

Comments of the
Semiconductor Industry Association (SIA)
On
Greenhouse Gas Reporting Program:
Addition of Global Warming Potentials
79 Fed. Reg. 44332 (July 31, 2014)

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Submitted by email to: A-and-R-Docket@epa.gov

The Semiconductor Industry Association (SIA), the voice of the U.S. semiconductor industry,¹ appreciates the opportunity to submit comments on EPA’s proposal to add and modify the global warming potentials (GWPs) of certain fluorinated gases.

The semiconductor industry has consistently urged EPA (and other governments around the world) to harmonize reporting requirements and methodologies with international standards. At the international level, the global semiconductor industry, under the auspices of the World Semiconductor Council (WSC), has for many years voluntarily reported on emissions of perfluorinated compounds (PFCs)² in accordance with the voluntary methods supported by the Intergovernmental Panel on Climate Change (IPCC). As of 2012, this voluntary initiative resulted in a 39 percent reduction of emissions in our industry compared with the baseline period and progress on further reductions as part of a new 10-year goal.³

In furtherance of the goal of promoting harmonization with international protocols, SIA generally supports EPA’s proposal to add chemical-specific GWPs for 103 fluorinated greenhouse gases that are drawn from the Fifth Assessment Report (AR5) published by the IPCC in 2013, with the exception of some of the low GWP materials discussed later in this letter.

We disagree, however, with EPA’s proposal to amend Table A–1 of the Greenhouse Gas Reporting Rule to add default GWPs for fluorinated gases and fluorinated heat transfer fluids (HTFs) for which peer-reviewed GWPs are not available. EPA proposes to establish default GWPs based on the average of the chemical-specific GWPs of chemicals that belong to that group and that are either currently on Table A-1 or that will be added to the table under this proposal.

This part of the proposal should be reconsidered. First, it is inconsistent with the practice of the IPCC and therefore diverges from accepted international practice. As a result, U.S. facilities would be subject to a different standard from competitors in the

¹ Additional information on SIA is available at www.semiconductors.org.

² In recognition of this initiative, EPA awarded the WSC one of the first Climate Protection Awards in 1998. See <http://www.epa.gov/cppd/awards/complisstofwinners.html>.

³ See WSC Joint Statement of 2013 at pp. 8-9 (available at: http://www.semiconductorcouncil.org/wsc/uploads/joint_statement_17th_meeting.pdf).

WSC and elsewhere. Second, these default values have not been published in a peer-reviewed scientific journal, which EPA acknowledges “helps to ensure that the data and methods used to evaluate the GWPs are consistent with current scientific good practice and thereby helps to ensure that the resulting GWPs are accurate.” For fluorinated greenhouse gases that do not have GWPs, it is appropriate to continue to report emissions as in kilograms (kg) instead of carbon equivalents. Third, as EPA acknowledges, “adoption of these chemical-specific and default GWPs may automatically apply in some state and local PSD programs,” and therefore incorporating these default GWPs could have permitting implications in some instances. Since GWPs that have not been through this peer review process are more likely to change significantly, we believe it is appropriate to delay adding them to these regulatory programs until more of a consensus is reached on the appropriate values.

Finally, the proposal would regulate greenhouse gases that are not emitted in high quantities and that the EPA acknowledges have extremely low global warming impacts. While these materials are indeed listed in AR5, we do not believe it is appropriate to subject them to various greenhouse gas regulatory programs by adding them to Table A-1. Doing so would result in an increase in the reporting burden on U.S. semiconductor fabs without significantly increasing the accuracy of facility reporting or the Inventory as a whole. To reduce the reporting burden on the U.S. industry, EPA should modify the definition of fluorinated greenhouse gas to exclude those fluorinated compounds with minimal global warming impact.

SIA appreciates EPA’s consideration of our views, and we look forward to continuing to work with EPA in improving the accuracy of greenhouse gas reporting.