

Greenhouse Gas Reporting Protocols

Landfills

Instructions for reporting greenhouse gas emissions to DEQ

Applicability

Oregon rules require reporting of greenhouse gas emissions from landfills that obtain a permit issued by DEQ's Solid Waste program under OAR chapter 340 divisions 93 through 96 and which emit 2,500 metric tons or more of carbon dioxide equivalent during a year. The emission threshold includes all emission sources at the landfill, including the landfill's fugitive methane emissions and any onsite stationary fuel combustion.

Landfills exempt from reporting

DEQ does not require greenhouse gas reporting from a landfill that does not accept waste during the emissions year if the landfill is not subject to [EPA's federal greenhouse gas reporting requirements](#) under 40 CFR Part 98 (e.g. landfills with annual emissions less than 25,000 metric tons of carbon dioxide equivalents).

Emissions exempt from reporting

Pursuant to Oregon rules, landfills are not required to report emissions from categorically insignificant activities defined in ORS 340-200-0020(18) to DEQ. Greenhouse gas emissions are typically difficult to quantify for these activities. The exemption applies to Oregon greenhouse gas reporting; however, if a landfill cannot separate categorically insignificant activities from other activities (such as a facility that has one fuel meter for all activities), it is acceptable for the landfill to report aggregate emissions that include categorically insignificant activities. Landfills reporting emissions to EPA should consult the federal reporting requirements to determine what emissions, if any, are exempt from federal reporting.

Reporting deadlines

Landfills required to report greenhouse gas emissions to DEQ must generally report emissions for the prior calendar year by March 31st of the following year. Landfills with an ACDP or Title V permit that have a deadline for their annual report later than March 31st may report greenhouse gas emissions to DEQ by this later date.

Reporting protocols

The greenhouse gas reporting protocols differ depending on whether the landfill holds an Oregon air quality permit and whether the landfill is subject to the federal greenhouse gas reporting requirements, as described below:

- **A landfill that does not hold an Oregon air quality permit and which is not subject to the federal greenhouse gas reporting requirements** does not need to provide DEQ with any additional information other than what the landfill already submits annually to DEQ in compliance with its solid waste permit.
- **A landfill that holds an Oregon air quality permit and which is not subject to the federal greenhouse gas reporting requirements** is not required to report fugitive emissions from decay of waste at the landfill; DEQ will use data associated with the landfill's solid waste permit to calculate greenhouse gas emissions from the storage of waste at the landfill. If the landfill has stationary fuel combustion governed by the facility's air quality permit, such as combustion of captured landfill gas in a flare or for heat or energy, the landfill must report these emissions using EZ-Filer, DEQ's online reporting tool. A landfill combusting captured landfill gas must use the "landfill gas" fuel type. Captured landfill gas that is sent (e.g. for combustion or storage) at a different facility need not be reported.



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- **A landfill that holds an Oregon air quality permit and is subject to the federal greenhouse gas reporting requirements should report emissions using EZ-Filer.** Emissions should be reported utilizing the facility applicable quantification methodologies prescribed in 40 CFR part 98. Fugitive methane emissions from solid waste facilities must be reported as anthropogenic in accordance with 40 CFR part 98 subpart HH.

In some instances a landfill may satisfy Oregon's greenhouse gas reporting requirements by providing DEQ with a copy of its EPA report in place of reporting separately to DEQ. Oregon rules authorize DEQ to require the submission of additional information if the copy of the report submitted to EPA is not sufficient to determine all greenhouse gas emissions and related information required by DEQ.

Reporting submittal

Landfills with air quality permits reporting greenhouse gas emissions to DEQ must do so using [EZ-Filer](#). EZ-Filer is an online reporting tool developed by DEQ. Refer to [this documentation](#) on how to register with and use EZ-Filer.

Additional reporting requirements

Persons 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. Each utility 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.

For More Information

Please visit DEQ's website for the latest information regarding greenhouse gas reporting for landfills, such as updates to the reporting protocols and reporting forms. For additional information and guidance for reporting please contact the program at 503-229-6476 or GHGReport@deq.state.or.us

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.

