



Arbitrary and Insufficient Reasoning for the Reconsideration of EPA's Greenhouse Gas Reporting Program

Environmental Data and Governance Initiative's Comment on the Environmental Protection
Agency (EPA) Proposed Rule: Reconsideration of the Greenhouse Gas Reporting Program
(Docket No. EPA-HQ-OAR-2025-0186)

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The Environmental Data and Governance Initiative (EDGI) is a network of academics, technologists, and non-profit professionals that promotes communities' right to know, evidence-based policy-making, and public interest science. We document, contextualize, and analyze environmental data, information, and governance practices through multidisciplinary and cross-professional collaborative work. EDGI includes more than 100 members in North America residing in 15 U.S. states.

The Environmental Data and Governance Initiative (EDGI) welcomes the opportunity to comment on the Environmental Protection Agency (EPA) proposed rule: Reconsideration of the Greenhouse Gas Reporting Program (Docket No: EPA-HQ-OAR-2025-0186).

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I. Introduction

Since its inception in 2009, the Greenhouse Gas Reporting Program (GHGRP) has provided the Environmental Protection Agency (EPA) and other agencies, industry, and stakeholders with valuable, standardized data on direct greenhouse gas (GHG) emissions from facilities and indirect emissions from fuel suppliers. The GHGRP has produced the most robust national dataset of GHG emissions that exists, which has been essential for developing an understanding of GHG sources and sinks and their influence on climate change. The EPA's proposed amendments to the GHGRP would remove all GHG reporting requirements for 46 of the 47 reporting industries, and would postpone the remaining reporting requirements until 2034.

The Environmental Data and Governance Initiative (EDGI) opposes the proposed amendments to the GHGRP in their entirety and asserts that the EPA has failed to provide sufficient rationale for these proposed amendments. Specifically, the cost-benefit analysis

is arbitrary, insufficient, and erroneous as it excludes any consideration of the benefits of the GHGRP. The proposed amendments would disrupt the ability to track GHG emission data in an efficient, verifiable, and consistent manner, impeding critical work in the public, private, and research spheres. It would also prevent regulators, investors, and communities from making evidence-based decisions with respect to GHGs and emitting industries. Furthermore, removing GHG emissions reporting requirements for high-emitting industries while simultaneously attempting to expand those same industries weakens EPA's ability to meet its Clean Air Act responsibilities and fulfill its mission more broadly.

II. Insufficient and Arbitrary Justification

The EPA's proposed amendments to the GHGRP would eliminate GHG reporting requirements for all source categories under [40 CFR part 98](#) except for the Petroleum and Natural Gas Systems, which would be suspended from reporting requirements until 2034. Additionally, it would remove the reporting requirements from the Natural Gas Distribution segments of the industry.

The EPA's stated justification for the proposed excision of reporting requirements is that the agency does not have a statutory obligation to collect GHG data on industries other than Petroleum and Natural Gas Systems, that the program "imposes significant cost on the regulated community," and that removing these requirements would be consistent with the Paperwork Reduction Act ([90 FR 44595](#)). However, the Paperwork Reduction Act requires agencies to consider the "practical utility" of the information collected, and the EPA has failed to do so in these proposed amendments. Moreover, the EPA acknowledges the proposed rule is based on an interpretation of its authorities that differ from prior rulemakings, but cites its "obligation to take the cost of information collection and reporting into account when taking action" as the driving reason to and repeal the GHGRP ([90 FR 44596](#)). To justify this, the EPA has asserted that the financial burden the GHGRP places on participating facilities is significant without providing any information about the costs relative to industry profits, and it has failed to consider the direct and indirect benefits of the GHGRP, including benefits to reporting facilities and their parent companies. The EPA's analysis from just 18 months ago describes significant benefits of the GHGRP: "Improved facility-specific emissions data will aid local, state, and national policymakers as they evaluate and consider future climate change policy decisions and other policy decisions for criteria pollutants, ambient air quality standards, and toxic air emissions. The benefits of improved reporting of petroleum and natural gas systems GHG emissions to

government also include enhancing existing programs, such as the Natural Gas STAR Program, that provide significant benefits, such as identifying cost-effective technologies and practices to reduce emissions of CH₄ from operations in all of the major industry sectors—production, gathering and processing, transmission, and distribution” ([89 FR 31883](#)).

A. Inappropriate Cost-Benefit Analysis

The Proposed Rule states:

“Continued data collection across all sectors does not provide additional benefits with respect to our statutory obligations relative to these costs. The EPA seeks comment on the costs of GHGRP reporting to industry stakeholders and on whether such costs are commensurate to any relevant benefits” ([90 FR 44599](#)).

In this section we provide evidence that (1) costs of reporting to industry stakeholders are low, and (2) benefits of the GHGRP are high.

1. Reporting costs are insignificant

The EPA asserts that the financial burden of the GHGRP on the regulated community, \$303 million annually, is significant and unjustifiable while failing to contextualize how, relative to the regulated facilities’ yearly profits, the cost of reporting is miniscule. Examining a small sample of the publicly listed companies with NAICS Codes categorized in the proposed rule as “regulated entities” submitting annual GHG reports clearly demonstrates that the cost of such reporting is not a significant draw on resources. [Revenues](#) of just 10 of the [3,300+ regulated parent companies](#) are over \$461 billion.^{1,2} Meanwhile, the estimated total reporting cost of \$303 million across these 3,300+ companies averages to only \$100,765 per company. Directly comparing these costs to revenues for representative large, medium, and smaller firms, this \$100,765 cost accounts for only 0.0001%, 0.0006%, and 0.003% of revenues, respectively. As seen in Table 1 below, regardless of company size, the per-company cost burden never reaches more than 0.005% of revenues, further demonstrating the insignificance of the costs associated with the GHGRP. This is consistent with EPA’s own analysis of the financial burdens of the reporting program (see [89 FR 42212](#)).

¹ SEC, “Search Filings,” U.S. Securities and Exchange Commission, accessed November 3, 2025, <https://www.sec.gov/search-filings>.

²U.S. EPA, “Data Sets,” EPA.gov, accessed November 3, 2025, <https://www.epa.gov/ghgreporting/data-sets>.

Table 1: Ten GHGRP-Reporting U.S. Corporations' Revenues, GHGRP Reporting Cost as Percentage of Revenue, and NAICS Code.

I.R.S. Employee ID Number	Company's Industry Classification	Company's Revenues in 2024	Average GHGRP Cost as a % of Revenues
94-0890210	Petroleum Refineries	\$193 Billion	0.0001%
27-1284632	Petroleum Refineries	\$140 Billion	0.0001%
01-0562944	Petroleum Refineries	\$55 Billion	0.0002%
13-1860817	Integrated iron and steel mills	\$31 Billion	0.0003%
25-1897152	Integrated iron and steel mills	\$16 Billion	0.0006%
81-1789115	Primary aluminum production facilities	\$12 Billion	0.0008%
04-3072771	Crude Petroleum Extraction	\$5 Billion	0.0018%
13-4004153	Underground coal mining	\$4 Billion	0.0024%
13-4922640	Electric power generation, fossil fuel	\$3 Billion	0.0034%
75-2520779	Cement manufacturing	\$2 Billion	0.0045%

Source: [US Securities and Exchange Commission](#)

2. Economic benefits of the GHGRP for companies

In the proposed rule, the EPA did not consider the various economic benefits that the GHGRP brings to regulated entities. For example, reporting for the GHGRP is a prerequisite for facilities to claim the [carbon sequestration tax credit](#) (45Q).³ [The IRS requires facilities claiming this credit to meet GHGRP subpart RR requirements](#),⁴ which necessitates an EPA-approved monitoring, reporting, and verification (MRV) plan and for companies to

³ Congressional Research Service, "The Section 45Q Tax Credit for Carbon Sequestration | Congress.Gov | Library of Congress," Congress.gov, accessed November 3, 2025, <https://www.congress.gov/crs-product/IF11455>.

⁴ Mariam Al-Shamma, "Why EPA's GHG Reporting Program Matters for the 45Q Carbon Sequestration Tax Credit | Bipartisan Policy Center," Bipartisan Policy Center, October 15, 2025, <https://bipartisanpolicy.org/blog/why-epas-ghg-reporting-program-matters-for-the-45q-carbon-sequestration-tax-credit/>.

report GHG emissions annually. While the EPA acknowledges this use of the data ([90 FR 44603](#)), the Agency's cost-benefit analysis failed to consider the tax benefits associated with this: [Participating facilities receive a tax credit](#) worth up to \$180 per ton of captured and sequestered carbon dioxide.⁵ If the GHGRP is reconsidered as the EPA suggests, these companies will need to rely on their own MRV plans and, without the EPA's approval, they may be ineligible for the tax credits or face higher audit and financial burdens to claim it. Furthermore, investors may be disincentivized from financing projects if it is harder for facilities to confirm the quality of their MRV plans. EPA overlooks a key issue by failing to account for this in its financial justification for the proposed rule.

Similarly, GHGRP data is vital for companies qualifying for the [Clean Hydrogen Production Tax Credit \(45V\)](#) for hydrogen projects that use natural gas with carbon capture technology.⁶ 45V is a tax credit with tiered incentives, and access to the highest credit tiers relies on robust emissions data that many projects use the GHGRP to obtain. As a result, removing reporting requirements under the GHGRP as the EPA proposes would undermine the reliability of emissions reporting, along with hydrogen projects' abilities to access the financial incentives of the 45V credit. Given that 45V provides a tax credit of up to \$3.00 per kilogram of clean hydrogen, the EPA once again disregards a significant economic factor in its financial analysis of the GHGRP.

3. Economic benefits of the GHGRP to the public

The EPA's proposed rule states: "Because this is a reporting rule and there are no requirements to reduce emissions, there are no expected emission changes or monetized changes in benefits from emissions," ([90 FR 44603](#)). However, this claim ignores evidence that the GHGRP has in fact been linked to reductions in emissions.

A [study from the National Bureau of Economic Research](#) (NBER),⁷ finds that the GHGRP itself is associated with significant reductions in CO₂ emissions from electric power plants. To arrive at this conclusion, the authors of the study examined plant-level CO₂ emission

⁵ Carbon Capture Coalition, "What Is the Section 45Q Carbon Capture Tax Credit?," Carbon Capture Coalition, August 2025, <https://carboncapturecoalition.org/wp-content/uploads/2023/11/45Q-primer-Carbon-Capture-Coalition.pdf>.

⁶ U.S. DOE, "Clean Hydrogen Production Tax Credit (45V) Resources," Energy.gov, January 3, 2025, <https://www.energy.gov/articles/clean-hydrogen-production-tax-credit-45v-resources>.

⁷ Lavender Yang, Nicholas Z. Muller, and Pierre Jinghong Liang, "The Real Effects of Mandatory CSR Disclosure on Emissions: Evidence from the Greenhouse Gas Reporting Program," *NBER Working Paper* No. 28984, July 2021, https://www.nber.org/system/files/working_papers/w28984/w28984.pdf.

data from power plants before and after the GHGRP program was enacted in 2010, controlling for several confounders. Their results revealed:

- Plants whose emissions were disclosed through GHGRP reduced their CO₂ emission rates by 7%
- The emission reduction was larger (10%) for plants owned by publicly-traded firms
- The emission reduction was even larger (11%) for plant owner membership in the S&P 500

Interestingly, the authors highlighted that the GHG emission data was publicly available before the GHGRP, but the GHGRP made the data much more accessible, standardized, and comparable. This implies that the reductions are not merely a function of data collection and availability, but in the GHGRP's function of "raising the profile of emission information to the public," (Yang et al, 2021, p. 2).

Further, the study finds evidence that owners of multiple facilities shift CO₂ emissions from facilities required to report to GHGRP to those that are not required to report to GHGRP ("leakage"). While this attenuates *net* emission reductions, local implications remain, and the authors ultimately concludes that their paper, "makes the case that standardized, mandatory Corporate Social Responsibility reporting (without thresholds) has the potential to induce large-scale changes in firm behavior that may have appreciable social benefits," (Yang et al, 2021, p. 28).

Building off the EPA's flawed analysis of the emissions reductions resulting from the GHGRP, the Agency's cost-benefit analysis of the program also ignores the indirect benefits of addressing climate change via reduced emissions. As Yang et al (2021) found, the GHGRP has resulted in lower GHG emissions, which supports climate change mitigation. The climate crisis is the most costly issue the United States faces today, with [experts estimating the total cost of weather and climate disasters in the U.S. from 1980-2024 to be over \\$2.9 trillion](#).⁸ Data from the GHGRP [helps regulated industries, as well as communities](#),⁹ identify sources of greenhouse gas emissions and opportunities for emissions reductions. By helping identify the industries most responsible for greenhouse gas emissions, this

⁸ NOAA National Centers for Environmental Information (NCEI), "Billion-Dollar Weather and Climate Disasters," Billion-Dollar Weather and Climate Disasters | National Centers for Environmental Information (NCEI), accessed November 3, 2025, <https://www.ncei.noaa.gov/access/billions/#:~:text=Menu,Overview,308%20per%20year>.

⁹ U.S. EPA, "GHGRP and the U.S. Inventory of Greenhouse Gas Emissions and Sinks," EPA, accessed November 3, 2025, <https://www.epa.gov/ghgreporting/ghgrp-and-us-inventory-greenhouse-gas-emissions-and-sinks>.

information is critical for informing climate-smart policy and averting the ever-increasing cost of climate change.

Carbon dioxide emission reductions translate into important public health benefits. Globally, CO₂ emissions contribute to climate change, making reductions in emissions important in averting the health and economic costs associated with climate change. Increases in CO₂ emissions have been linked to increases in health care expenditures, leading researchers who uncovered this finding to conclude, “[there can be tangible health related benefits associated with policies that aim to reduce carbon emissions across U.S. states.](#)”¹⁰ Research has also [linked carbon dioxide emissions to premature mortality globally](#) as well as [locally, finding that “reducing locally emitted CO2 may reduce local air pollution mortality.”](#)^{11,12} This contradicts EPA’s claim in the proposed rule that the action “does not concern human health” ([90 FR 44606](#)).

The GHGRP is associated with reductions in CO₂ emissions, and *also* provides data on CO₂ emissions. This is important information with high-stakes. As noted above, Jacobson (2008; 2010) links CO₂ emissions with air pollution mortality globally and locally, and Apergis et al. (2018) associate CO₂ emissions with increased health care expenditures. As such, the data provided in the GHGRP implicates human lives and health care costs, and provides communities and policy makers with important information.

Greenhouse gas emissions data is of such broad interest that, according to official analytics data of the United States, two of the top 10 most downloaded items from the EPA’s website for each of the past several weeks have been GHG Emission Factor Hub calculators.¹³

¹⁰ Nicholas Apergis et al., “U.S. State-Level Carbon Dioxide Emissions: Does It Affect Health Care Expenditure?,” *Renewable and Sustainable Energy Reviews* 91 (August 2018): 521–30, <https://doi.org/10.1016/j.rser.2018.03.035>.

¹¹ Mark Z. Jacobson, “On the Causal Link between Carbon Dioxide and Air Pollution Mortality,” *Geophysical Research Letters* 35, no. 3 (February 12, 2008), <https://doi.org/10.1029/2007gl031101>.

¹² Mark Z. Jacobson, “Enhancement of Local Air Pollution by Urban Co2Domes,” *Environmental Science & Technology* 44, no. 7 (March 10, 2010): 2497–2502, <https://doi.org/10.1021/es903018m>. Available at <https://web.stanford.edu/group/efmh/jacobson/Articles/V/es903018m.pdf>; accessed November 3, 2025.

¹³ GSA, “Environmental Protection Agency Website and Apps Analytics,” GSA, accessed November 3, 2025, <https://analytics.usa.gov/environmental-protection-agency>.

B. Questionable Legal Basis

The EPA claims its reconsideration of “significant elements of the GHGRP” is a response to two of President Trump’s Executive Orders. Specifically, the proposed rule states ([90 FR 44594](#)):

“President Trump signed Executive Order (E.O.) 14154 titled, “Unleashing American Energy,” on January 20, 2025, and E.O. 14192 titled, “Unleashing Prosperity Through Deregulation,” on January 31, 2025. In response to these E.O.s, the EPA is reconsidering significant elements of the GHGRP.”

However, the legality of EO 14154 is currently being widely challenged throughout the court system. For example, according to Just Security’s litigation tracker, [E.O. 14154 is implicated in at least 16](#) ongoing court cases.¹⁴ In one such case, *The Center for Biological Diversity v. Department of Interior. Et al (D.D.C.)*, the Plaintiffs filed a FOIA request related to E.O. 14154, for records documenting the EPA’s (as well as Departments of Interior, Commerce, and Agriculture) implementation of this EO. In the court case, the Plaintiffs are seeking a declaratory judgement that these government agencies violated FOIA, injunctions, and court orders mandating the Defendant produce the requested records. The case is ongoing.

It is reasonable to wonder if the outcomes of these court cases may have implications for the enactment of this proposed rule that cannot yet be foreseen—perhaps inviting more legal challenges. Drafting regulations to respond to EO 14154, while EO 14154 is still being widely contested in court, may prove risky, premature, and costly.

C. Benefits of Standardized GHG Emissions Data

The GHGRP serves as a foundational data source for many federal and state-level policy initiatives. The program provides the most robust data about GHG emissions in the United States, and the collected facility-level emissions data only available from this program are used to support other efforts such as the Landfill Methane Outreach Program (LMOP) and the U.S. Inventory of GHG Emissions. On the state level, programs such as the California Air Resources Board’s (CARB’s) GHG Inventory Program note that [“the inventory must still rely](#)

¹⁴ Just Security, “Litigation Tracker: Legal Challenges to Trump Administration Actions,” Just Security, October 31, 2025, <https://www.justsecurity.org/107087/tracker-litigation-legal-challenges-trump-administration/>.

[on additional sources of state and national level data.](#)¹⁵ The Massachusetts’s Department of Environmental Protection (MassDEP) is another example, with reports stating that [“MassDEP was able to rely on EPA’s Greenhouse Gas Reporting Program \(GHGRP\) and Facility Level Information on GreenHouse Gases Tool \(FLIGHT\)”](#)¹⁶ to conduct further environmental analysis. By creating a national standard for this data, states can collaborate or compare their emissions to the rest of the nation.

While the EPA asserts that it “would have ample information possible from these other sources to carry out our statutory obligations” and that reliances on GHGRP data for other stakeholders “could be addressed through collection from other sources” ([90 FR 44597](#)), the EPA’s 2016 Information Collection Request for the GHGRP directly contradicts this assertion. Importantly, the document highlights that [“While some programs collect similar information on GHG emissions, the Agency has determined that the GHGRP supplements and complements, rather than duplicates, existing programs’ data...”](#)¹⁷ In addition to the EPA’s own stance that other federal reporting programs do not and cannot fill the gaps created by weakening the GHGRP, it would also be far more costly and far less efficient to rely on reporting at state and local levels as the Agency suggests in the proposed rule ([90 FR 44597](#)).

Within the proposed rule, the EPA fails to take a coherent position on the viability and reliability of voluntary reporting of GHG emissions. Initially, the Agency suggests that federal, state, and local agencies, or Tribes that rely on federal GHGRP data and tools could use “voluntary consensus standards” that it purports to be “more efficient and potentially more accurate”, though the Agency does not provide evidence to support this suggestion ([90 FR 44595](#)). Later in the proposed rule, the EPA reverses its position and claims that

¹⁵ California Air Resources Board, “Frequently Asked Questions: Greenhouse Gas Emissions Inventory,” California Air Resources Board, accessed November 3, 2025, <https://ww2.arb.ca.gov/resources/documents/frequently-asked-questions-greenhouse-gas-emission-s-inventory-0>.

¹⁶ Massachusetts Department of Environmental Conservation, “Response to Comments on the Statewide Greenhouse Gas Emissions Level: 1990 Baseline Update, and Addendum and 2nd Addendum to the Update,” Massachusetts Department of Environmental Conservation, December 2022, <https://www.mass.gov/doc/response-to-comments-on-the-statewide-greenhouse-gas-emissions-level-1990-baseline-update-and-addendum-and-2nd-addendum-to-the-update-december-2022/download>

¹⁷ U.S. EPA, “Supporting Statement Part A: Information Collection Request for the Greenhouse Gas Reporting Program,” U.S. EPA, May 2016, <https://www.regulations.gov/document/EPA-HQ-OAR-2019-0027-0002>.

voluntary reporting could result in “incomplete or piecemeal reports, and the verification and accuracy of the data submitted would be limited” ([90 FR 44598](#)). While [some states maintain their own GHG reporting programs](#),¹⁸ these states [rely on federal GHGRP data to verify their own](#).¹⁹ EPA is aware of this consequence of the proposed amendments to the GHGRP, and later in the proposed rule, it suggests that states could gather their own GHG data for state programs ([90 FR 44598](#)). This disregards EPA’s role and responsibility as an expert federal agency, and fails to consider how this is likely to lead to regulatory competition and incongruent economic and environmental burdens by de-incentivizing reporting and regulation. One need look no further than the [history of the EPA’s own Clean Air Act](#) for an example of the necessity of national standards to ensure coordinated, comprehensive, and standardized reporting and environmental regulation.²⁰

III. GHG Emissions Data in Context

In addition to the necessary role of the GHGRP in providing reliable national GHG emissions data, the GHGRP also educates the public about emission rates, which facilitates data-driven, informed decision making and empirical analysis. Communities and policymakers rely on this information to mitigate risks associated with GHG emissions, such as the ones noted above.

A. Analysis of Top US GHG Emitters and Facility Compliance

GHGRP data is also used in tandem with other EPA datasets to assess air quality. For example, GHGRP data has been frequently [included in the EPA’s annual Toxic Release Inventory \(TRI\) national analyses](#).²¹ As the EPA [describes](#) in a comparison of the TRI and GHGRP databases, “the top air emitting sectors in TRI are similar, but not identical to, the top emitting sectors covered by the GHGRP. Analyzing toxic chemical releases reported to

¹⁸ California Air Resources Board, “California’s 2000-2022 AB 32 Greenhouse Gas Emissions Inventory (2024 Edition),” California Air Resources Board, September 20, 2024.

¹⁹ Ida Balakrishna and Denise Cathey, “US GHG Data Threat Prompts State Actions,” Latest Market News, June 3, 2025, <https://www.argusmedia.com/es/news-and-insights/latest-market-news/2695190-us-ghg-data-threat-prompts-state-actions>.

²⁰ U.S. EPA, “EPA History: Clean Air Act of 1970/1977,” EPA, accessed November 3, 2025, <https://www.epa.gov/history/epa-history-clean-air-act-19701977>.

²¹ U.S. EPA “2022 TRI National Analysis,” EPA.gov, March 2024, https://www.epa.gov/system/files/documents/2024-03/complete_2022_tri_national_analysis.pdf.

TRI and GHG emissions reported to the GHGRP together creates a more complete picture of emissions at the facility and sector levels.”²²

One key use case of the GHGRP is identifying the top contributors to GHG emissions in the US. This is critical for understanding the current landscape and the first step in holding these polluters accountable. Using [data collected from the GHGRP](#), we are able to identify the facilities that emitted the most CO₂ across industries for 2010-2023. Our analysis splits into two groups: facilities that produce direct emissions and the suppliers.

Using the facility identification numbers of these facilities and cross-referencing them with a mirror of EPA’s Enforcement and Compliance History Online (ECHO) database, we were able to [analyze the compliance track record](#) of the GHG emitting facilities.²³ For the top 25 direct emitting facilities, 28% have been out of compliance with the Clean Air Act for every quarter of the last three years. Another 44% have been out of compliance for at least one quarter during the same time period.

Using the same method, we cross-referenced the facility identification numbers of the 25 highest emitting supplier facilities with their ECHO records to [analyze their compliance rate](#). For the top 25 supplier facilities, once again 28% have been out of compliance with the Clean Air Act for every quarter of the last three years. Another 64% have been out of compliance for at least one quarter during the same time period.

Table 2. Top 25 Direct Emitters of Greenhouse Gases (2010-2023)

Facility Name	Total Direct Emissions (mtCO ₂ e)
James H Miller Jr	277,098,434
Scherer	223,191,764
Monroe	209,916,078
Colstrip	185,277,699
Bowen	176,025,133

²² U.S. EPA “Comparing TRI and Greenhouse Gas Reporting,” EPA, 2011, https://19january2017snapshot.epa.gov/sites/production/files/documents/2011_tri_na_overview_greenhouse_gas.pdf.

²³ EDGI, “ECHO-Cross-Programs,” 2025. Accessed November 3, 2025. <https://colab.research.google.com/github/edgi-govdata-archiving/ECHO-Cross-Program/blob/main/ECHO-Cross-Programs.ipynb#scrollTo=zJMvn6uWaRLR>.

Jim Bridger	171,176,877
John E Amos	166,802,418
Cumberland	159,305,114
Harrison Power Station	156,428,666
Sherburne County	155,766,985
Ghent	153,772,552
Navajo Generating Station	148,578,729
Sam Seymour	145,951,619
Cross	142,762,998
Crystal River Power Plant	139,644,023
US Steel Corp - Gary Works	139,012,575
Four Corners Steam Electric Station	135,392,255
Limestone	134,998,298
EXXONMOBIL Bt Site	131,198,644
Keystone	128,039,917
Cardinal	127,499,620
Springerville Generating Station	127,291,273
Petersburg	127,169,888
Baldwin Energy Complex	124,923,643
Conemaugh	124,473,167

Data Source: [EPA](#); analysis: [EDGI](#)

Table 3. Top 25 Supplier Emitters of Greenhouse Gases (2010-2023)

Facility Name	Total Direct Emissions (mtCO ₂ e)
Garyville Refinery	1,017,227,236
MOTIVA ENTERPRISES LLC	999,166,995
Valero Marketing and Supply Company	848,338,558
EXXONMOBIL BATON ROUGE REFINERY AND CHEMICAL PLANT	846,404,528
EXXONMOBIL Bt Site	783,110,857
Galveston Bay Refinery	689,141,498

BP Whiting Business Unit	655,454,811
Exxonmobil Beaumont Refinery	598,551,068
PREMCOR REFINING GROUP INCORPORATED PORTARTHUR REFINERY	543,681,885
WRB Refining LP Wood River Refinery	536,852,820
Chevron MM Pascagoula	493,529,086
Chevron MM El Segundo	458,603,067
Flint Hills Resources Corpus Christi - East Refinery and West Refinery	448,025,844
CITGO PETROLEUM CORP - LAKE CHARLES MANUFACTURING COMPLEX	447,101,746
Catlettsburg Refining, LLC	446,587,580
SWEENEY REFINERY	444,939,786
EXXONMOBIL OIL JOLIET REFINERY	426,358,105
Tesoro Refining & Marketing - Carson Refinery	396,072,609
Flint Hills Resources Pine Bend Refinery	391,981,797
Phillips 66 BAYWAY REFINERY	389,785,666
Chevron MM Richmond	379,178,500
Phillips 66 Ponca City Refinery	376,842,050
PHILLIPS 66 CO - LAKE CHARLES REFINERY	366,253,933
Norco Manufacturing Complex	357,465,258
Mont Belvieu Fractionator	353,725,189

Data Source: [EPA](#); analysis: [EDGI](#)

B. Removal of Reporting Requirements During Industry Expansion

The proposed amendments to the GHGRP must be examined in the broader context of this administration's approach to energy production and climate change. Following executive orders such as EO 14154 "Unleashing American Energy" and EO 14261 "Reinvigorating America's Beautiful Clean Coal Industry and Amending Executive Order 14241," the Trump administration has been pushing for "Energy Dominance," increasing American domestic energy production including through oil, natural gas, coal, and other fossil fuels. Some industries that have received particular attention, such as coking and carbon capture and sequestration, have the potential for high GHG emissions, particularly through "leakage."

Despite the administration's facilitation of industry expansion for these industries, the EPA is proposing to remove their GHG reporting requirements ([90 FR 44598](#)). Due to the high likelihood of GHG emissions from existing and future facilities, we oppose the removal of source categories related to carbon capture and sequestration ([90 FR 44603](#)). Removing GHG emissions reporting requirements for high-emitting industries while simultaneously attempting to expand those same industries weakens EPA's ability to meet its Clean Air Act responsibilities and fulfill its mission more broadly.

IV. Conclusion

The EPA's proposed amendments to the Greenhouse Gas Reporting Program rely on arbitrary and capricious reasoning, including an insufficient and inaccurate cost-benefit analysis of the program. The Agency asserts that the cost to facilities of participating in the GHGRP is significant without contextualizing the dollar amount of reporting against the facilities' annual revenues, which highlight the miniscule burden of emissions reporting. Furthermore, the Agency's economic analysis fails to account for the many direct and indirect economic benefits of the GHGRP, including public health benefits that result from reducing emissions and the program's impact on lessening the ever-increasing costs of addressing climate change.

As a result, the Environmental Data and Governance Initiative opposes the Environmental Protection Agency's proposed amendments to the Greenhouse Gas Reporting Program in their entirety.