Department of Environmental Quality

Memorandum

Date: March 19, 2021

To: Environmental Quality Commission

From: Richard Whitman, Director

Colin McConnaha, Manager, Office of Greenhouse Gas Programs

Nicole Singh, Senior Climate Policy Advisor

Michael Orman, Air Quality Planning Section Manager

Subject: Item I: Greenhouse Gas Programs update (Informational)

March 25-26, 2021, EQC meeting

Purpose of Item

DEQ will present updates on Greenhouse Gas Programs, including the development of the Climate Protection Program and rules, the Statewide Transportation Strategy and landfill methane emissions reduction rulemaking.

These items are all associated with Executive Order 20-04.

Prior EQC Involvement The commission approved the 34-member rulemaking advisory committee for the Climate Protection Program in December 2020. The commission received updates from DEQ staff on the Statewide Transportation Strategy and Every Mile Counts effort during an information item in May 2020.

Climate Protection Program: Background DEQ is developing a new Climate Protection Program to establish enforceable and declining limits on greenhouse gas emissions from some of Oregon's most significant sources. The Climate Protection Program will reduce emissions from the use of transportations fuels, Oregon's largest source of emissions, and the use of other liquid and gaseous fossil fuels, including natural gas. This rulemaking is based on existing statutory authority given to the EQC to control emissions of air pollution in Oregon.

Climate Protection Program: Development DEQ is using a three-phase approach to develop the new Climate Protection Program, and is now in the third phase. Program development is being informed by extensive public engagement, including active engagement with environmental justice and impacted communities.

Complete: Phase 1 - Preliminary Activities

This was an initial assessment and public engagement on the process DEQ and EQC should use to establish enforceable limits on greenhouse gasses from key sectors in Oregon. A June 30, 2020, report to the Governor's Office is available here that documents this initial work.

Complete: Phase 2 - Scoping Phase Public Engagement

This phase included a series of meetings designed for the public and stakeholders to share their goals, interests, concerns and ideas on the scope of the Climate Protection Program. Hundreds of Oregonians participated in scoping phase activities. The result of this phase was the identification of three key values for the program: achieving significant emissions reductions, while prioritizing equity and containing costs. Meeting materials and a <u>Final Report:</u> Scoping Phase Public Engagement available <u>here.</u>

Ongoing: Phase 3 - Rulemaking Activities

This phase represents the formal rulemaking for DEQ and EQC. DEQ anticipates that the rulemaking advisory committee, which was approved by EQC in December 2020, will meet monthly for at least six months. The rulemaking advisory committee provides DEQ and policymakers with diverse perspectives on policy proposals, including potential fiscal, environmental justice, public health and economic impacts. The rulemaking advisory committee meetings are open to the public with opportunities for public comment at each meeting. The rulemaking advisory committee has met twice in 2021 so far, with over 150 attendees at both meetings. To note, the committee is scheduled to meet March 18, 2021; however, this report was prepared before that meeting date.

As part of this rulemaking effort, DEQ is working with community-based organizations to promote engagement with frontline and environmental justice communities in addition to participation on the advisory committee. Staff meet regularly with environmental justice interests to ensure development of a proposed program remains centered in equity. The <u>advisory committee roster</u>, work plan, meeting and modeling materials are available on the <u>rulemaking</u> website.



Figure 1: Climate Protection Program Rulemaking Timeline

Climate Protection Program: Framework At a high level, DEQ envisions that each year the Climate Protection Program will establish an overall limit or emissions cap that would decline steadily towards a long-term target or multiple long-term targets. DEQ would distribute a number of compliance instruments to match the cap each year. One compliance instrument permits emissions of one metric ton of allowable greenhouse gases (in CO2 equivalent). For example: in year 1, the cap is 30 million tons, and year 2 the cap is 27 million tons; DEQ would issue 30 million instruments to regulated entities the first year, but only 27 million instruments the next year.

Regulated entities could comply by reducing emissions, or by using some of the program's potential compliance flexibility mechanisms. So for example, in the first year of the program four different entities each receive 10 compliance instruments, but emissions for each entity the previous year was 12 tons. The following figure demonstrates how these four different entities might comply. The four entities either reduce emissions and/or use the program's potential flexibility mechanisms to comply. These additional options could include buying or trading instruments, or potentially receiving credits for investments in community projects that reduce emissions.

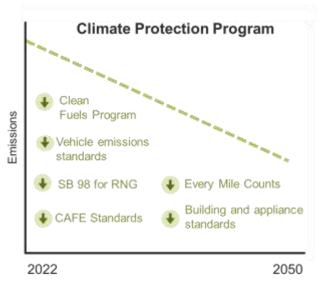
Entity A Entity B Transportation Natural gas utility fuel supplier Reduces Reduces 12 emissions using emissions earlier more renewable by increasing mix natural gas of biofuels, sells extra instrument to Entity D Year 0 Year 1 Year 0 Year 1 Entity D **Entity C** Transportation Natural gas fuel supplier utility Cannot make Cannot make enough immediate 12 enough reductions, could immediate invest in reductions, buys community climate instrument from projects Entity B Year 0 Year 1 Year 0 Year 1

Figure 2: Climate Protection Program Framework

This framework allows for enforceable limits on emissions, but doesn't specify how regulated entities reach these limits. This can create cost savings and encourages innovation in achieving significant emission reduction target, but needs to be coupled with program features that support equitable outcomes and benefits.

Additionally, this framework leverages the multiple federal, state and local initiatives which are already reducing emissions and tackling climate change. For example, the Clean Fuels Program reduces the carbon intensity of transportation fuels by creating incentives for supplying biofuels for use in Oregon. The state's zero emission vehicle mandate works with car manufacturers to increase the deployment of electric vehicles, reducing gasoline and diesel emissions. Both of these programs play an important role in reducing fossil fuel transportation emissions. The Climate Protection Program leverages and builds upon these complimentary programs. These program's emissions reductions help entities comply with the Climate Protection Program's limits on emissions. The Climate Protection Program's enforceable limits, in turn, drive further emissions reductions.

Figure 3: Climate Protection Program and Complimentary Programs



Climate Protection Program: Authorities

The Climate Protection Program will be developed based on the EQC's existing authority. DEQ staff understanding of EQC authority is that it likely does not include:

- Regulation of greenhouse gas emissions from sources outside of Oregon
- Regulation of biogenic greenhouse gas emissions
- Sale of permits or compliance instruments

Emissions Associated With Electricity Sector

With the 2020 closure of the Boardman coal power plant, all remaining fossil fuel electricity power generation in Oregon is natural gas. Electricity is a critical sector of Oregon's economy and increasingly important in

decarbonization pathways for Oregon. Multiple efforts are underway in Oregon, both public and private, to reduce emissions associated with this sector. DEQ is focused on establishing limits on fossil fuels used in Oregon, including gasoline, diesel and natural gas. However, due to specific legal and policy circumstances, DEQ is proposing to not directly regulate emissions from the electricity sector with this new program.

Most fossil fuel electricity emissions are generated out of state. That is, electricity is used in Oregon, but the fossil fuel plants are located outside of the state. This is coupled with DEQ's understanding that EQC authority does not extend to the regulation of emissions from sources outside of Oregon. If DEQ were to regulate only in-state generation this could pose a significant leakage risk. The program could create an incentive for Oregon utilities with in-state fossil fuel generation to shift generation to out-of-state fossil fuel plants, with potentially a dirtier mix than in-state plants. Finally, DEQ has substantial questions about whether authority exists for the EQC to regulate greenhouse gas emissions from energy facilities with a site certificate issued by the Energy Facility Siting Council. For all of these reasons, DEQ believes that it is best if greenhouse gas emissions from the electricity sector are addressed by the Oregon legislature.

Climate Protection Program: Key Program Elements

DEQ staff has identified several program design features or elements that will be critical for the program's success. In discussions with the rulemaking advisory committee, staff attempts to understand how different choices interact with the program goals of:

- Achieving significant emission reductions
- Promoting equitable outcomes by alleviating burdens and supporting opportunities for environmental justice and impacted communities
- Containing costs to businesses and consumers

DEQ staff continues to discuss, review and incorporate comments provided by the advisory committee and the public on these key program elements. Discussions are also being informed by the department's ongoing modeling analysis. To date, advisory committee discussions have focused on the following key design features:

- Emission reduction targets for regulated sectors
- Cost containment and flexibility mechanisms
- Banking, trading and compliance periods
- Community climate investment credits

Emissions reduction targets for regulated sectors

Climate change is already affecting Oregon's air, water, land, economy, and our most vulnerable communities. There are significant economic and health

costs associated with inaction on greenhouse gas emissions and climate change.

DEQ has heard strong preference for using mass-based caps, meaning the cap is a numerical limit on emissions, not an intensity-based standard, which uses an emissions limit per unit of generation or production. Mass-based caps are easier to quantify, more suited for tracking progress toward goals, and more directly achieve emissions reductions compared to intensity-based standards.

For Oregon to do its part to prevent the worst impacts and costs of climate change, preliminary discussions have focused on a mass-based cap which would reduce emissions by at least 80 percent by 2050. The emission cap would decline each year to ensure early and continuing steady reductions.

Cost containment and flexibility mechanisms

Achieving at least 80 percent reductions by 2050 will require using a variety of technologies, approaches and tools. Preliminary policy discussions have focused on designing cost containment and flexibility mechanisms that help achieve significant reductions, support equitable outcomes, lower potential cost increases and drive investments within Oregon. DEQ continues discussions with the advisory committee on how these mechanisms should be designed and incorporated in the program.

Environmental justice and impacted communities have experienced systemic neglect while experiencing disproportionate pollution impacts. These same communities are expected to disproportionately bear climate change burdens. Some compliance flexibility options could help direct benefits to environmental justice and impacted communities, while others may also reduce co-pollutants that have disproportionately harmed the health of these communities, such as poor air quality along busy roadways. Compliance flexibility does also mean that the pace of reductions varies from entity to entity, raising potential concerns that co-pollutant reductions could lag in communities near emissions sources with onsite pollution.

Without some compliance flexibility, the costs of complying with the Climate Protection Program could be high, increasing energy and fuel costs for everyday users and consumers. There is also is a greater risk that businesses could move outside of Oregon, negatively impacting the economy without meeting the objective of reducing emissions.

Banking, trading and compliance periods

DEQ staff has discussed allowing for regulated entities to bank and trade compliance instruments. Banking means that if an entity didn't use all the compliance instruments they received from DEQ in a given period due to early emission reductions, they could save them for future use. Trading means that

regulated entities could buy or sell unused compliance instruments through mutual agreements. DEQ continues to discuss with the rulemaking advisory committee whether there should be expiration dates for banked instruments and if trading should be limited for some regulated sectors.

The program will also have to establish compliance periods, that is the timeframe during which an entity must track emissions and at the end, present compliance instruments equal to their regulated emissions. DEQ staff have discussed three-year compliance periods with the rulemaking advisory committee. DEQ continues to discuss the appropriate length of the compliance period with the advisory committee.

Community climate investments credits

DEQ is exploring a mechanism that could offer an additional way for regulated entities to reduce emissions and comply with the Climate Protection Program, while driving investments and benefits in Oregon's communities. Essentially, regulated entities could potentially receive credits for investments in community projects that reduce greenhouse gas emissions.

The program could prioritize community climate investments in environmental justice and impacted communities. These investments could reduce disproportionate consumer costs for environmental justice and impacted communities, reduce co-pollutants like diesel particulate matter, improving public health, and could support infrastructure necessary for an equitable energy transition. Environmental justice and impacted community representation would be critical in any such mechanism to ensure projects are meeting program objectives.

These community climate investments could:

- Mandate that all investments reduce greenhouse gas emissions
- Mandate that all investments be located in Oregon
- Ensure a certain percentage of projects are located in environmental justice and impacted communities
- Ensure that the emissions reduction projects best support the goals of environmental justice and impacted communities
- Recognize the diversity of needs and goals among different communities
- Create a process that incorporates environmental justice and impacted communities representation

Other key design elements discussed with the committee to date include the point of regulation for each covered sector and the methodology for distributing compliance instruments to regulated entities.

Informational item: Greenhouse Gas Programs update March 25-26, 2021, EQC meeting Page 8 of 14

Climate Protection Program: Contracted Modeling Analysis DEQ is also contracting for emissions, economic, health and equity modeling to help inform the development of the Climate Protection Program. DEQ's consultant is assessing different program design options, called modeling scenarios, to provide information on:

- Forecasted greenhouse gas emissions;
- Equity, air quality, public health co-benefits; and
- Economic effects for regulated sectors and Oregon's economy

The modeling begins with a reference case, a projected world without the Climate Protection Program. Then different modeling scenarios are compared to the reference case to understand potential changes due to the program. These modeling scenarios do not represent final or complete program design proposals and do not include assumptions for all potential program design elements. This quantitative and qualitative analysis can however, provide information on how different designs best support the program's three goals of emissions reductions, equity and cost containment. Informed by advisory committee and public input, DEQ staff has developed three initial modeling scenarios.

DEQ will discuss results from these initial policy scenarios at the March 18 and April 22, 2021, advisory committee meetings. DEQ will then develop a fourth modeling scenario informed by rulemaking advisory committee and public input.

Figure 4: Initial Modeling Policy Scenarios

Key Topic	Policy Scenario 1	Policy Scenario 2	Policy Scenario 3	
Cap Trajectory	Straight line to 80% by 2050	45% by 2035; 80% by 2050	50% by 2035; 90% by 2050	
Cap Application	One cap applied across all sectors			
Trading Allowed?	Yes and trading across sectors can occur	Not allowed for stationary sources	Yes and trading across sectors can occur	
Banking Allowed?	Yes; unlimited through time			
Regulated Sectors	 Natural gas utilities; Non-natural gas fuel suppliers; Large stationary sources with process emissions >=25,000 MTCO2e 	 Natural gas utilities; Non-natural gas fuel suppliers; Large stationary sources with process plus natural gas emissions >=25,000 MTCO2e 	 Natural gas utilities; Non-natural gas fuel suppliers with emissions >=300,000 MT CO2e; Large stationary sources with process emissions >=25,000 MTCO2e 	

Informational item: Greenhouse Gas Programs update

March 25-26, 2021, EQC meeting

Page 9 of 14

Not Included	 Landfills; Electric generators; Stationary source process emissions below threshold; All natural gas supplied by interstate pipeline companies; Fuels used for aviation 	 Landfills; Electric generators; Stationary source process emissions below threshold; Natural gas supplied by interstate pipeline companies that is not regulated at stationary sources; Fuels used for aviation 	 Landfills; Electric generators; Stationary source process emissions below threshold; All natural gas supplied by interstate pipeline companies; Fuels used for aviation; Emissions from non-natural gas fuel suppliers below threshold
Natural Gas Point of Regulation	All natural gas regulated at utility. Stationary sources are only regulated directly for process emissions above threshold.	Regulated at stationary sources if process plus natural gas emissions are above the threshold. Otherwise, all natural regulated at utility.	All natural gas regulated at utility. Stationary sources are only regulated directly for process emissions above threshold.
Allowable Use of Alternative Compliance	Up to 25% of compliance obligation per year	Up to 5% of compliance obligation per year	Up to 25% of compliance obligation per year
Expanded Complemen tary Policies	Clean Fuels Program assumed to be expanded from current 10% by 2025 target to 25% by 2035*		

Statewide Transportation Strategy: Every Mile Counts DEQ, as part of a multi-agency planning effort called Every Mile Counts, is developing revisions to existing programs and proposing new regulations to reduce emissions of greenhouse gases from the transportation sector. Agencies involved include the Oregon Department of Land Conservation and Development, the Oregon Department of Transportation, the Oregon Department of Energy, and DEQ. Each agency is developing policies or rules that require coordination and collaboration amongst partner agencies for successful implementation. DEQ is leading work on a set of policies and rules to propose to the commission in the coming months.

Every Mile Counts: Program Development DEQ is leading the development of a number of specific policy and rules for consideration by the commission:

- Commute Trip Alternatives Rulemaking
- New Emissions Standards and ZEV Requirements for Medium- and Heavy-Duty Trucks
- Truck Alternatives Fuel Study
- Expansion of the Oregon Clean Fuels Program

Commute Trip Alternatives Rulemaking

DEQ GHG inventory data indicates that in 2016, about 40% of greenhouse gas emissions in Oregon came from the transportation sector. The transport of employees to and from work may represent a large portion of those emissions. For example, according to the American Community Survey, in 2019, in several counties outside of the Portland metropolitan area, about 70 to 80% of commutes are "drive alone" trips. Many metropolitan areas of the state have a variety of options available to employees to accomplish their commute to and from work. The Portland metropolitan region currently has a set of rules, known as the Employee Commute Options program, that require businesses of certain sizes to survey their employees on how they get to and from work, and in some cases, build plans to further increase the use of alternatives. The ECO program was established to reduce the formation of carbon monoxide, but the benefits of the program, and the value of incentivizing alternatives for commuting, remains applicable when considering greenhouse gas reductions.

The Commute Options rulemaking will build off of the ECO program, and other efforts at the local level to incentivize transit use, like ODOT's Transportation Options program. The rule will seek to require businesses to incentivize the use of alternative modes of transportation to and from work that emit less greenhouse gas emissions. DEQ expects to convene an advisory committee in April and for rules to be brought to the Commission in November 2021.

Adopt New Emissions Standards and ZEV Requirements for Mediumand Heavy-Duty Trucks

Emissions from the combustion of diesel fuel in Medium- and Heavy-Duty vehicles makes up a significant portion of greenhouse gas emissions in the transportation sector. DEQ and panel members also described to the Commission the public health impacts represented by the operation of these vehicles and the options available to the Commission for regulating these emissions during the Diesel Workshop held for the Commission in January this year. In short, the Commission has the option of adopting identical regulations for new engines to those adopted by the California Air Resources Board.

With the above in mind, DEQ supported California in their development of the Advanced Clean Trucks and Heavy-Duty Low NOx Omnibus rules, which were approved by the California Air Resource Board on June 25, 2020, and August 27, 2020, respectively. Oregon also signed onto a Memorandum of Understanding with the Northeast States for Coordinated Air Use Management member states to coordinate efforts to accelerate the adoption of medium- and heavy-duty ZEVs. Oregon has completed outreach on the MOU to support the work of the national collaborative and assist in the development of a multistate action plan. In the multi-state action plan, one of the key

Informational item: Greenhouse Gas Programs update March 25-26, 2021, EQC meeting Page 11 of 14

recommendations under consideration is for states to adopt new emissions standards and ZEV requirements for medium- and heavy-duty trucks

DEQ plans to move forward with a proposed rulemaking to adopt these emission standards and ZEV requirements. DEQ has held initial stakeholder discussions over the past few months and will continue holding additional meetings with stakeholders this spring. More formal rulemaking will begin this summer with a final proposed rule presented to the commission for consideration in November 2021.

Truck Alternatives Fuel Study

As part of the EMC effort, DEQ committed to leading a study to identify barriers to the adoption of alternative fuels in the current medium- and heavy-duty truck fleet in Oregon. DEQ planned this work to be completed in two phases: 1) development of a profile of Oregon's medium- and heavy-duty fleet; and 2) a survey to identify barriers to alternative fuel adoption by sector resulting in a report that highlights the gaps in awareness, data, policy, and incentives. DEQ is reaching out to fleet owners and operators with a survey that opened February 8th, and will close April 15, 2021. DEQ is expecting fleet data from ODOT in early 2021 to complete the medium and heavy-duty fleet profile of Oregon. DEQ anticipates the report to be completed by the fall of 2021.

The completed report will discuss alternative fuel options, fleet barriers, sector specific case studies of alternative fuel use, and current funding opportunities such as the Diesel Emissions Reduction Act grants and Clean Fuels Program. In addition, the report will identify next steps that fleets can take for the adoption of alternative fuels.

Expansion of the Oregon Clean Fuels Program

DEQ committed to complete two phases of activities for increasing emission reductions through the Clean Fuels Program as part of Every Mile Counts.

The first phase is to amend the Clean Fuels Program regulation. The first step in that phase is the Clean Fuels Program Electricity 2021 Rulemaking that is scheduled to be considered for adoption at the March 2021 EQC meeting and will strengthen the ties between the Clean Fuels Program and Oregon's transportation electrification goals. The remaining steps, including studies, the program review, and second rulemaking, has begun and will continue through 2022.

The second phase is to reach out to Oregon's state agencies to increase their demand for clean fuels by converting their fleets and leveraging their programs and policies. This task has changed in order to coordinate with the Department of Administrative Services on their project to identify ways to decarbonize the

Informational item: Greenhouse Gas Programs update March 25-26, 2021, EQC meeting

Page 12 of 14

state's fleets. This work began in early 2021 with a pilot project with ODOT and continues through 2022.

Statewide Transportation Strategy: Other Agencies' Efforts

DLCD, ODOT, and ODOE are all leading other efforts to reduce greenhouse gas emissions from the transportation sector, and DEQ is in a support for the following projects:

- Climate Friendly and Equitable Communities Rulemaking DLCD
- Every Mile Counts Transportation Emissions Dashboard ODOT
- Transportation Electrification Infrastructure Needs Analysis ODOT
- Zero Emission Vehicle Interagency Action Plan ODOE

Executive Order 20-04 instructed DLCD, ODOT, ODOE, and DEQ to work together to implement the Oregon Statewide Transportation Strategy: A 2050 Vision for Greenhouse Gas Emissions Reduction. The STS is Oregon's roadmap for greenhouse gas reduction in the transportation sector. It was developed by the Oregon Department of Transportation in close partnership with the Department of Land Conservation and Development, the Oregon Department of Energy, and DEQ coming out of the Oregon Sustainable Transportation Initiative (OSTI), which originated with the passage of Senate Bill 1059 in 2010. SB 1059 directed ODOT and DLCD to develop tools and, for DLCD and its policy-making body LCDC, regulations to help certain urban areas in Oregon reduce transportation GHG emissions.

The agencies completed the Strategy in 2013 after a three-year process of extensive engagement and technical analysis by agency staff. The Strategy address all aspects of transportation-related emissions, including the movement of people on the ground and in the air, as well as the movement of freight on all transportation modes. The STS is designed to achieve a 60 percent reduction in transportation GHG emissions by 2050 – meaning that other complimentary actions may be needed in addition to full implementation of the STS to address transportation GHG emissions, particularly in the area of freight-related emissions, which continue to grow more rapidly than the rest of the sector.

The Every Mile Counts collaboration is the formalization of the process the partner agencies used to identify projects within the existing authorities of the agencies and policy boards and commissions and within their existing resources that would put the STS into practice. The agencies submitted the EMC work plan to the Governor's Office in July 2020. Partner agencies are currently implementing many portions of the Every Mile Counts work plan, with ultimate conclusion of projects by the end of 2022.

Landfill Emissions: Background

Emissions from landfills makes up approximately 37 percentage of all greenhouse gas emissions from stationary sources. Executive Order 20-04 directs DEQ and the commission to reduce methane emissions from landfills

and, specifically, to align Oregon's actions with the most stringent standards and regulatory practices of neighboring states. DEQ researched landfill rules in bordering states and found that the California landfill rules are the most stringent. New rules are to be developed based on the EQC's existing authority and may require additional monitoring, recording, reporting, and control requirements.

Landfill emissions can generally be reduced by collecting and controlling the landfill gasses being produced and reducing methane producing wastes going to the landfill. Decomposition of organic wastes leads to methane production. DEQ's Materials Management Program prepared a Preliminary Work Plan to Reduce Food Waste in May 2020. This Work Plan includes a goal to reduce food waste by 50 percent by 2030.

Landfill Emissions: Rule Development DEQ convened a rules advisory committee that consists of industry, non-profit and local government representatives. The RAC has met twice since January 2021 and has discussed landfill basics, existing landfill gas emission rules, and the draft rules prepared by DEQ. The rulemaking advisory committee meetings are open to the public with opportunities for public comment at each meeting. Key discussions at the meetings, to date, have included:

- Costs to local governments and owners and operators of small to medium landfills
- The need to collect data on small to medium sized landfills to current and future work
- Optimizing landfill monitoring requirements to collect the best data while minimizing the financial burden where possible
- Including flexibility to account for the large variety in landfill types

The draft rules increase emission monitoring, emission reduction requirements, reporting requirements, and the type and overall number of landfills permitted through DEQ's Air Quality Program. DEQ is currently reviewing comments from the RAC on the draft rules. RAC members were primarily interested in additional data collection, optimizing landfill monitoring requirements, and concerned with costs to local governments and landfill owners or operators. DEQ anticipates having the third and final advisory committee meeting in mid-April.

The advisory committee roster, agendas, draft rules and background materials regarding this rule making are available on the <u>Landfill Gas Emissions 2021</u> rulemaking webpage. DEQ anticipates releasing a proposed rule in spring 2021 for public comment. DEQ would then present a proposed rule for EQC review and consideration during the July EQC meeting.

DEQ has prepared draft landfill gas emission rules that combine strict requirements from California Landfill Methane Regulations, federal

Informational item: Greenhouse Gas Programs update March 25-26, 2021, EQC meeting Page 14 of 14

requirements, and Oregon-specific additions. These draft landfill methane emissions rules could reduce methane emissions through a variety of factors:

- Increase the required destruction efficiency of many of the gas controls.
- Decrease the allowed surface emissions before additional gas controls are required.
- Include smaller sized landfills so that methane emissions are tracked and controlled, if feasible.
- Shorten compliance times so that emissions are controlled sooner.
- Require more thorough monitoring of landfill gas emissions onsite.

EQC Involvement

There is no EQC action associated with the information presented today. DEQ will continue to update the EQC on rulemaking activities for the Climate Protection Program. DEQ anticipates releasing a proposed Climate Protection Program rule in early fall 2021 for public comment, with final rules proposed for commission consideration at the end of 2021. DEQ will provide updates on the Every Mile Counts work, and other Statewide Transportation Strategy work, as part of regular Office of Greenhouse Gas Programs updates, and in preparation for the rule proposals discussed in above sections. DEQ will also continue to update the EQC on rulemaking activities for the Landfill Methane Rule, scheduled for commission consideration in July 2021.

Report compiled from program information