

November 3, 2025

U.S. Environmental Protection Agency
EPA Docket Center, Docket ID No. EPA-HQ-OAR-2025-0186
Mail code: 28221T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Attention: Docket No. EPA-HQ-OAR-2025-0186

Re: Proposed Rulemaking: Reconsideration of the Greenhouse Gas Reporting Program (40 CFR Part 98)

On behalf of the Pennsylvania Departments of Environmental Protection (PADEP), we appreciate the opportunity to provide comments regarding the United States Environmental Protection Agency's (EPA) proposed reconsideration of the Greenhouse Gas Reporting Program (**GHGRP**). With this action, the EPA proposes to amend the program by removing reporting obligations for most source categories, including the distribution segment of the petroleum and natural gas systems source category, and suspend program obligations for all the other source categories until reporting year 2034.

The initial Greenhouse Gas Reporting Rule was mandated by Congress in the Fiscal Year 2008 Consolidated Appropriations Act and was promulgated under section 114 of the Clean Air Act (CAA). The GHGRP requires reporting of GHG data from large sources and suppliers across a range of industry sectors. The GHGRP collects annual greenhouse gas data from 47 source categories and currently has fourteen years of data from these sources, including reports from more than 8,000 direct emitters and suppliers of GHGs. This data is used by PADEP to measure and assess progress towards pollution and reduction emissions goals. For the 2023 reporting year, Pennsylvania had 286 facilities that were required to report data. These sources represent roughly a third of Pennsylvania's annual emissions in the Commonwealth's highest emitting sectors¹. The data also includes emissions from facilities which do not currently hold Title V or state air quality permits and release approx. 8,600,000 metric tons of CO₂ equivalent pollution (CO₂e). These non-permitted facilities do not currently submit emission inventory data to the Commonwealth.

As a part of the Pennsylvania Climate Change Act of 2008 (Act 70),² PADEP is required to compile an annual greenhouse gas inventory that includes an accounting of emissions from all sectors in the Commonwealth. PADEP utilizes data from federal sources, including the EPA's State Inventory Tool and the National Inventory of Greenhouse Gas Emissions and Sinks, to develop its annual inventory, both of which draw from the GHGRP. These sources inform emissions data for key emitting sources in the industrial sector, such as industrial processes and

¹ [GHG Inventory | Department of Environmental Protection | Commonwealth of Pennsylvania](#)

² [Act No. 70 of 2008 - The Official Website of the Pennsylvania General Assembly](#)

product use and supplement in-state data sources. With the loss of the GHGRP, PADEP and other states, locals and tribes will be forced to collect this data directly from facilities, inevitably creating uneven reporting requirements and additional work for industry.

The Commonwealth uses this data to produce annual high-quality inventories and perform professional analysis to measure its progress in achieving Pennsylvania's climate goals. The data, measurements, and information on emissions sources that the greenhouse gas inventories provide, enables PADEP to strategically direct its limited resources towards targeted emissions reduction strategies including funding, workforce, and innovation, that successfully remove public harms, improve public health, and identify and remove potential climate risks. Any impediments to identifying emissions reduction targets using these critical datasets, which are subsequently used to deploy emission reduction projects, results in harms to resident health, and Pennsylvania's ecology and economy.

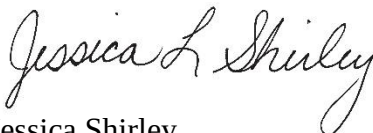
Industry operators rely on the data to claim tax credits for carbon capture and storage (CCS) and clean hydrogen production. A repeal of the GHGRP could potentially create multiple fragmented reporting systems as the burden for data collection shifts to states. A centralized, credibly sourced, and reviewed third-party independent data collection and reporting program such as EPA's GHGRP creates industry certainty and public trust in the data gathered.

While the proposed rulemaking claims to reduce costs and burdens, the cost may come at the expense of the health, well-being and livelihood of individuals and communities in Pennsylvania and across the nation. Furthermore, dissolving this program and the projects and programs it generates, could impair opportunities to create over 700,000 jobs and decrease revenue from work already underway to implement strategies that reduce emissions,³ supported by the use and analysis of this data.

In conclusion, PADEP's mission is to protect Pennsylvania's air, land, water, and resources while ensuring the health and safety of all residents and we do not believe that removing the obligation to report harmful substances allows us to protect the health and safety of our residents. We strongly urge the EPA to follow their mission to protect human health and the environment and continue the GHGRP program.

PADEP appreciates the opportunity to provide comments on EPA's proposed rulemaking reconsideration of the GHGRP. Should you have any questions or need additional information, please contact Dave Althoff, Director, Energy Programs Office, by e-mail at dalthoff@pa.gov.

Sincerely,



Jessica Shirley
Secretary

³ [Pennsylvania Climate Action Plan | Department of Environmental Protection | Commonwealth of Pennsylvania](#)