobic treatment or pretreatment in anaerobic reactors (ERG 2018b). The IPCC default emission factor of 0.2 kg CH_4/kg COD for anaerobic treatment and 0 for aerobic treatment were used to estimate the CH_4 produced from these on-site treatment systems (IPCC 2006). The amount of CH_4 recovered through anaerobic wastewater treatment was estimated, and a 99 percent destruction efficiency was used (ERG 2018b; Stier J. 2018). Very limited activity data are available on the number of U.S. breweries that are performing side streaming or pretreatment of wastewater prior to discharge.

Domestic Wastewater N_2O Emission Estimates

Domestic wastewater N_2O emissions originate from both septic systems and POTWs. Within these centralized systems, N_2O emissions can result from aerobic systems, including systems like constructed wetlands. Emissions will also result from discharge of centrally treated wastewater to waterbodies with nutrient-impacted/eutrophic conditions. The systems with emission estimates are:

- Septic systems (A);
- Centralized treatment aerobic systems (B), including aerobic systems (other than constructed wetlands) (B1), constructed wetlands only (B2), and constructed wetlands used as tertiary treatment (B3);
- Centralized anaerobic systems (C); and
- Centralized wastewater treatment effluent (D).

Methodological equations for each of these systems are presented in the subsequent subsections; total domestic N_2O emissions are estimated as follows:

Equation 7-30: Total Domestic N_2O Emissions from Wastewater Treatment and Discharge

$$\text{Total Domestic } N_2O \text{ Emissions from Wastewater Treatment and Discharge (kt)} = A + B + C + D$$

Table 7-27 presents domestic wastewater N_2O emissions for both septic and centralized systems, including emissions from centralized wastewater treatment effluent, in 2021.

Table 7-27: Domestic Wastewater N_2O Emissions from Septic and Centralized Systems (2021, kt, MMT CO_2 Eq. and Percent)

	N_2O Emissions (kt)	N_2O Emissions (MMT CO_2 Eq.)	% of Domestic Wastewater N_2O
Septic Systems	3	0.8	3.8

	N_2O Emissions (kt)	N_2O Emissions (MMT CO_2 Eq.)	% of Domestic Wastewater N_2O
Centrally-Treated Aerobic Systems	58	15.4	75.5
Centrally-Treated Anaerobic Systems	+	+	+
Centrally-Treated Wastewater Effluent	16	4.2	20.7
Total	**77**	**20.4**	**100**

+ Does not exceed 0.5 kt or 0.05 MMT CO_2 Eq.

Note: Totals may not sum due to independent rounding.

Emissions from Septic Systems:

Nitrous oxide emissions from domestic treatment depend on the nitrogen present, in this case, in the form of protein. Per capita protein consumption (kg protein/person/year) was determined by multiplying per capita annual food availability data and its protein content. Those data are then adjusted using a factor to account for the fraction of protein actually consumed. The methodological equations are:

Equation 7-31: Annual per Capita Protein Supply (U.S. Specific)

$$\text{Protein}_{\text{SUPPLY}}\ (\text{kg/person/year}) = \text{Protein}_{\text{per capita}}/1000 \times 365.25$$

Equation 7-32: Consumed Protein [IPCC 2019 (Eq. 6.10A)]

$$\text{Protein}\ (\text{kg/person/year}) = \text{Protein}_{\text{SUPPLY}} \times \text{FPC}$$

Table 7-28: Variables and Data Sources for Protein Consumed

Variable	Variable Description	Units	Inventory Years: Source of Value
Protein			
$\text{Protein}_{\text{SUPPLY}}$	Annual per capita protein supply[a]	kg/person/year	1990-2021: Calculated
$\text{Protein}_{\text{per capita}}$	Daily per capita protein supply[a]	g/person/day	1990-2021: USDA (2021)
1000	Conversion factor	g to kg	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion
FPC	Fraction of Protein Consumed[a]	kg protein consumed / kg protein available	1990-2010: USDA (2021) 2011-2019: FAO (2022c) and scaling factor 2020-2021: Forecasted from the rest of the time series

[a] Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from septic systems were estimated by multiplying the U.S. population by the percent of wastewater treated in septic systems (about 17 percent in 2021; U.S. Census Bureau 2019), consumed protein per capita (kg protein/person/year), the fraction of N in protein, the correction factor for additional nitrogen from household products, the factor for industrial and commercial co-discharged protein into septic systems, the factor for non-consumed protein added to wastewater and an emission factor and then converting the result to kt/year. All factors obtained from IPCC (2019).

U.S. population data were taken from historic U.S. Census Bureau national population totals data and include the populations of the United States and Puerto Rico (U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau 2021a and 2021b, Instituto de Estadísticas de Puerto Rico 2021). Population data for American Samoa, Guam, Northern Mariana Islands, and the U.S. Virgin Islands were taken from the U.S. Census Bureau International Database (U.S. Census Bureau 2022). Table 7-12 presents the total U.S. population for 1990 through 2021. The fraction of the U.S. population using septic systems, as well as centralized treatment systems (see below), is based on data from *American Housing Survey* (U.S. Census Bureau 2019). The methodological equations are:

Equation 7-33: Total Nitrogen Entering Septic Systems (IPCC 2019 [Eq. 6.10])

$$\mathrm{TN}_{\mathrm{DOM}_{\mathrm{SEPTIC}}}\left(\frac{\mathrm{kg\ N}}{\mathrm{year}}\right)$$
$$= (\mathrm{US}_{\mathrm{POP}} \times \mathrm{T}_{\mathrm{SEPTIC}}) \times \mathrm{Protein} \times \mathrm{F}_{\mathrm{NPR}} \times \mathrm{N}_{\mathrm{HH}} \times \mathrm{F}_{\mathrm{NON-CON_septic}} \times \mathrm{F}_{\mathrm{IND-COM_septic}}$$

Equation 7-34: Emissions from Septic Systems (IPCC 2019 [Eq. 6.9])

$$\mathrm{A}\left(\frac{\mathrm{kt\ N_2O}}{\mathrm{year}}\right) = \mathrm{TN}_{\mathrm{DOM_SEPTIC}} \times (\mathrm{EF}_{\mathrm{SEPTIC}}) \times 44/28 \times 1/10^6$$

Table 7-29: Variables and Data Sources for N_2O Emissions from Septic System

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Septic Systems			
TN_{DOM_SEPTIC}	Total nitrogen entering septic systems	kg N/year	1990-2021: Calculated
US_{POP}	U.S. population[a]	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau 2002; Instituto de Estadísticas de Puerto Rico 2021 2000-2009: U.S. Census Bureau 2011 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
T_{SEPTIC}	Percent treated in septic systems[a]	%	Odd years from 1989 through 2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
F_{NPR}	Fraction of nitrogen in protein (0.16)	kg N/kg protein	1990-2021: IPCC (2019) Eq. 6.10
N_{HH}	Additional nitrogen from household products (1.17)	No units	1990-2021: IPCC (2019) Table 6.10a
$F_{NON-CON_septic}$	Factor for Non-Consumed Protein Added to Wastewater (1.13)	No units	
$F_{IND-COM_septic}$	Factor for Industrial and Commercial Co-Discharged Protein, septic systems (1)	No units	1990-2021: IPCC (2019)
EF_{SEPTIC}	Emission factor, septic systems (0.0045)	kg N_2O-N/kg N	1990-2021: IPCC (2019) Table 6.8a
44/28	Conversion factor	Molecular weight ratio of N_2O to N_2	Standard conversion
$1/10^6$	Conversion factor	kg to kt	Standard conversion

[a] Value of this activity data varies over the Inventory time series.

Emissions from Centrally Treated Aerobic and Anaerobic Systems:

Nitrous oxide emissions from POTWs depend on the total nitrogen entering centralized wastewater treatment. The total nitrogen entering centralized wastewater treatment was estimated by multiplying the U.S. population by the percent of wastewater collected for centralized treatment (about 83 percent in 2021), the consumed protein per capita, the fraction of N in protein, the correction factor for additional N from household products, the factor for industrial and commercial co-discharged protein into wastewater treatment, and the factor for non-consumed protein added to wastewater.

Equation 7-35: Total Nitrogen Entering Centralized Systems (IPCC 2019 [Eq. 10])

$$\mathrm{TN_{DOM_{CENTRAL}}}\left(\frac{\mathrm{kg\ N}}{\mathrm{year}}\right) = (\mathrm{US_{POP}} \times \mathrm{T_{CENTRALIZED}}) \times \mathrm{Protein} \times \mathrm{F_{NPR}} \times \mathrm{N_{HH}} \times \mathrm{F_{NON-CON}} \times \mathrm{F_{IND-COM}}$$

Table 7-30: Variables and Data Sources for Non-Consumed Protein and Nitrogen Entering Centralized Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
US_{POP}	U.S. population[a]	Persons	United States and Puerto Rico: 1990-1999: U.S. Census Bureau (2002); Instituto de Estadísticas de Puerto Rico (2021) 2000-2009: U.S. Census Bureau 2011 2010-2019: U.S. Census Bureau (2021a) 2020-2021: U.S. Census Bureau (2021b) U.S. Territories other than Puerto Rico: 1990-2021: U.S. Census Bureau (2022)
$T_{CENTRALIZED}$	Percent collected[a]	%	Odd years from 1989 through 2019: U.S. Census Bureau (2019) Data for intervening years obtained by linear interpolation 2020-2021: Forecasted from the rest of the time series
Protein	Consumed protein per capita[a]	kg/person/year	1990-2021: Calculated
F_{NPR}	Fraction of nitrogen in protein (0.16)	kg N/kg protein	1990-2021: IPCC (2019), Eq. 6.10
N_{HH}	Factor for additional nitrogen from household products (1.17)	No units	1990-2021: IPCC (2019), Table 6.10a
$F_{NON-CON}$	Factor for U.S. specific non-consumed protein (1.13)	No units	
$F_{IND-COM}$	Factor for Industrial and Commercial Co-Discharged Protein (1.25)	No units	1990-2021: IPCC (2019) Table 6.11

[a] Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from POTWs were estimated by multiplying the total nitrogen entering centralized wastewater treatment, the relative percentage of wastewater treated by aerobic systems (other than constructed wetlands) and anaerobic systems, aerobic systems with constructed wetlands as the sole treatment, the emission factor for aerobic systems and anaerobic systems, and the conversion from N_2 to N_2O.

Table 7-34 presents the data for U.S. population, population served by centralized wastewater treatment plants, available protein, and protein consumed. The methodological equations are:

Equation 7-36: Total Domestic N_2O Emissions from Centrally Treated Aerobic Systems

$$Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (other\ than\ Constructed\ Wetlands)\ (B1)\ +\ Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (Constructed\ Wetlands\ Only)\ (B2)\ +\ Emissions\ from\ Centrally\ Treated\ Aerobic\ Systems\ (Constructed\ Wetlands\ used\ as\ Tertiary\ Treatment)\ (B3)\ =\ B\ (kt\ N_2O/year)$$

where,

Equation 7-37: Emissions from Centrally Treated Aerobic Systems (other than Constructed Wetlands) (IPCC 2019 [Eq. 6.9])

$$\mathrm{B1\ (kt\ N_2O/year)} = [(\mathrm{TN_{DOM_CENTRAL}}) \times (\%\ \mathrm{aerobic_{OTCW}})] \times \mathrm{EF_{aerobic}} \times 44/28 \times 1/10^6$$

Table 7-31: Variables and Data Sources for N_2O Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Treated Aerobic Systems (Other than Constructed Wetlands) (kt N_2O/year)			
$TN_{DOM_CENTRAL}$	Total nitrogen entering centralized systems[a]	kg N/year	1990-2021: Calculated
% $aerobic_{OTCW}$	Flow to aerobic systems, other than constructed wetlands only / total flow to POTWs[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: EPA (1992, 1996, 2000, 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
$EF_{aerobic}$	U.S.-specific emission factor – aerobic systems (0.015)	kg N_2O-N/kg N	1990-2021: IPCC (2022)
44/28	Conversion factor	Molecular weight ratio of N_2O to N_2	Standard conversion
$1/10^6$	Conversion factor	kg to kt	Standard conversion

[a] Value of this activity data varies over the Inventory time series.

Nitrous oxide emissions from constructed wetlands used as sole treatment include similar data and processes as aerobic systems other than constructed wetlands. See description above. Nitrous oxide emissions from constructed wetlands used as tertiary treatment were estimated by multiplying the flow to constructed wetlands used as tertiary treatment, wastewater N concentration entering tertiary treatment, constructed wetlands emission factor, and converting to kt/year.

Equation 7-38: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands Only) (IPCC 2014 [Eq. 6.9])

$$B2\ \left(\frac{\text{kt } N_2O}{\text{year}}\right) = [(TN_{DOM_CENTRAL}) \times (\%\ \text{aerobic}_{CW})] \times EF_{CW} \times 44/28 \times 1/10^6$$

Equation 7-39: Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands used as Tertiary Treatment) (U.S.-Specific)

$$B3\ \left(\frac{\text{kt } N_2O}{\text{year}}\right) = [(POTW_flow_CW) \times (N_{CW,INF}) \times 3.785 \times (EF_{CW})] \times 1/10^6 \times 365.25$$

Table 7-32: Variables and Data Sources for N_2O Emissions from Centrally Treated Aerobic Systems (Constructed Wetlands)

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Constructed Wetlands Only (kt N_2O/year)			
$TN_{DOM_CENTRAL}$	Total nitrogen entering centralized treatment[a]	kg N/year	1990-2021: Calculated
% $aerobic_{CW}$	Flow to aerobic systems, constructed wetlands used as sole treatment / total flow to POTWs[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
EF_{CW}	Emission factor for constructed wetlands (0.0013)	kg N_2O-N/kg N	1990-2021: IPCC (2014) Table 6.7
44/28	Conversion factor	Molecular weight ratio of N_2O to N_2	Standard conversion
$1/10^6$	Conversion factor	kg to kt	Standard conversion
Emissions from Constructed Wetlands used as Tertiary Treatment (kt N_2O/year)			
POTW_flow_CW	Wastewater flow to POTWs that use constructed wetlands as tertiary treatment [a]	MGD	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012) Data for intervening years obtained by linear interpolation.

Variable	Variable Description	Units	Inventory Years: Source of Value
			2013-2021: Forecasted from the rest of the time series
$N_{CW,INF}$	BOD concentration in wastewater entering the constructed wetland (25)	mg/L	1990-2021: Metcalf & Eddy (2014)
3.785	Conversion factor	liters to gallons	Standard conversion
EF_{CW}	Emission factor for constructed wetlands (0.0013)	kg N_2O-N/kg N	1990-2021: IPCC (2014) Table 6.7
$1/10^6$	Conversion factor	mg to kg	Standard conversion
365.25	Conversion factor	Days in a year	Standard conversion

[a] Value of this activity data varies over the Inventory time series.

Data sources and methodologies are similar to those described for aerobic systems, other than constructed wetlands. See discussion above.

Equation 7-40: Emissions from Centrally Treated Anaerobic Systems (IPCC 2019 [Eq. 6.9])

$$\left(\frac{\text{kt } N_2O}{\text{year}}\right) = [(TN_{DOM_CENTRAL}) \times (\%\text{ anaerobic})] \times EF_{anaerobic} \times 44/28 \times 1/10^6$$

Table 7-33: Variables and Data Sources for N_2O Emissions from Centrally Treated Anaerobic Systems

Variable	Variable Description	Units	Inventory Years: Source of Value
Emissions from Centrally Treated Anaerobic Systems			
$TN_{DOM_CENTRAL}$	Total nitrogen entering centralized treatment[a]	kg N/year	1990-2021: Calculated
% anaerobic	Percent centralized wastewater that is anaerobically treated[a]	%	1990, 1991: Set equal to 1992 1992, 1996, 2000, 2004: (EPA 1992, 1996, 2000, 2004), respectively Data for intervening years obtained by linear interpolation. 2005-2021: Forecasted from the rest of the time series
$EF_{anaerobic}$	Emission factor for anaerobic reactors/deep lagoons (0)	kg N_2O-N/kg N	1990-2021: IPCC (2019) Table 6.8A
44/28	Conversion factor	Molecular weight ratio of N_2O to N_2	Standard conversion
$1/10^6$	Conversion factor	mg to kg	Standard conversion

[a] Value of this activity data varies over the Inventory time series.

Table 7-34: U.S. Population (Millions) Fraction of Population Served by Centralized Wastewater Treatment (percent), Protein Supply (kg/person-year), and Protein Consumed (kg/person-year)

Year	Population	Centralized WWT Population (%)	Protein Supply	Protein Consumed
1990	253	75.6	43.1	33.2
2005	300	78.8	44.9	34.7

2017	329	82.1	44.7	34.5
2018	330	82.9	45.5	35.1
2019	332	83.6	45.4	35.0
2020	335	82.7	44.6	34.4
2021	336	83.0	44.6	34.4

Sources: Population – U.S. Census Bureau 2002; U.S. Census Bureau 2011; U.S. Census Bureau (2021a and 2021b); Instituto de Estadísticas de Puerto Rico (2021); U.S. Census Bureau (2022); WWTP Population – U.S. Census Bureau (2019); Available Protein – USDA (2021), FAO (2022c); Protein Consumed – FAO (2022c).

Emissions from Discharge of Centralized Treatment Effluent:

Nitrous oxide emissions from the discharge of wastewater treatment effluent were estimated by multiplying the total nitrogen in centrally treated wastewater effluent by the percent of wastewater treated in primary, secondary, and tertiary treatment and the fraction of nitrogen remaining after primary, secondary, or tertiary treatment and then multiplying by the percent of wastewater volume routed to waterbodies with nutrient-impaired/eutrophic conditions and all other waterbodies (ERG 2021a) and emission factors for discharge to impaired waterbodies and other waterbodies from IPCC (2019). The methodological equations are:

Equation 7-41: Emissions from Centrally Treated Systems Discharge (U.S.-Specific)

$$\mathrm{D}\left(\frac{\mathrm{kt\ N_2O}}{\mathrm{year}}\right) = \left[\left(\mathrm{N_{EFFLUENT,IMP}} \times \mathrm{EF_{IMP}}\right) + \left(\mathrm{N_{EFFLUENT,NONIMP}} \times \mathrm{EF_{NONIMP}}\right)\right] \times 44/28 \times 1/10^6$$

where,

Equation 7-42: Total Organics in Centralized Treatment Effluent (IPCC 2019 [Eq. 6.8])

$$\mathrm{N_{EFFLUENT,DOM}}\left(\frac{\mathrm{kg\ N}}{\mathrm{year}}\right) = \left[\mathrm{TN_{DOM_CENTRAL}}[12] \times \%\ \mathrm{primary} \times \left(1 - \mathrm{N_{rem,PRIMARY}}\right)\right] + \left[\mathrm{TN_{DOM_CENTRAL}} \times \%\ \mathrm{secondary} \times \left(1 - \mathrm{N_{rem,SECONDARY}}\right)\right] + \left[\mathrm{TN_{DOM_CENTRAL}} \times \%\ \mathrm{tertiary} \times \left(1 - \mathrm{N_{rem,TERTIARY}}\right)\right]$$

Equation 7-43: Total Nitrogen in Effluent Discharged to Impaired Waterbodies (U.S.-Specific)

$$\mathrm{N_{EFFLUENT,IMP}}\ (\mathrm{kg\ N/year}) = \left(\mathrm{N_{EFFLUENT,DOM}} \times \mathrm{Percent_{IMP}}\right)/1000$$

Equation 7-44: Total Nitrogen in Effluent Discharged to Nonimpaired Waterbodies (U.S.-Specific)

$$\mathrm{N_{EFFLUENT,NONIMP}}\ (\mathrm{kg\ N\ year}) = \mathrm{N_{EFFLUENT,DOM}} \times \mathrm{Percent_{NONIMP}})/1000$$

Table 7-35: Variables and Data Sources for N_2O Emissions from Centrally Treated Systems Discharge

Variable	Variable Description	Units	Source of Value
$N_{EFFLUENT,DOM}$	Total organics in centralized treatment effluent[a]	kg N/year	1990-2021: Calculated
44/28	Conversion factor	Molecular weight ratio of N_2O to N_2	Standard conversion
$1/10^6$	Conversion factor	kg to kt	Standard conversion
$TN_{DOM_CENTRAL}$	Total nitrogen entering centralized treatment[a]	kg N/year	1990-2021: Calculated
1000	Conversion factor	kg to kt	Standard Conversion

[12] See emissions from centrally treated aerobic and anaerobic systems for methodological equation calculating $TN_{DOM_CENTRAL}$.

Variable	Variable Description	Units	Source of Value
% primary	Percent of primary domestic centralized treatment[a]	%	1990,1991: Set equal to 1992. 1992, 1996, 2000, 2004, 2008, 2012: EPA (1992, 1996, 2000, 2004, 2008, and 2012), respectively Data for intervening years obtained by linear interpolation. 2013-2021: Forecasted from the rest of the time series
% secondary	Percent of secondary domestic centralized treatment[a]	%	
% tertiary	Percent of tertiary domestic centralized treatment[a]	%	
$N_{rem,PRIMARY}$	Fraction of nitrogen removed from primary domestic centralized treatment (0.1)	No units	1990-2021: IPCC (2019) Table 6.10c
$N_{rem,SECONDARY}$	Fraction of nitrogen removed from secondary domestic centralized treatment (0.4)	No units	
$N_{rem,TERTIARY}$	Fraction of nitrogen removed from tertiary domestic centralized treatment (0.9)	No units	
$N_{EFFLUENT,IMP}$	Total nitrogen in effluent discharged to impaired waterbodies	kg N/year	1990-2021: Calculated
$N_{EFFLUENT,NONIMP}$	Total nitrogen in effluent discharged to nonimpaired waterbodies	kg N/year	
EF_{IMP}	Emission factor (discharge to impaired waterbodies) (0.19)	kg N_2O-N/kg N	1990-2021: IPCC (2019) Table 6.8a
$EF_{NONIMPr}$	Emissions factor (discharge to nonimpaired waterbodies) (0.005)	kg N_2O-N/kg N	
$Percent_{IMP}$	Percent of wastewater discharged to impaired waterbodies[a]	%	1990-2010: Set equal to 2010 2010: ERG (2021a) 2011: Obtained by linear interpolation 2012: ERG (2021a) 2013-2021: Set equal to 2012
$Percent_{NONIMP}$	Percent of wastewater discharged to nonimpaired waterbodies[a]	%	

[a] Value for this activity data varies over the Inventory time series.

Industrial Wastewater N_2O Emission Estimates

Nitrous oxide emission estimates from industrial wastewater are estimated according to the methodology described in the *2019 Refinement*. U.S. industry categories that are likely to produce significant N_2O emissions from wastewater treatment were identified based on whether they generate high volumes of wastewater, whether there is a high nitrogen wastewater load, and whether the wastewater is treated using methods that result in N_2O emissions. The top four industries that meet these criteria and were added to the inventory are meat and poultry processing; petroleum refining; pulp and paper manufacturing; and breweries (ERG 2021a). Wastewater treatment and discharge emissions for these sectors for 2021 are displayed in Table 7-36 below. Table 7-20 contains production data for these industries.

Table 7-36: Total Industrial Wastewater N_2O Emissions by Sector (2021, MMT CO_2 Eq. and Percent)

Industry	N_2O Emissions (MMT CO_2 Eq.)	% of Industrial Wastewater N_2O
Meat & Poultry	0.2	47.7
Petroleum Refineries	0.1	29.8

Pulp & Paper	0.1	21.7
Breweries	+	0.8
Total	**0.5**	**100**

+ Does not exceed 0.5 MMT CO_2 Eq.
Note: Totals may not sum due to independent rounding.

Emissions from Industrial Wastewater Treatment Systems:

More recent research has revealed that emissions from nitrification or nitrification-denitrification processes at wastewater treatment, previously judged to be a minor source, may in fact result in more substantial emissions (IPCC 2019). N_2O is generated as a by-product of nitrification, or as an intermediate product of denitrification. Therefore, N_2O emissions are primarily expected to occur from aerobic treatment systems. To estimate these emissions, the total nitrogen entering aerobic wastewater treatment for each industry must be calculated. Then, the emission factor provided by the *2019 Refinement* is applied to the portion of wastewater that undergoes aerobic treatment.

The total nitrogen that enters each industry's wastewater treatment system is a product of the total amount of industrial product produced, the wastewater generated per unit of product, and the nitrogen expected to be present in each meter cubed of wastewater (IPCC equation 6.13).

Equation 7-45: Total Nitrogen in Industrial Wastewater

$$TN_{INDi} = P_i \times W_i \times TN_i$$

where,

TN_{INDi} = total nitrogen in wastewater for industry *i* for inventory year, kg TN/year
i = industrial sector
P_i = total industrial product for industrial sector *i* for inventory year, t/year
W_i = wastewater generated per unit of production for industrial sector *i* for inventory year, m^3/t product
Tni = total nitrogen in untreated wastewater for industrial sector *i* for inventory year, kg TN/m^3

For the four industries of interest, the total production and the total volume of wastewater generated has already been calculated for CH_4 emissions. For these new N_2O emission estimates, the total nitrogen in the untreated wastewater was determined by multiplying the annual industry production, shown in Table 7-20, by the average wastewater outflow, shown in Table 7-23, and the nitrogen loading in the outflow shown in Table 7-37.

Table 7-37: U.S. Industrial Wastewater Nitrogen Data

Industry	Wastewater Total N (kg N/ m^3)	Source for Total N
Pulp and Paper	0.30[a]	Cabrera (2017)
Meat Processing	0.19	IPCC (2019), Table 6.12
Poultry Processing	0.19	IPCC (2019), Table 6.12
Petroleum Refining	0.051	Kenari et al. (2010)
Breweries – Craft	0.055	IPCC (2019), Table 6.12
Breweries – NonCraft	0.055	IPCC (2019), Table 6.12

[a] Units are kilograms N per air-dried metric ton of production.

Nitrous oxide emissions from industry wastewater treatment are calculated by applying an emission factor to the percent of wastewater (and therefore nitrogen) that undergoes aerobic treatment (IPCC Equation 6.11).

Equation 7-46: N_2O Emissions from Industrial Wastewater Treatment Plants

$$N_2O\ Plants_{IND} = \left[\sum_i \left(T_{i,j} \times EF_{i,j} \times TN_{INDi}\right)\right] \times \frac{44}{28}$$

where,

N_2O $Plants_{IND}$	=	N_2O emissions from industrial wastewater treatment plants for inventory year, kg N_2O/year
TN_{INDi}	=	total nitrogen in wastewater from industry *i* for inventory year, kg N/year
$T_{i,j}$	=	degree of utilization of treatment/discharge pathway or system *j*, for each industry *i* for inventory year
i	=	industrial sector
j	=	each treatment/discharge pathway or system
$EF_{i,j}$	=	emission factor for treatment/discharge pathway or system j, kg N_2O-N/kg N. 0.015 kg N_2O-N/kg N (IPCC 2022)
44/28	=	conversion of kg N_2O-N into kg N_2O

For each industry, the degree of utilization (Ti,j)–the percent of wastewater that undergoes each type of treatment–was previously determined for CH_4 emissions and presented in Table 7-22.

Emissions from Industrial Wastewater Treatment Effluent:

Nitrous oxide emissions from industrial wastewater treatment effluent are estimated by multiplying the total nitrogen content of the discharged wastewater effluent by an emission factor associated with the location of the discharge. Where wastewater is discharged to aquatic environments with nutrient-impacted/eutrophic conditions (i.e., water bodies which are rich in nutrients and very productive in terms of aquatic animal and plant life), or environments where carbon accumulates in sediments such as lakes, reservoirs, and estuaries, the additional organic matter in the discharged wastewater is expected to increase emissions.

Equation 7-47: N_2O Emissions from Industrial Wastewater Treatment Effluent

$$\mathrm{N_2O\ Effluent_{IND}} = \mathrm{N_{EFFLUENT,IND}} \times \mathrm{EF_{EFFLUENT}} \times 44/28$$

where,

N_2O $Effluent_{IND}$	=	N_2O emissions from industrial wastewater discharge for inventory year (kg N_2O/year)
$N_{EFFLUENT,IND}$	=	Total nitrogen in industry wastewater effluent discharged to aquatic environments for inventory year (kg N/year)
$EF_{EFFLUENT}$	=	Tier 1 emission factor for wastewater discharged to aquatic environments (0.005 kg N_2O-N/kg N) (IPCC 2019)
44/28	=	Conversion of kg N_2O-N into kg N_2O

The total N in treated effluent was determined through use of a nutrient estimation tool developed by EPA's Office of Water (EPA 2019). The Nutrient Tool uses known nutrient discharge data within defined industrial sectors or subsectors, as reported on Discharge Monitoring Reports, to estimate nutrient discharges for facilities within that sector or subsector that do not have reported nutrient discharges but are likely to discharge nutrients. The estimation considers, within each sector or subsector, elements such as the median nutrient concentration and flow, as well as the percent of facilities within the sector or subsector that have reported discharges. Data from 2018 are available for the pulp, paper, and paperboard, meat and poultry processing, and petroleum refining industries. To complete the time series, an industry-specific percent removal of nitrogen was calculated using the total nitrogen in untreated wastewater. See Table 7-38.

Because data for breweries was not available, the removal of nitrogen was assumed to be equivalent to secondary treatment, or 40 percent (IPCC 2019). The Tier 1 emission factor (0.005 kg N_2O/kg N) from IPCC (2019) was used.

Table 7-38: Industrial Wastewater Nitrogen Discharged in 2018 by Sector (kg N)

Industry	N $Effluent_{IND}$ (kg N)	Industry-Specific N Removal Factor
Meat & Poultry	12,078,919	0.082
Petroleum Refineries	1,698,953	0.045
Pulp & Paper	18,809,623	1.08

Breweries[a]	1,604,878	NA

[a] Nitrogen discharged by breweries was estimated as 60 percent of untreated wastewater nitrogen.
NA (Not Available)
Source: ERG (2021a).

Uncertainty

The overall uncertainty associated with both the 2021 CH_4 and N_2O emission estimates from wastewater treatment and discharge was calculated using the *2006 IPCC Guidelines* Approach 2 methodology (IPCC 2006). Uncertainty associated with the parameters used to estimate CH_4 emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, fruits and vegetable processing, ethanol production, petroleum refining, and breweries. Uncertainty associated with the parameters used to estimate N_2O emissions include that of numerous input variables used to model emissions from domestic wastewater and emissions from wastewater from pulp and paper manufacturing, meat and poultry processing, petroleum refining, and breweries. Uncertainty associated with centrally treated constructed wetlands parameters including U.S. population served by constructed wetlands, and emission and conversion factors are from IPCC (2014), whereas uncertainty associated with POTW flow to constructed wetlands and influent BOD and nitrogen concentrations were based on expert judgment (ERG 2021b).

The results of this Approach 2 quantitative uncertainty analysis are summarized in Table 7-39. For 2021, methane emissions from wastewater treatment were estimated to be between 15.1 and 27.8 MMT CO_2 Eq. at the 95 percent confidence level (or in 19 out of 20 Monte Carlo Stochastic Simulations). This indicates a range of approximately 29 percent below to 32 percent above the 2021 emissions estimate of 21.1 MMT CO_2 Eq. Nitrous oxide emissions from wastewater treatment were estimated to be between 13.8 and 61.2 MMT CO_2 Eq., which indicates a range of approximately 34 percent below to 193 percent above the 2021 emissions estimate of 20.9 MMT CO_2 Eq.

Table 7-39: Approach 2 Quantitative Uncertainty Estimates for 2021 Emissions from Wastewater Treatment (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate[a] (MMT CO_2 Eq.)		(%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Wastewater Treatment	**CH_4**	**21.1**	**15.1**	**27.8**	**-29%**	**+32%**
Domestic	CH_4	13.9	9.2	19.7	-34%	+42%
Industrial	CH_4	7.2	4.2	11.3	-42%	+58%
Wastewater Treatment	**N_2O**	**20.9**	**13.8**	**61.2**	**-34%**	**+193%**
Domestic	N_2O	20.4	12.8	60.4	-37%	+195%
Industrial	N_2O	0.5	0.5	1.4	-0.4%	+202%

[a] Range of emission estimates predicted by Monte Carlo Stochastic Simulation for a 95 percent confidence interval.

QA/QC and Verification

General QA/QC procedures were applied to activity data, documentation, and emission calculations consistent with the U.S. *Inventory* QA/QC plan, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). This effort included a general or Tier 1 analysis, including the following checks:

- Checked for transcription errors in data input;

- Ensured references were specified for all activity data used in the calculations;
- Checked a sample of each emission calculation used for the source category;
- Checked that parameter and emission units were correctly recorded and that appropriate conversion factors were used;
- Checked for temporal consistency in time series input data for each portion of the source category;
- Confirmed that estimates were calculated and reported for all portions of the source category and for all years;
- Investigated data gaps that affected trends of emission estimates; and
- Compared estimates to previous estimates to identify significant changes.

Calculation-related QC (category-specific, Tier 2) was performed for a portion of the domestic wastewater treatment discharges methodology, which included assessing available activity data to ensure the most complete publicly data set was used and checking historical trends in the data to assist determination of best methodology for filling in the time series for data that are not available annually.

All transcription errors identified were corrected and documented. The QA/QC analysis did not reveal any systemic inaccuracies or incorrect input values.

Recalculations Discussion

Population data were updated using the same and latest data sources as the state-level emissions Inventory to create consistency across inventory estimates. These changes affected the entire timeseries, except 2000. Protein data were updated to reflect available protein values available for 2011, 2013, and 2018 through 2020 (FAO 2022c). Pulp, paper, and paperboard production data were updated to reflect revised values for 2020 (FAO 2022a). Pulp, paper, and paperboard wastewater outflow data were updated to reflect new available values for 2020 which affected 2019 and 2020 (AF&PA 2022). Updated red meat production values for 2020, were updated based on revised data (USDA 2022a; USDA 2022c). Fruits and vegetables production values were updated for the time series (ERG 2022). Ethanol production values for 2015 and 2020 were based on revised data (RFA 2022a; RFA 2022b). Petroleum refining production values for 2020 were revised based on EIA (2022). In addition, EPA revised the domestic sludge generation methodology to estimate the sludge generation from U.S. Territories and update the time series to include new 2018 values (ERG 2022).

In addition, for the current Inventory, estimates of CO_2-equivalent total CH_4 and N_2O emissions from wastewater treatment and discharge have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous Inventories). The GWP of CH_4 has increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions while the GWP for N_2O decreased from 298 to 265 leading to a decrease in CO_2-equivalent N_2O emissions. The AR5 GWPs have been applied across the entire time series for consistency. Further discussion on this update and the overall impacts of updating the Inventory GWP values to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculation and Improvements.

Compared to the previous Inventory which applied 100-year GWP values from AR4, the cumulative effect of all these recalculations had a minor impact on the overall wastewater treatment emission estimates:

- Domestic wastewater treatment and discharge CH_4 emissions increased on average 13.9 percent over the timeseries, with the smallest increase of 11.4 percent (1.7 MMT CO_2 Eq.) in 1995 and largest increase of 19.9 percent (2.3 MMT CO_2 Eq.) in 2019.

- Domestic wastewater treatment and discharge N_2O emissions decreased an average 11.0 percent over the timeseries, with the smallest decrease in 8.9 percent (2.0 MMT CO_2 Eq.) in 2019 to the largest decrease of 11.0 percent (2.6 MMT CO_2 Eq.) in 2020.
- Industrial wastewater treatment and discharge CH_4 emissions increased on average 12.1 percent over the timeseries, with the smallest increase of 11.3 percent (0.7 MMT CO_2 Eq.) in 2020 and largest increase of 12.3 percent (0.77 MMT CO_2 Eq.) in 2017.
- Industrial wastewater treatment and discharge N_2O emissions decreased an average 11.1 percent over the timeseries, with the smallest decrease of 11.1 percent (0.04 MMT CO_2 Eq.) in 1991 to the largest decrease of 11.5 percent (0.06 MMT CO_2 Eq.) in 2020.

Over the time series, the total emissions on average increased by 1.1 percent from the previous Inventory. The changes ranged from the smallest increase, 0.4 percent (0.2 MMT CO_2 Eq.), in 2004, to the largest decrease, 2.4 percent (1.0 MMT CO_2 Eq.), in 2019.

Planned Improvements

EPA notes the following improvements may be implemented or investigated within the next two or three inventory cycles pending time and resource constraints:

- Investigate anaerobic sludge digester and biogas data compiled by the Water Environment Federation (WEF) in collaboration with other entities *as a potential source of updated activity data;*
    - *Due to lack of these data, the United States continues to use another method for estimating biogas produced. This method uses the standard 100 gallons/capita/day wastewater generation factor for the United States (Ten-State Standards). However, based on stakeholder input, some regions of the United States use markedly less water due to water conservation efforts so EPA plans to investigate updated sources for this method as well.*

EPA notes the following improvements will continue to be investigated as time and resources allow, but there are no immediate plans to implement them until data are available or identified:

- Investigate additional sources for estimating wastewater volume discharged and discharge location for both domestic and industrial sources. For domestic wastewater, the goal would be to provide additional data points along the time series, while the goal for industrial wastewater would be to update the Tier 1 discharge methodology to a Tier 2 methodology.
- Investigate additional sources for domestic wastewater treatment type in place data.
- Continue to review whether sufficient data exist to develop U.S.-specific CH_4 or N_2O emission factors for domestic wastewater treatment systems, including whether emissions should be differentiated for systems that incorporate biological nutrient removal operations; and
- Investigate additional data sources for improving the uncertainty of the estimate of N entering municipal treatment systems.
- Evaluate the use of POTW BOD effluent discharge data from ICIS-NPDES.[13] Currently only half of POTWs report organics as BOD_5 so EPA would need to determine a hierarchy of parameters to appropriately sum all loads. Using these data could potentially improve the current methane emission estimates from domestic discharge.

[13] ICIS-NPDES refers to EPA's Integrated Compliance Information System – National Pollutant Discharge Elimination System.

- Evaluate the use of POTW N effluent discharge data from ICIS-NPDES. Currently only about 80 percent of POTWs report a form of N so EPA would need to determine an appropriate method to scale to the total POTW population. EPA is aware of a method for industrial sources and plans to determine if this method is appropriate for domestic sources.

7.3 Composting (CRF Source Category 5B1)

Composting of organic waste, such as food waste, garden (yard) and park waste, and wastewater treatment sludge and/or biosolids, is common in the United States. Composting reduces the amount of methane-generating waste entering landfills, destroys pathogens in the waste, sequesters carbon, and provides a source of organic matter. Composting can also generate a saleable product and reduce the need for chemical fertilizers when the end product is used as a fertilizer or soil amendment. This source category assumes all composting facilities are commercial, large-scale anaerobic windrow composting facilities with yard trimmings as the main waste stream composted (BioCycle 2017). Facilities using aerobic composting methods (e.g., aerated static piles, in-vessel composting) are operational in the United States, however national estimates of the material processed by these facilities are not readily available and therefore not included. Residential backyard composting is also not included in this source category.

Composting naturally converts a large fraction of the degradable organic carbon in the waste material into carbon dioxide (CO_2) through aerobic processes without anthropogenic influence. With anthropogenic influences (e.g., at commercial or large on-site composting operations), anaerobic conditions can be created in sections of the compost pile when there is excessive moisture or inadequate aeration (or mixing) of the compost pile, resulting in the formation of methane (CH_4). Methane in aerobic sections of a windrow pile are generally oxidized by microorganisms, which convert the CH_4 to CO_2 emissions. Even though CO_2 emissions are generated, they are not included in net greenhouse gas emissions for composting. Consistent with the *2006 IPCC Guidelines*, net CO_2 flux from carbon stock changes in waste material are estimated and reported under the LULUCF sector. The estimated CH_4 released into the atmosphere ranges from less than 1 percent to a few percent of the initial C content in the material (IPCC 2006). Depending on how well the compost pile is managed, nitrous oxide (N_2O) emissions can also be produced. The formation of N_2O depends on the initial nitrogen content of the material and is mostly due to nitrogen oxide (NO_x) denitrification during the thermophilic and secondary mesophilic stages of composting (Cornell 2007). Emissions vary and range from less than 0.5 percent to 5 percent of the initial nitrogen content of the material (IPCC 2006). Animal manures are typically expected to generate more N_2O than, for example, yard waste, however data are limited.

From 1990 to 2021, the amount of waste composted in the United States increased from 3,810 kt to 22,946 kt (see Table 7-42). There was some fluctuation in the amount of waste composted between 2006 to 2009 where a peak of 20,063 kt composted was observed in 2008, which decreased to 18,838 kt composted the following year, presumably driven by the economic crisis of 2009 (data not shown). Since 2009, the amount of waste composted has gradually increased, and when comparing 2010 to 2021, a 25 percent increase in waste composted is observed. Emissions of CH_4 and N_2O from composting from 2010 to 2021 have increased by the same percentage.

In 2021, CH_4 emissions from composting (see Table 7-40 and Table 7-41) were 2.6 MMT CO_2 Eq. (92 kt), and N_2O emissions from composting were 1.8 MMT CO_2 Eq. (7 kt), representing consistent emissions trends over the past several years. Composted material primarily includes yard trimmings (grass, leaves, and tree and brush trimmings) and food scraps from the residential and commercial sectors (such as grocery stores; restaurants; and school, business, and factory cafeterias). The composted waste quantities reported here do not include small-scale backyard composting and agricultural composting mainly due to the lack of consistent and comprehensive national data. Additionally, it is assumed that backyard composting tends to be a more naturally managed process with less chance of generating anaerobic conditions and CH_4 and N_2O emissions. Agricultural composting is accounted for in Volume 4, Chapter 5 (Cropland) of this Inventory, as most agricultural composting operations are assumed to land-apply the resultant compost to soils.

The growth in composting since the 1990s and specifically over the past decade may be attributable to the following factors: (1) the enactment of legislation by state and local governments that discouraged or banned the disposal of yard trimmings and/or food waste in landfills, (2) an increase in yard trimming collection and yard trimming drop off sites operated by local solid waste management districts/divisions, (3) an increased awareness of the environmental benefits of composting, and (4) loans or grant programs to establish or expand composting infrastructure.

Most bans or diversion laws on the disposal of yard trimmings were initiated in the early 1990s by state or local governments (U.S. Composting Council 2010). California, for example, enacted a waste diversion law for organics including yard trimmings and food scraps in 1999 (AB939) that required jurisdictions to divert 50 percent of the waste stream by 2000, or be subjected to fines. Currently, 20 states representing up to 42 percent of the nation's population have enacted legislation banning yard waste from landfill disposal (U.S. Composting Council 2022). Additional initiatives at the metro and municipal level also exist across the United States. Roughly 4,713 composting facilities exist in the United States with most (57.2 percent) composting yard trimmings only (BioCycle 2017).

In the last decade, bans and diversions for food waste have also become more common. As of 2022, eight states (California, Connecticut, Massachusetts, New Jersey, New York, Orgon, Vermont, Washington) and seven local governments (Austin, TX; Boulder, CO; Hennepin County, MN; Portland, OR; New York City, NY; San Francisco, CA; Seattle, WA) had implemented organic waste bans or mandatory recycling laws to help reduce organic waste entering landfills, with most having taken effect after 2013 (U.S. Composting Council 2022). In most cases, organic waste reduction in landfills is accomplished by following recycling guidelines, donating excess food for human consumption, or by sending waste to organics processing facilities (Harvard Law School and CET 2019). An example of an organic waste ban as implemented by California is the California Mandatory Recycling Law (AB1826), which requires companies to comply with organic waste recycling procedures if they produce a certain amount of organic waste and took effect on January 1, 2015 (Harvard Law School and CET 2019). In 2017, *BioCycle* released a report in which 27 of 43 states that responded to their organics recycling survey noted that food waste (collected residential, commercial, institutional, and industrial food waste) was recycled via anaerobic digestion and/or composting. These 27 states reported an estimated total of 1.8 million tons of food waste diverted from landfills in 2016 (BioCycle 2018b). A growing number of initiatives to encourage households and businesses to compost or beneficially reuse food waste also exist.

Table 7-40: CH_4 and N_2O Emissions from Composting (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4	0.4	2.1	2.7	2.5	2.5	2.6	2.6
N_2O	0.3	1.5	1.9	1.8	1.8	1.8	1.8
Total	**0.7**	**3.6**	**4.7**	**4.3**	**4.3**	**4.4**	**4.4**

Note: Totals by gas may not sum due to independent rounding.

Table 7-41: CH_4 and N_2O Emissions from Composting (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4	15	75	98	90	91	92	92
N_2O	1	6	7	7	7	7	7

Methodology

Methane and N_2O emissions from composting depend on factors such as the type of waste composted, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), and aeration during the composting process.

The emissions shown in Table 7-40 and Table 7-41 were estimated using the IPCC default (Tier 1) methodology (IPCC 2006), which is the product of an emission factor and the mass of organic waste composted (note: no CH_4 recovery is expected to occur at composting operations in the emission estimates presented):

Equation 7-48: Greenhouse Gas Emission Calculation for Composting

$$E_i = M \times EF_i$$

where,

E_i	=	CH_4 or N_2O emissions from composting, kt CH_4 or N_2O
M	=	mass of organic waste composted in kt
EF_i	=	emission factor for composting, 4 t CH_4/kt of waste treated (wet basis) and 0.3 t N_2O/kt of waste treated (wet basis) (IPCC 2006)
i	=	designates either CH_4 or N_2O

Per IPCC Tier 1 methodology defaults, the emission factors for CH_4 and N_2O assume a moisture content of 60 percent in the wet waste (IPCC 2006). While the moisture content of composting feedstock can vary significantly by type, composting as a process ideally proceeds between 40 to 65 percent moisture (University of Maine 2016; Cornell 1996).

Estimates of the quantity of waste composted (M, wet weight as generated) are presented in Table 7-42 for select years. Estimates of the quantity composted for 1990 and 2005 were taken from EPA's *Advancing Sustainable Materials Management: Facts and Figures* 2015 (EPA 2018); estimates of the quantities composted for 2017 to 2018 were taken from EPA's *Advancing Sustainable Materials Management: 2018 Tables and Figures* (EPA 2020a); the estimate of the quantity composted for 2019 to 2021 were extrapolated using the 2018 quantity composted and a ratio of the U.S. population growth between 2018 to 2019, 2019 to 2020, and 2020 to 2021, respectively (U.S. Census Bureau 2021 and U.S. Census Bureau 2022). Estimates of waste composted by commercial facilities in Puerto Rico were provided for select years by EPA Region 2 (Kijanka 2020). This data includes amount of waste composted at three facilities in Puerto Rico for 2017, 2018, and 2019, ranging from approximately 1,200 kt to a high of 15,000 kt. The average waste composted for these years was used as the annual amount composted for the respective facility for years the facility was operational. The annual quantity of composted waste in Puerto Rico was forecasted for 2020 and 2021 using available data from prior years, assumed metro area population data near where each facility is located, and the Microsoft Excel FORECAST function to obtain annual composting estimates.

Table 7-42: U.S. Waste Composted (kt)

Activity	1990	2005	2017	2018	2019	2020	2021
Waste Composted	3,810	18,655	24,501	22,594	22,698	22,918	22,946

Uncertainty

The major uncertainty drivers are the assumption that all composting emissions come from commercial windrow facilities and the use of default emission factors (IPCC 2006) which is tied to a homogenous mixture of waste processed across the country (largely yard trimmings). Data presented by BioCycle (BioCycle 2017) confirm most composting operations use the windrow method and yard trimmings are the largest share of material composted across the country, but there are other composting methods used and waste characteristics will vary at a facility level. Additionally, there are composting operations in Puerto Rico and U.S. territories that are not explicitly included in the national quantity of material composted as reported in the EPA Sustainable Materials Management Reports because the methodological scope does not include Puerto Rico and U.S. territories. EPA took steps to include emissions from Puerto Rico and U.S. Territories beginning in the 1990 to 2020 inventory and will continue to seek out additional data in future Inventories.

The estimated uncertainty from the *2006 IPCC Guidelines* is ±58 percent for the Tier 1 methodology and considers the individual emission factors applied to the default emission factors and activity data.

Emissions from composting in 2021 were estimated to range between 1.8 and 7.0 MMT CO_2 Eq., which indicates a range of 58 percent below to 58 percent above the 2021 emission estimate of each gas (see Table 7-43).

Table 7-43: Tier 1 Quantitative Uncertainty Estimates for Emissions from Composting (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Composting	CH_4	2.6	1.1	4.1	-58%	+58%
	N_2O	1.8	0.8	2.9	-58%	+58%
	Total	**4.4**	**1.8**	**7.0**	**-58%**	**+58%**

QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1 Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current Inventory.

Recalculations Discussion

The U.S. population estimate for 2020 was revised with current U.S. Census Bureau data (U.S. Census Bureau 2022). Because the 2020 composting estimates are extrapolated based on population growth, this recalculation also resulted in a nominal increase (1 percent or 145 kt) in the quantity of material composted for 2020 compared to that in the 1990 to 2020 Inventory report.

In addition, for the current Inventory, CO_2-equivalent estimates of total CH_4 and N_2O emissions from composting have been revised to apply the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in the previous inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions while the GWP for N_2O decreased from 298 to 265 leading to a decrease in CO_2-equivalent N_2O emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CO_2-equivalent CH_4 emissions was a 12 percent increase for each year of the time series, while the change in CO_2-equivalent N_2O emissions was an 11 percent decrease for each year of the time series. Further discussion on this update and the overall impacts of updating the inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements. The net impact from these updates was an average annual 1 percent increase in composting emissions for the time series.

Planned Improvements

EPA recently completed a literature search on emission factors and composting systems and management techniques that were documented in a draft technical memorandum. The purpose of this literature review was to compile all published emission factors specific to various composting systems and composted materials in the United States to determine whether the emission factors used in the current methodology can be revised or expanded to account for geographical differences and/or differences in composting systems used. For example, outdoor composting processes in arid regions typically require the addition of moisture compared to similar

composting processes in wetter climates. In general, there is a lack of facility-specific data on the management techniques and sum of material composted to enable the use of different emission factors. EPA will continue to seek out more detailed data on composting facilities to enable this improvement in the future.

Relatedly, EPA has received comments during previous Inventory cycles recommending that calculations for the composting sector be based on waste subcategories (i.e., leaves, grass and garden debris, food waste) and category-specific moisture contents. At this time, EPA is not aware of any available datasets which would enable estimations to be performed at this level of granularity. EPA will continue to search for data which could lead to the development of subcategory-specific composting emission factors to be used in future Inventory cycles.

EPA has put significant work into its Excess Food Opportunities Map dataset, including the compilation of composting facilities and feedstock accepted across the country. Additionally, the EPA's 2018 Wasted Food Report (EPA 2020b) includes estimates of composted waste for individual sectors (e.g., food and beverage manufacturing, restaurants/food services, hospitals, correctional facilities, office buildings). Estimates are provided for one year, 2018. The Inventory compilation team plans to review this report's estimates in comparison to the EPA's Facts and Figures report to identify sectors that are not duplicated in the Facts and Figures reports and develop a methodology to generate estimates for all years in the Inventory time series (1990 through 2021).

EPA will also continue to seek out activity data including processing capacity and years of operation for commercial composting facilities in Puerto Rico (for additional years), Guam, and other U.S. Territories for inclusion in a future Inventory.

7.4 Anaerobic Digestion at Biogas Facilities (CRF Source Category 5B2)

Anaerobic digestion is a series of biological processes in the absence of oxygen in which microorganisms break down organic matter, producing biogas and digestate. The biogas primarily consists of CH_4, biogenic CO_2, and trace amounts of other gases such as N_2O (IPCC 2006) and is often combusted to produce heat and power, or further processed into renewable natural gas or for use as a transportation fuel. Digester gas contains approximately 65 percent CH_4 (a normal range is 55 percent to 65 percent) and approximately 35 percent CO_2 (WEF 2012; EPA 1993). Methane emissions may result from a fraction of the biogas that is lost during the process due to leakages and other unexpected events (0 to 10 percent of the amount of CH_4 generated, IPCC 2006), collected biogas that is not completely combusted, and entrained gas bubbles and residual gas potential in the digestate. Carbon dioxide emissions are biogenic in origin and should be reported as an informational item in the Energy Sector (IPCC 2006). Volume 5 Chapter 4 of the *2006 IPCC Guidelines* notes that at biogas plants where unintentional CH_4 emissions are flared, CH_4 emissions are likely to be close to zero.

Anaerobic digesters differ based on the operating temperature, feedstock type and moisture content, and mode of operation. The operating temperature dictates the microbial communities that live in the digester. Mesophilic microbes are present at temperatures ranging from 85 to 100 degrees Fahrenheit while thermophilic microbes thrive at temperatures ranging from 122 to 140 degrees Fahrenheit (WEF 2012). Digesters may process one or more types of feedstock, including food waste; municipal wastewater solids; livestock manure; industrial wastewater and residuals; fats, oils, and grease; and other types of organic waste streams. Co-digestion (multiple feedstocks) is employed to increase methane production in cases where an organic matter type does not break down easily. In co-digestion, various organic wastes are decomposed in a singular anaerobic digester by using a combination of wastewater solids or manure and food waste from restaurants or food processing industry, a combination of manure and waste from energy crops or crop residues (EPA 2016), or alternative combinations of feedstock. The moisture content of the feedstock (wet or dry) impacts the amount of biogas generation. Wet anaerobic digesters process feedstock with a solids content of less than 15 percent while dry anaerobic digesters process feedstock with a solids content greater than 15 percent (EPA 2020). Digesters may also operate in batch or

continuous mode, which affects the feedstock loading and removal. Batch anaerobic digesters are manually loaded with feedstock all at once and then manually emptied while continuous anaerobic digesters are continuously loaded and emptied with feedstock (EPA 2020).

The three main categories of anaerobic digestion facilities included in national greenhouse gas inventories include the following:

- Anaerobic digestion at biogas facilities, or stand-alone digesters, can be industry-dedicated digesters that process waste from on industry or industrial facility (typically food of beverage waste from manufacturing), or multi-source digesters that process feedstocks from various sources (e.g., municipal food scraps, manure, food processing waste). Some stand-alone digesters also co-digest other organics such as yard waste.
- On-farm digesters manage organic matter and reduce odor generated by farm animals or crops. On-farm digesters are found mainly at dairy, swine, and poultry farms where there is the highest potential for methane production to energy conversion. On-farm digesters may also accept food waste as feedstock for co-digestion.
- Digesters at water resource recovery facilities (WRRF) produce biogas through the treatment and reduction of wastewater solids. Some WRRF facilities may also accept and co-digest food waste.

This section focuses on stand-alone anaerobic digestion at biogas facilities. Emissions from on-farm digesters are included Chapter 5 (Agriculture) and AD facilities at WRRFs are included in Section 7.2 (Wastewater Treatment).

From 1990 to 2021, the estimated amount of waste managed by stand-alone digesters in the United States increased from approximately 786 kt to 8,263 kt, an increase of 951 percent. As described in the Uncertainty section, no data sources present the annual amount of waste managed by these facilities prior to 2015 when the EPA began a comprehensive data collection survey. Thus, the emission estimates between 1990 and 2014, and for 2019 to 2021 are general estimates extrapolated from data collected for years 2015 to 2018. The steady increase in the amount of waste processed over the time series is likely driven by increasing interest in using biogas produced from waste as a renewable energy source and other organics diversion goals.

In 2021, emissions from stand-alone anaerobic digestion at biogas facilities were approximately 0.2 MMT CO_2 Eq. (6 kt) (see Table 7-44 and Table 7-45).

Table 7-44: CH_4 Emissions from Anaerobic Digestion at Biogas Facilities (MMT CO_2 Eq.)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4 Generation	+	0.1	0.2	0.2	0.2	0.2	0.2
CH_4 Recovery	(+)	(+)	(+)	(+)	(+)	(+)	(+)
CH_4 Emissions	**+**	**+**	**0.2**	**0.2**	**0.2**	**0.2**	**0.2**

+ Absolute value does not exceed 0.05 MMT

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values

Table 7-45: CH_4 Emissions from Anaerobic Digestion at Biogas Facilities (kt CH_4)

Activity	1990	2005	2017	2018	2019	2020	2021
CH_4 Generation	1	2	7	7	7	7	7
CH_4 Recovery	(+)	(+)	(+)	(+)	(+)	(+)	(+)
CH_4 Emissions	**1**	**2**	**6**	**6**	**6**	**6**	**6**

+ Does not exceed 0.5 kt.

Notes: Totals may not sum due to independent rounding. Parentheses indicate negative values.

Methodology

Methane emissions from anaerobic digestion depend on factors such as the type of waste managed, the amount and type of supporting material (such as wood chips and peat) used, temperature, moisture content (e.g., wet and fluid versus dry and crumbly), and aeration during the digestion process.

The emissions presented in Table 7-44 were estimated using the IPCC default (Tier 1) methodology (Volume 5, Chapter 4, IPCC 2006) given in Equation 7-49 below, which is the product of an emission factor and the mass of organic waste processed. Only CH_4 emissions are estimated because N_2O emissions are considered negligible (IPCC 2006). Some Tier 2 data are available (annual quantity of waste digested) for the later portion of the time series (2015 and later).

Equation 7-49: Methane Emissions Calculation for Anaerobic Digestion

$$CH_4\ Emissions = \sum_i (M_i \times EF_i) \times 10^{-3} - R$$

where,

CH_4 Emissions	=	total CH_4 emissions in inventory year, Gg CH_4
M_i	=	mass of organic waste treated by biological treatment type *i*, Gg, see Table 7-46
EF	=	emission factor for treatment *i*, g CH_4/kg waste treated, 0.8 Mg/Gg CH_4
i	=	anaerobic digestion
R	=	total amount of CH_4 recovered in inventory year, Gg CH_4

Equation 7-50: Recovered Methane Estimation for Anaerobic Digestion

$$R = Biogas \times 0.0283 \times \frac{minutes}{year} \times Biogas\ CH_4\ Density \times C_{CH4} \times \frac{1}{10^9} \times (1 - DE)$$

where,

Biogas	=	the amount of biogas produced, standard cubic feet per minute (scfm)
0.0283	=	conversion factor cubic meter/cubic feet
525,600	=	minutes per year
662	=	CH_4 density in biogas (EPA 1993), g CH_4/m^3 CH_4
65%	=	C_{CH4}, concentration of CH_4 in the biogas (WEF 2012; EPA 1993)
$1/10^9$	=	conversion factor, grams to kt
0.99	=	destruction efficiency for combustion unit

Per IPCC Tier 1 methodology defaults, the emission factor for CH_4 assumes a moisture content of 60 percent in the wet waste (IPCC 2006). Both liquid and solid wastes are processed by stand-alone digesters and the moisture content entering a digester may be higher. One emission factor recommended by the *2006 IPCC Guidelines* (0.8 Mg/Gg CH_4) is applied for the entire time series (IPCC 2006 Volume 5, Chapter 4, Table 4.1).

The annual quantity of waste digested is sourced from EPA surveys of anaerobic digestion facilities (EPA 2018, 2019, and 2021). The EPA was granted the authority to survey anaerobic digestion facilities that process food waste annually through an Information Collection Request (ICR No. 2533.01). The scope includes stand-alone and co-digestion facilities (on-farm and water resource recovery facilities [WRRF]). Three reports with survey results have been published to date:

- *Anaerobic Digestion Facilities Processing Food Waste in the United States in 2015: Survey Results* (EPA 2018)
- *Anaerobic Digestion Facilities Processing Food Waste in the United States in 2016: Survey Results* (EPA 2019)
- *Anaerobic Digestion Facilities Processing Food Waste in the United States in (2017 & 2018): Survey Results* (EPA 2021)

These reports present aggregated survey data including the annual quantity of waste processed by digester type (i.e., stand-alone, on-farm, and WRRF); waste types accepted; biogas generation and end use; and more. The aggregated data presented in the EPA reports are underestimates of the actual amount of processed waste and biogas produced because (1) surveys rarely achieve a 100 percent response rate and some fraction of facilities in each survey year did not respond to the survey; (2) EPA focused this survey on facilities that process food waste, and there may be additional operational digesters that are not located on farms or at wastewater treatment plants; and (3) EPA has done due diligence to identify all stand-alone digesters that process food waste but may not have identified all facilities across the United States and its territories. The amount of waste digested as reported in the survey reports were assumed to be in wet weight; the majority of stand-alone digesters were found to be wet and mesophilic (EPA 2019).

The annual quantity of waste digested at stand-alone digesters for 1990 to 2014 (only 1990 and 2005 are shown in Table 7-46) was estimated by multiplying the count of estimated operating facilities (as presented in Table 7-47) by the weighted average of waste digested in 2015 and 2016 collected through EPA's survey data (EPA 2018; EPA 2019). Masked survey responses of food and non-food waste processed were shared with the Inventory team by the EPA team leading the EPA AD Data Collection Surveys. This provided an accurate count of the number of facilities that provided annual quantities of digested waste, which matters for the weighted average. The weighted average applied to the current inventory is calculated as follows for 1990 to 2014:

Equation 7-51: Weighted Average of Waste Processed

$$Weighted\ Average\ Waste\ Processed = \frac{(W_{2016} \times Fac_{2016} + W_{2015} \times Fac_{2015})}{(Fac_{2016} + Fac_{2015})}$$

where,

W = total waste processed in the respective survey year, food and non-food waste (short tons).

Fac = the number of facilities that reported an amount of waste processed in the respective survey year. Note the number of facilities that provided an annual quantity of waste processed data was internally shared and differs from the total number of facilities that responded to the EPA surveys as presented in EPA (2018, 2019).

Estimates of the quantity of waste digested (M, wet weight as generated) are presented in for select years and the number of facilities that reported annual quantities of waste digested to the EPA survey were 45 and 44 in 2015 and 2016, respectively (using masked facility data provided by the EPA AD survey data collection team).

Estimates of the quantity of waste digested for 1990 to 2014 are calculated by multiplying the weighted average of waste digested from 2015 and 2016 survey data (216,494 short tons) by the count of operating facilities in each year. This calculation assumes that each facility operates continuously from the first year of operation for the remainder of the time series. Additional efforts will be made to quantify the number of operating facilities and estimates of the total waste digested by year for future Inventories as described in the Planned Improvements section. Estimates of the quantity digested for 2015 and 2016 were taken from EPA's AD survey data (EPA 2018; EPA 2019, respectively). The estimate of waste digested for 2019 through 2021 were extrapolated using the average of the waste digested from the 2017 and 2018 survey data (EPA 2021) as a proxy. The average did not include data from 2015 and 2016 because there is a drop in the amount of waste digested by nearly 1 million tons between 2016 and 2017. The quantities digested between 2015 and 2016 are similar, and quantities digested between 2017 and 2018 are similar. Estimates for 2019 to 2021 will be updated as future EPA survey reports are published.

Table 7-46: U.S. Waste Digested (kt) from 1990-2021

Activity	1990	2005	2017	2018	2019	2020	2021
Waste Digested[a]	786	2,357	8,206	8,320	8,263	8,263	8,263

[a] The amount of waste digested primarily consists of food waste. The amount processed for all years is likely an underestimate because the estimates were developed from survey data provided by operating facilities for 2015 to 2018 (EPA 2018; EPA 2019; EPA 2021). Facilities that did not respond to the EPA surveys are not included and all years except 2015 to 2018 are estimated using assumptions regarding the number of operating facilities and the weighted average of waste digested. Additionally, the liquid portion of the waste digested in 2015 and 2016 are not included due to limited information on the specific waste types to perform the unit conversion to kt. EPA converted liquid waste to tons for 2018 and 2019 using a conversion factor of 3.8 pounds per gallon (EPA 2021). The weighted average of waste digested in 2015 and 2016 (as reported in EPA 2018 and 2019) is used as the average for 1990 to 2014, and the average waste digested as reported in EPA (2021) is used as a proxy for years 2019 to 2021.

The estimated count of operating facilities is calculated by summing the count of digesters that began operating by year over the time series. The year a digester began operating is sourced from EPA (2021). This assumes all facilities are in operation from their first year of operation throughout the remainder of the time series, including facilities prior to 1990. This is likely an overestimate of facilities operating per year but does not necessarily translate to an overestimate in the amount of waste processed because a weighted average of waste processed for the surveyed facilities is applied to these years. The number of facilities in 1990 to 2014 are directly used in calculating the emissions, while the directly reported annual amount of waste processed from the survey data are used for 2015 to 2021.

Table 7-47: Estimated Number of Stand-Alone AD Facilities Operating[a] from 1990-2021

Year	1990	2005	2017	2018	2019	2020	2021
Estimated Count of Operational Facilities	4	12	68	68	68	68	68

[a] The count of operational facilities was visually estimated from Figure 5 in EPA (2021), which presents the count of the first year of digester operation. The number of operational facilities by year is assumed to be the cumulative total from the prior year. This method assumes all facilities are operating from 1990, or their first year of operation, to 2020. The number of facilities operating between 2015 to 2018 are equal to the number of facilities surveyed by EPA (EPA 2018, 2019, and 2021). The number of facilities operating in 2019 and 2020 are assumed to be the same as the last survey report data year, i.e., 2018 as reported in EPA (2021). These assumptions are further discussed in the Methodology and Time-Series Consistency section.

Activity data for the amount of biogas recovered (R in the emission calculation equation) is limited across the time series. Currently, there are only four data points (2015, 2016, 2017, and 2018) represented for the entire sector, as reported in the EPA AD Data Collection Survey reports (EPA 2018, 2019, and 2021). The total of biogas produced annually from the survey respondents is reported in standard cubic feet per minute (scfm) as shown in Table 7-48. Volume 5, Chapter 4 of the *2006 IPCC Guidelines* notes that only emissions from flaring can be reported under the waste sector. The top three known uses of the biogas generated by stand-alone digesters are combined heat and power (CHP), the production of electricity that is sold to the grid, and using the biogas to fuel boilers and furnaces to heat the digestor and other facility spaces (EPA 2018; EPA 2019). Thus, no biogas is assumed to be flared.

Table 7-48: Estimated Biogas Produced and Methane Recovered from Anaerobic Digestion at Biogas Facilities Operating from 1990-2021[a]

Activity	1990	2005	2017	2018	2019	2020	2021
Total Biogas Produced (scfm)[b]	767	2,301	6,402	7,282	6,842	6,842	6,842
R, recovered CH_4 from biogas (kt)[c]	(0.05)	(0.14)	(0.41)	(0.47)	(0.49)	(0.49)	(0.49)

[a] Total biogas produced in standard cubic feet per minute (scfm) was reported in aggregate in the EPA survey data (EPA 2018, 2019, 2021) for 2015 to 2018. The quantities presented in this table are likely underestimates because not all operational facilities provided a survey response to the EPA AD Data Collection Surveys.

[b] Data for all years in the time series except for 2015 and 2016 are extrapolated using the average of the total biogas collected between 2015 to 2018, divided by the average number of survey responses to generate a weighted average

estimate of biogas collected per facility, which is then multiplied by the total facility count (as shown in Table 7-47).

[c] The quantity of CH_4 recovered from the biogas produced is estimated for all years except 2015 to 2018, which are taken from EPA (2018), EPA (2019), and EPA (2021).

Note: Parentheses indicate negative values.

Uncertainty

The methodology applied for the 1990 to 2014 emissions estimates should be considered a starting point to build on in future years if additional historical data become available. Four years of facility-provided data are available (2015 to 2018) while the rest of the time series is estimated based on an assumption of facility counts and the 2015 and 2016 weighted average annual waste digested as calculated from survey data. The major limitations, and uncertainty drivers in the emissions estimates, are related to the uncertainty in assumptions to ensure completeness across the time series and the limitations in the EPA AD survey data, as described below:

1. The EPA AD survey (EPA 2018; EPA 2019; EPA 2021) did not receive a 100 percent response rate, meaning that the survey data represent a portion, albeit the majority, of stand-alone digesters, annual waste processed, and biogas recovered. The methodology applied here did not attempt to estimate waste digested by facilities that did not respond to the survey, which likely underestimates the quantity of waste digested and CH_4 emissions.
2. The EPA AD survey data (EPA 2018; EPA 2019) present both food and non-food waste digested. The non-food waste was reported as liquid (gallons) and solid (tons). The quantity of liquid waste managed is not included in the estimated quantity of annual waste digested for 2015 and 2016, which is used as a proxy for 1990 to 2014 because data on the waste types are not available to convert the quantity from gallons to tons. This slightly underestimates the quantity of waste digested and CH_4 emissions. EPA (2021) did convert the liquid waste managed to tons for 2017 and 2018 using a general conversion factor.
3. The assumption required to estimate the activity data for 1990 to 2014 may overestimate the number of facilities in operation because it assumes that each facility operates from its start year for the entire time series (i.e. facility closures are not taken into account). This introduces a large amount of uncertainty in the estimates compared to years where there is directly reported survey data. It is unclear whether this under- or over-estimates the quantity of waste digested and CH_4 emissions.

The estimated uncertainty from the *2006 IPCC Guidelines* is ±54 percent for the Approach 1 methodology.

Emissions from anaerobic digestion at stand-alone biogas facilities in 2021 were estimated to be between 0.1 and 0.3 MMT CO_2 Eq., which indicates a range of 54 percent below to 54 percent above the 2021 emission estimate of CH_4 (see Table 7-49). A ±20 percent uncertainty factor is applied to the annual amount of material digested (i.e., the activity data), which was developed with expert judgment (Bronstein 2021). A ±50 percent default uncertainty factor is applied to the CH_4 emission factor (IPCC 2006). Using the IPCC's error propagation equation (Equation 3.1 in IPCC 2006 Volume 1, Chapter 3), the combined uncertainty percentage is ±54 percent.

Table 7-49: Approach 1 Quantitative Uncertainty Estimates for Emissions from Anaerobic Digestion (MMT CO_2 Eq. and Percent)

Source	Gas	2021 Emission Estimate (MMT CO_2 Eq.)	Uncertainty Range Relative to Emission Estimate (MMT CO_2 Eq.)		Uncertainty Range Relative to Emission Estimate (%)	
			Lower Bound	Upper Bound	Lower Bound	Upper Bound
Anaerobic Digestion at Biogas Facilities	CH_4	0.2	0.1	0.3	-54%	+54%

QA/QC and Verification

General QA/QC procedures were applied to data gathering and input, documentation, and calculations consistent with the *U.S. Inventory QA/QC Plan*, which is in accordance with Vol. 1, Chapter 6 of the *2006 IPCC Guidelines* (see Annex 8 for more details). No errors were found for the current Inventory.

Recalculations Discussion

For the current Inventory, estimates of CO_2-equivalent CH_4 emissions from anaerobic digestion at biogas facilities have been revised to reflect the 100-year global warming potentials (GWPs) provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ slightly from those presented in the IPCC *Fourth Assessment Report* (AR4) (IPCC 2007) (used in previous Inventories). The AR5 GWPs have been applied across the entire time series for consistency. The GWP of CH_4 has increased from 25 to 28, leading to an overall increase in CO_2-equivalent CH_4 emissions. Compared to the previous Inventory which applied 100-year GWP values from AR4, the change in CO_2-equivalent CH_4 emissions was a 12 percent increase for each year of the time series. Further discussion on this update and the overall impacts of updating the Inventory GWPs to reflect the IPCC *Fifth Assessment Report* can be found in Chapter 9, Recalculations and Improvements.

Planned Improvements

EPA will continue to incorporate updated survey data from future EPA AD Data Collection Surveys when the survey data are published. These revisions will change the estimated emissions for 2019 to 2021.

EPA will also re-assess how best to estimate annual waste processed using proxy data for years between the EPA AD Data Collection Survey reports as needed (e.g., for 2019, 2020, 2021). The methodology described here assumes the same average amount of waste is processed each year for 2019 through 2021.

EPA continues to seek out data sources to confirm the estimated number of operational facilities by year prior to 2015 and consider how best to estimate the quantity of waste processed per year by these facilities with the goal of better estimating the annual quantity of waste digested between 1990 to 2014. Available data will also be compiled where available for facilities that did not directly respond to the EPA AD Data Collection surveys for completeness.

EPA will seek out data sources to confirm the amount of recovered biogas for years prior to 2015 (i.e., the years prior to the EPA AD Data Collection Surveys). Currently, partial data of recovered biogas are available between 2015 to 2018 from the EPA AD Data Collection Surveys. The primary purpose of this improvement will be to understand whether the range of recovered biogas from the survey data are reflective of earlier years in the time series.

7.5 Waste Incineration (CRF Source Category 5C1)

As stated earlier in this chapter, carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4) emissions from the combustion of waste are accounted for in the Energy sector rather than in the Waste sector because almost all combustion of municipal solid waste (MSW) in the United States occurs at waste-to-energy facilities where useful energy is recovered. Similarly, the Energy sector also includes an estimate of emissions from burning waste tires and hazardous industrial waste, because virtually all of the combustion occurs in industrial and utility boilers that recover energy. The combustion of waste in the United States in 2021 resulted in 12.8 MMT CO_2 Eq. of emissions. For more details on emissions from the combustion of waste, see Section 3.3 of the Energy chapter.

Additional sources of emissions from waste combustion include non-hazardous industrial waste incineration and medical waste incineration. As described in Annex 5 of this report, data are not readily available for these sources and emission estimates are not provided.

An analysis of the likely level of medical waste incineration emissions was conducted based on a 2009 study of hospital/ medical/ infectious waste incinerator (HMIWI) facilities in the United States (RTI 2009). Based on that study's information of waste throughput and an analysis of the fossil-based composition of the waste, it was determined that annual greenhouse gas emissions for medical waste incineration would be below 500 kt CO_2 Eq. per year and considered insignificant for the purposes of Inventory reporting under the UNFCCC. More information on this analysis is provided in Annex 5.

Furthermore, an analysis was conducted on the likely level of sewage sludge incineration emissions based on the total amount of sewage sludge generated and assumed percent incineration. Based on assumed amount of sludge incinerated and non-CO_2 factors for solid biomass it was determined that annual greenhouse gas emissions for sewage sludge incineration would be below 500 kt CO_2 Eq. per year and considered insignificant for the purposes of Inventory reporting under the UNFCCC. More information on this analysis is provided in Annex 5.

7.6 Waste Sources of Precursor Greenhouse Gases

In addition to the main greenhouse gases addressed above, waste generating and handling processes are also sources of precursors to greenhouse gases. The reporting requirements of the UNFCCC[14] request that information should be provided on precursor emissions, which include carbon monoxide (CO), nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOCs), and sulfur dioxide (SO_2). These gases are not direct greenhouse gases, but can indirectly impact Earth's radiative balance by altering the concentrations of other greenhouse gases (e.g., tropospheric ozone) and atmosphere aerosol (e.g., particulate sulfate). Total emissions of NO_x, CO, NMVOCs, and SO_2 from waste sources for the years 1990 through 2021 are provided in Table 7-50.

Table 7-50: Emissions of NO_x, CO, NMVOC, and SO_2 from Waste (kt)

Gas/Source	1990	2005	2017	2018	2019	2020	2021
NO_x	84	51	74	73	73	76	76
CO	1,028	1,178	1,182	1,182	1,182	1,342	1,342
NMVOCs	870	152	156	156	157	173	173
SO_2	36	20	23	23	23	33	33

Methodology and Time-Series Consistency

Emission estimates for 1990 through 2021 were obtained from data published on the National Emissions Inventory (NEI) Air Pollutant Emissions Trends Data website (EPA 2023a). For Table 7-50, NEI reported emissions of CO, NO_x, SO_2, and NMVOCs are recategorized from NEI Emissions Inventory System (EIS) sectors. The EIS sectors are mapped to categories more closely aligned with UNFCCC reporting sectors and categories, based on based on

[14] See http://unfccc.int/resource/docs/2013/cop19/eng/10a03.pdf.

discussions between the EPA Inventory and NEI staff (see crosswalk documented in Annex 6.3).[15] EIS sectors mapped to the waste sector categories in this report include: waste disposal and recycling (landfills; publicly owned treatment works; industrial wastewater; treatment, storage, and disposal facilities; waste incineration; and other).[16] As described in the NEI Technical Support Documentation (TSD) (EPA 2023b), emissions are estimated through a combination of emissions data submitted directly to the EPA by state, local, and tribal air agencies, as well as additional information added by the Agency from EPA emissions programs, such as the emission trading program, Toxics Release Inventory (TRI), and data collected during rule development or compliance testing. Within the NEI, there is only one EIS sector for waste generating and handling processes, so precursor estimates are aggregated in Table 7-50 for consistency with NEI reporting. Future presentations of this data may disaggregate emissions so it better maps to UNFCCC reporting categories.

Methodological recalculations were applied to the entire time series to ensure time-series consistency from 1990 through 2021, which are described in detail in the NEI's TSD (EPA 2021). No quantitative estimates of uncertainty were calculated for this source category.

[15] The NEI estimates and reports emissions from six criteria air pollutants (CAPs) and 187 hazardous air pollutants (HAPs) in support of National Ambient Air Quality Standards. EPA reported CAP emission trends are grouped into 60 sectors and 15 Tier 1 source categories, which broadly cover similar source categories to those presented in this chapter. For reporting precursor emissions in the common reporting format (CRF), EPA has mapped and regrouped emissions of greenhouse gas precursors (CO, NO_x, SO_2, and NMVOCs) from NEI's EIS sectors to better align with NIR source categories, and to ensure consistency and completeness to the extent possible. See Annex 6.3 for more information on this mapping.

[16] Precursor emissions from waste incineration were reported in the Energy sector in the previous Inventory but are not disaggregated from the Waste sector in this report. EPA will further disaggregate waste-related EIS categories for the next (i.e., 1990 through 2022) Inventory.

8. Other

The United States does not report any greenhouse gas emissions under the Intergovernmental Panel on Climate Change (IPCC) “Other” sector.

9. Recalculations and Improvements

Each year, many emission and sink estimates in the *Inventory of U.S. Greenhouse Gas Emissions and Sinks* are recalculated and revised, as efforts are made to improve the estimates through the use of better methods and/or data with the goal of improving inventory quality and reducing uncertainties, including the transparency, completeness, consistency, and overall usefulness of the report. In this effort, the United States follows the *2006 IPCC Guidelines* (IPCC 2006), which state, "Both methodological changes and refinements over time are an essential part of improving inventory quality. It is *good practice* to change or refine methods when available data have changed; the previously used method is not consistent with the IPCC guidelines for that category; a category has become key; the previously used method is insufficient to reflect mitigation activities in a transparent manner; the capacity for inventory preparation has increased; improved inventory methods become available; and/or for correction of errors."

When methodological changes have been implemented, the previous Inventory's time series (i.e., 1990 to 2020) is assessed and potentially recalculated to reflect the change, per guidance in IPCC (2006). Changes in historical data are often the result of changes in statistical data supplied by other agencies, and these changes do not necessarily impact the entire time series. In addition, the current Inventory updates GWPs for calculating CO_2-equivalent emission estimates of non-CO_2 gases (CH_4, N_2O, HFCs, PFCs, SF_6, and NF_3) to reflect updated science. This Inventory has been revised to use the 100-year GWPs provided in the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). AR5 GWP values differ from those presented in the IPCC *Fourth Assessment Report* and used in the previous Inventories as required by earlier UNFCCC reporting guidelines. Recent decisions under the UNFCCC[1] require Parties to use 100-year GWP values from the IPCC *Fifth Assessment Report* (AR5) for calculating CO_2-equivalence in their national reporting (IPCC 2013) by the end of 2024. In preparation for upcoming UNFCCC requirements[2], this report reflects CO_2-equivalent greenhouse gas totals using 100-year AR5 GWP values. The use of AR5 GWP values in this Inventory results in time-series recalculations for most inventory sources and sinks. Note, all estimates provided in sectoral chapters of this report are presented in both CO_2 equivalents and unweighted units for non-CO_2 emissions.

The results of all methodological changes and historical data updates made in the current Inventory, including the quantitative effects of updating to from use of AR4 to AR5 GWPs in calculating CO_2-equivalent U.S. greenhouse gas emissions and sinks across the Energy, Industrial Processes and Product Use (IPPU), Agriculture, Land Use, Land Use-Change and Forestry, and Waste sectors are presented in Figure 9-2, while impacts on both total and net emissions by gas are presented in Table 9-1 and Table 9-2. Collectively, these changes resulted in an average annual increase of 44.1 MMT CO_2 Eq. (0.6 percent) in gross total emissions. Table 9-3 and Table 9-4 include the

[1] See paragraphs 1 and 2 of the decision on common metrics adopted at the 27th UNFCCC Conference of Parties (COP27) available online here: https://unfccc.int/sites/default/files/resource/cp2022_10a01_adv.pdf. The UNFCCC reporting guidelines require use of the 100-year GWPs listed in table 8.A.1 in Annex 8.A of Chapter 8 of the *Fifth Assessment Report* of the Intergovernmental Panel on Climate Change, excluding the value for fossil methane.

[2] See Annex to decision 18/CMA.1 available online at https://unfccc.int/sites/default/files/resource/CMA2018_03a02E.pdf.

quantitative effects of methodological changes and historical data updates made in the current Inventory excluding the quantitative effects of updating from AR4 to AR5 GWPs in calculating CO_2-equivalent U.S. greenhouse gas emissions by gas across all sectors. The methodological changes and historical data updates resulted in an annual average increase of 19.6 MMT CO_2 Eq. (0.3 percent). The tables below present results relative to the previously published Inventory (i.e., the 1990 to 2020 report) in units of million metric tons of carbon dioxide equivalent (MMT CO_2 Eq.). To understand the details of any specific recalculation or methodological improvement, see the Recalculations within each source/sink categories' section found in Chapters 3 through 7 of this report. A discussion of Inventory improvements in response to review processes is described in Annex 8.

The Inventory includes new categories not included in the previous Inventory that improve completeness of the national estimates. Specifically, the current report includes CO_2 emissions from substitution of ozone depleting substances, and the reporting of CO_2 from the biogenic components of municipal solid waste as a memo item.

The following source and sink categories underwent the most significant methodological and historical data changes. A brief summary of the recalculations and/or improvements undertaken are provided for these categories.

- *Forest Land Remaining Forest Land: Changes in Forest Carbon Stocks (CO_2).* The methods used in the current Inventory to compile estimates for forest ecosystem carbon stocks and stock changes and harvested wood products (HWPs) from 1990 through 2021 are consistent with those used in the previous (1990 through 2020) Inventory. Population estimates of carbon stocks and stock changes were compiled using NFI data from each U.S. state and national estimates were compiled by summing over all states. New NFI data in most states were incorporated in the latest Inventory which contributed to lower forest land area estimates and carbon stocks, particularly in Alaska with new data from 2018 to 2021. Fire data sources were also updated for Alaska through 2021 and this, combined with the new NFI data for the years 2018 through 2021, resulted in substantial changes in carbon stocks. These changes can be attributed to obtaining plot-level soil orders using the more refined gridded National Soil Survey Geographic Database (gNATSGO) dataset (Soil Survey Staff 2020a, 2020b), rather than the Digital General Soil Map of the United States (STATSGO2) dataset which had been used in previous Inventories. This resulted in a structural change in the soil carbon estimates for mineral and organic soils across the entire time series, particularly in Alaska where new data on forest area was included for the years 2018 through 2021. Finally, recent land-use change in Alaska (since 2015) also contributed to variability in soil carbon stocks and stock changes in recent years in the time series. New data included in the HWP time-series result in a minor decrease (<1 percent) in carbon stocks in the HWP pools but a substantial increase (60 percent) in the carbon stock change estimates for Products in Use and to a lesser extent (2 percent) in SWDS between the previous Inventory and the current Inventory. With the easing of the global pandemic and the return of consumers to the marketplace, there was a rebound in the purchase and accumulation of both paper and solid wood products. These changes resulted in an average annual increase in C stock change losses of 31.9 MMT CO_2 Eq. (4.4 percent), across the 1990 through 2020 time series, relative to the previous Inventory. See Chapter 6, Section 6.2 for more information on recalculations.

- *Wetlands Remaining Wetlands: Emissions from Flooded Land Remaining Flooded Land (CH_4).* The 1990 through 2021 Inventory uses the National Wetlands Inventory (NWI) as the primary data source for flooded land surface area, whereas the 1990 through 2020 Inventory report used the National Hydrography Data (NHD) as the primary geospatial data source. The NWI is far more detailed than the NHD, resulting in increased emission estimates across the time series. The NWI also includes Alaska, Hawaii, and Puerto Rico, which were not included in the 1990 through 2020 Inventory. Emissions from reservoirs in Flooded Land Remaining Flooded Land were further increased by correcting the creation date of several large reservoirs in South Dakota, North Dakota, Alabama, Arkansas, Georgia, and South Carolina. These reservoirs were incorrectly classified as Land Converted to Flooded Land for a portion of the 1990 through 2020 time series but are classified as Flooded Land Remaining Flooded Land throughout the 1990 through 2021 Inventory time series. The 1990 through 2020

Inventory distinguished between reservoirs and inundation areas. Inundation areas were defined as periodically flooded lands that bordered a permanently flooded reservoir. The NWI includes both permanently and periodically flooded lands, but does not consistently discriminate between them, therefore inundation areas and reservoirs are consolidated into reservoirs for the 1990 through 2021 Inventory. The net effect of these recalculations was an average annual increase in CH_4 emission estimates from reservoirs of 23.4 MMT CO_2 Eq. (107.1 percent) over the time series.

- *Biomass and Biofuel Consumption (CO_2).* The CO_2 emissions associated with the biogenic components of MSW combustion were added to this year's report as a memo item. The emissions were calculated based on the same approach used to develop fossil CO_2 emissions from the fossil components of MSW as described in Section 3.3. The result of these changes was an increase in biogenic CO_2 emissions reported as a memo item relative to the previous Inventory. These combined impacts of these changes resulted in an average increase in emissions of 15.7 MMT CO_2 Eq., or 6.2 percent, from 1990 to 2020 relative to the previous Inventory. See Chapter 3, Section 3.10 for more information on recalculations.

- *Agricultural Soil Management (N_2O).* Several improvements in this Inventory included a) incorporating new USDA-NRCS NRI data through 2017; b) extending the time series for crop histories through 2020 using USDA-NASS CDL data; c) incorporating USDA-NRCS CEAP survey data for 2013 to 2016; d) incorporating cover crop and tillage management information from the OpTIS remote-sensing data product from 2008 to 2020; e) modifying the statistical imputation method for the management activity data associated with about tillage practices, mineral fertilization, manure amendments, cover crop management, planting and harvest dates using gradient boosting instead of an artificial neural network; f) updating time series of synthetic N fertilizer sales data, PRP N and manure N available for application to soils; g) constraining synthetic N fertilization and manure N applications in the Tier 3 method at the state scale rather than the national scale; h) re-calibrating the soil C module in the DayCent model using Bayesian methods; and i) application of global warming potential values from the IPCC *Fifth Assessment Report* (AR5) (IPCC 2013). These combined impact from these changes resulted in an average increase in emissions of 10.9 MMT CO_2 Eq., or 3.9 percent, from 1990 to 2020 relative to the previous Inventory. See Chapter 5, Section 5.4 for more information on recalculations.

- *Petroleum Systems (CH_4).* In this Inventory, an update that incorporates additional basin-level data from GHGRP Subpart W was implemented for several emission sources in the onshore production segment, including for pneumatic controllers, equipment leaks, chemical injection pumps, and storage tanks. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. The combined impact of revisions to 2020 petroleum systems CH_4 emission estimates on a CO_2-equivalent basis, compared to the previous Inventory, is an increase from 40.2 to 54.5 MMT CO_2 Eq. (14.2 MMT CO_2 Eq., or 35 percent). The recalculations resulted in higher CH_4 emission estimates on average across the 1990 through 2020 time series, compared to the previous Inventory, by 5.7 MMT CO_2 Eq., or 12.0 percent. See Chapter 3, Section 3.6 for more information on recalculations.

- *Land Converted to Grassland: Changes in all Ecosystem Carbon Stocks (CO_2).* Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks associated with conversions from Cropland Converted to Grassland (woodlands), Other Land Converted to Grassland, and Settlements Converted to Grassland; updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks from Forest Land Converted to Grassland; and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Grassland has an estimated increase in C stock changes of 2.9 MMT CO_2 Eq. (23.2 percent) on average over the time series.

- *Land Converted to Cropland: Changes in all Ecosystem Carbon Stocks (CO_2).* Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks

in Grassland Converted to Cropland (i.e., woodland conversion to cropland), updated FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Cropland, and updated estimates for mineral soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Cropland has an estimated larger C loss of 2.6 MMT CO_2 Eq. (4.9 percent) on average over the time series. See Chapter 6, Section 6.5 for more information on recalculations.

- *Natural Gas Systems (CH_4).* In this Inventory, an update that incorporates additional basin-level data from GHGRP Subpart W was implemented for several emission sources in the onshore production segment, including for pneumatic controllers, equipment leaks, chemical injection pumps, storage tanks, and liquids unloading. For each of these emission sources, EPA modified the calculation methodology to use GHGRP data to develop basin-specific activity factors and/or emission factors. The combined impact of revisions to 2020 natural gas systems CH_4 emissions, compared to the previous Inventory, is an increase from 164.9 to 185.3 MMT CO_2 Eq. (20.4 MMT CO_2 Eq., or 12 percent). The recalculations resulted in an average increase in the annual CH_4 emission estimates across the 1990 through 2020 time series, compared to the previous Inventory, of 2.5 MMT CO_2 Eq., or 1.3 percent. See Chapter 3, Section 3.7 for more information on recalculations.
- *Fossil Fuel Combustion (CO_2).* Several updates to activity data and emission factors led to recalculations of previous year results. The major updates include updated data from EIA sources (EIA 2023) for energy consumption statistics, industrial energy sector activity data, natural gas consumption, and petroleum statistics across the time series relative to the previous Inventory. The carbon content for propylene was updated from 65.95 kg CO_2/MMBtu to 67.77 kg CO_2/MMBtu to reflect values used in the EPA Greenhouse Gas Emission Factors Hub. Fuel consumption for the U.S. Territories provided by EIA's International Energy Statistics (EIA 2022) was updated across the time series. Updates were also made to the values of natural gas used for ammonia production which led to changes in energy sector adjustments. Overall, these revisions impacted estimates from the combustion of fossil fuels in a number of ways including decreased petroleum emissions from the residential sector, decreased petroleum emissions from U.S. Territories, increased natural gas emissions across all economic sectors, and decreased coal emissions from U.S. Territories. These changes resulted in an average annual increase of 2.5 MMT CO_2 Eq. (less than 0.05 percent) in CO_2 emissions from fossil fuel combustion relative to the previous Inventory. See Chapter 3, Section 3.1 for more information on recalculations.
- *Land Converted to Settlements: Changes in all Ecosystem Carbon Stocks (CO_2).* Recalculations are associated with routine annual incorporation of the latest FIA data from 1990 to 2021 on biomass, dead wood and litter C stocks in Forest Land Converted to Settlements and woodland conversion associated with Grassland Converted to Settlements, and updated estimates for mineral and organic soils from 2016 to 2021 using the linear extrapolation method. As a result, Land Converted to Settlements has an estimated larger C loss of 2.3 MMT CO_2 Eq. on average over the time series. This represents a 2.9 percent increase in C stock changes for Land Converted to Settlements compared to the previous Inventory. See Chapter 6, Section 6.11 for more information on recalculations.

Figure 9-1: Impacts of Recalculations on Net Emissions

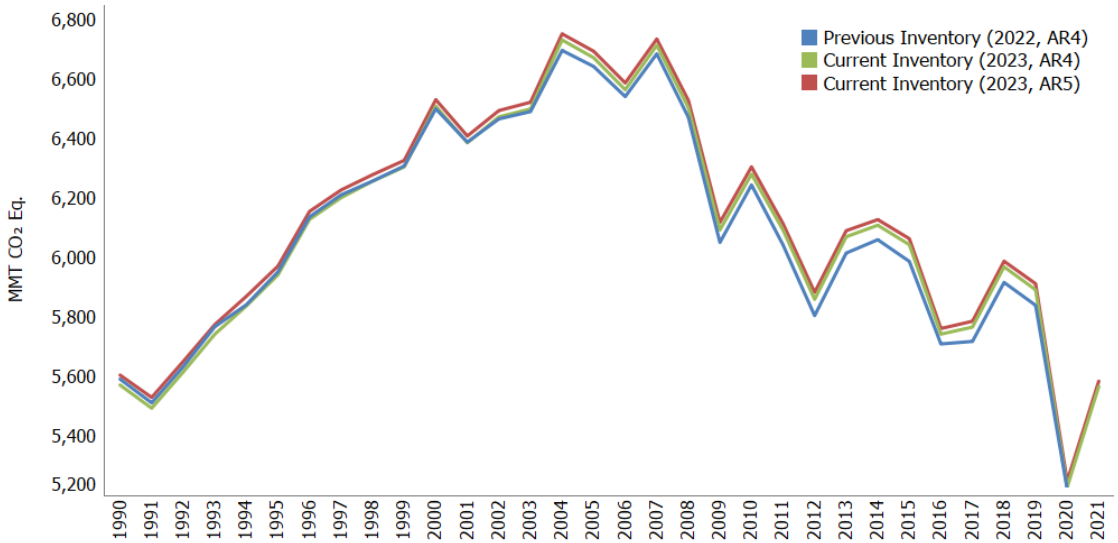


Figure 9-2: Impacts from Recalculations to U.S. Greenhouse Gas Emissions by Sector, Including Quantitative Change Related to the Use of AR5 GWP Values

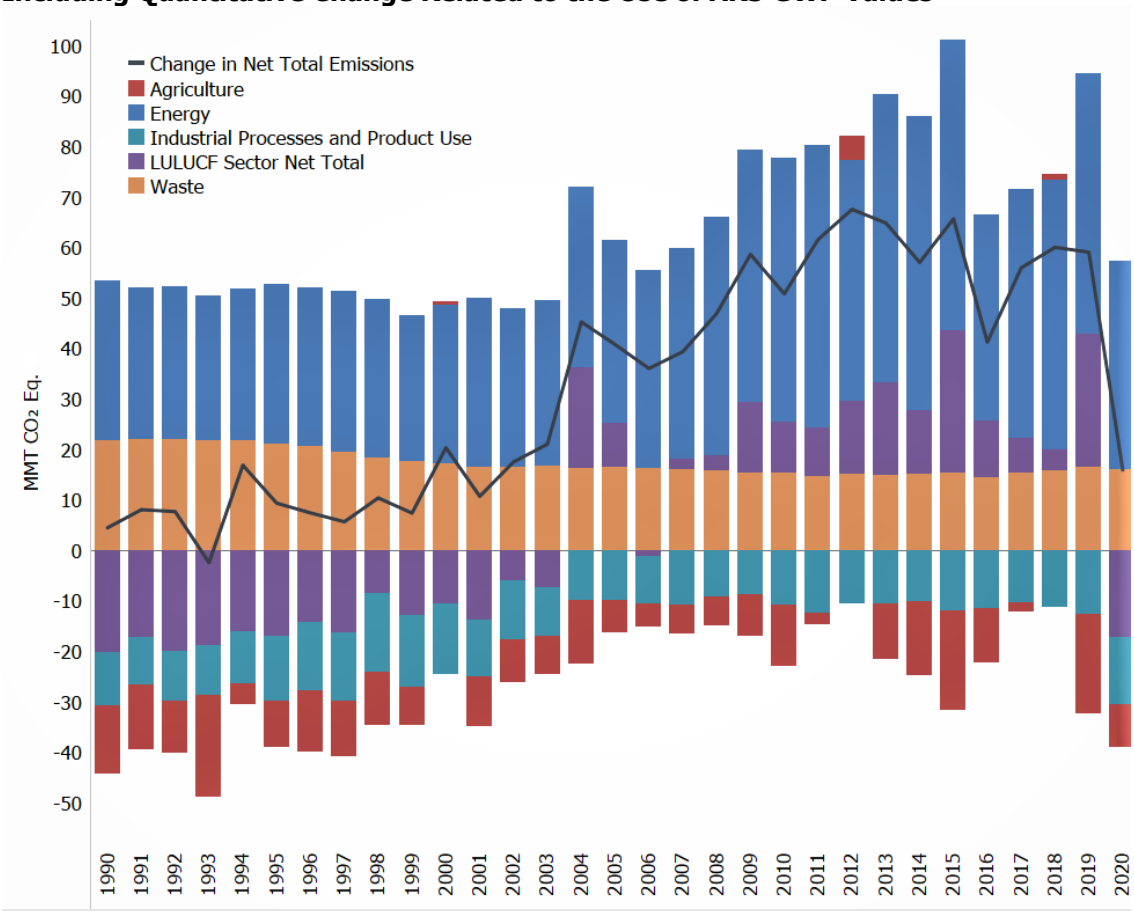


Table 9-1: Revisions to the U.S. Greenhouse Gas Emissions, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	Average Annual Change
CO_2	**(1.5)**	**(5.4)**	**1.2**	**1.1**	**3.0**	**(1.1)**	**(2.4)**
Fossil Fuel Combustion	(3.0)	(4.7)	(0.8)	0.5	3.6	2.2	(2.6)
Electric Power Sector	NC	NC	NC	0.5	0.6	0.6	+
Transportation	NC	NC	0.1	0.1	2.6	0.5	0.1
Industrial	(1.3)	(0.7)	(1.4)	(0.6)	(0.2)	1.6	(0.8)
Residential	(+)	+	+	+	+	(2.7)	(+)
Commercial	(+)	+	(+)	+	+	1.6	(+)
U.S. Territories	(1.7)	(4.0)	0.5	0.5	0.6	0.6	(1.9)
Non-Energy Use of Fuels	0.2	(+)	0.2	0.6	0.8	(1.8)	0.2
Iron and Steel Production & Metallurgical Coke Production	0.3	0.1	0.7	0.4	(0.2)	1.1	0.2
Cement Production	NC	NC	0.2	0.2	NC	(+)	+
Natural Gas Systems	NC	NC	NC	NC	NC	NC	NC
Petrochemical Production	NC	NC	NC	NC	NC	(0.2)	NC
Petroleum Systems	(0.1)	(1.8)	(0.6)	(1.2)	0.2	(1.1)	(1.2)
Incineration of Waste	(+)	(+)	NC	NC	NC	(0.2)	(+)
Ammonia Production	1.4	1.1	1.4	0.5	0.1	0.3	1.0
Lime Production	NC	NC	NC	NC	NC	NC	NC
Other Process Uses of Carbonates	NC	NC	NC	NC	(1.4)	(1.4)	(+)
Urea Fertilization	NC	NC	(+)	(0.1)	(0.1)	(0.2)	(+)
Carbon Dioxide Consumption	NC	NC	NC	NC	NC	NC	NC
Urea Consumption for Non-Agricultural Purposes	NC	NC	(+)	0.1	0.1	(0.2)	+
Liming	+	+	(+)	(+)	(0.2)	0.5	(+)
Coal Mining	NC	NC	0.1	0.1	+	+	+
Glass Production	(0.4)	(+)	(+)	+	+	+	(+)
Soda Ash Production	NC	NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC	NC	NC	NC	NC	+
Aluminum Production	NC	NC	NC	+	(+)	NC	+
Titanium Dioxide Production	NC	NC	NC	NC	NC	(0.1)	NC
Zinc Production	NC	NC	NC	NC	NC	(+)	NC
Phosphoric Acid Production	NC	NC	NC	NC	NC	(+)	NC
Lead Production	NC	NC	NC	+	+	(+)	+
Carbide Production and Consumption	NC	NC	NC	NC	+	+	+
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Substitution of Ozone Depleting Substances	+*	+*	+*	+*	+*	+*	+*
Magnesium Production and Processing	NC	NC	NC	NC	NC	NC	NC
Biomass and Biodiesel Consumption	18.5	14.7	16.2	16.2	15.8	13.9	15.8
International Bunker Fuels[b]	NC	NC	NC	2.1	(2.5)	NC	(+)
CH_4[c]	**87.8**	**93.6**	**98.9**	**102.9**	**99.0**	**91.8**	**95.0**
Enteric Fermentation	19.6	20.2	21.0	21.1	21.1	21.0	20.4
Natural Gas Systems	19.5	25.8	19.7	22.5	21.5	20.4	24.2
Landfills	21.2	16.2	14.7	15.0	15.4	15.4	16.9
Manure Management	4.2	5.9	6.9	7.1	7.0	7.1	5.7
Petroleum Systems	3.5	9.6	21.4	22.0	19.5	14.2	10.9
Coal Mining	11.6	7.7	6.6	6.4	5.6	5.0	8.4
Wastewater Treatment	2.4	2.5	3.1	3.1	3.1	3.1	2.6
Rice Cultivation	1.9	2.2	1.8	1.9	1.8	1.9	1.9

Stationary Combustion	1.0	0.9	0.9	1.0	1.1	0.8	1.0
Abandoned Oil and Gas Wells	1.2	1.3	1.3	1.3	1.3	1.3	1.3
Abandoned Underground Coal Mines	0.9	0.8	0.8	0.7	0.7	0.7	0.9
Mobile Combustion	0.7	0.4	0.4	0.4	0.4	0.4	0.5
Composting	+	0.2	0.3	0.3	0.3	0.3	0.2
Field Burning of Agricultural Residues	+	0.1	0.1	0.1	0.1	0.1	+
Petrochemical Production	+	+	+	+	+	+	+
Anaerobic Digestion at Biogas Facilities	+	+	+	+	+	+	+
Ferroalloy Production	+	+	+	+	+	+	+
Carbide Production and Consumption	+	+	+	+	+	+	+
Iron and Steel Production & Metallurgical Coke Production	+	+	+	+	+	+	+
Incineration of Waste	+	+	+	+	+	+	+
International Bunker Fuels[b]	+	+	+	+	+	+	+
N_2O[c]	**(44.2)**	**(37.5)**	**(29.9)**	**(27.5)**	**(46.5)**	**(37.2)**	**(39.1)**
Agricultural Soil Management	(28.1)	(22.3)	(17.7)	(15.1)	(35.9)	(25.7)	(24.5)
Stationary Combustion	(2.8)	(3.8)	(3.1)	(3.1)	(2.7)	(2.6)	(3.3)
Wastewater Treatment	(1.8)	(2.2)	(2.6)	(2.4)	(2.1)	(2.7)	(2.2)
Manure Management	(1.5)	(1.8)	(2.1)	(2.1)	(2.2)	(2.2)	(1.8)
Mobile Combustion	(6.2)	(4.3)	(1.6)	(1.6)	(0.9)	(1.3)	(4.2)
Nitric Acid Production	(1.3)	(1.3)	(1.0)	(1.1)	(1.1)	(1.0)	(1.3)
Adipic Acid Production	(1.7)	(0.8)	(0.8)	(1.2)	(0.6)	(0.9)	(0.9)
N_2O from Product Uses	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)	(0.5)
Composting	(+)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)
Caprolactam, Glyoxal, and Glyoxylic Acid Production	(0.2)	(0.2)	(0.2)	(0.2)	(0.2)	(+)	(0.2)
Incineration of Waste	(0.1)	(+)	(+)	(+)	(+)	(+)	(+)
Electronics Industry	+	(+)	(+)	(+)	(+)	(+)	(+)
Field Burning of Agricultural Residues	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Petroleum Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Natural Gas Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
International Bunker Fuels[b]	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)
HFCs, PFCs, SF_6 and NF_3	**(8.2)**	**(8.1)**	**(9.4)**	**(9.2)**	**(9.2)**	**(9.0)**	**(9.3)**
HFCs	**(7.5)**	**(11.1)**	**(10.3)**	**(10.2)**	**(10.5)**	**(10.6)**	**(10.2)**
Substitution of Ozone Depleting Substances	+	(7.8)	(9.4)	(9.5)	(9.8)	(10.1)	(6.5)
HCFC-22 Production	(7.5)	(3.2)	(0.8)	(0.5)	(0.6)	(0.3)	(3.7)
Electronics Industry	(+)	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(+)
Magnesium Production and Processing	NC	NC	(+)	(+)	(+)	(+)	(+)
PFCs	**(2.4)**	**(0.6)**	**(0.4)**	**(0.5)**	**(0.6)**	**(0.5)**	**(1.1)**
Electronics Industry	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.3)	(0.4)
Aluminum Production	(2.2)	(0.3)	(0.1)	(0.2)	(0.3)	(0.2)	(0.7)
Substitution of Ozone Depleting Substances	NC	(+)	(+)	(+)	(+)	(+)	(+)
Electrical Transmission and Distribution	NC	(+)	+	NC	(+)	(+)	(+)
SF_6	**1.7**	**3.7**	**1.4**	**1.4**	**1.9**	**2.1**	**2.0**
Electrical Transmission and Distribution	1.5	3.5	1.3	1.4	1.9	2.1	1.9
Magnesium Production and Processing	0.2	0.1	+	+	+	+	0.1
Electronics Industry	+	0.1	+	+	+	+	+
NF_3	**(+)**	**(0.1)**	**(+)**	**(+)**	**(+)**	**(+)**	**(+)**
Electronics Industry	(+)	(0.1)	(+)	(+)	(+)	(+)	(+)
Total Gross Emissions	**33.9**	**42.5**	**60.8**	**67.3**	**46.2**	**44.6**	**44.1**
Percent Change in Total Emissions	**0.5%**	**0.6%**	**0.9%**	**1.0%**	**0.7%**	**0.7%**	**0.6%**
Change in LULUCF Sector Net Total[d]	**(20.3)**	**8.7**	**7.0**	**4.1**	**26.4**	**(17.2)**	**(0.9)**
Net Emissions (Sources and Sinks)	**13.6**	**51.2**	**67.9**	**71.5**	**72.6**	**27.4**	**43.2**
Percent Change in Net Emissions	**0.2%**	**0.8%**	**1.2%**	**1.2%**	**1.2%**	**0.5%**	**0.7%**

NC (No Change)

+ Absolute value does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

* Indicates a new source for the current Inventory year. Emissions from new sources are captured in net emissions and percent change totals.

[a] Emissions from International Bunker Fuels are not included in totals.

[b] Emissions from Biomass and Biofuel Consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.

[c] LULUCF emissions of CH_4 and N_2O are reported separately from gross emissions totals in Table 9-2. LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands; and N_2O emissions from Forest Soils and Settlement Soils.

[d] The LULUCF Sector Net Total is the net sum of all CH_4 and N_2O emissions to the atmosphere plus net carbon stock changes. More detail on the impacts of recalculations on the LULUCF sector can be found in Table 9-2.

Notes: Net change in total emissions presented without LULUCF. Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 9-2: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry, Including Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	Average Annual Change
Forest Land Remaining Forest Land	**(46.1)**	**(21.5)**	**(25.1)**	**(28.3)**	**(6.2)**	**(41.8)**	**(30.5)**
Changes in Forest Carbon Stocks[a]	(47.5)	(27.0)	(22.4)	(27.3)	(14.5)	(39.4)	(31.9)
Non-CO_2 Emissions from Forest Fires[b]	1.4	5.5	(2.7)	(0.9)	8.3	(2.3)	1.5
N_2O Emissions from Forest Soils[c]	(+)	(0.1)	(0.1)	(0.1)	(0.1)	(0.1)	(+)
Non-CO_2 Emissions from Drained Organic Soils[d]	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Land Converted to Forest Land	**0.1**	**0.6**	**1.2**	**1.3**	**1.3**	**1.3**	**0.7**
Changes in Forest Carbon Stocks[e]	0.1	0.6	1.2	1.3	1.3	1.3	0.7
Cropland Remaining Cropland	**+**	**+**	**(+)**	**(+)**	**+**	**(+)**	**+**
Changes in Mineral and Organic Soil Carbon Stocks	+	+	(+)	(+)	+	(+)	+
Land Converted to Cropland	**3.0**	**2.6**	**2.3**	**2.4**	**2.3**	**2.3**	**2.6**
Changes in all Ecosystem Carbon Stocks[f]	3.0	2.6	2.3	2.4	2.3	2.3	2.6
Grassland Remaining Grassland	**1.8**	**2.3**	**1.6**	**1.6**	**1.6**	**1.5**	**2.2**
Changes in Mineral and Organic Soil Carbon Stocks	1.8	2.3	1.6	1.6	1.6	1.5	2.2
Non-CO_2 Emissions from Grassland Fires[g]	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Land Converted to Grassland	**(3.5)**	**(3.1)**	**(1.8)**	**(1.8)**	**(1.8)**	**(1.8)**	**(2.9)**
Changes in all Ecosystem Carbon Stocks[f]	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.9)
Wetlands Remaining Wetlands	**26.8**	**25.9**	**25.9**	**25.9**	**25.9**	**26.0**	**26.1**
Changes in Organic Soil Carbon Stocks in Peatlands	NC	NC	NC	+	+	+	+
Changes in Biomass, DOM, and Soil Carbon Stocks in Coastal Wetlands	(8.4)	(7.7)	(8.8)	(8.8)	(8.8)	(8.8)	(6.8)
CH_4 Emissions from Coastal Wetlands Remaining Coastal Wetlands	12.6	11.9	13.1	13.1	13.1	13.1	11.1
N_2O Emissions from Coastal Wetlands Remaining Coastal Wetlands	(3.6)	(3.6)	(3.7)	(3.7)	(3.7)	(3.7)	(3.6)
Non-CO_2 Emissions from Peatlands Remaining Peatlands	(0.1)	(0.2)	(0.1)	(0.2)	(0.2)	(0.2)	(0.2)
CH_4 Emissions from Flooded Land Remaining Flooded Land	26.4	25.5	25.5	25.5	25.5	25.5	25.7
Land Converted to Wetlands	**(3.9)**	**0.1**	**0.2**	**0.2**	**0.2**	**(+)**	**(0.9)**
Changes in Biomass, DOM, and Soil Carbon Stocks in Land Converted to Coastal Wetlands	+	+	+	+	+	NC	+
CH_4 Emissions from Land Converted to Coastal Wetlands	+	+	+	+	+	+	+
Changes in Land Converted to Flooded Land	(2.4)	+	0.1	0.1	0.1	(+)	(0.6)
CH_4 Emissions from Land Converted to Flooded Land	(1.5)	+	0.1	0.1	0.1	+	(0.3)
Settlements Remaining Settlements	**(0.2)**	**(0.3)**	**(0.2)**	**(0.1)**	**0.1**	**(7.9)**	**(0.5)**
Changes in Organic Soil Carbon Stocks	NC	NC	NC	NC	NC	NC	NC
Changes in Settlement Tree Carbon Stocks	NC	NC	0.2	0.3	0.5	(6.9)	(0.2)
Changes in Yard Trimming and Food Scrap Carbon Stocks in Landfills	NC	NC	NC	NC	NC	-0.6	(+)

N_2O Emissions from Settlement Soils[h]	(0.2)	(0.3)	(0.4)	(0.4)	(0.4)	(0.4)	(0.3)
Land Converted to Settlements	**1.7**	**2.2**	**2.9**	**3.1**	**3.2**	**3.2**	**2.3**
Changes in all Ecosystem Carbon Stocks[f]	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Change in LULUCF Total Net Flux[i]	**(46.8)**	**(22.4)**	**(15.8)**	**(20.5)**	**(7.4)**	**(40.4)**	**(27.9)**
Change in LULUCF Emissions[j]	**26.5**	**31.1**	**22.9**	**24.6**	**33.8**	**23.1**	**27.0**
Change in LULUCF Sector Net Total[k]	**(20.3)**	**8.7**	**7.0**	**4.1**	**26.4**	**(17.2)**	**(0.9)**
Percent Change in LULUCF Sector Net Total	**-2.4%**	**1.1%**	**0.9%**	**0.5%**	**3.6%**	**-2.3%**	**0.0%**

NC (No Change)

+ Absolute value does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

[a] Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products.

[b] Estimates include CH_4 and N_2O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include N_2O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[e] Includes the net changes to carbon stocks stored in all forest ecosystem pools.

[f] Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.

[g] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[h] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

[i] LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.

[j] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands; and N_2O emissions from Forest Soils and Settlement Soils.

[k] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 9-3: Revisions to U.S. Greenhouse Gas Emissions, Excluding Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)

Gas/Source	1990	2005	2017	2018	2019	2020	Average Annual Change
CO_2	**(1.5)**	**(5.4)**	**1.2**	**1.1**	**3.0**	**(1.1)**	**(2.4)**
Fossil Fuel Combustion	(3.0)	(4.7)	(0.8)	0.5	3.6	2.2	(2.5)
Electric Power Sector	NC	NC	NC	0.5	0.6	0.6	0.1
Transportation	NC	NC	0.1	0.1	2.6	0.5	0.1
Industrial	(1.3)	(0.7)	(1.4)	(0.6)	(0.2)	1.6	(0.8)
Residential	(+)	+	+	+	+	(2.7)	(0.1)
Commercial	(+)	+	(+)	+	+	1.6	0.1
U.S. Territories	(1.7)	(4.0)	0.5	0.5	0.6	0.6	(1.8)
Non-Energy Use of Fuels	0.2	(+)	0.2	0.6	0.8	(1.8)	0.2
Iron and Steel Production & Metallurgical Coke Production	NC	NC	0.2	0.2	NC	(+)	+
Cement Production	NC	NC	NC	NC	NC	NC	NC
Natural Gas Systems	0.3	0.1	0.7	0.4	(0.2)	1.1	0.2
Petrochemical Production	NC	NC	NC	NC	NC	(0.2)	(+)
Petroleum Systems	(0.1)	(1.8)	(0.6)	(1.2)	0.2	(1.1)	(1.2)

Incineration of Waste	(+)	(+)	NC	NC	NC	(0.2)	(+)
Ammonia Production	1.4	1.1	1.4	0.5	0.1	0.3	1.0
Lime Production	NC	NC	NC	NC	NC	NC	NC
Other Process Uses of Carbonates	NC	NC	NC	NC	(1.4)	(1.4)	(0.1)
Urea Fertilization	NC	NC	(+)	(0.1)	(0.1)	(0.2)	(+)
Carbon Dioxide Consumption	NC	NC	NC	NC	NC	NC	NC
Urea Consumption for Non-Agricultural Purposes	NC	NC	(+)	0.1	0.1	(0.2)	(+)
Liming	+	+	(+)	(+)	(0.2)	0.5	+
Coal Mining	NC	NC	0.1	0.1	+	+	+
Glass Production	(0.4)	(+)	(+)	+	+	+	(+)
Soda Ash Production	NC	NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC	NC	NC	NC	NC	+
Aluminum Production	NC	NC	NC	+	(+)	NC	+
Titanium Dioxide Production	NC	NC	NC	NC	NC	(0.1)	(+)
Zinc Production	NC	NC	NC	NC	NC	(+)	(+)
Phosphoric Acid Production	NC	NC	NC	NC	NC	(+)	(+)
Lead Production	NC	NC	NC	+	+	(+)	+
Carbide Production and Consumption	NC	NC	NC	NC	+	+	+
Abandoned Oil and Gas Wells	+	+	+	+	+	+	+
Substitution of Ozone Depleting Substances	+*	+*	+*	+*	+*	+*	+*
Magnesium Production and Processing	(+)	(+)	+	+	+	+	+
Biomass and Biodiesel Consumption[a]	18.5	14.7	16.2	16.2	15.8	13.9	15.7
International Bunker Fuels[b]	NC	NC	NC	2.1	(2.5)	NC	(+)
CH_4[c]	**(5.9)**	**9.9**	**19.2**	**22.4**	**18.7**	**13.8**	**9.3**
Enteric Fermentation	NC	NC	NC	NC	NC	NC	NC
Natural Gas Systems	(3.9)	4.5	(0.3)	1.9	0.8	0.7	2.5
Landfills	NC	0.4	1.6	1.6	1.7	2.3	0.4
Manure Management	NC	NC	NC	NC	NC	NC	+
Petroleum Systems	(2.2)	4.6	16.5	17.4	14.7	9.4	5.7
Coal Mining	NC	+	+	+	(0.1)	+	(+)
Wastewater Treatment	(+)	0.1	0.8	0.9	0.9	0.9	0.3
Rice Cultivation	NC	NC	NC	NC	NC	(+)	(+)
Stationary Combustion	(+)	(+)	+	+	+	(0.1)	(+)
Abandoned Oil and Gas Wells	0.4	0.4	0.5	0.5	0.5	0.5	0.4
Abandoned Underground Coal Mines	NC	NC	NC	NC	NC	+	+
Mobile Combustion	(0.1)	(0.1)	0.1	0.1	0.1	0.1	+
Composting	NC	NC	NC	NC	(+)	+	+
Field Burning of Agricultural Residues	NC	NC	NC	NC	NC	NC	(+)
Petrochemical Production	NC	NC	NC	NC	NC	(+)	(+)
Anaerobic Digestion at Biogas Facilities	NC	NC	NC	NC	NC	NC	NC
Ferroalloy Production	NC	NC	NC	NC	NC	NC	+
Carbide Production and Consumption	NC	NC	NC	NC	NC	NC	+
Iron and Steel Production & Metallurgical Coke Production	NC	NC	NC	NC	NC	(+)	(+)
Incineration of Waste	NC	NC	NC	NC	NC	(+)	(+)
International Bunker Fuels[b]	NC	NC	NC	NC	NC	NC	NC
N_2O[c]	**5.7**	**12.7**	**19.3**	**23.2**	**4.1**	**10.0**	**11.2**
Agricultural Soil Management	6.9	12.4	18.7	22.4	2.3	9.3	10.9
Stationary Combustion	(+)	(+)	+	+	+	(+)	(+)
Wastewater Treatment	(+)	(+)	+	0.2	0.5	(+)	+
Manure Management	NC	NC	NC	NC	NC	NC	NC
Mobile Combustion	(1.2)	0.2	0.6	0.5	1.3	0.7	0.3
Nitric Acid Production	NC	NC	NC	NC	NC	NC	NC

Adipic Acid Production	NC	NC	NC	NC	NC	NC	NC
N_2O from Product Uses	NC	NC	NC	NC	NC	NC	NC
Composting	NC	NC	NC	NC	(+)	+	+
Caprolactam, Glyoxal, and Glyoxylic Acid Production	NC	NC	NC	NC	NC	0.1	+
Incineration of Waste	NC	NC	NC	NC	NC	(+)	(+)
Electronics Industry	+	+	+	+	+	(+)	+
Field Burning of Agricultural Residues	NC	NC	NC	NC	NC	NC	(+)
Petroleum Systems	(+)	(+)	(+)	(+)	(+)	(+)	(+)
Natural Gas Systems	+	+	(+)	(+)	(+)	(+)	(+)
International Bunker Fuels[b]	NC	NC	NC	NC	(+)	NC	(+)
HFCs, PFCs, SF_6 and NF_3	**0.8**	**3.2**	**1.1**	**1.2**	**1.5**	**1.9**	**1.5**
HFCs	**+**	**(0.1)**	**(0.1)**	**(+)**	**(+)**	**+**	**(0.1)**
Substitution of Ozone Depleting Substances	NC	(0.1)	(0.1)	(+)	(+)	(+)	(0.1)
HCFC-22 Production	NC	NC	NC	NC	NC	NC	NC
Electronics Industry	+	+	+	+	+	+	+
Magnesium Production and Processing	NC	NC	NC	NC	+	NC	+
PFCs	**+**	**(+)**	**+**	**(0.1)**	**(0.2)**	**(0.1)**	**(+)**
Electronics Industry	+	(+)	+	(+)	+	(+)	(+)
Aluminum Production	NC	+	+	(0.1)	(0.2)	(0.1)	(+)
Substitution of Ozone Depleting Substances	NC	NC	NC	NC	NC	NC	NC
Electrical Transmission and Distribution	NC	(+)	+	NC	NC	NC	(+)
SF_6	**0.8**	**3.3**	**1.2**	**1.3**	**1.7**	**1.9**	**1.6**
Electrical Transmission and Distribution	0.8	3.2	1.2	1.3	1.7	1.9	1.6
Magnesium Production and Processing	NC	+	NC	NC	NC	(+)	+
Electronics Industry	NC	0.1	(+)	(+)	(+)	+	+
NF_3	**NC**	**(+)**	**+**	**(+)**	**(+)**	**(+)**	**(+)**
Electronics Industry	NC	(+)	+	(+)	(+)	(+)	(+)
Total Gross Emissions	**(0.9)**	**20.3**	**40.9**	**47.9**	**27.3**	**24.6**	**19.6**
Percentage Change in Total Emissions	**0.0%**	**0.3%**	**0.6%**	**0.7%**	**0.4%**	**0.4%**	**0.3%**
Change in LULUCF Sector Net Total[d]	**(23.1)**	**(6.2)**	**4.2**	**1.5**	**23.9**	**(20.1)**	**(3.5)**
Net Emissions (Sources and Sinks)	**(24.0)**	**26.4**	**45.1**	**49.4**	**51.2**	**4.5**	**16.1**
Percent Change in Net Emissions	**-0.4%**	**0.4%**	**0.8%**	**0.8%**	**0.9%**	**0.1%**	**0.3%**

NC (No Change)

+ Absolute value does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

* Indicates a new source for the current Inventory year. Emissions from new sources are captured in net emissions and percent change totals.

[a] Emissions from International Bunker Fuels are not included in totals.

[b] Emissions from Biomass and Biofuel Consumption are not included specifically in summing Energy sector totals. Net carbon fluxes from changes in biogenic carbon reservoirs are accounted for in the estimates for Land Use, Land-Use Change, and Forestry.

[c] LULUCF emissions of CH_4 and N_2O are reported separately from gross emissions totals in Table 9-2. LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils.

[d] The LULUCF Sector Net Total is the net sum of all CH_4 and N_2O emissions to the atmosphere plus net carbon stock changes. More detail on the impacts of recalculations on the LULUCF sector can be found in Table 9-4.

Notes: Net change in total emissions presented without LULUCF. Parentheses indicate negative values. Totals may not sum due to independent rounding.

Table 9-4: Revisions to U.S. Greenhouse Gas Emissions and Removals (Net Flux) from Land Use, Land-Use Change, and Forestry, Excluding Quantitative Change Related to the Use of AR5 GWP Values (MMT CO_2 Eq.)

Land-Use Category	1990	2005	2017	2018	2019	2020	Average Annual Change
Forest Land Remaining Forest Land	**(45.7)**	**(20.1)**	**(23.5)**	**(27.1)**	**(5.7)**	**(39.5)**	**(29.6)**
Changes in Forest Carbon Stocks[a]	(47.5)	(27.0)	(22.4)	(27.3)	(14.5)	(39.4)	(31.9)
Non-CO_2 Emissions from Forest Fires[b]	1.7	6.7	(1.3)	0.1	8.6	(0.3)	2.2
N_2O Emissions from Forest Soils[c]	+	0.1	0.1	0.1	0.1	0.1	0.1
Non-CO_2 Emissions from Drained Organic Soils[d]	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Forest Land	**0.1**	**0.6**	**1.2**	**1.3**	**1.3**	**1.3**	**0.7**
Changes in Forest Carbon Stocks[e]	0.1	0.6	1.2	1.3	1.3	1.3	0.7
Cropland Remaining Cropland	**+**	**+**	**(+)**	**(+)**	**+**	**(+)**	**+**
Changes in Mineral and Organic Soil Carbon Stocks	+	+	(+)	(+)	+	(+)	+
Land Converted to Cropland	**3.0**	**2.6**	**2.3**	**2.4**	**2.3**	**2.3**	**2.6**
Changes in all Ecosystem Carbon Stocks[f]	3.0	2.6	2.3	2.4	2.3	2.3	2.6
Grassland Remaining Grassland	**1.8**	**2.4**	**1.7**	**1.7**	**1.6**	**1.6**	**2.2**
Changes in Mineral and Organic Soil Carbon Stocks	1.8	2.3	1.6	1.6	1.6	1.5	2.2
Non-CO_2 Emissions from Grassland Fires[g]	+	0.1	0.1	0.1	0.1	0.1	0.1
Land Converted to Grassland	**(3.5)**	**(3.1)**	**(1.8)**	**(1.8)**	**(1.8)**	**(1.8)**	**(2.9)**
Changes in all Ecosystem Carbon Stocks[f]	(3.5)	(3.1)	(1.8)	(1.8)	(1.8)	(1.8)	(2.9)
Wetlands Remaining Wetlands	**24.2**	**23.1**	**23.1**	**23.1**	**23.1**	**23.2**	**23.4**
Changes in Organic Soil Carbon Stocks in Peatlands	NC	NC	NC	+	+	+	+
Changes in Biomass, DOM, and Soil Carbon Stocks in Coastal Wetlands	+	(0.1)	+	+	+	+	+
CH_4 Emissions from Coastal Wetlands Remaining Coastal Wetlands	NC	NC	NC	NC	NC	NC	NC
N_2O Emissions from Coastal Wetlands Remaining Coastal Wetlands	+	+	+	+	+	+	+
Non-CO_2 Emissions from Peatlands Remaining Peatlands	+	+	+	+	+	+	+
CH_4 Emissions from Flooded Land Remaining Flooded Land	24.2	23.1	23.1	23.1	23.1	23.1	23.4
Land Converted to Wetlands	**(4.2)**	**+**	**0.1**	**0.1**	**0.1**	**(+)**	**(1.0)**
Changes in Biomass, DOM, and Soil Carbon Stocks in Land Converted to Coastal Wetlands	+	+	+	+	+	NC	+
CH_4 Emissions from Land Converted to Coastal Wetlands	NC	NC	NC	NC	NC	NC	NC
Changes in Land Converted to Flooded Land	(2.4)	+	0.1	0.1	0.1	(+)	(0.6)
CH_4 Emissions from Land Converted to Flooded Land	(1.8)	+	0.1	0.1	0.1	(+)	(0.4)
Settlements Remaining Settlements	**0.4**	**0.6**	**0.5**	**0.6**	**0.8**	**(7.2)**	**0.3**
Changes in Organic Soil Carbon Stocks	NC	NC	NC	NC	NC	NC	NC
Changes in Settlement Tree Carbon Stocks	NC	NC	0.2	0.3	0.5	(6.9)	(0.2)
Changes in Yard Trimming and Food Scrap Carbon Stocks in Landfills	NC	NC	NC	NC	NC	-0.6	(+)

N_2O Emissions from Settlement Soils[h]	0.4	0.6	0.3	0.3	0.3	0.3	0.5
Land Converted to Settlements	**1.7**	**2.2**	**2.9**	**3.1**	**3.2**	**3.2**	**2.3**
Changes in all Ecosystem Carbon Stocks[f]	1.7	2.2	2.9	3.1	3.2	3.2	2.3
Change in LULUCF Total Net Flux[i]	**(46.8)**	**(22.4)**	**(15.8)**	**(20.5)**	**(7.4)**	**(40.4)**	**(27.9)**
Change in LULUCF Emissions[j]	**24.6**	**30.7**	**22.4**	**23.8**	**32.3**	**23.4**	**25.9**
Change in LULUCF Sector Net Total[k]	**(22.2)**	**8.3**	**6.6**	**3.3**	**24.9**	**(17.0)**	**(2.0)**
Percent Change in LULUCF Sector Net Total	**-2.6%**	**1.1%**	**0.4%**	**0.4%**	**3.4%**	**-2.2%**	**-0.1%**

NC (No Change)

+ Absolute value does not exceed 0.05 MMT CO_2 Eq. or 0.05 percent.

[a] Includes the net changes to carbon stocks stored in all forest ecosystem pools and harvested wood products.

[b] Estimates include CH_4 and N_2O emissions from fires on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[c] Estimates include N_2O emissions from N fertilizer additions on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[d] Estimates include CH_4 and N_2O emissions from drained organic soils on both Forest Land Remaining Forest Land and Land Converted to Forest Land.

[e] Includes the net changes to carbon stocks stored in all forest ecosystem pools.

[f] Includes changes in mineral and organic soil carbon stocks for all land use conversions to cropland, grassland, and settlements, respectively. Also includes aboveground/belowground biomass, dead wood, and litter carbon stock changes for conversion of forest land to cropland, grassland, and settlements, respectively.

[g] Estimates include CH_4 and N_2O emissions from fires on both Grassland Remaining Grassland and Land Converted to Grassland.

[h] Estimates include N_2O emissions from N fertilizer additions on both Settlements Remaining Settlements and Land Converted to Settlements because it is not possible to separate the activity data at this time.

[i] LULUCF Carbon Stock Change includes any C stock gains and losses from all land use and land use conversion categories.

[j] LULUCF emissions include the CH_4 and N_2O emissions reported for Peatlands Remaining Peatlands, Forest Fires, Drained Organic Soils, Grassland Fires, and Coastal Wetlands Remaining Coastal Wetlands; CH_4 emissions from Land Converted to Coastal Wetlands; and N_2O emissions from forest soils and settlement soils.

[k] The LULUCF Sector Net Total is the net sum of all LULUCF CH_4 and N_2O emissions to the atmosphere plus LULUCF net carbon stock changes.

Notes: Parentheses indicate negative values. Totals may not sum due to independent rounding.

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Abbreviations

ABS	Acrylonitrile butadiene styrene
AC	Air conditioner
ACC	American Chemistry Council
AEDT	FAA Aviation Environmental Design Tool
AEO	Annual Energy Outlook
AER	All-electric range
AF&PA	American Forest and Paper Association
AFEAS	Alternative Fluorocarbon Environmental Acceptability Study
AFOLU	Agriculture, Forestry, and Other Land Use
AFV	Alternative fuel vehicle
AGA	American Gas Association
AGR	Acid gas removal
AHEF	Atmospheric and Health Effect Framework
AHRI	Air-Conditioning, Heating, and Refrigeration Institute
AIM Act	American Innovation and Manufacturing Act
AISI	American Iron and Steel Institute
ALU	Agriculture and Land Use
ANGA	American Natural Gas Alliance
ANL	Argonne National Laboratory
APC	American Plastics Council
API	American Petroleum Institute
APTA	American Public Transportation Association
AR4	IPCC *Fourth Assessment Report*
AR5	IPCC *Fifth Assessment Report*
AR6	IPCC *Sixth Assessment Report*
ARI	Advanced Resources International
ARMA	Autoregressive moving-average
ARMS	Agricultural Resource Management Surveys
ASAE	American Society of Agricultural Engineers
ASLRRA	American Short-line and Regional Railroad Association
ASR	Annual Statistical Report
ASTM	American Society for Testing and Materials
AZR	American Zinc Recycling
BCEF	Biomass conversion and expansion factors
BEA	Bureau of Economic Analysis, U.S. Department of Commerce
BIER	Beverage Industry Environmental Roundtable
BLM	Bureau of Land Management
BoC	Bureau of Census
BOD	Biological oxygen demand
BOD5	Biochemical oxygen demand over a 5-day period
BOEM	Bureau of Ocean Energy Management
BOEMRE	Bureau of Ocean Energy Management, Regulation and Enforcement
BOF	Basic oxygen furnace
BRS	Biennial Reporting System
BSEE	Bureau of Safety and Environmental Enforcement
BTS	Bureau of Transportation Statistics, U.S. Department of Transportation
Btu	British thermal unit
C	Carbon
C&D	Construction and demolition waste
C&EN	Chemical and Engineering News
CAAA	Clean Air Act Amendments of 1990
CAFOS	Concentrated Animal Feeding Operations
CaO	Calcium oxide
CAPP	Canadian Association of Petroleum Producers
CARB	California Air Resources Board
CBI	Confidential business information
C-CAP	Coastal Change Analysis Program
CDAT	Chemical Data Access Tool
CEAP	USDA-NRCS Conservation Effects Assessment Program
CEFM	Cattle Enteric Fermentation Model
CEMS	Continuous emission monitoring system
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CGA	Compressed Gas Association
CH_4	Methane
CHAPA	California Health and Productivity Audit
CHP	Combined heat and power
CI	Confidence interval
CIGRE	International Council on Large Electric Systems
CKD	Cement kiln dust
CLE	Crown Light Exposure
CMA	Chemical Manufacturer's Association
CMM	Coal mine methane
CMOP	Coalbed Methane Outreach Program
CMR	Chemical Market Reporter
CNG	Compressed natural gas
CO	Carbon monoxide
CO_2	Carbon dioxide
COD	Chemical oxygen demand
COGCC	Colorado Oil and Gas Conservation Commission
CONUS	Continental United States
CRF	Common Reporting Format
CRM	Component ratio method
CRP	Conservation Reserve Program
CSRA	Carbon Sequestration Rural Appraisals
CTIC	Conservation Technology Information Center
CVD	Chemical vapor deposition
CWNS	Clean Watershed Needs Survey
d.b.h	Diameter breast height
DE	Digestible energy

DESC	Defense Energy Support Center-DoD's Defense Logistics Agency
DFAMS	Defense Fuels Automated Management System
DGGS	Division of Geological & Geophysical Surveys
DHS	Department of Homeland Security
DLA	DoD's Defense Logistics Agency
DM	Dry matter
DOC	Degradable organic carbon
DOC	U.S. Department of Commerce
DoD	U.S. Department of Defense
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
DOM	Dead organic matter
DOT	U.S. Department of Transportation
DRE	Destruction or removal efficiencies
DRI	Direct Reduced Iron
EAF	Electric arc furnace
EDB	Aircraft Engine Emissions Databank
EDF	Environmental Defense Fund
EER	Energy economy ratio
EF	Emission factor
EFMA	European Fertilizer Manufacturers Association
EJ	Exajoule
EGR	Exhaust gas recirculation
EGU	Electric generating unit
EIA	Energy Information Administration, U.S. Department of Energy
EIIP	Emissions Inventory Improvement Program
EOR	Enhanced oil recovery
EPA	U.S. Environmental Protection Agency
EREF	Environment Research & Education Foundation
ERS	Economic Research Service
ETMS	Enhanced Traffic Management System
EV	Electric vehicle
EVI	Enhanced Vegetation Index
FAA	Federal Aviation Administration
FAO	Food and Agricultural Organization
FAOSTAT	Food and Agricultural Organization database
FAS	Fuels Automated System
FCCC	Framework Convention on Climate Change
FEB	Fiber Economics Bureau
FEMA	Federal Emergency Management Agency
FERC	Federal Energy Regulatory Commission
FGD	Flue gas desulfurization
FHWA	Federal Highway Administration
FIA	Forest Inventory and Analysis
FIADB	Forest Inventory and Analysis Database
FIPR	Florida Institute of Phosphate Research
FOD	First order decay
FOEN	Federal Office for the Environment
FOKS	Fuel Oil and Kerosene Sales
FQSV	First-quarter of silicon volume
FSA	Farm Service Agency
FTP	Federal Test Procedure
g	Gram
G&B	Gathering and boosting
GaAs	Gallium arsenide
GCV	Gross calorific value
GDP	Gross domestic product
GEI	Gulfwide Emissions Inventory
GHG	Greenhouse gas
GHGRP	EPA's Greenhouse Gas Reporting Program
GIS	Geographic Information Systems
GJ	Gigajoule
GOADS	Gulf Offshore Activity Data System
GOM	Gulf of Mexico
GPG	Good Practice Guidance
GRI	Gas Research Institute
GSAM	Gas Systems Analysis Model
GTI	Gas Technology Institute
GWP	Global warming potential
ha	Hectare
HBFC	Hydrobromofluorocarbon
HC	Hydrocarbon
HCFC	Hydrochlorofluorocarbon
HCFO	Hydrochlorofluoroolefin
HDDV	Heavy duty diesel vehicle
HDGV	Heavy duty gas vehicle
HDPE	High density polyethylene
HF	Hydraulically fractured
HFC	Hydrofluorocarbon
HFO	Hydrofluoroolefin
HFE	Hydrofluoroether
HHV	Higher Heating Value
HMA	Hot Mix Asphalt
HMIWI	Hospital/medical/infectious waste incinerator
HTF	Heat Transfer Fluid
HTS	Harmonized Tariff Schedule
HVAE	High Voltage Anode Effects
HWP	Harvested wood product
IBF	International bunker fuels
IC	Integrated Circuit
ICAO	International Civil Aviation Organization
ICBA	International Carbon Black Association
ICE	Internal combustion engine
ICR	Information Collection Request
IEA	International Energy Agency
IFO	Intermediate Fuel Oil
IGES	Institute of Global Environmental Strategies
IISRP	International Institute of Synthetic Rubber Products
ILENR	Illinois Department of Energy and Natural Resources
IMO	International Maritime Organization
IPAA	Independent Petroleum Association of America
IPCC	Intergovernmental Panel on Climate Change
IPPU	Industrial Processes and Product Use
ITC	U.S. International Trade Commission

ITRS	International Technology Roadmap for Semiconductors
JWR	Jim Walters Resources
KCA	Key category analysis
kg	Kilogram
kt	Kiloton
kWh	Kilowatt hour
LDPE	Low density polyethylene
LDT	Light-duty truck
LDV	Light-duty vehicle
LEV	Low emission vehicles
LFG	Landfill gas
LFGTE	Landfill gas-to-energy
LHV	Lower Heating Value
LKD	Lime kiln dust
LLDPE	Linear low density polyethylene
LMOP	EPA's Landfill Methane Outreach Program
LNG	Liquefied natural gas
LPG	Liquefied petroleum gas(es)
LTO	Landing and take-off
LULUCF	Land Use, Land-Use Change, and Forestry
LVAE	Low Voltage Anode Effects
M&R	Metering and regulating
MARPOL	International Convention for the Prevention of Pollution from Ships
MC	Motorcycle
MCF	Methane conversion factor
MCL	Maximum Contaminant Levels
MCFD	Thousand cubic feet per day
MDI	Metered dose inhalers
MDP	Management and design practices
MECS	EIA Manufacturer's Energy Consumption Survey
MEMS	Micro-electromechanical systems
MER	Monthly Energy Review
MGO	Marine gas oil
MgO	Magnesium oxide
MJ	Megajoule
MLRA	Major Land Resource Area
mm	Millimeter
MMBtu	Million British thermal units
MMCF	Million cubic feet
MMCFD	Million cubic feet per day
MMS	Minerals Management Service
MMT	Million metric tons
MMTCE	Million metric tons carbon equivalent
MMT CO_2 Eq.	Million metric tons carbon dioxide equivalent
MODIS	Moderate Resolution Imaging Spectroradiometer
MoU	Memorandum of Understanding
MOVES	U.S. EPA's Motor Vehicle Emission Simulator model
MPG	Miles per gallon
MRLC	Multi-Resolution Land Characteristics Consortium
MRV	Monitoring, reporting, and verification
MSHA	Mine Safety and Health Administration
MSW	Municipal solid waste
MT	Metric ton
MTBE	Methyl Tertiary Butyl Ether
MTBS	Monitoring Trends in Burn Severity
MVAC	Motor vehicle air conditioning
MY	Model year
N_2O	Nitrous oxide
NA	Not applicable; Not available
NACWA	National Association of Clean Water Agencies
NAHMS	National Animal Health Monitoring System
NAICS	North American Industry Classification System
NAPAP	National Acid Precipitation and Assessment Program
NARR	North American Regional Reanalysis Product
NAS	National Academies of Sciences, Engineering, and Medicine
NASA	National Aeronautics and Space Administration
NASF	National Association of State Foresters
NASS	USDA's National Agriculture Statistics Service
NC	No change
NCASI	National Council of Air and Stream Improvement
NCV	Net calorific value
ND	No data
NE	Not estimated
NEH	National Engineering Handbook
NEI	National Emissions Inventory
NEMA	National Electrical Manufacturers Association
NEMS	National Energy Modeling System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NEU	Non-Energy Use
NEV	Neighborhood Electric Vehicle
NF_3	Nitrogen trifluoride
NFI	National forest inventory
NGL	Natural gas liquids
NID	National inventory of Dams
NIR	National Inventory Report
NLA	National Lime Association
NLCD	National Land Cover Dataset
NMOC	Non-methane organic compounds
NMVOC	Non-methane volatile organic compound
NMOG	Non-methane organic gas
NO	Not occurring
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxides
NOAA	National Oceanic and Atmospheric Administration
NOF	Not on feed
NPDES	National Pollutant Discharge Elimination System

NPP	Net primary productivity
NPRA	National Petroleum and Refiners Association
NRBP	Northeast Regional Biomass Program
NRC	National Research Council
NRCS	Natural Resources Conservation Service
NREL	National Renewable Energy Laboratory
NRI	National Resources Inventory
NSCEP	National Service Center for Environmental Publications
NSCR	Non-selective catalytic reduction
NSPS	New source performance standards
NWS	National Weather Service
OAG	Official Airline Guide
OAP	EPA Office of Atmospheric Programs
OAQPS	EPA Office of Air Quality Planning and Standards
ODP	Ozone depleting potential
ODS	Ozone depleting substances
OECD	Organization of Economic Co-operation and Development
OEM	Original equipment manufacturers
OGJ	Oil & Gas Journal
OGOR	Oil and Gas Operations Reports
OH	Hydroxyl radical
OMS	EPA Office of Mobile Sources
ORNL	Oak Ridge National Laboratory
OSHA	Occupational Safety and Health Administration
OTA	Office of Technology Assessment
OTAQ	EPA Office of Transportation and Air Quality
OVS	Offset verification statement
PADUS	Protected Areas Database of the United States
PAH	Polycyclic aromatic hydrocarbons
PCA	Portland Cement Association
PCC	Precipitate calcium carbonate
PDF	Probability Density Function
PECVD	Plasma enhanced chemical vapor deposition
PET	Polyethylene terephthalate
PET	Potential evapotranspiration
PEVM	PFC Emissions Vintage Model
PFC	Perfluorocarbon
PFPE	Perfluoropolyether
PHEV	Plug-in hybrid vehicles
PHMSA	Pipeline and Hazardous Materials Safety Administration
PI	Productivity index
PLS	Pregnant liquor solution
POTW	Publicly Owned Treatment Works
ppbv	Parts per billion (10^9) by volume
ppm	Parts per million
ppmv	Parts per million (10^6) by volume
pptv	Parts per trillion (10^{12}) by volume
PRCI	Pipeline Research Council International
PRP	Pasture/Range/Paddock
PS	Polystyrene
PSU	Primary Sample Unit
PU	Polyurethane
PVC	Polyvinyl chloride
PV	Photovoltaic
QA/QC	Quality Assurance and Quality Control
QBtu	Quadrillion Btu
R&D	Research and Development
RECs	Reduced Emissions Completions
RCRA	Resource Conservation and Recovery Act
RFA	Renewable Fuels Association
RFS	Renewable Fuel Standard
RMA	Rubber Manufacturers' Association
RPA	Resources Planning Act
RTO	Regression-through-the-origin
SAE	Society of Automotive Engineers
SAGE	System for assessing Aviation's Global Emissions
SAIC	Science Applications International Corporation
SAN	Styrene Acrylonitrile
SAR	IPCC Second Assessment Report
SCR	Selective catalytic reduction
SCSE	South central and southeastern coastal
SDR	Steel dust recycling
SEC	Securities and Exchange Commission
SEMI	Semiconductor Equipment and Materials Industry
SF_6	Sulfur hexafluoride
SIA	Semiconductor Industry Association
SiC	Silicon carbide
SICAS	Semiconductor International Capacity Statistics
SNAP	Significant New Alternative Policy Program
SNG	Synthetic natural gas
SO_2	Sulfur dioxide
SOC	Soil Organic Carbon
SOG	State of Garbage survey
SOHIO	Standard Oil Company of Ohio
SSURGO	Soil Survey Geographic Database
STMC	Scrap Tire Management Council
SULEV	Super Ultra Low Emissions Vehicle
SWANA	Solid Waste Association of North America
SWDS	Solid waste disposal sites
SWICS	Solid Waste Industry for Climate Solutions
TA	Treated anaerobically (wastewater)
TAM	Typical animal mass
TAME	Tertiary amyl methyl ether
TAR	IPCC Third Assessment Report
TBtu	Trillion Btu
TDN	Total digestible nutrients
TEDB	Transportation Energy Data Book
TFI	The Fertilizer Institute
TIGER	Topologically Integrated Geographic Encoding and Referencing survey
TJ	Terajoule
TLEV	Traditional low emissions vehicle
TMLA	Total Manufactured Layer Area
TOW	Total organics in wastewater

TPO	Timber Product Output
TRI	Toxic Release Inventory
TSDF	Hazardous waste treatment, storage, and disposal facility
TTB	Tax and Trade Bureau
TVA	Tennessee Valley Authority
UAN	Urea ammonium nitrate
UDI	Utility Data Institute
UFORE	U.S. Forest Service's Urban Forest Effects model
UG	Underground (coal mining)
U.S.	United States
U.S. ITC	United States International Trade Commission
UEP	United Egg Producers
ULEV	Ultra low emission vehicle
UNEP	United Nations Environmental Programme
UNFCCC	United Nations Framework Convention on Climate Change
USAA	U.S. Aluminum Association
USAF	United States Air Force
USDA	United States Department of Agriculture
USFS	United States Forest Service
USGS	United States Geological Survey
USITC	U.S. International Trade Commission
VAIP	EPA's Voluntary Aluminum Industrial Partnership
VAM	Ventilation air methane
VKT	Vehicle kilometers traveled
VMT	Vehicle miles traveled
VOCs	Volatile organic compounds
VS	Volatile solids
WBJ	Waste Business Journal
WEF	Water Environment Federation
WERF	Water Environment Research Federation
WFF	World Fab Forecast (previously WFW, World Fab Watch)
WGC	World Gas Conference
WIP	Waste-in-place
WMO	World Meteorological Organization
WMS	Waste management systems
WRRF	Water resource recovery facilities
WTE	Waste-to-energy
WW	Wastewater
WWTP	Wastewater treatment plant
ZEVs	Zero emissions vehicles

News

Wayne Co. toxic spill exposes lack of NCDEQ transparency

CAFOs, Environmental, Neuse River Watershed, Regulatory, Sound Rivers, Uncategorized, Water Quality

Posted on September 7th, 2022



Espuma hecha de cerdos muertos, desechos de mataderos y carnes caducadas. (NCDEQ)

LEE ESTE ARTICULO EN ESPANOL AQUI.

READ THE SELC/SOUND RIVERS LETTER TO DEQ HERE.

A major spill of toxic foam at a Wayne County biogas facility and industrial swine operation polluted air, groundwater and surface water for weeks this summer, and the state agency charged with its regulation failed to notify the public.

Read the front page article on the Raleigh News & Observer here.

White Oak Farms/Legacy Biogas has operated a biogas-collection facility at the location since 2013, and though it has a long history of violations issued by North Carolina Department of Environmental Quality, the facility was allowed to continue to operate. Over Memorial Day weekend, that continued operation culminated in the rupture of the methane-capturing cap installed over a hog waste lagoon, covering a large area of the surrounding land with several feet of toxic foam that permeated the ground, entered the surface waters of Nahunta Swamp and released ammonia fumes described by one North Carolina Department of Environmental Quality inspector as overwhelming.

According to DEQ documentation, the spill continued for six weeks and the discharge took nearly two months to clean up by a firm specializing in environmental disasters. During that time, DEQ made no public announcement about a spill that created a public health risk from air, groundwater and surface-water pollution.

"This facility has a clear history of illegally discharging waste, and DEQ knew it. They failed to take meaningful action to prevent a major pollution event from happening, and failed to adequately notify the public," said Sound Rivers' Neuse Riverkeeper Samantha Krop. "This is people's drinking water; it's the water they swim in; it's the water they fish from — and the agency responsible for protecting it isn't doing its job. We worked with the Southern Environmental Law Center to send a letter to DEQ, requesting they take immediate action related to this facility's permit, the clean up, and public notification of this pollution event. We also remain concerned about the DEQ's ability to adequately regulate this industry and enforce permit conditions for facilities, with or without digesters. The current regulatory program has demonstrated time and time again its inability to keep these disasters from happening. In the past five years, we've had three major spills unrelated to weather events or hurricanes in the Neuse watershed alone."

This spring, biogas technology, which utilizes covered lagoons or digesters, was being touted as "clean, renewable energy" by industry representatives as DEQ was holding public hearings to determine what a general biogas permit would

like — while the major pollution event in the Neuse watershed was proving this unproven technology may not be clean at all and raising serious questions about the use of digesters and open pits to dispose of hog waste, the impact on our environment, and whether NCDEQ has the expertise and knowledge to regulate biogas facilities.



Up to four feet of foam slurry surrounded the bloated biogas digester and inundated nearby buildings. (NCDEQ)

Permitted biogas facilities cap hog waste lagoons to harness methane and other gases produced by the decomposition of the waste. According to DEQ, however, this facility had no hogs on site. Instead, the lagoon held a slurry of decomposing expired meats from Smithfield Foods' facilities, hog parts and fluids left over from slaughtering and dead hogs from other facilities chopped up into small pieces. The biogas being harnessed at this facility was from that slurry; the foam, a byproduct of its decomposition.

READ THE SELC/SOUND RIVERS LETTER TO DEQ HERE.

BACKGROUND

On Aug. 3, during a routine monitoring flight of the Neuse River watershed, Neuse Riverkeeper Samantha Krop flew over the White Oak Farms/Legacy Biogas facility and observed significant earthwork being done near the barns, lagoon and anaerobic digester (covered lagoon). After the flight, Sound Rivers learned about a significant spill at this facility by looking through DEQ's Laserfiche records. Despite a large quantity of swine waste, dead hogs and food-waste-product sludge entering jurisdictional surface waters — as well as the release of gasses from a ruptured lagoon cover that pose a risk to human health — DEQ made no public statement about this spill, instead relying on an outdated public notification made by the facility in a local newspaper.

White Oak Farms has been operating as a hog CAFO (concentrated animal feeding operation) since the early 1990s; in October 2013, it received a permit from DEQ to cover a lagoon to generate biogas from swine waste and to expand the facility by 60,000 animals, a problematic exception to the swine facility moratorium that's been in place since 1997. The facility has a history of compliance issues, and DEQ has cited the facility as non-compliant multiple times during routine annual inspections.

In 2019, the facility began adding off-site waste as approved by the Division of Water Resources. In June 2020, the Department of Agriculture State Veterinary Division gave the facility conditional approval to begin accepting dead hogs (off-site generated mortality) to incorporate into the digester system. DEQ issued a permit modification dated June 17, 2020, for the same. Dead hogs are added to a "dump pit" on site, then macerated into pieces (less than 2 inches in size) before being added to the digester.

On May 30, 2022, the facility self-reported a failure of the digester cover to DEQ. This resulted in a discharge of "foam" waste material from the digester lagoon. DEQ staff were on site on May 30, May 31, June 3, June 7 and June 23, 2022, confirmed the discharge and observed the efforts made to contain the "foam" pollutant. During site inspections, ruptures in the digester cover were

identified, and discharge of the foam product from the digester into the surrounding environment was observed. “Foam waste product” was observed in surface waters of Nahunta Swamp.



In February, inspectors found hay covering about 4 inches of foam on the ground at the facility. No spill had been reported. (NCDEQ)

DEQ was unable to provide neither an estimated volume of discharge from the digester, nor an estimated volume of waste that ended up in surface waters. Based on communications with DEQ regional staff, as of July 20, 2022, discharge of the foam had ceased. It is unclear where the waste was disposed of. Aerial photos taken on Aug. 23, indicate cleaning is not complete.

It should be noted that during the February 2022 routine inspection by DEQ, the facility was found to be non-compliant, and there was evidence of a discharge — unreported to DEQ — which the facility attempted to cover up by layering hay over about four inches of the foam, according to DEQ reports.

While DEQ was responding to the digester over rupture and spill of hog waste, dead hog, and food-waste foam this spring, the agency was in the process of developing the general permit for swine waste digester systems. This general permit was issued on June 30, six days prior to the issuance of a Notice of Violation to White Oak Farms for this spill. Sound Rivers, and many other environmental advocates, community groups and residents have opposed this general permit, given its lack of assurances that biogas facilities will not be polluting the environment or surrounding communities.

It is Sound Rivers' understanding that DEQ staff performing inspections of industrial hog facilities have not been adequately trained in the inspection of digester systems or covered lagoons, and DEQ Central Office was aware of repeated issues and concerns identified by DEQ regional field staff.

DEQ did not report or announce this issue to the general public. The facility put a public notice in the local paper stating a "wastewater foam discharge of greater than 15,000 gallons occurred on May 30, 2022, and was contained on May 31, 2022" and that 37,400 gallons reached wetlands.

Based on DEQ's site inspections after May 31, the date of containment is not accurate, and the facility's claim that only 37,400 gallons were discharged is a gross underestimation. Based on the facility's self report to DEQ from this past July, they stated more than 3 million gallons of foam were released from the digester. They also reported that all 40,095 gallons discharged to the swamp were recovered, suggesting that all waste contamination was removed from the swamp. They maintained that no waste reached or was cleaned up with jurisdictional waters.

IMPACTS

On the southeastern portion of the property, trees have been cleared in the area impacted by the discharge. The suspicion, based on historical aerial



An area between the facility and Nahunta Swamp shows evidence of the massive spill's impact on surrounding land. (Sound Rivers)

photography/satellite imagery, is the trees may have died due to either inundation by an earlier, unreported foam discharge or groundwater contamination.

There are two groundwater monitoring wells on the southern portion of the property between the digester/covered lagoon and Nahunta Swamp. Water samples collected from these wells show extremely concerning levels of contaminants present.

A large, unusual fish kill occurred downstream of Nahunta Swamp in Contentnea Creek, from Snow Hill to Grifton, between May 27-29. There is no confirmation that the spill event and fish kill are related, however, based on timing and proximity, there is belief that previous ongoing discharges from this facility may have contributed to the fish kill.

Sound Rivers will be updating this story as new information becomes available.

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Katey Zimmerman | Pamlico-Tar Riverkeeper katey@soundrivers.org
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From: Lydia Garcia
To: Trevor Martin
Subject: Biomethane Plant Opposition
Date: Tuesday, December 5, 2023 3:21:06 PM

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Mr. Martin,
I am a community member of Sunnyside and have been for over fifty years. I am appalled that that the City of Sunnyside approve for this methane plant to move forward in our community!! Obviously, no attention has been paid to the close proximity to families in the area this plant will be built on. Furthermore, communication has only been provided English. Companies such as this should make every effort to clearly inform the community they intend to enter into.

The positive environmental impact that this company wants to convince us of, will create issues for the people that have sustained Sunnyside for generations.

I want to reiterate, I am fully opposed to this methane plant coming into our community.

Lydia Garcia
ldgrc7@gmail.com
Sent from my iPhone

From: Evonne Gonzales Martinez
To: Trevor Martin
Subject: comments re: biomethane plant
Date: Tuesday, December 5, 2023 3:45:29 PM

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Mr. Martin,

It is my understanding that all comments regarding the proposed biomethane plant at the Port of Sunnyside are to be submitted to you. Although I do not currently reside in Sunnyside, I have in the past and I do own property in the Sunnyside area. In addition, my grandparents were one of the early Latino families that settled in the Sunnyside area after migrating from Texas. I spent many years visiting them in the late 60s until we moved to Washington State ourselves in 1968. My early memories of Sunnyside were the smells. The smell of the mint as the roots were being prepared for planting and then as it was later harvested. The smell of the grapes as they were nearing harvest and the smells of apples and other fruits. Sunnyside was a beautiful place back then and I remember how wonderful it was to visit and enjoy all that the Yakima Valley had to offer.

However, as Sunnyside allowed dairy after mega dairy to develop, the only smell that has been present for several years is the stench of manure and the dust that arises from the cows especially in the summer. This proposed biomethane plant has the capacity to completely destroy the city of Sunnyside. Aside from the pollution that would be generated from the processing of manure, there is also the even more critical issue of the possibility of destroying and contaminating the water supply to the city. We are already witnessing how that can happen with manure pollution in the city of Mabton. It is essential that we prevent this from happening in Sunnyside. The fact as well that residents that live near the area were not informed of the potential risks from the development of this plant is also cause for concern. Residents would be further negatively impacted by the increase in diesel fuel vehicle traffic that would need to be utilized for the operation of the plant that causes further pollution. We know that the micro particles in this type of pollution are very damaging to the lungs and elders, children and those in more marginalized communities are further at increased risk for severe illness and shortened life spans.

I hope that you are able to present these comments and concerns to the appropriate parties and that deep, intentional and public consideration can be fully utilized before a final decision is made on this project.

Thank you,

Evonne G. Martinez

From: Yasmin Barrios
To: Trevor Martin
Subject: Fwd: please see attached
Date: Tuesday, December 5, 2023 5:02:22 PM
Attachments: image001.png
trevor.docx

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Sent from my iPhone

Begin forwarded message:

> **From:** Yasmin Barrios <yasmin.barrios@co.yakima.wa.us>
> **Date:** December 5, 2023 at 5:01:10 PM PST
> **To:** Yasmin Barrios <yasminbarrios@gmail.com>
> **Subject: please see attached**
>
> Sent on behalf of a personal Yasmin- not to be associated with Yakima Health District
> Views or opinions.
> Thank you

Yasmín V. Barrios, PhD, MPH
Epidemiologist

Office: 509-249-6543
Mobile: 509-941-7365

1210 Ahtanum Ridge Drive
Union Gap, WA 98903

Re: 60-Acre BioMethane Plant

To Whom It May Concern,

Thank you for the opportunity to comment on the proposed Biomethane Plant I am a resident of Sunnyside and have a doctorate in Public Health-Epidemiology.

I would like to raise concerns about the proposed Biomethane Plant:

1. My first concern is the particulate matter released into the air by the proposed plant. The provided Exhibit A titled [New Source Review Application Supporting Information Report Sunnyside RNG LLC Proposed Renewable Natural Gas Facility Yakima County, Washington] presents estimates for various pollutants. One in particular is presented as TONS per YEAR and I would like to see what the 24 hour estimate would be in order to compare it to the exposure rate cited by the EPA The National Ambient Air Quality Standard for PM2. 5 24-hour standard is 35 micrograms per cubic meter of air (μg/m3). The annual standard for PM2. 5 is 12.0 μg/m3, averaged over three years.
2. My second concern is the lack of community awareness of this proposed project. In a community that primarily speaks Spanish there appears to have been very few opportunities to educate the community or include the broader community in making this decision that will impact the air and water quality to an unknown degree.

Sincerely,

Yasmin V. Barrios
PhD, MPH

From: Chelsea Dimas
To: Trevor Martin
Subject: Public Comment Regarding BioMethane Plant
Date: Tuesday, December 5, 2023 5:04:38 PM

CAUTION : This email originated from outside of this organization. Please exercise caution with links and attachments, and verify any instructions with the sender in person or over the phone.

Hi Trevor,

Below you will a find a list of concerns that I have regarding the Pacific Ag project:

- Lack of communications and transparency
  - Why did the community not receive a public notice
  - Why was the notice hidden on the city's website
  - Why are there no Spanish communications given our monolingual community
- Why did the project move forward despite not meeting the Clean Air standards?
- Where is the EIS?
- Why hasn't this project been reviewed by a third party?
- What have been the community members living near the proposed location kept in the dark?
- Who will be held responsible if a disaster occurs?
- Will community members affected be compensated?
- Who will be monitoring the potential environmental and health impact?
- Why was the website only recently updated?
- Why has the city not responded to the community?
- When can we expect a reply from you and the city?

With gratitude,

Chelsea

--

Chelsea Dimas
She/Her/Ella
Storyteller + Servant Leader

Founder of RAÍCES
Commissioner at the Washington State Human Rights Commission

staygoldchels@gmail.com
(509) 305-6921
Learn more about Chelsea here

May 31- 2023

TO: Trevor Martin Development Director
City of Sunnyside Development Dept:

My Name is Gerard Deaton I own And operate Jerrys Valley Meats LLC At 2561 Sunnyside Mabton Road. I Have operated my Business At This location For 47 years. I also own The Parcel Next To my meatshop where my Home is.

I Am Highly Opposed To The Methane Gas Plant That you Are proposing To Build Right IN my Back Yard. Other Neighbors in The Immediate Area Also Do Not Like The Idea. There Are several Homes in The Immediate Area That Have Been Here For Many years And There Are many Things we Feel will Be Disrupting To Our Enviroment, Loud Noises, Increased Truck Traffic Problems, Increased Ware & Tear on Pavement, which is Already A Problem, From All of The Current Truck And Agriculture Traffic, Other Issues Brighthights, Odors & Smells From processing Cow Crap. Can Tell Me That it is NOT Going To Have An Offensive Smell To it. Also The possability of some Kind of Hazzard From Dealing with Hazzardous Materials.

Lets Face it! This company is Going To Be Manufacturing A Very Dangerous Product in An Area where There Are Many Homes And Don't Borget The City of Sunnyside Itself Its NOT That Far Away. In Case of Emergency Situation It Could Be Subjected To Side Effects As Well! Seems To me This Could Have Been Put in A Remote Area Somewhere, There Are Lots of Other Areas where it Could Be Located without Causing so many serious Side effects in case of an emeregency Situation

Get Some Companies To Come Into The Port of Sunnyside That Do Not Have so Many Adverse Side Effects To Our Community

Jerrys Valley Meats LLC
Gerald A. Deater
509-837-3626

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

RECEIVED
DEC 27 2023
VM 10:56 am

December 26, 2023

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 & 2022.0200, WADOE SEPA RECORD NUMBERS #202303037 & 202305593

Dear Mr. Martin,

I hope this correspondence finds you well. I am writing to you as a concerned resident during the public comment period concerning the proposed Sunnyside RNG biomethane plant in proximity to Sunnyside city limits and residential areas. My purpose is to articulate reservations and seek clarity on potential environmental impact risks, specifically in relation to air and water quality.

Upon conducting some research on biomethane plants in other municipalities, I have developed apprehensions regarding potential harm to the health and well-being of my family and neighbors. Notably, my concern is compounded by the apparent absence of explicit information addressing potential harm within the public discourse thus far. An examination of biodigester projects in other locales reveals instances ranging from minor inconveniences to significant environmental consequences. The lack of proactive communication on these matters from the city or port is disconcerting.

In light of these concerns, I respectfully request detailed information regarding any potential adverse environmental and public health risks associated with the Sunnyside RNG project. To ensure objectivity and transparency, I propose the commissioning of a comprehensive environmental impact statement, conducted by an impartial third party through SEPA review.

As a resident deeply invested in the well-being of our community, I anticipate that City and Port officials will uphold a commitment to transparency by disseminating clear and comprehensive information about both the benefits and drawbacks of a project as substantial as a biomethane plant.

Furthermore, I advocate for inclusive communication practices. Given the significant portion of our community that primarily communicates in Spanish, I urge that communications regarding the environmental impact be made available in Spanish. This will facilitate equitable understanding and engagement for all residents, irrespective of language preferences.

I eagerly await the City and Port of Sunnyside's provision of the requested environmental impact statement for the Sunnyside RNG project. This information will enable residents to engage in a thorough review and contribute meaningful public comments. Your adherence to clear and transparent communication is instrumental in fostering community understanding and informed decision-making.

Thank you for your attention to this matter, and I look forward to a prompt and comprehensive response.

Concerned Sunnyside and Surrounding Area Resident

Print Name ROBERT HERNANDEZ

Signature

Address 20 Cody Lane
Sunnyside, WA 98944

RECEIVED
DEC 2.. 2023

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

December 26, 2023

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Concerned Sunnyside and Surrounding Area Resident

Pablo Meraz
Print Name

Pablo Meraz
Signature

30 Cody LN
Address

Sunnyside WA 98944

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

RECEIVED
DEC 2
City of Sunnyside

December 26, 2023

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Concerned Sunnyside and Surrounding Area Resident

Arturo Santana
Print Name

Signature

110 Cody Lane, Sunnyside, WA 98944
Address

RECEIVED
DEC 26 2023
City of Sunnyside

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

December 26, 2023

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Concerned Sunnyside and Surrounding Area Resident

M. Cristina Santa
Print Name

Signature

110 Cody Lane
Address Sunnyside, WA 98944

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

December 26, 2023

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Concerned Sunnyside and Surrounding Area Resident

Norma Guizar
Print Name

Signature

61 Cody Lane
Address
Sunnyside, Wa 98944

RECEIVED
DEC 26 2023
City of Sunnyside

Trevor Martin, AICP

December 26th, 2023

Community & Economic Development Director

City of Sunnyside

RE: SEPA 2022-0200

Sunnyside RNG

Dear Mr. Martin,

My name if Kathleen Rogers. I live at 1920 Braden Road, Grandview, WA, just off Waneta Road.

One mile west of me as the crow flies from my 40 year home off Waneta Road, the Sunnyside Port District, is being led down a path of no return for our beautiful agricultural community. Its loyal citizenry is being impacted by foul agricultural mis guidance.

Port Commissioner Arnold Martin informed me that on their tour of a similar facility planned for here, there was no smells! County Commissioner LaDon Linde sees nothing and believes its ok.

When you are ready to sell your car don't you vacuum it out, give it a wash, when you sell your home, don't you pretty it up before you show it? When they toured this facility, this was a planned organized visit from the get go. Things were cleaned up, processes were no in full swing. When the President visits a city in CA, the feces were cleaned up, trash removed, plants planted. The visual to the guests were pleasant.

I can guarantee this business will not do our community any good. This is going to smell. You cannot believe that disturbed, hauled, wet manures across the valley to this location off Alexander Road, unloaded onto the ground, then processed, cooked, will not invade out air quality? Oh my gosh.

I've been involved in YRCAA and our air quality issues in the beautiful Lower Yakime Valley for over 30 years. 1 ½ Million dollars a year to keep that organization running and they cant even mitigate air issues other than wood stove smoke, and orchard burning.

I've also been involved in GWMA, Ground Water Management Area, where I worked along side my husband and many many CAFO owners, local farmers, local orchardists, water and ground government agencies. I did this for the full 7 years to help folks in my area who had high nitrate levels in their wells. 7 full years. For 3 Million dollars spent and no solutions.

You cannot tell me that this new RNG will not impact not only our air quality on the south side of Sunnyside, and the new homes being built out here, and the ground water that runs underneath this location. You cannot tell me it won't.

I'm surrounded by CAFO's with 30,'s thousands of dairy cows are all kinds of process ages. They claim they are not polluting the ground water and air. But they seem to be trying to keep under the radar of EPA!!! Lining lagoons now, moving manure onto cropped fields.

RECEIVED
DEC 27 2023
City of Sunnyside

My neighbors the "Veldhuis" family Klompe Dairy,etc. the largest CAFO on this side of Sunnyside, maybe the valley, has manure they will be selling to RNG. They look forward to it. They will scoop it up, they will fill trucks and ha-ul it across the Waneta, Alexander, Mabton Highway to this location to be dumped, one more time. -

RNG will then disturb it again, to collect the methane it supposedly will create for them to collect and sell as a fuel to the electricity grid. REALLY? Creating what bi product?

We already have Nutrien, making fertilizers from chemicals being hauled in by train and truck. It has already had a very dangerous incident that harmed several people.

--We have Ostrom's! Look at them, hauling in chicken manure from somewhere else to put into straw to put on mushrooms! Mushrooms aren't a local agricultural thing, but we have them here because they "STUNK" too bad near our Capital and kept new homes from being built. So, the Sunnyside Port district whooed them to come to Sunnyside. Now we have the stink. The cloud of chicken manure and mold spores. We have people that got in trouble for treating their workers poorly!!!

Really Sunnyside? This is what we need?

Take this business to the south of Mabton in the sage hills or North in the sage lands. Not down here in our town's environment.

Please re consider. Is Grandview better than us? Their port district has not sold their people down the rotten road of environmental ilk. Use them as a guide. They are doing pretty darn good.

For the good of the people in the Lower Yakima Valley, Sunnyside, say no.

Kathleen Rogers

1920 Braden Rd

Grandview, WA

509-830-6637

Keith Sparrow

1920 Braden Road

Grandview, WA

509-840-0521

November 30, 2023

Trevor Martin, Community & Economic Development Director
City of Sunnyside, Community & Economic Development Department
818 E. Edison Ave., Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037

Mr. Martin,

I am writing during this public comment period about the biomethane plant, Sunnyside RNG, proposed for a location near Sunnyside city limits and residential areas. I have obtained some information about biomethane plants in other cities, and I have concerns about any environmental impact risks, particularly with our air and water quality.

I am concerned about the potential of real harm to my family and neighbors. I have not seen the city or port address any aspects of potential harm, which I find disturbing given that a simple internet search of biomethane plants and digesters in other cities provides article after article demonstrating that biodigesters have caused some harm in their respective areas, ranging from slight to extreme occurrences.

I would like more information about any potential adverse environmental and public health risks. Please provide me with an environmental impact statement based on an objective third party SEPA review. As a resident, I would expect for city and port officials and administrators to be clear and transparent, with their community about any project as significant as a biomethane plant so that we may become familiar with both the benefits and disadvantages of such a project. Communications about the environmental impact must also be provided in Spanish because our community is made up of a significant number of families that primarily speak Spanish.

I look forward to the City and Port of Sunnyside providing the environmental impact statement for the Sunnyside RNG project for resident's review and additional public comment.

Concerned Sunnyside and Surrounding Area Resident

Rosie Perez
Print Name

Rosie Perez
Signature

21 Cody Lane
Address

Sunnyside, WA. 98944
Address

RECEIVED
DEC 27 2023
City of Sunnyside

Trevor Martin, Director
Departamento de Desarrollo Comunitario y Económico
Ciudad de Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

26 de diciembre de 2023

Asunto: Comentario Público sobre la Planta de Biometano/Digestores Propuesta, Sunnyside RNG y Solicitud de Declaración de Impacto Ambiental SEPA-20225.022 y 2022.0200, NÚMEROS DE REGISTRO DE SEPA DE WADOE #202303037 y 202305593

Estimado Sr. Martin,

Espero que esta correspondencia lo encuentre bien. Le escribo como residente preocupado durante el período de comentarios públicos sobre la propuesta planta de biometano Sunnyside RNG, en proximidad a los límites de la ciudad de Sunnyside y áreas residenciales. Mi propósito es expresar reservas y buscar claridad sobre posibles riesgos de impacto ambiental, específicamente en relación con la calidad del aire y del agua.

Después de realizar investigaciones sobre plantas de biometano en otras municipalidades, he desarrollado aprehensiones con respecto al posible daño a la salud y bienestar de mi familia y vecinos. Especialmente, mi preocupación se ve agravada por la aparente falta de información explícita abordando posibles perjuicios dentro del discurso público hasta el momento. Un examen de proyectos de biodigestores en otras localidades revela instancias que van desde inconvenientes menores hasta consecuencias ambientales significativas. La falta de comunicación proactiva sobre estos asuntos por parte de la ciudad o el puerto es inquietante.

Dadas estas preocupaciones, solicito respetuosamente información detallada sobre cualquier posible riesgo ambiental adverso y riesgos para la salud pública asociados con el proyecto Sunnyside RNG. Para garantizar objetividad y transparencia, propongo la realización de una declaración completa de impacto ambiental, llevada a cabo por un tercero imparcial a través de una revisión SEPA.

Como residente profundamente comprometido con el bienestar de nuestra comunidad, anticipo que los funcionarios de la Ciudad y el Puerto mantendrán un compromiso con la transparencia al difundir información clara y completa sobre los beneficios y desventajas de un proyecto tan importante como una planta de biometano.

Además, abogo por prácticas de comunicación inclusivas. Dada la parte significativa de nuestra comunidad que se comunica principalmente en español, insto a que las comunicaciones sobre el impacto ambiental estén disponibles en español. Esto facilitará la comprensión y participación equitativa para todos los residentes, independientemente de sus preferencias de idioma.

Espero con interés la provisión por parte de la Ciudad y el Puerto de Sunnyside de la declaración de impacto ambiental solicitada para el proyecto Sunnyside RNG. Esta información permitirá a los residentes realizar una revisión exhaustiva y contribuir con comentarios públicos significativos. Su adhesión a la comunicación clara y transparente es fundamental para fomentar la comprensión comunitaria y la toma de decisiones informada.

Gracias por su atención a este asunto, y espero una respuesta pronta y completa.

Residente Preocupado de Sunnyside y Áreas Circundantes

Nombre Impreso

Firma

Dirección

RECEIVED
DEC 27 2023
City of Sunnyside

RECEIVED
DEC 27 2023
City of Sunnyside

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

December 26, 2023

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 & 2022.0200, WADOE SEPA RECORD NUMBERS #202303037 & 202305593

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Concerned Sunnyside and Surrounding Area Resident

RACHEL MAGANA
Print Name

Rachel Magana
Signature

2623 Sunnyside Mabton Rd
Address
Sunnyside WA 98944

I have additional issues with the timeframe that the comments must be made. I made comments at the Dec 11. 2023 city of Sunnyside council meeting about this, it being mailed out during busy holiday season with only a few days to replay by the time we get it in the mail. You Trevor, said that you were extending comments yet here we are again with everyone receiving the new paperwork in the mail a few days before Christmas with the deadline 2 days after Christmas. That is NOT good practice and I feel like your trying to limit the amount of comments received. Plus the ever changing SEPA numbers. This is getting to be confusing and I think these are all tactics that you are using to confuse and limit the public knowledge of this methane gas plant because nobody wants this here and you know the more people that find out about this the more pushback there is going to be.

Thanks
RACHEL & SHANE

RECEIVED
DEC 27 2023
City of Sunnyside

Trevor Martin, Director
Community & Economic Development Department
City of Sunnyside
818 E. Edison Ave.
Sunnyside, WA 98944

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Sherrie Daniel
Print Name

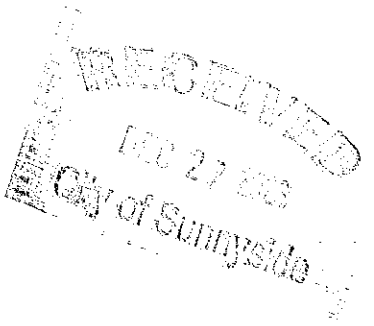
Signature

2623 Sunnyside Mabton Rd
Address
Sunnyside WA 98944

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DEC 27
City of Sunnyside

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Thanks
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November 30, 2023

Trevor Martin, Community & Economic Development Director
City of Sunnyside, Community & Economic Development Department
818 E. Edison Ave., Sunnyside, WA 98944

4:52 pm

RECEIVED
DEC 05 2023

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Concerned Sunnyside and Surrounding Area Resident

Eva Gonzalez
Print Name

Eva Gonzalez
Signature

830 Willowcrest Rd
Address

Sunnyside WA
Address

November 30, 2023

Trevor Martin, Community & Economic Development Director
City of Sunnyside, Community & Economic Development Department
818 E. Edison Ave., Sunnyside, WA 98944

Asunto: Comentario público sobre la propuesta de planta/digestores de biometano, Sunnyside RNG y Solicitud de Declaración de Impacto Ambiental Para SEPA-2022.0200 SEPA #202303037

Sr. Martin,

Le escribo durante este período de comentarios públicos sobre la planta de biometano, Sunnyside RNG, propuesta para una ubicación cerca de los límites de la ciudad y las áreas residenciales de Sunnyside. He obtenido información sobre plantas de biometano en otras ciudades y me preocupan los riesgos de impacto ambiental, particularmente con la calidad del aire y el agua.

Me preocupa la posibilidad de que se produzcan daños reales a mi familia y mis vecinos. No he visto que la ciudad o el puerto aborden ningún aspecto de daño potencial, lo cual me parece inquietante dado que una simple búsqueda en Internet de plantas y digestores de biometano en otras ciudades proporciona artículo tras artículo que demuestra que los biodigestores han causado algún daño en sus respectivas áreas, que van desde ocurrencias leves hasta ocurrencias extremas.

Me gustaría obtener más información sobre posibles riesgos adversos para el medio ambiente y la salud pública. Por favor, proporciónenme una declaración de impacto ambiental basada en una revisión SEPA objetiva de un tercero. Como residente, esperaría que los funcionarios y administradores de la ciudad y el puerto fueran claros y transparentes con su comunidad sobre cualquier proyecto tan importante como una planta de biometano para que podamos familiarizarnos tanto con los beneficios como con las desventajas de dicho proyecto. Las comunicaciones sobre el impacto ambiental también deben realizarse en español porque nuestra comunidad está compuesta por un número significativo de familias que hablan principalmente español.

Espero que la ciudad y el puerto de Sunnyside proporcionen la declaración de impacto ambiental para el proyecto Sunnyside RNG para revisión de los residentes y comentarios públicos adicionales.

Residente Preocupado de Sunnyside y Areas Alrededores

Jesus Perez
Nombre

Jesus Perez
Firma

902 Mclane Sunnyside WA
Domicilio

Domicilio

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DEC 01 2023
City of Sunnyside

November 30, 2023

Trevor Martin, Community & Economic Development Director
City of Sunnyside, Community & Economic Development Department
818 E. Edison Ave., Sunnyside, WA 98944

Re: Public Comment for Proposed Bio Methane Plant/Digesters, Sunnyside RNG and Request for Environmental Impact Statement SEPA-20225.022 WADOE SEPA#202303037

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Concerned Sunnyside and Surrounding Area Resident

JUAN C PEREZ
Print Name

Juan C Perez
Signature

902 McLane Sunnyside WA.
Address

Address

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DEC 04 2023
City of Sunnyside

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818 E. Edison Ave., Sunnyside, WA 98944

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Concerned Sunnyside and Surrounding Area Resident

Alicia Perez
Print Name

Alicia Perez
Signature

902 McLane Sunnyside WA
Address

Address

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Concerned Sunnyside and Surrounding Area Resident

Lorena Cuevas
Print Name

Lorena Cuevas
Signature

521 - Thompson Cir. Sunnyside WA
Address

Address

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City of Sunnyside

Jesus perez
Print Name

Jesus perez
Signature

521 Thompson drive Sunnyside WA
Address

Address

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Concerned Sunnyside and Surrounding Area Resident

Print Name Socorro Ramos

Signature

6576 Vanbelle Rd

Address Sunnyside WA 98944

Address

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Concerned Sunnyside and Surrounding Area Resident

Javier Garcia
Print Name

Signature

Address

635 Sunnyside Ave
Address

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Concerned Sunnyside and Surrounding Area Resident

Cristina Santana
Print Name

Signature

110 Cody lane
Address

Sunnyside, WA 98944
Address

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Concerned Sunnyside and Surrounding Area Resident

Arturo Santana
Print Name

Signature

110 Cody Lane
Address

Sunnyside, WA 98944
Address

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Nalleli Rodriguez
Print Name

Nalleli Rodriguez
Signature

635 Sunnyside Ave, Sunnyside, WA 98944
Address

Address

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Concerned Sunnyside and Surrounding Area Resident

Janeth Rodriguez
Print Name

Janeth Rodriguez
Signature

1635 Sunnyside Ave. Sunnyside WA
Address

Address

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City of Sunnyside