

Greenhouse Gas Reporting Protocols

Air Quality Permit Holders

Instructions for reporting greenhouse gas emissions to DEQ

Overview

Certain facilities that hold an air contaminant discharge permit (ACDP) or Title V operating permit (under OAR Chapter 340 Divisions 216 and 218, respectively) are required to report greenhouse gas emissions to DEQ. This document describes the types of facilities required to report, reporting deadlines and the methodologies each facility must use to calculate and report.

Landfills holding an ACDP or Title V permit in addition to a permit issued by DEQ's solid waste program under OAR Chapter 340 Divisions 93 through 96 should review [the reporting protocols for landfills](#).

Applicability

Oregon's greenhouse gas reporting rules (OAR Chapter 340 [Division 215](#)) require the owner or operator of a facility holding an ACDP or Title V permit with direct emissions of 2,500 metric tons or more of carbon dioxide equivalent (mtCO_{2e}) during a year to report greenhouse gas emissions to DEQ. The reporting threshold includes all emission sources located at the facility, including emissions from fuel combustion and facility processes. Because the greenhouse gas reports include fuel types, we can distinguish between biogenic and anthropogenic emissions and possible implications of using certain fuels can be taken into account.

As a guide, a facility that uses less than the following amounts of fuel is probably below the reporting threshold, assuming there are no other sources of greenhouse gas emissions at the facility.

Fuel type	Approximate fuel quantity per 2,500 mtCO _{2e}
Natural gas	45,000,000 cubic feet
Distillate fuel oil	244,000 gallons
Residual fuel oil	211,000 gallons
Wood	1,700 tons at 12 percent moisture
Propane	445,000 gallons

Some facilities also have emissions from industrial processes (e.g. cement production or pulp and paper manufacturing); these process emissions need to be included when determining whether a facility meets the reporting threshold. However, DEQ is temporarily deferring the reporting of fugitive emissions from municipal wastewater treatment facilities.

Circumstances under which a facility can stop reporting

Pursuant to Oregon rule, once a facility must report greenhouse gas emissions, it must report in subsequent years regardless of the facility's quantity of emissions unless the facility meets at least one of the following criteria:

- Oregon rules allow a facility that reduces emissions below the threshold to stop reporting, but prevent the situation where a facility near the threshold could move in and out of reporting due to small variations in emissions from one year to the next. Similar to the federal greenhouse gas reporting rule in 40 CFR Part 98, which the U.S. Environmental Protection Agency finalized on October 30, 2009, Oregon rules provide for a facility to cease reporting if its direct emissions are below the threshold for three consecutive years.



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- A facility can stop reporting if it ceases all operations that lead to direct emissions of greenhouse gases throughout the entire calendar year, such as if the facility closes permanently prior to the beginning of the year. This does not apply to seasonal or other temporary cessation of operations and does not apply to landfills that are required to report greenhouse gas emissions to EPA.

Emissions exempt from reporting

Facilities are not required to report emissions from categorically insignificant activities defined in [OAR 340-200-0020](#)(23). Greenhouse gas emissions are typically difficult to quantify for these activities. If a facility cannot separate categorically insignificant activities from other activities it is acceptable to report aggregate emissions that include categorically insignificant activities. This exemption only applies to facilities reporting exclusively to DEQ and not to EPA. A facility reporting greenhouse gas emission to EPA under 40 CFR Part 98 must include all emissions required in EPA's emission quantification methodologies, and this might include categorically insignificant emissions.

In addition, at this time, emissions from flared digester gas along with fugitive emissions at municipal wastewater treatment facilities are not reported and are not included in determining whether a facility meets the reporting threshold.

Reporting deadlines

All facilities subject to the reporting program must annually report by March 31 following the emission calendar year or at the same time the facility's annual report is due under the facility's ACDP or Title V operating permit, whichever is later.

Reporting protocols

Each facility subject to Oregon's greenhouse gas reporting rules must report using the protocols in this document. Certain requirements for a facility reporting greenhouse gas emissions to only DEQ and not EPA are different from the requirements for a facility reporting to both DEQ and EPA, as described below. However, every facility reporting greenhouse gas emissions to DEQ must use EPA's emission quantification methodologies in 40 CFR Part 98 to determine emissions from fuel combustion and applicable facility processes. [Visit EPA's website](#) for more information. The "Supporting documentation" section of this document describes the requirements for submitting the greenhouse gas report to DEQ, documenting emissions from industrial processes, and other requirements. Oregon's greenhouse gas reporting rules (OAR Chapter 340 [Division 215](#)) describe additional requirements that are not described in this document such as recordkeeping and reporting fees.

EZ-Filer

[EZ-Filer](#) is DEQ's greenhouse gas reporting tool. It is designed to make the reporting process easy and reliable by automating the calculation process for fuel combustion, retaining facility information so a reporter does not have to re-enter this information in future years, and providing a simple structure to complete the annual emissions report.

Protocols for facilities required to report to DEQ, but not to EPA

A facility subject to Oregon's greenhouse gas reporting rules but not subject to EPA's greenhouse gas reporting rules in 40 CFR Part 98 must report emissions to DEQ using [EZ-Filer](#). The facility must report greenhouse gas emissions from fuel combustion and report total emissions in metric tons carbon dioxide equivalent from each industrial process performed by the facility (e.g. cement production or pulp and paper manufacturing).



- Starting with the 2015 emissions year, facilities may report emissions from stationary combustion utilizing tier 1 or tier 4 methodology from 40 CFR Part 98, Subpart C, General Stationary Combustion.
 - Facilities may use EZ-Filer to automatically calculate and report emissions from fuel combustion utilizing Subpart C tier 1 methodologies.
 - Facilities equipped with continuous emission monitoring systems (CEMS) may utilize 40 CFR Part 98 subpart C tier 4 methodology to determine greenhouse gas emissions from fuel combustion for the purposes of reporting. EZ-Filer does not automatically calculate emissions utilizing subpart four methodologies. Data must be entered into EZ-Filer in metric tons carbon dioxide equivalent. Please see the [guide to reporting emissions utilizing CEM readings](#) for step by step instructions on entering stationary combustion emissions utilizing tier 4 quantification methodology.
- The facility must use EPA's methodologies in subparts D through UU to determine emissions from industrial processes at the facility; the facility may use the lowest available tier in EPA's methodologies to determine emissions from each applicable industrial process. Please see the [EZ-Filer user guide](#) for specific guidance on reporting emissions from industrial processes.
- Starting with the 2015 emissions year, a facility is no longer required to report emissions from any industrial processes performed by the facility that are not covered by EPA's 40 CFR Part 98 subparts D through UU.

Protocols for facilities required to report to DEQ and EPA

A facility subject to Oregon's greenhouse gas reporting rules and subject to EPA's greenhouse gas reporting rules in 40 CFR Part 98 must report emissions to DEQ using EZ-Filer unless the facility's federal greenhouse gas report contains all of the data inputs used to calculate emissions and is sufficient to determine all greenhouse gas emissions and related information required by DEQ. If this is the case, the facility does not need to report using EZ-Filer, but instead must email a copy of its federal report to DEQ at ghgreport@deq.state.or.us.

Each facility must use EPA's emission quantification methodologies in 40 CFR Part 98 to determine emissions from fuel combustion covered by subpart C and applicable facility processes covered by subparts D through UU as required by the federal rule.

If the facility makes subsequent changes to its federal report, it must email a revised report to DEQ within thirty days of submitting its revisions to EPA; it must also contact DEQ about resubmitting its EZ-Filer report.

Special cases for Title V Operating Permit Holders

In rare cases, there are differences in how emissions are reported to DEQ and EPA. Any reporting entity holding a Title V permit that reports greenhouse gases to EPA under 40 CFR Part 98 and whose property is separated by more than a public right-of-way should read this section to determine how Oregon's greenhouse gas reporting requirements may differ from EPA's requirements.

A single Title V permit holder can encompass more land and operations than would be included in the reporting entity's federal greenhouse gas report. Oregon rules and the federal Clean Air Act use the term "source" to establish the geographic and functional extent covered by a Title V permit. Similarly, the EPA's federal greenhouse gas reporting rules uses the term "facility" to establish the geographic and



functional extent of an entity for purposes of reporting greenhouse gas emissions to EPA. In most cases, these definitions yield the same geographic and functional extent for a reporting entity. However, in a few cases, a Title V permit holder (known as a "source") encompasses more land and operations than EPA's use of the term "facility" in regards to greenhouse gas reporting. This arises when the Title V permit includes buildings and properties separated by more than a public right-of-way. This type of separation is specifically prohibited in the federal greenhouse gas reporting rule's definition of a "facility," whereas this exclusion is not included in the Clean Air Act definition of a major source or the corresponding Oregon rules defining "source."

Because the Oregon greenhouse gas reporting requirement is associated with the Title V permit, a Title V permit holder encompassing more operations than included in EPA's definition of a facility might need to report greenhouse gas emissions to Oregon differently than it reports to EPA. If your Title V permit encompasses properties separated by more than public right-of-way, please contact DEQ to determine the appropriate method of complying with Oregon's greenhouse gas reporting rules. With the exception of this section for special cases, DEQ uses the term facility throughout this document when referring to Title V permit holders and other entities subject to Oregon's greenhouse gas reporting program.

Supporting documentation

Reports must include data inputs used in the equations to calculate emissions. Data inputs include but are not limited to fuel throughput, emission factors, and production volumes or product usage that are used to calculate emissions from industrial processes. The facility must upload the documentation in EZ-Filer. EZ-Filer accepts certain file formats such as Adobe .PDF and Microsoft Excel and Word files.

Pursuant to Oregon's greenhouse gas reporting rules, each facility must retain records of all information used to calculate and report emissions, including inputs to equations, in a manner that is suitable for inspection and review.

Due to concerns expressed from a few facilities that some data inputs might be sensitive business information, DEQ allows facilities to omit certain data inputs used to calculate their greenhouse gas emissions. Data inputs that a facility wishes not to disclose, such as production volumes, may be omitted from the supplemental documentation of a facility's greenhouse gas report if the information meets the following two criteria:

1. The information is not reported to DEQ or any other public agency or is not otherwise publicly available. For example, information used to calculate a facility's greenhouse gas emissions that is being reported elsewhere, such as data contained in a facility's annual ACDP or Title V report, must be included with the greenhouse gas report; and
2. EPA has delayed reporting of the information under the federal greenhouse gas reporting program for the given emissions year.

If you choose to omit information from the report to DEQ, contact the program directly to receive a form to list the types of data inputs withheld from the report and certify that the omitted information meet the two criteria described above. Mail the completed form to DEQ as instructed on the form.

Because the reporting protocols are subject to change, visit [DEQ's website](#) for the latest information regarding greenhouse gas reporting from air quality permit holders, including updates to the reporting protocols.



Accessibility

Documents can be provided upon request in an alternate format for individuals with disabilities or in a language other than English for people with limited English skills. To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email deqinfo@deq.state.or.us.

