

Draft Quantification Methodologies, Chapter 5 Quantification of On-Site Transportation Emissions – Summary of Feedback and Responses

#	Page #	Line	Clause/Section	Intro Section	Table	Equation	Nature of the Comment	Sub-Topic	Comment/Question	Alberta Climate Change Office Response
1	56		5				Overarching		<p>Motor vehicle usage on site for general transportation purposes:</p> <p>We request CCIR to align with federal GHGRP's definition of on-site transportation which does not include general transportation in the on-site transportation category. As it does not look practical for sites to track actual fuel consumed in motor vehicles (used for general transportation) which will definitely result in inconsistent reporting amongst industry.</p> <p>Fed GHGRP definition: "On-site transportation emissions" means releases from machinery used for the transport or movement of substances, materials, equipment or products that are used in the production process at an integrated facility. This includes releases from vehicles without public road licenses."</p>	In most cases, onsite transportation emissions will represent a negligible emission source. For these emissions, facilities may use alternative methodologies to quantify these emissions instead of fuel tracking. Future review is needed to determine whether alignment on the definition is appropriate.
2	56	17	5.1				Technical		<p>"Motor vehicle usage on site for general transportation purposes" is inconsistent with the definition of on-site transportation given in the SGRR standard: "on-site transportation emissions means direct emissions from machinery used for the on-site transportation of substances, materials or products that are integral to the production process, including without limitation raw, intermediate and end products, wastes, overburden, and materials moved for land clearing"</p> <p>Since this document is intended to be used for both CCIR and SGRR, some additional clarification should be given regarding motor vehicles for general transportation. Presumably, it must be accounted for as a clear fuel under CCIR, but it would not be reported under on-site transportation under SGRR.</p>	Added clarification for clear fuel.
3	57		5.2.5				Technical		<p>NONROAD is not well supported on more modern operating systems and the US EPA recommends using MOVES on more modern machines (see <a href="https://www.epa.gov/moves/nonroad-model-nonroad-engines-equipment-and-vehicles">https://www.epa.gov/moves/nonroad-model-nonroad-engines-equipment-and-vehicles</a>).</p> <p>As per EPA recommendation, this should be MOVES2014b or later. NONROAD was incorporated into MOVES, and MOVES is more up to date. All references to NONROAD should be removed.</p>	Removed methodology as recommended.
4	57		5.2.5				Technical		<p>Point of Clarification: Do the fuels in the NONROAD system accurately represent the biofuel content of Alberta fuels (both gasoline and diesel)? If not, this is a large opportunity for error if the user is not selecting values for gasoline and diesel appropriate for Alberta when calculating CO2 at Tier 4.</p> <p>Recommendation: There should be guidance on avoiding such pitfalls given in this section.</p>	Removed methodology as recommended.
5	57		5.2.5				Technical		<p>Point of Clarification: Does the use of NONROAD not contradict the requirement in section C.11 of the Quantification Methodologies (ver 1.1) to use an oxidation factor of 100%? The NONROAD model uses oxidation factors other than 100% in its function.</p>	Removed methodology as recommended.
6	60	1	5.3.3				Technical		<p>It is debatable that using NONROAD and assuming 100% of HC and NOx emissions are CH4 and N2O provide any better data than using appropriate emission factors for CH4 and N2O.</p> <p>There is a wealth of published literature suggesting that N2O and NOx are poorly correlated in general, or inversely correlated when NOx control technologies are employed (for example Journal of Environmental Protection, 2011, 2, 1095-1100 <a href="https://doi.org/10.4236/jep.2011.28126">https://doi.org/10.4236/jep.2011.28126</a>)</p> <p>Another option would be to generate emission factor model files for N2O and CH4 for NONROAD. The deterioration factors for NOx and THC could be used without much error and the resulting data would be at least as good as using emission factors directly.</p>	Removed methodology as recommended.
7	56	16					Technical		<p>Please provide an exemption for on-site motor vehicle usage using commercial fuel (unmarked) as that fuel is covered by the fuel levy and is excluded from the CCIR obligation.</p>	Refer to Section 5.1 for clarification on the treatment of unmarked fuels under CCIR.