

## Petroleum and Petrochemical Bulletin

### 40 C.F.R. Part 98, Mandatory Greenhouse Gas Reporting Rule in the USA

**Bulletin 10-01  
Rev. 0**

IFIA is a trade association representing companies engaged in the business of inspection and testing, of which many are involved in the inspection and testing of petroleum and its derivatives. In the course of our work companies measure and produce reports on quantities of "petroleum products" imported and exported by "Petroleum Product Suppliers" as defined within the 40 C.F.R. part 98, Mandatory Greenhouse Gas Reporting Rule (the "Reporting Rule").

It is a specific requirement, of the Reporting Rule, that volume measurement and measurement devices meet certain criteria with respect to the application of consensus based standards to procedures, device design/construction and ongoing maintenance and calibration.

As IFIA members understand that their customers will use inspection reports, to meet the Petroleum Product Suppliers obligations under the Reporting Rule, we feel it appropriate to endorse reports with a suitable attestation to assist the customers establish the conformance of the data to the Reporting Rule requirements. The members will apply a uniform statement, derived by the independent inspection companies, to assist both the customer and the EPA and reduce the likelihood of misinterpretation. The statement that will be applied by IFIA members is as follows:

**"All (IFIA member) measurement devices and methods used for quantity and quality determination meet the pertinent requirements of 40 CFR 98.3 et. seq. (Greenhouse Gas Mandatory Reporting Rule)"**

The members feel it most important that there is a common message on this issue. Therefore, as of April 1<sup>st</sup> 2010 IFIA Member companies will apply this statement to import and export cargo reports issued to "Petroleum Product Suppliers".

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#### Revisions/Reaffirmations

Rev. 0 April 2010

Reaffirmed November 2016