

CHAPTER 15. EMISSION ANALYSIS

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CHAPTER 15. EMISSION ANALYSIS

15.1 INTRODUCTION

This chapter describes potential changes to emissions of carbon dioxide (CO₂) and three air pollutants that may result from new and amended energy conservation standards for automatic commercial ice makers. The impacts on air emissions are largely driven by changes in power plant types and quantities of electricity generated under each of the considered standard levels. Changes in electricity generation are described in the utility impact analysis in chapter 13 of this preliminary technical support document.

15.2 AIR EMISSIONS DESCRIPTIONS AND REGULATION

This analysis will consider three pollutants: sulfur dioxide (SO₂), nitrogen oxides (NO_x), and mercury (Hg). An air pollutant is any substance in the air that can cause harm to humans or the environment. Pollutants may be natural or man-made (*i.e.*, anthropogenic) and may take the form of solid particles (*i.e.*, particulates or particulate matter (PM)), liquid droplets, or gases.^a The U.S. Department of Energy's (DOE's) analysis also considers CO₂.

Sulfur Dioxide. Sulfur dioxide, or SO₂, belongs to the family of sulfur oxide gases (SO_x). These gases dissolve easily in water. Sulfur is prevalent in all raw materials, including crude oil, coal, and ore that contains common metals like aluminum, copper, zinc, lead, and iron. SO_x gases are formed when fuel containing sulfur, such as coal and oil, is burned, and when gasoline is extracted from oil, or metals are extracted from ore. SO₂ dissolves in water vapor to form acid, and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and their environment.¹

Nitrogen Oxides. Nitrogen oxides, or NO_x, is the generic term for a group of highly reactive gases, all of which contain nitrogen and oxygen in varying amounts. Many of the nitrogen oxides are colorless and odorless. However, one common pollutant, nitrogen dioxide (NO₂), along with particles in the air can often be seen as a reddish-brown layer over many urban areas. NO₂ is the specific form of NO_x reported in this document. NO_x is one of the main ingredients involved in the formation of ground-level ozone, which can trigger serious respiratory problems. It can contribute to the formation of acid rain, and can impair visibility in areas such as national parks. NO_x also contributes to the formation of fine particles that can impair human health.¹

Nitrogen oxides form when fossil fuel is burned at high temperatures, as in a combustion process. The primary man-made sources of NO_x are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fossil fuels. NO_x can also be formed naturally. Electric utilities account for about 22 percent of NO_x emissions in the United States.²

^a More information on air pollution characteristics and regulations is available on the U.S. Environment Protection Agent (EPA)'s website at www.epa.gov.

Mercury. Coal-fired power plants emit mercury, or Hg, found in coal during the burning process. While coal-fired power plants are the largest remaining source of human-generated Hg emissions in the United States, they contribute very little to the global Hg pool or to contamination of U.S. waters.¹ U.S. coal-fired power plants emit Hg in three different forms: oxidized Hg (likely to deposit within the United States); elemental Hg, which can travel thousands of miles before depositing to land and water; and Hg that is in particulate form. Atmospheric Hg is then deposited on land, lakes, rivers, and estuaries through rain, snow, and dry deposition. Once there, it can transform into methylmercury and accumulate in fish tissue through bioaccumulation.

Americans are exposed to methylmercury primarily by eating contaminated fish. Because the developing fetus is the most sensitive to the toxic effects of methylmercury, women of childbearing age are regarded as the population of greatest concern. Children exposed to methylmercury before birth may be at increased risk of poor performance on neurobehavioral tasks, such as those measuring attention, fine motor function, language skills, visual-spatial abilities, and verbal memory.³

Carbon Dioxide. Carbon dioxide, or CO₂, is not a criteria pollutant (see below), but it is of interest because of its classification as a greenhouse gas (GHG). GHGs trap the sun's radiation inside the Earth's atmosphere and either occur naturally in the atmosphere or result from human activities. Naturally occurring GHGs include water vapor, CO₂, methane (CH₄), nitrous oxide (N₂O), and ozone (O₃). Human activities, however, add to the levels of most of these naturally occurring gases. For example, CO₂ is emitted to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), wood, and wood products are burned. In 2007, over 90 percent of anthropogenic (*i.e.*, human-made) CO₂ emissions resulted from burning fossil fuels.⁴

Concentrations of CO₂ in the atmosphere are naturally regulated by numerous processes, collectively known as the "carbon cycle." The movement of carbon between the atmosphere and the land and oceans is dominated by natural processes, such as plant photosynthesis. While these natural processes can absorb some of the anthropogenic CO₂ emissions produced each year, billions of metric tons are added to the atmosphere annually. In 2007, the United States' CO₂ emissions from electricity generation accounted for 39 percent of total U.S. GHG emissions.⁴

Particulate Matter. Particulate matter, or PM, also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (*e.g.*, nitrates and sulfates), organic chemicals, metals, and soil or dust particles.

PM impacts are of concern due to human exposures that can impact health. Particle pollution—especially fine particles—contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Numerous scientific studies have linked particle pollution exposure to a variety of problems, including: increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

DOE acknowledges that PM exposure can impact human health. Power plant emissions can have either direct or indirect impacts on PM. A portion of the pollutants emitted by a power plant are in the form of particulates as they leave the smoke stack. These are direct, or primary, PM emissions. However, the great majority of PM emissions associated with power plants are in the form of secondary sulfates, which are produced at a significant distance from power plants by complex atmospheric chemical reactions that often involve the gaseous (non-particulate) emissions of power plants, mainly SO₂ and NO_x. The quantity of the secondary sulfates produced is determined by a very complex set of factors, including the atmospheric quantities of SO₂ and NO_x, and other atmospheric constituents and conditions. Because these highly complex chemical reactions produce PM comprised of different constituents from different sources, the U.S. Environmental Protection Agency (EPA) does not distinguish direct PM emissions from power plants from the secondary sulfate particulates in its ambient air quality requirements, PM monitoring of ambient air quality, or PM emissions inventories. For these reasons, it is not currently possible to determine how the amended standard impacts either direct or indirect PM emissions. Therefore, DOE is not planning to assess the impact of these standards on PM emissions. Further, as described below, it is uncertain whether efficiency standards will result in a net decrease in power plant emissions of SO₂, and of NO_x in many states, because those pollutants are now largely regulated by cap-and-trade systems.

Air Quality Regulation. The Clean Air Act Amendments of 1990 list 188 toxic air pollutants that EPA is required to control.⁶ EPA has set national air quality standards for six common pollutants (also referred to as “criteria” pollutants), two of which are SO₂ and NO_x. Also, the Clean Air Act Amendments of 1990 gave EPA the authority to control acidification and to require operators of electric power plants to reduce emissions of SO₂ and NO_x. Title IV of the 1990 amendments established a cap-and-trade program for SO₂, in all 50 states and the District of Columbia, intended to help control acid rain.⁶ This cap-and-trade program serves as a model for more recent programs with similar features.

In 2005, EPA issued the Clean Air Interstate Rule (CAIR) under sections 110 and 111 of the Clean Air Act (40 CFR Parts 51, 96, and 97).^b 70 FR 25162–25405 (May 12, 2005). CAIR limited emissions from 28 eastern states and D.C. by capping emissions and creating an allowance-based trading program. Although, CAIR was remanded to EPA by the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit), (see *North Carolina v. EPA*, 550 F.3d 1176 (D.C. Cir. 2008)) it remained in effect temporarily, consistent with the D.C. Circuit’s earlier opinion in *North Carolina v. EPA*, 531 F.3d 896 (D.C. Cir. 2008).

On July 6, 2010, EPA issued the Transport Rule proposal, a replacement for CAIR, 75 FR 45210 (Aug. 2, 2010). On July 6, 2011, EPA promulgated the final Transport Rule, entitled “Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals,” but commonly referred to as the Cross-State Air Pollution Rule or the Transport Rule. 76 FR 48208 (Aug. 8, 2011).

With respect to Hg emissions, in 2005, EPA issued the final rule entitled “Standards of Performance for New and Existing Stationary Sources: Electric Steam Generating Units,” under

^b See www.epa.gov/cleanairinterstaterule/.

sections 110 and 111 of the Clean Air Act (40 CFR Parts 60, 63, 72, and 75).⁸ This rule, called the Clean Air Mercury Rule (CAMR), was closely related to the CAIR and established standards of performance for Hg emissions from new and existing coal-fired electric utility steam generating units. The CAMR regulated Hg emissions from coal-fired power plants. On February 8, 2008, the U.S. Court of Appeals for the D.C. Circuit issued its decision in *State of New Jersey, et al. v. Environmental Protection Agency*,^c in which the Court, among other actions, vacated the CAMR.

15.3 GLOBAL CLIMATE CHANGE

Climate change has evolved into a matter of global concern because it is expected to have widespread, adverse effects on natural resources and systems. A growing body of evidence points to anthropogenic sources of GHGs (*e.g.*, CO₂), as major contributors to climate change. Because this rule, if finalized, will likely decrease CO₂ emission rates from the fossil fuel sector in the United States, DOE here examines the impacts and causes of climate change and then the potential impact of the rule on CO₂ emissions and global warming.

Impacts of Climate Change on the Environment. Climate is usually defined as the average weather, over a period ranging from months to many years. Climate change refers to a change in the state of the climate, which is identifiable through changes in the mean and/or the variability of its properties (*e.g.*, temperature or precipitation) over an extended period, typically decades or longer.

The World Meteorological Organization and United Nations Environment Programme (UNEP) established the Intergovernmental Panel on Climate Change (IPCC) to provide an objective source of information about climate change. According to the IPCC Fourth Assessment Report (IPCC Report), published in 2007, climate change is consistent with observed changes to the world's natural systems; the IPCC expects these changes to continue.⁹

Changes that are consistent with warming include warming of the world's oceans to a depth of 3,000 meters; global average sea level rise at an average rate of 1.8 mm per year from 1961 to 2003; loss of annual average Arctic sea ice at a rate of 2.7 percent per decade, changes in wind patterns that affect extra-tropical storm tracks and temperature patterns, increases in intense precipitation in some parts of the world, as well as increased drought and more frequent heat waves in many locations worldwide, and numerous ecological changes.⁹

Looking forward, the IPCC describes continued global warming of about 0.2 °C per decade for the next two decades under a wide range of emission scenarios for CO₂, other GHGs, and aerosols. After that period, the rate of increase is less certain. The IPCC Report describes increases in average global temperatures of about 1.1 °C to 6.4 °C at the end of the century relative to today. These increases vary depending on the model and emissions scenarios.⁹

The IPCC Report describes incremental impacts associated with the rise in temperature. At ranges of incremental increases to the global average temperature, IPCC reports, with either high or very high confidence, that there is likely to be an increasing degree of impacts such as

^c 517 F.3d 574, 583 (D.C. Cir. 2008).

coral reef bleaching, loss of wildlife habitat, loss to specific ecosystems, and negative yield impacts for major cereal crops in the tropics, but also projects that there likely will be some beneficial impacts on crop yields in temperate regions.

Causes of Climate Change. The IPCC Report states that the world has warmed by about 0.74 °C in the last 100 years. The IPCC Report finds that most of the temperature increase since the mid-20th century is very likely due to the increase in anthropogenic concentrations of CO₂ and other long-lived GHGs, such as methane and NO_x in the atmosphere, rather than from natural causes.

Increasing the CO₂ concentration partially blocks the earth's re-radiation of captured solar energy in the infrared band, inhibits the radiant cooling of the earth, and thereby alters the energy balance of the planet, which gradually increases its average temperature. The IPCC Report estimates that currently, CO₂ makes up about 77 percent of the total CO₂-equivalent^d global warming potential in GHGs emitted from human activities, with the vast majority (74 percent) of the CO₂ attributable to fossil fuel use.¹⁰ For the future, the IPCC Report describes a wide range of GHG emissions scenarios, but under each scenario CO₂ would continue to comprise above 70 percent of the total global warming potential.¹⁰

Stabilization of CO₂ Concentrations. Unlike many traditional air pollutants, CO₂ mixes thoroughly in the entire atmosphere and is long-lived. The residence time of CO₂ in the atmosphere is long compared to the emission processes. Therefore, the global cumulative emissions of CO₂ over long periods determine CO₂ concentrations because it takes hundreds of years for natural processes to remove the CO₂. Globally, 49 billion metric tons of CO₂—equivalent of anthropogenic (man-made) GHGs are emitted every year.^e Of this annual total, fossil fuels contribute about 29 billion metric tons of CO₂.¹¹

Researchers have focused on considering atmospheric CO₂ concentrations that likely will result in some level of global climate stabilization, and the emission rates associated with achieving the “stabilizing” concentrations by particular dates. They associate these stabilized CO₂ concentrations with temperature increases that plateau in a defined range. For example, at the low end, the IPCC Report scenarios target CO₂ stabilized concentrations range between 350 ppm and 400 ppm (essentially today's value)—because of climate inertia, concentrations in this low-end range would still result in temperatures projected to increase 2.0 °C to 2.4 °C above pre-industrial levels^f (about 1.3 °C to 1.7 °C above today's levels). To achieve concentrations between 350 ppm to 400 ppm, the IPCC scenarios present that there would have to be a rapid downward trend in total annual global emissions of GHGs to levels that are 50 to 85 percent below today's annual emission rates by no later than 2050. Since it is assumed that there would

^d GHGs differ in their warming influence (radiative forcing) on a global climate system due to their different radiative properties and lifetimes in the atmosphere. These warming influences may be expressed through a common metric based on the radiative forcing of CO₂ (*i.e.*, CO₂-equivalent). CO₂ equivalent emission is the amount of CO₂ emission that would cause the same- time integrated radiative forcing, over a given time horizon, as an emitted amount of other long- lived GHG or mixture of GHGs.

^e Other non-fossil fuel contributors include CO₂ emissions from deforestation and decay from agriculture biomass; agricultural and industrial emissions of methane; and emissions of nitrous oxide and fluorocarbons.

^f IPCC Working Group 3 Table TS 2.

continue to be growth in global population and substantial increases in economic production, the scenarios identify required reductions in GHGs emissions intensity (emissions per unit of output) of more than 90 percent. However, even at these rates, the scenarios describe some warming and some climate change is projected due to already accumulated CO₂ and GHGs in the atmosphere.¹²

The Beneficial Impact of the Rule on CO₂ Emissions. It is anticipated that the Rule will reduce energy-related CO₂ emissions, particularly those associated with energy consumption in buildings. The U.S. Energy Information Administration (EIA) reports in its 2011 *Annual Energy Outlook (AEO2011)*¹³ that U.S. annual energy-related emissions of CO₂ in 2008 were about 5.8 billion metric tons, of which 1.1 billion tons were attributed to the commercial buildings sector (including energy-using products such as automatic commercial ice makers). Most of the GHG emissions attributed to commercial buildings are emitted from fossil fuel-fired power plants that generate electricity used in this sector. In the *AEO2011* Reference Case, EIA projected that annual energy-related CO₂ emissions would grow from 5.7 billion metric tons in 2015 to 6.3 billion metric tons in 2035, an increase of 11 percent, while commercial emissions would grow to from 1.0 billion metric tons to 1.3 billion metric tons, an increase of 28 percent.

The Incremental Impact of the Rule on Climate Change. It is difficult to correlate specific emission rates with atmospheric concentrations of CO₂ and specific atmospheric concentrations with future temperatures because the IPCC Report describes a clear lag in the climate system between any given concentration of CO₂ (even if maintained for long periods) and the subsequent average worldwide and regional temperature, precipitation, and extreme weather regimes. For example, a major determinant of climate response is “equilibrium climate sensitivity,” a measure of the climate system response to sustained radioactive forcing. It is defined as the global average surface warming following a doubling of CO₂ concentrations. The IPCC Report describes its estimated, numeric value as about 3 °C, but the likely range of that value is 2 °C to 4.5 °C, with cloud feedbacks the largest source of uncertainty. Further, as illustrated above, the IPCC Report scenarios for stabilization rates are presented in terms of a range of concentrations, which then correlates to a range of temperature changes. Thus, climate sensitivity is a key uncertainty for CO₂ mitigation scenarios that aim to meet specific temperature levels. Because of how complex global climate systems are, it is difficult to know to what extent and when particular CO₂ emissions reductions will impact global warming.

15.4 ANALYTICAL METHODS FOR AIR EMISSIONS

For each of the considered TSLs, DOE will calculate total power-sector emissions based on output from the National Energy Modeling System (NEMS-BT) model (see chapter 13 for description of the model).

Coal-fired electric generation is the single largest source of electricity in the United States. Because the mix of coals used significantly affects the emissions produced, the model includes a detailed representation of coal supply. The NEMS-BT model considers the rank of the coal as well as the sulfur contents of the fuel used when determining optimal dispatch.¹⁴

Within the NEMS-BT model, planning options for achieving emissions restrictions in the Clean Air Act Amendments include installing pollution control equipment on existing power plants and building new power plants with low emission rates. These methods for reducing emissions are compared to dispatching options such as fuel switching and allowance trading. Environmental regulations also affect capacity expansion decisions. For instance, new plants are not allocated SO₂ emissions allowances according to the Clean Air Act Amendments. Consequently, the decision to build a particular capacity type must consider the cost (if any) of obtaining sufficient allowances. This could involve purchasing allowances or over complying at an existing unit.

SO₂ emissions from affected electric generating units (EGUs) are subject to nationwide and regional emissions cap-and-trade programs, and DOE has preliminarily determined that these programs create uncertainty about the standards' impact on SO₂ emissions. The attainment of emissions caps is typically flexible among EGUs and is enforced through the use of emissions allowances and tradable permits. Under existing EPA regulations, any excess SO₂ emissions allowances resulting from the lower electricity demand caused by the imposition of an efficiency standard could be used to permit offsetting increases in SO₂ emissions by any regulated EGU. However, if the standard resulted in a permanent increase in the quantity of unused emissions allowances, there would be an overall reduction in SO₂ emissions from the standards. While there remains some uncertainty about the ultimate effects of efficiency standards on SO₂ emissions covered by the existing cap-and-trade system, the NEMS-BT modeling system that DOE uses to forecast emissions reductions currently indicates that no physical reductions in power sector emissions would occur for SO₂.^g

The CAIR established a cap on NO_x emissions in 28 eastern states and the District of Columbia. All these States and D.C. have elected to reduce their NO_x emissions by participating in cap-and-trade programs for EGUs. Therefore, energy conservation standards for automatic commercial ice makers may have little or no physical effect on these emissions in the 28 eastern States and the D.C. for the same reasons that they may have little or no physical effect on SO₂ emissions.

With respect to Hg, in the absence of CAMR or another trading program, a DOE standard would likely change Hg emissions and DOE will use NEMS-BT to estimate these emission reductions. However, DOE continues to review the impact of rules that reduce energy consumption on Hg emissions, and may revise its assessment of Hg emission reductions in future rulemakings.

As noted in chapter 13, NEMS-BT model forecasts end in year 2035. Rather than extrapolate beyond this year, DOE assumes that emissions impacts beyond 2035 are equal to the impacts in 2035.

^g In contrast to the modeling forecasts of NEMS-BT that SO₂ emissions will remain at the cap, during the years 2007 and 2008, SO₂ emissions were below the trading cap. This raises the possibility that standards could cause some reduction in SO₂ emissions. However, because DOE does not have a method to predict when emissions will be below the trading cap, it continues to rely on NEMS-BT and thus does not estimate SO₂ emissions reductions at this time.

15.5 EFFECTS ON POWER PLANT EMISSIONS

Table 15.5.1 shows *AEO2011* Reference Case power plant emissions in selected years. The Reference Case emissions are the emissions shown by the NEMS-BT model to result if none of the TSLs are promulgated (the base case).

Table 15.5.1 Power Sector Emissions from *AEO2011* Reference Case, 2010-2035

NEMS-BT Results	2010	2015	2020	2025	2030	2035
CO ₂ (million metric tons)	2,303	2,138	2,225	2,360	2,444	2,526
NO _x (million tons)	2.57	1.99	1.98	2.00	2.03	2.05
Hg (tons)	40.51	26.88	26.82	28.21	29.08	29.91

15.6 EFFECTS ON UPSTREAM FUEL-CYCLE EMISSIONS

Upstream fuel-cycle emissions refer to the emissions associated with the amount of energy used in the upstream production and downstream consumption of electricity, including energy used at the power plant.¹⁷ Upstream processes include the mining of coal or extraction of natural gas, physical preparatory and cleaning processes, and transportation to the power plant. The NEMS-BT does a thorough accounting of emissions at the power plant due to downstream energy consumption, but does not account for upstream emissions (*i.e.*, emissions from energy losses during coal and natural gas production). Thus, this analysis will report only power plant emissions.

However, previous DOE environmental assessment documents have developed approximate estimates of effects on upstream fuel-cycle emissions. These emissions factors provide the reader with a sense of the possible magnitude of upstream effects. These upstream emissions would be in addition to emissions from direct combustion.

Relative to the entire fuel cycle, estimates based on the work of Dr. Mark DeLuchi, and reported in earlier DOE environmental assessment documents, find that an amount approximately equal to eight percent, by mass, of emissions (including SO₂) from coal production are due to mining, preparation that includes cleaning the coal, and transportation from the mine to the power plant.¹⁸ Transportation emissions include emissions from the fuel used by the mode of transportation that moves the coal from the mine to the power plant. In addition, based on Dr. DeLuchi's work, DOE estimated that an amount equal to approximately 14 percent of emissions from natural gas production result from upstream processes.

Emission factor estimates and corresponding percentages of contributions of upstream emissions from coal and natural gas production, relative to power plant emissions, are shown in Table 15.6.1 for CO₂ and NO_x. The percentages provide a means to estimate upstream emission savings based on changes in emissions from power plants. This approach does not address Hg emissions.

Table 15.6.1 Estimated Upstream Emissions of Air Pollutants as a Percentage of Direct Power Plant Combustion Emissions

Pollutant	Percent of Coal Combustion Emissions	Percent of Natural Gas Combustion Emissions
CO ₂	2.7	11.9
NO _x	5.8	40

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