

Course 1-1: Handout 1.1.4 Issues Log Examples

ABC Verification Company, Inc.						
Two Issues Logs for Verification of ACME Combustion (2014)						
Reporting Entity: ACME Combustion (ARB ID# 100999)						
Subparts Reported: C						
Year of Emissions Data: 2014						
Lead Verifier: Mary Smith						
#	Date	Description of Issue/Source	Regulation Citation	Potential Impact upon GHG Data	Action Required by Reporting Entity	Resolution
1	4/23/2014	GHG Monitoring Plan (1)	MRR §95105 (2)	Meter and calibration issues may affect report. (3)	Correct error. (4)	Resolved. (5)
2	5/15/2014	Propane heaters (6)	MRR §95115 (7)	Non-conformance (8)	Report emissions from propane as De Minimis.(9)	Reporter used verifier calculations (10)
3	5/15/2014	The reporting entity calculated emissions from RUZ10 boiler burning non-pipeline quality natural gas using the default high heating value of 1,028 Btu/scf for pipeline quality natural gas.	MRR §95115(c) and 40 CFR §98.33(b)	Non-conformance; correctable error.	Provide the regulation citation that allows for the use of a Tier 1 calculation for non-pipeline quality natural gas. Please determine if §95115(c)(4) applies to your facility and revise your emissions data report by 5/30/2014. Please contact ARB staff if you have questions about which Tier to use to report your emissions data.	<u>Resolved on 5/25 via email.</u> Reporting entity revised their emissions calculation to use Tier 3. Calibrations, MW calcs, flow measurements and corrections are all provided in GT40-GHGdata.xlsx spreadsheet. Calculation is in conformance (EDR certified in Cal e-GGRT 5/24).

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1	4/23/2015	GHG Monitoring Plan incomplete.	MRR §95105(c)	Meter location, description, and calibration records not made available. Non-conformance if not provided.	Please email these documents to me before the site visit on May 15, 2015. Failure to demonstrate accuracy may result in possible material misstatement and an adverse verification statement.	<u>Resolved on 5/10 via email. Revised Plan emailed on 5/10 and was found to be complete.</u>
2	5/15/2015	Emissions from propane heaters in Bldg. 54-A not reported.	40 CFR §98.32, and MRR §95115	Non-conformance; correctable error.	Provide invoices from 2013, 2014 and 2015, to include the delivery date and amount of fuel delivered. Report propane emissions in Cal e-GGRT. This error must be fixed, or an adverse emissions data verification statement would be triggered.	Resolved on 5/20 via email. Invoices clearly showed fuel usage for 2014, and were clearly billed starting on the first day of each month. Propane emissions reported as de minimis. Calculation method is reasonable (Tier 1); emissions confirmed to be <3% of total and <20,000 MT CO2e.

3	5/15/2015	The reporting entity calculated emissions from RUZ10 boiler burning non-pipeline quality natural gas using the default high heating value of 1,028 Btu/scf for pipeline quality natural gas.	MRR §95115(c) and 40 CFR §98.33(b)	Non-conformance; correctable error.	Provide the regulation citation that allows for the use of a Tier 1 calculation for non-pipeline quality natural gas. Please determine if §95115(c)(4) applies to your facility and revise your emissions data report by 5/30/2014. Please contact ARB staff if you have questions about which Tier to use to report your emissions data.	<b><u>Resolved on 5/25 via email. Reporting entity revised their emissions calculation to use Tier 3. Calibrations, MW calcs, flow measurements and corrections are all provided in GT40-GHGdata.xlsx spreadsheet. Calculation is in conformance (EDR certified in Cal e-GGRT 5/24).</u></b>
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*[Note: For the "Resolution" column, some verifiers ask the client to provide an explanation of what data was revised directly in the issues log, while other verifiers prefer to control their own document and request responses in a separate document.]*

Text of email that includes the draft issues log as an attachment:

To avoid an adverse emissions data verification statement for not fixing a correctable error, please report those emissions and re-certify your emissions data report by August 1, 2015.