

Rulemaking Advisory Committee #1

GHG2019 Rulemaking

Sept. 11, 2019

RAC #1 Agenda

Sept. 11, 2019

TIME	TOPIC
9 a.m.	Welcome & Introductions
9:15 a.m.	Committee Business <ul style="list-style-type: none">• Roster• Charter
9:30 a.m.	Streamlining Fuels Reporting: GHG Reporting Program and Clean Fuels Program
10 a.m.	Proposed Rules: GHG Reporting Program
Noon	Lunch
1:30 p.m.	Proposed Rules: Verification Requirements
3:30 p.m.	Public Comment
3:45 p.m.	Next Steps
4 p.m.	Adjourn

Rulemaking Resources

Rulemaking Webpage:

<https://www.oregon.gov/deq/Regulations/rulemaking/Pages/rGHG2019.aspx>

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GHG Reporting Program

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Third-Party Verification

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Clean Fuels Program

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Committee Business

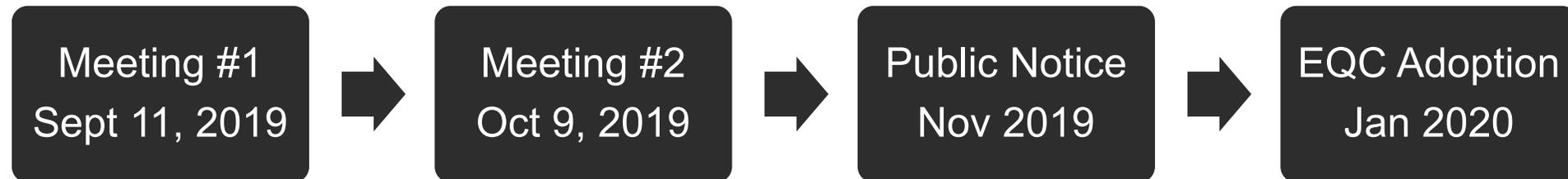
Background

- Oregon's GHG reporting program was authorized by the 2009 Legislature to collect data to inform climate policymaking discussions
- DEQ is conducting this rulemaking to enhance data collection under the program
 - The proposed rules will improve the specificity of how emissions data are calculated, reported, and verified
- These proposed improvements will allow the program to better support and keep pace with the evolving climate policy discussions in Oregon

Scope of Rulemaking

- Streamline the reporting requirements of the Greenhouse Gas Reporting Program (Division 215) and the Clean Fuels Program (Division 253) to enable entities subject to both programs to report into a single system
- Modify the GHG Reporting Program (Division 215) to incorporate existing reporting and emissions accounting protocols into rule
- Propose a new Division 272 to require some data submitted to DEQ for compliance with the Greenhouse Gas Reporting Program and the Clean Fuels Program be verified by independent third-parties
- Amend Division 12 to classify certain violations and establish or clarify enforcement criteria for violations of the Greenhouse Gas Reporting Requirements

Current Rulemaking Timeline



RAC #1 Agenda

Streamline Reporting: Greenhouse Gas Reporting Program (Division 215) and the Clean Fuels Program (Division 253)

Modify the Greenhouse Gas Reporting Program (Division 215)

Propose requirements for third-party verification (Division 272)

Streamlining of Fuels Reporting for GHG RP and CFP

→ Streamlining will reduce reporting burden

GHG RP

- Changes affect: fuel suppliers and in-state producers (excluding natural gas suppliers)
- Generally not changing **what** is reported, just **where** it is reported

CFP

- Changes affect: liquid fuels that involve position holders
- Minor changes: definitions and additional transaction types to capture data needed for GHG RP

GHG Reporting Program (Division 215)

Proposed Changes

→ Does NOT apply to natural gas suppliers (must report following the requirements of OAR 340-215-0040(4))

OAR 340-215-0040(3)

Fuel suppliers and in-state producers (All)

- Report through existing “CFP Online System”
- Report fuel type and quantity in **gallons** (was barrels) imported, sold, or distributed for use in Oregon
- Calculate and report emissions using quantification methodology in 40 C.F.R. part 98 subpart MM
 - DEQ will assign emission factors not listed by EPA
- Submit reports by **April 30** (was March 31)

GHG Reporting Program (Division 215)

Proposed Changes

OAR 340-215-0040(3)

Fuel suppliers and in-state producers (subject to CFP)

- Comply with Division 253 reporting requirements
 - Quarterly and annual reports
 - Small proposed changes
- May further report annual volumes by individual fuel type
- Attest to and submit data as an annual report to GHG RP

Fuel suppliers and in-state producers (NOT subject to CFP)

- NO CHANGE: just report annually as current rules and protocols require, with the exception of using a new reporting system

Clean Fuels Program (Division 253)

Proposed Changes

OAR 340-253-0040 (Definitions)

- Bulk transfer/terminal system
- Position holder sales definitions
- Changes to import definitions to align with GHG RP
 - Inside or outside the bulk system

RAC #1 Agenda

Streamline Reporting: Greenhouse Gas Reporting Program (Division 215) and the Clean Fuels Program (Division 253)

Modify the Greenhouse Gas Reporting Program (Division 215)

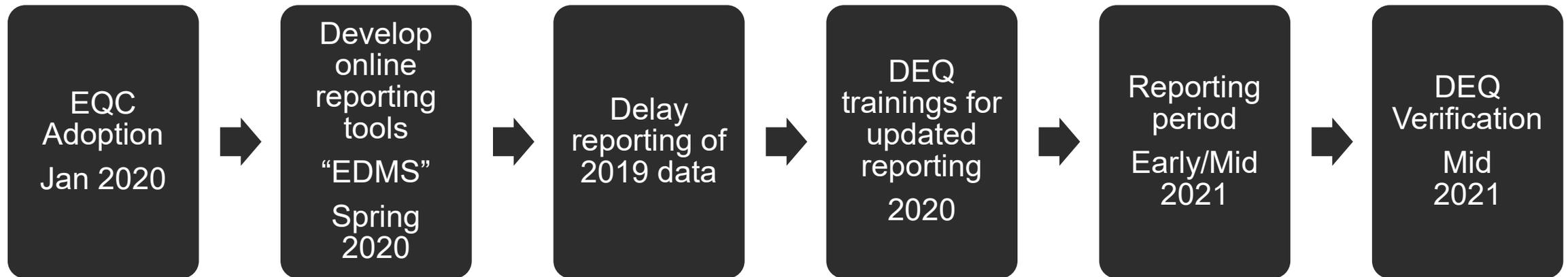
Propose requirements for third-party verification (Division 272)

GHG Reporting Program (GHG RP)

Guiding Principles

- Clarify reporting, record retention, and data requirements
- Create transparency in emissions calculations
- Ensure consistent treatment across regulated entities within each sector
- Streamline processes and reporting when possible
- Rely on established methodologies and practices
- Incorporate stakeholder feedback

Rule Implementation and Timeline



General Reporting Changes

- Incorporating existing protocols into rule
 - In most instances this does not change what is reported to DEQ but may require some additional details.
- Designating a representative
- Modifying deadlines
- Clarifying cessation requirements
- Clarifying reporting for biomass-derived fuels
- Minor changes
 - Liquid fuel was reported in barrels; now in gallons to align with CFP
 - Recordkeeping requirements were for 5 years; now 10 years

Areas with No Proposed Changes

- In most instances, DEQ is not proposing to change methods or procedures, just enhancements to existing data collection
- In most instances, DEQ is not changing who is reporting
- No changes to fees associated with GHG reporting

Making Comments on Proposed Rules

- Does the rule properly use terms with industry specific meanings?
- Are the definitions and language easily understood?
- What additional definitions are needed?
- Are there any concerns about data sensitivity?
- Are deadlines and timelines reasonable and appropriate?
- Is a 14 day turnaround time reasonable for DEQ to expect delivery after requests of information?

Reporting Deadlines

- DEQ may issue a notice to change deadlines in any given reporting year
- **March 31**
 - Permitted air contamination sources
 - Natural gas suppliers
 - Petroleum & natural gas systems
- **April 30**
 - Fuel suppliers (to align with CFP)
- **June 1**
 - Electricity system providers

Air Contamination Sources

Proposed Changes

- No proposed changes to applicability
 - Any source required to obtain certain permits must report
- Codify and clarify certain requirements in rule (OAR 340-215-0040(2))
 - Use EPA emissions quantification methodologies (Subparts C-UU)
 - Requirements for certain sources not subject to EPA reporting to comply with EPA (Subpart QQ) and DEQ requirements
 - Clarify separate reporting of fuel type, quantities, and emissions from fuel combustion

Air Contamination Sources

Proposed Changes

- New requirements for more comprehensive data collection
 - Report additional information about electricity generating and cogeneration units
 - Net and gross MWh
 - Thermal energy (MMBtu) used on-site and delivered to end users outside the facility
 - Follow certain procedures for calculating and reporting emissions from biomass-derived fuels
 - Report the natural gas received along with identifying information about the natural gas supplier

Air Contamination Sources

DEQ Requesting Comment to Address:

- Alignment with EPA methodologies and requirements
- The proposed quantification methods for foam blowing operations
 - OAR 340-215-0040(2)(a)(E)
- Procedures for emissions from biomass-derived fuels
 - OAR 340-215-0040(2)(a)(F)
- Are there data sensitivity concerns given the reporting requirements to disclose information about natural gas suppliers?

Fuel Suppliers and In-State Producers

Proposed Changes

- Aligning with the Clean Fuels Program
 - Use of the term “Fuel Importers”
 - Position holder transactions
 - Fuel definitions
 - Clarifying the methods used to report methane and nitrous oxide emissions from imported fuel.
- Including in-state producers
 - Already reporting to CFP for transportation fuels
- Providing guidance on how to report biomass-derived fuels and associated emissions including information about contracts and vendors for renewable fuels
- Simplifying the threshold for propane importers to exclude any entity that imports less than 3,500 gallons

Fuel Suppliers and In-State Producers

DEQ Requesting Comment to Address:

- Alignment with the Clean Fuels program
 - 350-215-0040(3)
- The inclusion of in-state producers
- The proposed thresholds for propane
 - 350-215-0030(3)(e)
- Reporting requirements when a change of ownership occurs
 - 350-215-0040(1)(e)(B)(iii)
- Reporting timelines: aligning with the April 30 CFP Deadline
 - 350-215-0040(3)(a)(B)
- Terms and definitions
 - Fuel Importer
 - Position holder

Natural Gas Suppliers

Proposed Changes

Includes interstate pipelines, natural gas utilities, importers of natural gas products, and in state production

- Requiring the use of EPA calculation methodology
 - Subpart NN quantification methodology for CO₂
 - Subpart C for methane (CH₄) and nitrous oxide (N₂O)
- Reporting data on large end users:
 - Gas supplied to large end users (188,500 MMBtu or greater) along with identifying information about the end user
- Reporting data on marketers:
 - Report quantity of gas transported for marketers contracting use of the distribution system along with identifying information about the marketer
- Providing guidance on reporting biomethane

Natural Gas Suppliers

DEQ Requesting Comment to Address:

- Are the differences in reporting requirements for each type of natural gas supplier clear?
- Can this data be obtained and reported?
- Are there data sensitivity concerns given the reporting requirements to disclose information about large end users and marketers?

Petroleum and Natural Gas Systems Proposed Reporting Requirements

- Report emissions using EPA Subpart W methods for infrastructure physically located in Oregon:
- This would impact:
 - Interstate Pipeline Owners
 - Transmission
 - Natural Gas Utilities
 - Distribution

Petroleum and Natural Gas Systems

DEQ Requesting Comment to Address:

- Is there additional information that DEQ should consider requiring beyond subpart W?
- Are there exemptions from subpart W that should or can be reported?

Electricity Proposed Changes

Change in point of reporting/point of regulation

- Electricity Suppliers → Electricity System Managers
- Aim is to treat entities that import, sell, allocate or distributes electricity to end users in the state consistently
 - In most cases, this approach assigns reporting responsibility to a load-serving entity, which generally produces the same reporting obligations for the same entities as current rules

Electricity

Proposed Reporting

- **Multijurisdictional Utilities:** Oregon's share of their system
- **PGE:** Emissions from generation supplying their retail load in their BA
- **Electricity Service Suppliers:** deliveries to their direct-access customers
- **COUs:** All owned or contracted generating resources and market purchases for their load outside of purchases from BPA
 - COUs that serve load outside of Oregon will report total sales in Oregon
- **BPA:** Power distributed to Oregon COUs (includes both full- and partial- requirements customers)
- **PNGC and other similar entities:** Power distributed to serve Oregon load (non-federal power scheduled on behalf of COUs)

Electricity

Proposed Specificity

- Improved emission factor specificity:
 - A “specified source” is:
 - Tied to a specific generating resource through contracts or ownership/operational control (DEQ-assigned EF by facility/unit)
 - Electricity from a DEQ-recognized Asset-Controlling Supplier (DEQ-assigned EF by ACS system)
 - An “unspecified source” is from unidentified market purchases (DEQ-assigned EF of 0.428 metric tons CO₂e/MWh; aligns with CARB and WCI)

Electricity

DEQ Requesting Comment to Address:

- Is the proposed rule language clear on who is the point of reporting and what they must report?
- Terms and definitions
 - Electricity system provider (point of reporting)
 - Asset-controlling supplier
 - Power contract
- Requirements for claims of specified sources of electricity
 - OAR 340-215-0040(5)(d)

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Streamline Reporting: Greenhouse Gas Reporting Program (Division 215) and the Clean Fuels Program (Division 253)

Modify the Greenhouse Gas Reporting Program (Division 215)

Propose requirements for third-party verification (Division 272)

Third-Party Verification (3PV)

Guiding Principles

Why require third-party verification?

- Improve data reliability to track progress toward targets and support policy discussions
- Identify areas of risk and opportunity
- Decrease liability associated with incorrect data
- Obtain detailed, thorough, independent review of data

Third-Party Verification (3PV) Overview

What/Who must be verified?

- GHG Reporting Program reports
 - Emissions data reports for large emitters
- Clean Fuels Program reports
 - Annual fuel pathway (CI) reports
 - Quarterly transaction reports (annual verification)
 - Project reports

How does verification work?

- Reporter contracts with a DEQ-accredited verifier
- Verification services are conducted after the reporter attests to and submits data to DEQ and before the verification deadline
- DEQ receives a verification statement upon completion of services

Third-Party Verification

- **What/who must be verified?**
- How does verification work?

3PV Applicability

Clean Fuels Program (Division 253)

OAR 340-272-0110

- **Fuel pathway (CI) applications** are NOT required to obtain 3PV, but those that elect to have applications validated will be prioritized for approval
- **Each annual fuel pathway (CI) report** submitted
 - Holders of approved fuel pathways in California must submit those verification statements to DEQ
 - Exemptions:
 - Holders of approved fuel pathways that do not generate $\geq 6,000$ credits and deficits during the previous calendar year for the quantity of fuel produced at a given facility
- **Project reports** submitted by project operators

3PV Applicability

Clean Fuels Program (Division 253)

OAR 340-272-0110

- **Quarterly reports** (are subject to annual verification) and are eligible for less intensive verification
 - Limited to the following transaction types:
 - All liquid fuels
 - NGV fueling
 - Propane fueling
 - Exemptions:
 - Entities regardless of transaction type that do not generate $\geq 6,000$ credits and deficits during the previous calendar year
 - Fuel importers that submit an emissions data report to the GHG RP that does not indicate emissions $\geq 25,000$ metric tons of CO₂e

3PV Applicability

GHG Reporting Program (Division 215)

OAR 340-272-0120

- Each **emissions data report** meeting the following conditions:
 - Any report with emissions $\geq 25,000$ metric tons of CO₂e
 - Threshold for determining applicability includes vented and fugitive emissions, but excludes CO₂ from biomass-derived fuels
 - A third party (who is not BPA) who submits a report on behalf of a COU must have data verified for each individual utility meeting the threshold (excluding emissions associated with power purchased from BPA)
- Verification must be conducted for total reported emissions (including CO₂ from biomass-derived fuels)

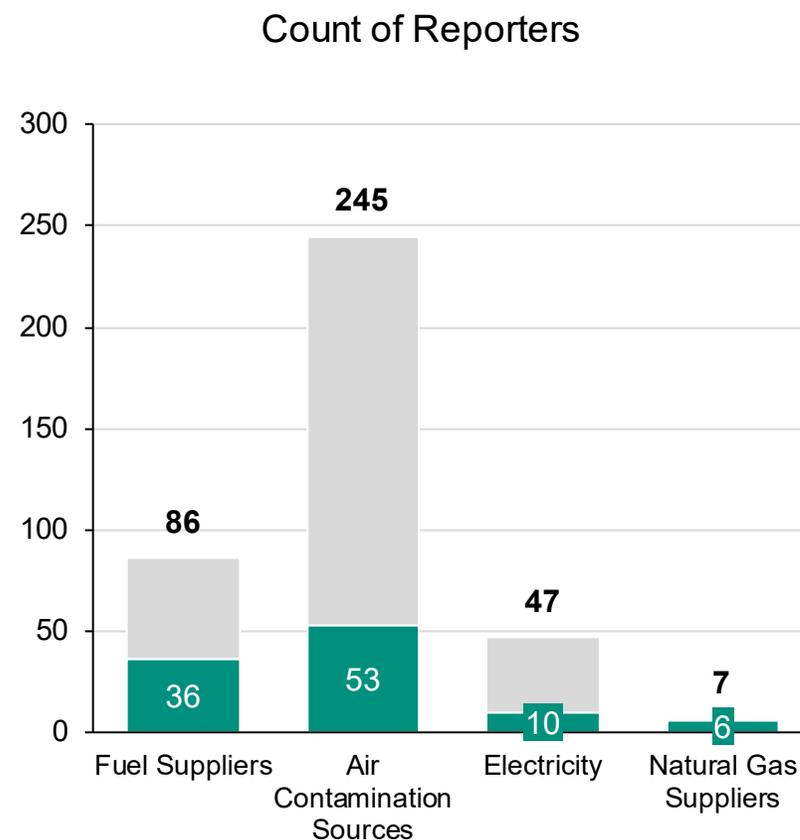
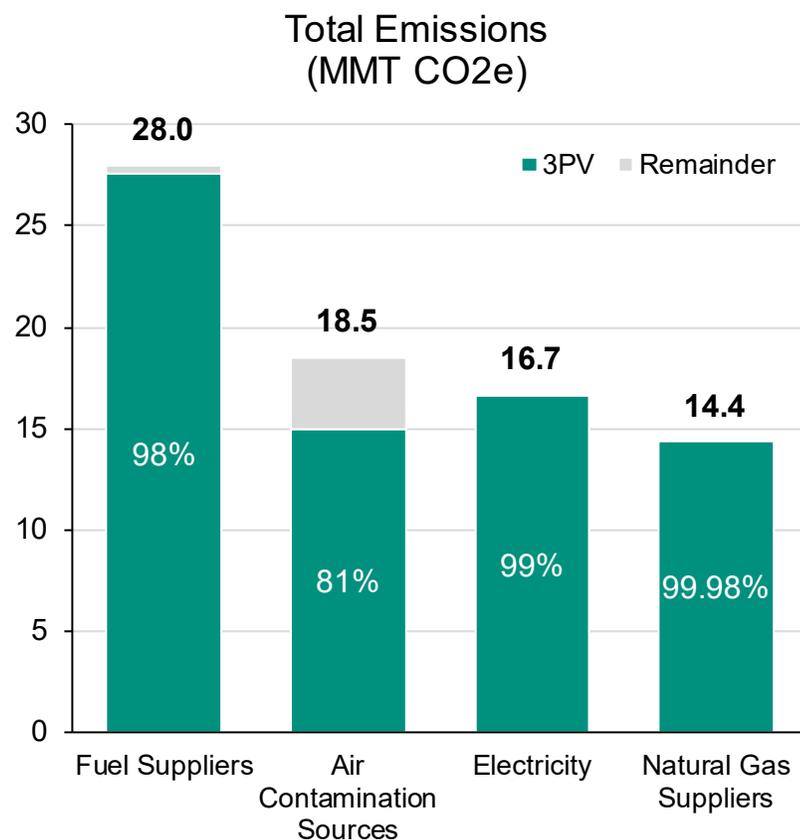
3PV Applicability

GHG Reporting Program (Division 215)

OAR 340-272-0120

- Emissions data reports are eligible for less intensive verification
- Entities that have met reporting/verification cessation requirements are not subject to 3PV
 - Must have the emissions data report verified for the first year that emissions are reduced below the applicability threshold

Scope of 3PV Emissions and Reporters under GHG RP (based on 2017 data)



Those reporting anthropogenic emissions $\geq 25,000$ MT CO₂e would be subject to 3PV of total emissions and other reported data. This would result in 3PV of ~95% of reported emissions.

Third-Party Verification

- What/who must be verified?
- **How does verification work?**
 - **Verification Services**
 - Verifier Accreditation
 - Proposed Implementation

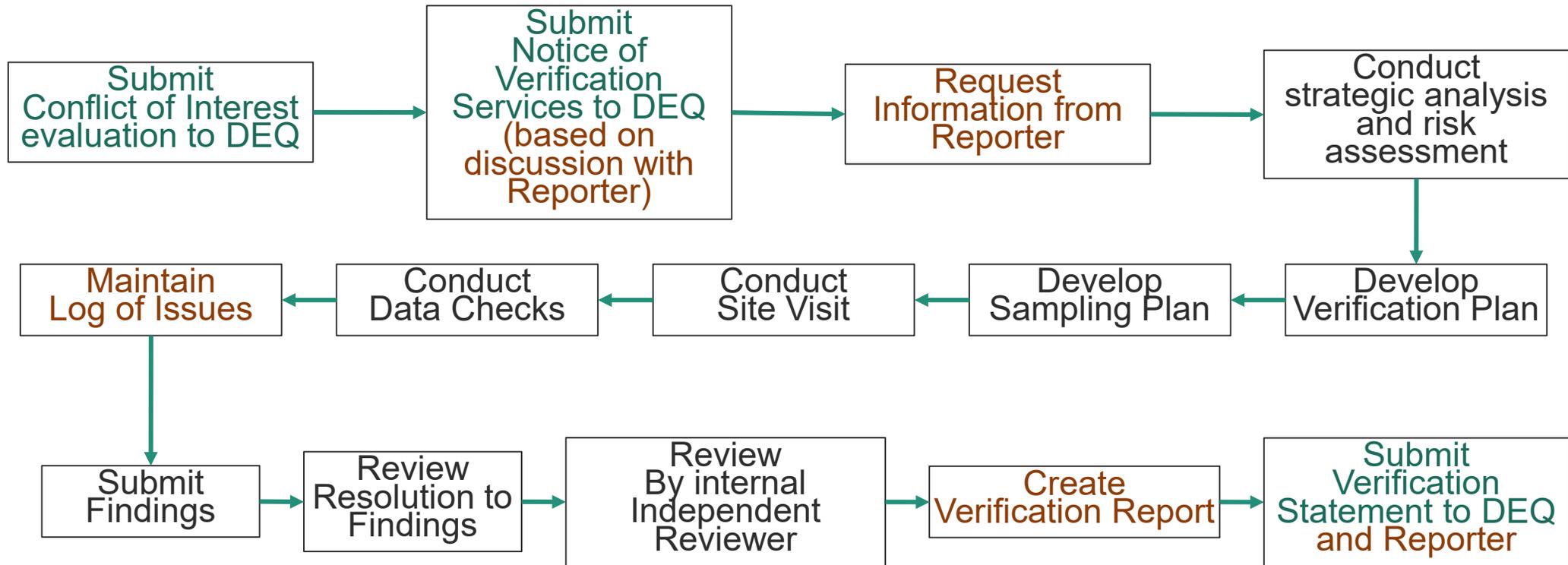
Key 3PV Concepts

- A **verification body** accredited by DEQ will conduct verification services to determine whether a submitted report is free of material misstatement and whether it conforms to the applicable requirements
 - **Verification services:** review of a submitted report, compliance and accuracy assessment, submission of verification statement(s)
 - **Material Misstatement:** verification team believes a submitted report contains one or more errors that, individually or collectively, result in an overstatement or understatement greater than 5%
 - **Nonconformance:** failure to meet the requirements of Division 272, Division 215, or Division 253, as applicable, including use of the methods or emission factors specified in the applicable division

Key 3PV Requirements for Reporters

- 3PV of reports submitted to the GHG RP and CFP is **proposed to begin in 2021 (for verification of 2020 data)**
- OAR 340-272-0100 (general requirements)
 - Attest to and submit data to DEQ before verification services can begin
 - Contract with a DEQ-accredited verifier and hire a new verifier after six years with the same body
 - Ensure the verifier submits a verification statement to DEQ by the **verification deadline of August 31**
- OAR 340-272-0306 (modifications to reports)
 - Correctable errors found by the verifier must be fixed
- OAR 340-272-0600 (re-verification)
 - May be required if a conflict of interest is found between the reporter and the verifier or if a report fails a DEQ audit

Verification Services: Key Steps for Verifier



- Key areas of coordination with reporter
- Key areas of submissions to DEQ

Details for verification services:
OAR 340-272-0300 through -0313

What Reporters Can Expect from the Verifier

List of Requested Documents and Records

Likely included as part of the verification plan

Verification Plan:
OAR 340-272-0301

Log of Issues

- Objective evaluation w/ clear explanation of issue (what, why, where, how)
- Includes potential impact on material misstatement or conformance, and will be updated when resolved

Log of Issues:
OAR 340-272-0308

Verification Report

A draft should be reviewed before report is finalized

Completion of services:
OAR 340-272-0400(3)

Verification Statement

Also submitted to DEQ

Completion of services:
OAR 340-272-0400

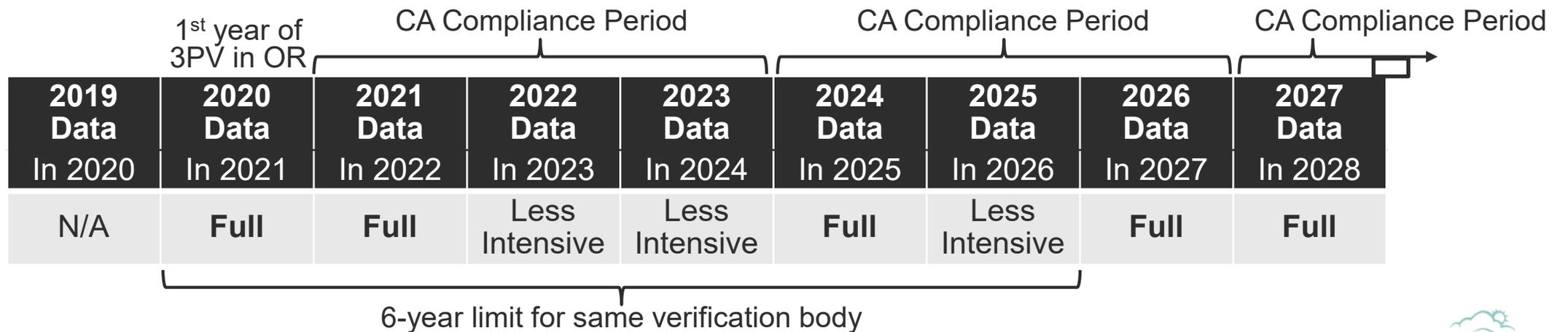
Information that May be Requested/Reviewed During Verification

- Be prepared to trace data to its origin and provide data to verifier
 - Anticipate questions about data quality
 - Prepare evidence supporting data estimates
- Reporters should be able to provide to their verifier:
 - Information for the verifier to develop a general understanding of entity boundaries, operations, and electricity/fuel transactions
 - Documentation to confirm sources/sales of electricity/fuel
 - Contracts
 - Meter data
 - NERC e-Tags (may be used to confirm MWh/delivery in Oregon)
 - Procedures for missing data estimates

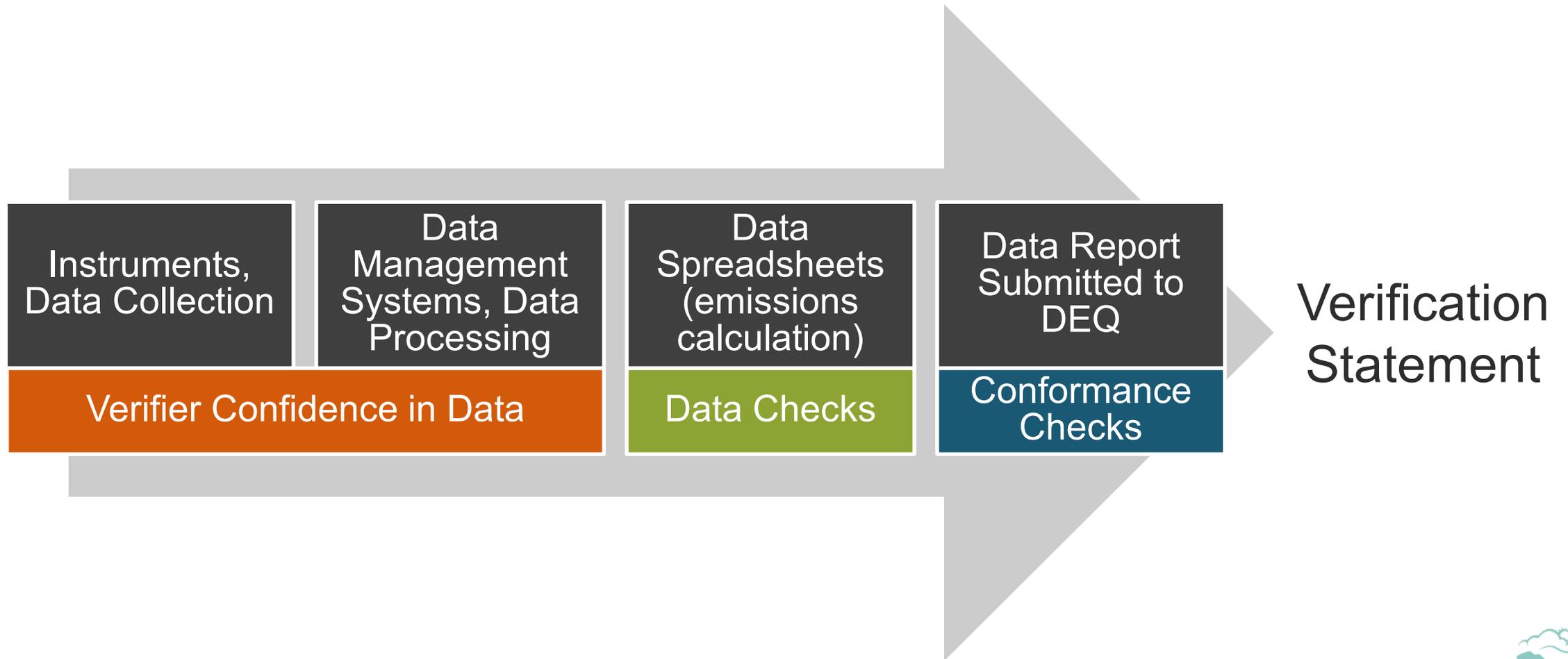
Less Intensive Verification

OAR 340-272-0100(1)

- Available for annual verification of emissions data reports (GHG RP) and quarterly fuel transaction reports (CFP)
- Allows for less detailed data checks / document reviews and does **not** require site visit(s) if:
 - Verifier chooses not to conduct site visit
 - Received positive verification statement
 - No change in verification body
 - No change in ownership/operational control
 - Not the first year of a California Cap and Trade compliance period



Data Verification Process



Confidence in Data Systems

- Transparency provides confidence in data
 - Staff competency, knowledge of reporting requirements, how reporting system is integrated with other systems
- Planning for meter failure
 - Ensures verifier you have an understanding of the importance of accurately reporting data
- Cross-checking and risk evaluation
 - Comparing CEMS data to emissions estimates
 - Review of flow meters and gas samples

Data Checks

- Data checks may be simplified if verifier has confidence in data systems
 - Comparison of random days/months with reported data
- Data checks may be more detailed if verifier does NOT have confidence in data systems or reported data
 - Errors found during verification will likely require the verifier to increase amount of data review

Conformance

- Verifier review for completeness and accuracy
 - Are all sources included?
 - Were the correct calculation methods and emission factors applied?
 - Natural gas provider information
 - Aggregation of units, review of fuel sampling frequencies and test methods, and any other 40 C.F.R Part 98 requirements

Verification Statement

- **Verification statement:** final statement from a verification body attesting whether a report is free of material misstatement and conforms to all applicable requirements
- Reporter must ensure verifier submits a verification statement to DEQ by August 31

Verification Statement	Description
Positive	free of material misstatement and conforms to the applicable requirements (3PV, CFP or GHG RP)
Qualified Positive	free of material misstatement and conforms to the 3PV requirements, but may include one or more other nonconformance(s) (with CFP or GHG RP requirements), which do not result in a material misstatement
Adverse	contains material misstatement or includes nonconformance(s) (i.e. contains correctable errors)

Correctable Errors Must be Fixed

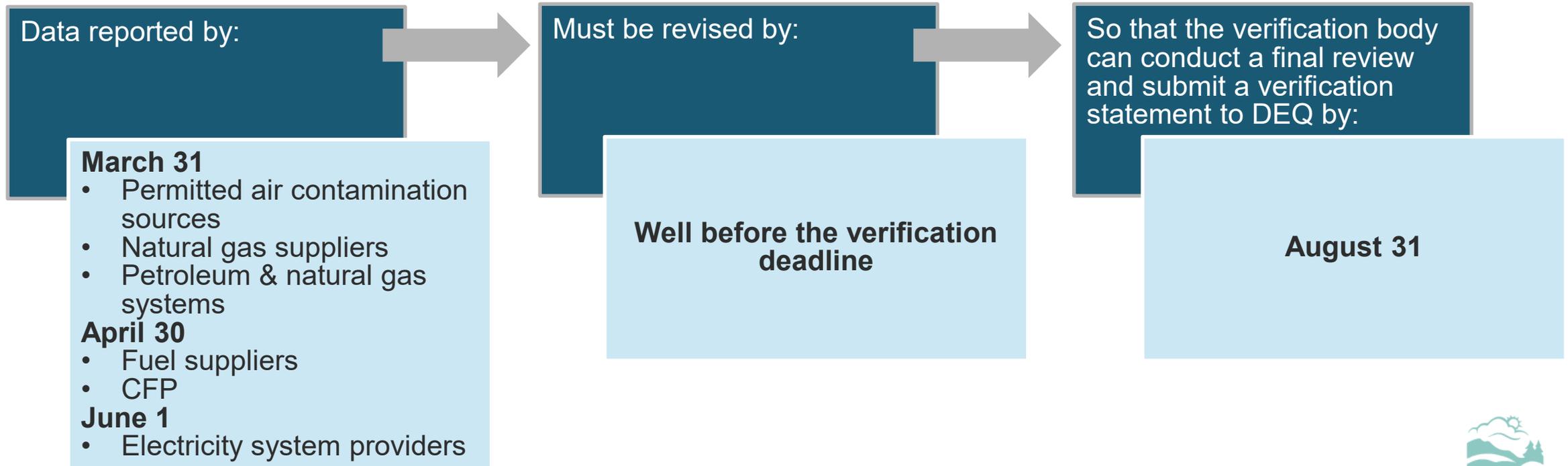
OAR 340-272-0306

- Failure to fix a correctable error identified by the verifier triggers an adverse verification statement
- Not all errors require a fix
 - An error that is not correctable may trigger a qualified positive verification statement if the total emissions data is otherwise accurate

Correctable Error?	Description
	errors identified by the verification team that affect data in the submitted report, which result from a nonconformance with Division 215 (GHG RP) or Division 253 (CFP)
	errors based on the professional judgement of the verification team that are the result of differing but reasonable methods of truncation, rounding, or averaging, where a specific procedure is not prescribed and therefore do not require correction

Report Modifications

- Verification is an iterative process
- Submitted reports can be modified
- It is common to have errors identified during first years of verification



Third-Party Verification

- What/who must be verified?
- **How does verification work?**
 - Verification Services
 - **Verifier Accreditation**
 - Proposed Implementation

Accreditation

OAR 340-272-0800

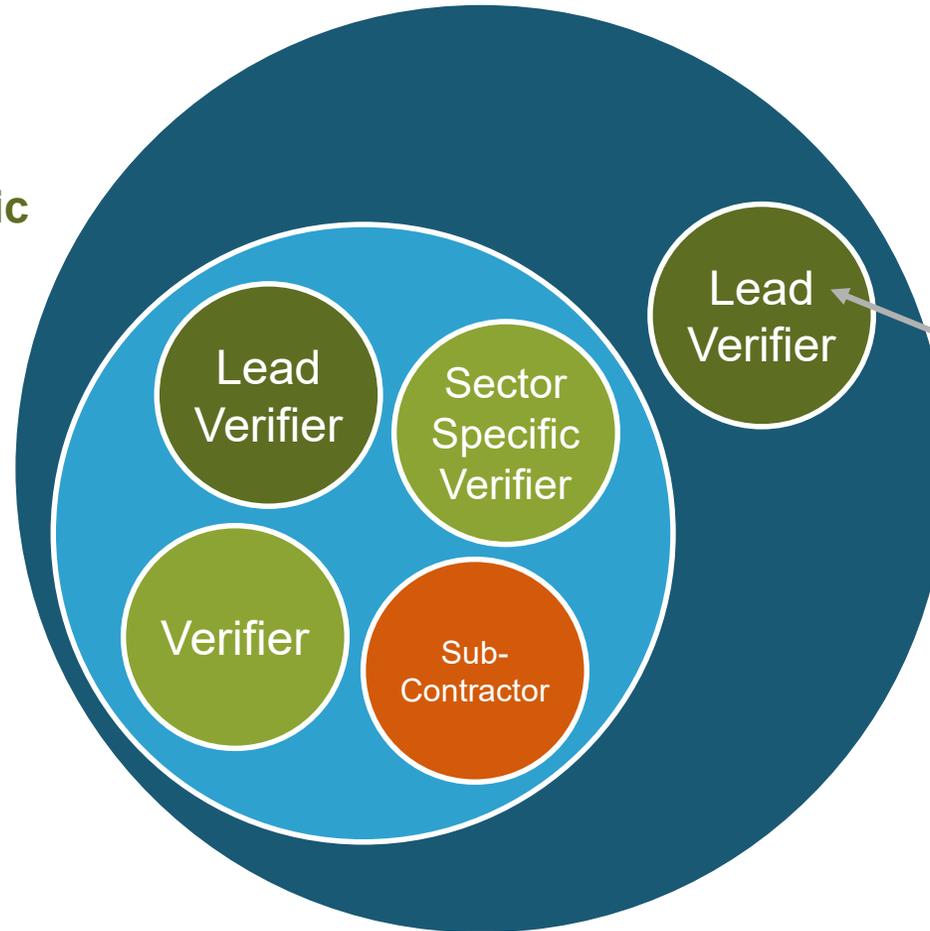
- Only DEQ-accredited verifiers may provide services
- Must apply for DEQ accreditation as a verification body, lead verifier, sector specific verifier, or general verifier
- Verifiers must meet educational and professional experience requirements (that align with California ARB) and must take DEQ trainings and exams
- Verification bodies may subcontract verification services, if the subcontractor meets certain requirements, including obtaining DEQ-accreditation
- Must apply to be reaccredited every three years

Staff Designated to Provide Verification Services

Verification Team

Conducting verification services

- Must include a **lead verifier**
- Must include a **sector specific verifier** (may double as lead verifier)
- Any **subcontractors** contracted by the verification body must also be accredited by DEQ



Verification Body

Accredited by DEQ

- Must meet certain eligibility requirements

Lead Verifier

Serving as **independent reviewer** (part of completion of verification services)

- Must be part of the verification body (cannot be a subcontractor)
- Must be listed on Notice of Verification Services
- May be a sector specific verifier, but is not required

Verification Body Requirements

- OAR 340-272-0800(1)(a)(C): to be eligible, must have active accreditation or recognition under other programs such as California ARB, The Climate Registry, ANSI, certain ISO registrars, etc.
- OAR 340-272-0800(2)(b): minimum requirements
- As part of verification services:
 - Evaluate conflict of interest with reporter
 - Reporter can help by providing records regarding business relationships within the past 5 years
 - Develop sampling plan and verification report
 - Reporters should offer to describe and summarize data so it is easy for verifier to use

Individual Verifier Requirements

- OAR 340-272-0800(2)(c): minimum requirements
 - Educational and professional experience requirements
 - Be an expert in the regulation requirements
 - Lead verifier applicants must demonstrate leadership roles
- As part of verification services:
 - Evaluate conformance and material misstatement of submitted data
 - Review reporter's QA/QC procedures
 - Provide written explanation of evidence to DEQ that reported data are accurate

Sector Specific Verifier Requirements

- OAR 340-272-0800(2)(f): general requirements
- Oregon DEQ is not proposing types of sector specific verifiers in this rulemaking, but guidance will be made available
- California sector specific verifiers include:
 - Process Emissions Specialist
 - Cement, glass, lime, pulp and paper, iron and steel, nitric acid
 - Transactions Specialist
 - Natural gas, LPG, transportation fuel, CO₂ suppliers, electricity system providers
 - Oil and Gas Systems Specialist
 - Refineries, hydrogen production, oil and gas production
- As part of verification services:
 - At least one member of the verification team must have sector accreditation

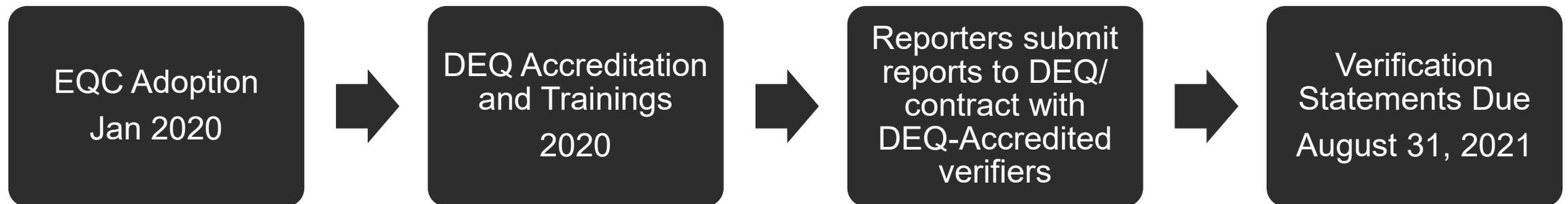
DEQ Requesting Comment to Address:

- Is there a general understanding of what these proposed rules are requiring?
- Are the applicability requirements (and exemptions) reasonable?
 - OAR 340-272-0100 through -0120
- Does the 3PV requirement beginning in 2021 and annual deadline of August 31 seem reasonable?
 - Is there interest in staggering 3PV deadlines to align with staggered reporting deadlines?
- Is the less intensive verification option of interest? Is there interest in aligning the schedule with California Cap and Trade compliance periods or some other schedule?
- Reporters are encouraged to provide comment on cost of 3PV

Third-Party Verification

- What/who must be verified?
- **How does verification work?**
 - Verification Services
 - Verifier Accreditation
 - **Proposed Implementation**

Proposed Rule Implementation and Timeline



Proposed Next Steps for Verification

- DEQ would begin the implementation process in 2020 after EQC adoption
- Continue development of:
 - FAQs and tips for the verification process
 - Best practices
 - Streamlining the verification process
 - Verifier application and evaluation forms
 - Trainings and exams

Opportunity for Public Comment

Comments and Feedback

- DEQ is currently accepting comment on:
 - Proposed draft rules
 - OAR 340-215, OAR 340-253, and OAR 340-272
 - Input for the fiscal impacts analysis (to be presented at the next RAC meeting)
 - Provide information on costs for third-party verification
- DEQ will not be responding to individual comments
 - The official Public Comment period will be in November

Next Steps

- Please submit comment on today's discussion and draft rule language (available on the rulemaking webpage) by **COB Sep. 18, 2019**
 - Submit comment to: GHG2019@deq.state.or.us
- The next Rulemaking Advisory Committee meeting is scheduled for **Oct. 9, 2019**
 - Updated draft rule language and concepts
 - Fiscal impacts analysis

Rulemaking Resources

Rulemaking Webpage:

<https://www.oregon.gov/deq/Regulations/rulemaking/Pages/rGHG2019.aspx>

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