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COUNCIL OF
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Mr. Marcus Peacock
Deputy Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Mail Code: 1102A
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Dear Mr. Peacock:

As the states and U.S. EPA move toward establishing rules on greenhouse gas reporting, we have an opportunity to establish an efficient and sensible process for sharing emissions information and minimizing state reporting burdens. With your help and leadership, EPA can establish a single data exchange standard for greenhouse gases (GHGs) and other air pollutants.

As you know, states and EPA have made significant investments in the National Environmental Information Exchange Network to improve the accuracy, efficiency, and timeliness of data sharing. As a result, the Exchange Network is now well positioned to support exchanges of GHG emissions data among states and EPA.

The Network currently has a standard in place for sharing air emissions data as part of the annual National Emissions Inventory (NEI). EPA's Office of Air Quality Planning and Standards (OAQPS) is currently revising this standard as part of a re-engineering process. Simultaneously, the Office of Atmospheric Programs (OAP) is developing a new exchange standard specifically for GHG emissions. Our understanding is that the two offices are considering combining the two efforts and adding the six GHGs to the revised NEI standard, but we have not yet heard a firm commitment to a single standard.


We strongly support this approach and we ask for your help in encouraging EPA to commit to developing a single exchange standard based on the Exchange Network. That method offers states and EPA one efficient and expandable way of sharing all air emissions data, including GHGs, while supporting state and EPA goals for state reporting burden reduction.

We must act swiftly to maximize the benefits and add value to other related efforts. For example, the standards-based nature of the Network makes it a viable option for exchanging data with other organizations such as The Climate Registry (TCR). TCR is currently implementing a solution for recording voluntary reports of GHG emissions and it is interested in using the Exchange Network as a data sharing mechanism.

TCR plans to become operational in July 2008, so it will require information on the exchange standard as soon as possible if it is to design the registry to be compatible with the Exchange Network.

Your attention to this matter would help states and EPA move toward an interoperable and efficient air pollutant data system. We appreciate any assistance you can provide to help make this a reality.

Sincerely,



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Director, VA Department of Environmental Quality



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