

Gasoline, diesel and aircraft fuel distributors

Instructions for reporting greenhouse gas emissions to DEQ

Overview

Certain distributors of gasoline, diesel and aircraft fuels are required to report greenhouse gas emissions to DEQ. This document describes the types of distributors that report, reporting deadlines and the methodologies distributors must use to calculate and report emissions.

Applicability

DEQ is collecting reports from the fewest number of people possible in the fuel distribution system, including distributors that disburse fuel from Oregon terminal storage facilities (these distributors are referred to as position holders) and certain distributors that import fuel from out of state. While the Oregon greenhouse gas reporting rules (OAR Chapter 340 Division 215) are applicable to all Oregon licensed fuel sellers and dealers as well as any person that distributes more than 5,500 gallons of certain tax-exempt fuels for use in Oregon, DEQ established distributor categories in the reporting protocols described on this page in addition to the applicability in the reporting rules. This significantly reduced the number of reporting businesses. As a result of the distributor categories, the reporting requirements apply only to position holders and fuel importers as described in section two below. A distributor must report for each year that it meets any of the criteria in section one and any of the criteria in section two below. A distributor that does not meet at least one criterion in each section is not required to report. Most reporters will be major oil companies disbursing fuel from terminal storage facilities in Oregon. Some smaller companies, terminal owners and operators and fuel importers must report as well.

Section 1: Criteria established in OAR Chapter 340 Division 215

Licensed fuel dealers: Includes any person or business licensed with the Oregon Department of Transportation as a fuel dealer and subject to the Oregon Motor Vehicle and Aircraft Fuel Dealer License Tax.

Licensed fuel sellers: Includes any person or business licensed with the Oregon Department of Transportation as a fuel seller and subject to the Oregon Use Fuel Tax.

Distributors of tax-exempt fuels: Includes any person or business that disburses at least 5,500 gallons of gasoline, diesel or aircraft fuel during a year where that fuel is for use in Oregon and not subject to the Oregon Motor Vehicle and Aircraft Fuel Dealer License Tax or the Oregon Use Fuel Tax.

Section 2: Distributor categories

Position holders: Includes any person or business that stores gasoline, diesel or aircraft fuel in bulk at an Oregon terminal storage facility and any of that fuel is removed at the terminal rack for use in Oregon.

Fuel importers: Includes any person or business that imports gasoline, diesel or aircraft fuel into Oregon from out of state for use in Oregon, excluding fuels stored at an Oregon terminal storage facility. This exclusion is explained in the Protocols section of this document.

As defined in Oregon rule, to “import” means to have ownership of the fuel from locations outside of Oregon at the time the fuel is brought into this state by any means of transport other than fuel brought into this state in the fuel tank of a vehicle used for the



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propulsion of that vehicle. Most fuels covered by this category are imported into Oregon by truck or rail; however, this category also covers any fuels imported by pipeline, barge or marine vessel where the fuels are not subsequently stored at an Oregon terminal storage facility.

Reporting deadlines

Fuel distributors must report annually by March 31 following the distribution year.

Reporting protocols

EZ-Fuels online reporting tool: EZ-Fuels is DEQ's greenhouse gas reporting tool for gasoline, diesel, and aircraft fuel distributors. It is designed to automate the calculation process making reporting easier and more reliable. Additionally, it retains fuel distributor information so that a reporter does not have to re-enter information each year.

Fuel distributors using EZ-Fuels must report emissions from fuel distributed in Oregon according to the following protocols:

Report only on gasoline, diesel and aircraft fuels intended for use in Oregon. Report the types and quantities of fuels disbursed under each applicable distributor category, as follows:

Distributor categories: Distributor categories include position holders and fuel importers. The fundamental distinction between the distributor categories is whether or not a fuel brought into Oregon is stored at one of Oregon's terminal facilities described in the position holder category. A fuel distributor may report using one or both categories.

- **Using the position holder category:** A company in this category reports the type and quantity of fuel it owns and disburses from Oregon's terminals. Terminals are connected to petroleum pipelines and include but are not limited to BP West Coast Products, Shore Terminals LLC, Kinder-Morgan Energy Partners, Chevron Products Company, Conoco Phillips, and Equilon Enterprises.

The reporting company reports only those quantities of fuel that are removed from the terminal during the year (January 1 through December 31) at the terminal's loading rack, where that fuel is intended for distribution and use in Oregon. This category applies to the company owning the fuel at the loading rack, not the company picking up fuel at the receiving end of the loading rack.

The final position holder disbursing the fuel for use in Oregon is responsible for reporting the fuel to DEQ using this category. Do not report fuels that the company transferred to another position holder, whether the fuel was transferred within the same terminal or transferred to another terminal.

- **Using the fuel importer category:** A company in this category reports the type and quantity of fuel it owns at the time the fuel is brought into Oregon from out of state, where that fuel is intended for distribution and use in Oregon. The reporting company reports only those quantities of fuel that are imported during the calendar year (Jan.1 through Dec. 31).

The fuels covered by this category are primarily imported by rail, truck and marine vessel. This category does not include fuels imported by pipeline because pipelines deliver fuel directly to terminal storage facilities. Do not report fuels imported by rail, truck, marine vessel or other methods where those fuels are subsequently stored at Oregon terminals because any fuels stored at an Oregon terminal will be reported using the position holder category described above.



The “fuel importer” is the company who owns the fuel as it is brought into Oregon. Do not report fuels that are purchased within Oregon’s borders from another company.

- **Fuel types:** Include all fuel types disbursed for use in Oregon, regardless of whether the fuel is intended for transportation or non-transportation use and regardless of whether the fuel is subject to state or federal fuel taxes. DEQ’s reporting uses fuel types and emission factors derived from the federal greenhouse gas reporting rules for suppliers of petroleum products (40 CFR Part 98 [Subpart MM](#), finalized by the U.S. Environmental Protection Agency on Oct. 30, 2009). If formulations are unknown for a given quantity of gasoline, you may report that quantity of gasoline using the fuel type “**Gasoline formulation unknown**”. If distillate or residual fuel numbers are unknown for a given quantity of diesel, you may report that quantity of fuel using the fuel type “**Diesel type unknown.**” Dyed and undyed diesel fuels may be reported together.
- **Fuel types mixed with ethanol or biodiesel:** Report the type of gasoline, diesel or aircraft fuel in each renewable fuel mixture and report the ethanol or biodiesel content as a percent of the mixture. Below is an example of what a company might report on one million barrels of B20 disbursed from an Oregon terminal, one million barrels of E10 (formulation known) disbursed from an Oregon terminal, and five thousand barrels of non-ethanol gasoline the company imported from Tesoro in Vancouver.

Fuel distributor category	Fossil fuel type disbursed under the distributor category	Ethanol or biodiesel renewable fuel content		Net fuel quantity in barrels
		Fuel type	Fuel percent content	
Position holder	Distillate fuel oil no. 2 (e.g. heating oil and road diesel)	Biodiesel	20%	1,000,000
Position holder	Conventional winter premium	Ethanol	10%	1,000,000
Fuel Importer	Gasoline formulation unknown	None	0%	5,000

Fuel quantities:

- Report fuel quantities in barrels, where one barrel equals 42 gallons.
- Report fuels disbursed for use in Oregon. Do not report fuels exported for distribution outside of Oregon.
- Report net fuel quantities by fuel type, where fuel measurements are adjusted to standard temperature and pressure (60 degrees Fahrenheit, 1 atmosphere). Determine fuel quantities using standard quantity measurement methods from consensus-based standards organizations such as ASTM International and the American Petroleum Institute, as specified in 40 CFR Part 98.394(a) ([Subpart MM](#)). If standards do not exist, use industry standard practices.

Emissions calculations

EZ-Fuels automatically calculates the carbon dioxide emissions that would result from the complete combustion of each fuel. The tool utilizes emission factors from the federal greenhouse gas reporting rules for suppliers of petroleum products ([Subpart MM](#)) to determine the carbon dioxide emissions that would result from the combustion of each fossil-based fuel type and the



carbon dioxide emissions that would result from the combustion of the ethanol and biodiesel in renewable fuel mixtures. A distributor that knows the emission factors specific to the fuel it distributed should contact DEQ.

People required to report should review the greenhouse gas reporting [rules](#) in OAR Chapter 340 Division 215 to identify additional elements of the reporting program such as recordkeeping requirements.

Businesses reporting to EPA

Businesses that report greenhouse gas emissions to EPA under [Subpart MM](#) of the federal reporting rules and which disburse fuels solely in Oregon and no other states may contact DEQ to determine if a copy of the federal report will satisfy Oregon's requirements. Businesses reporting to EPA can provide DEQ a copy of the federal report in place of reporting separately to DEQ if the report delineates fuel distribution and emissions for Oregon. Oregon rules authorize DEQ to require the submission of additional information in the circumstance that the copy of the federal report submitted to EPA is not sufficient to determine greenhouse gas emissions and related information otherwise required by Oregon rules.

Businesses reporting to the Oregon Department of Transportation

Some of the businesses reporting greenhouse gas emissions to DEQ are licensed with the Oregon Department of Transportation's [fuels tax program](#). DEQ's reporting program is not affiliated with the fuel tax program; however, it's possible that reports collected by ODOT could be revised in the future to satisfy the requirements of both agencies. Currently, the reports collected by ODOT do not contain certain information DEQ is collecting, such as fuels intended for non-transportation uses and annual summary information. At this time, fuel distributors subject to OAR Chapter 340 Division 215 must report separately to DEQ using the protocols described above.

Relationship to Clean Fuels Program

Oregon's mandatory greenhouse gas reporting requirement for gasoline, diesel, and aircraft fuel distributors is a separate reporting requirement from the Oregon Clean Fuels Program. For details on complying with the Oregon Clean Fuels Program please visit the Oregon Clean Fuels homepage.

In certain instances small finished fuel importers may utilize their greenhouse gas report to meet Oregon Clean Fuels reporting obligations. Additional details can be found on the [Oregon Clean Fuels reporting website](#).