



Tina Kotek, Governor

Oregon

Department of Environmental Quality

Office of Greenhouse Gas Programs

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April 12, 2024

Intel Corporation
Attn: Wes Lund
3585 SW 198th Ave.
Aloha, OR 97007

RE: Warning Letter with Opportunity to Correct

Source Name: Intel Corporation

Permit# 34-2681-ST-02

WL# 2024-WLOTC-6767

Dear Wes,

On March 15, 2024, Intel Corporation (Intel) notified DEQ of inaccuracies it had discovered in its 2022 Greenhouse Gas emissions data report submitted to DEQ in March 2023. Specifically, Intel undercalculated its 2022 greenhouse gas emissions by approximately 154,840 metric tons of carbon dioxide equivalent (MtCO₂e) due to an inaccurate inventory of gas tanks for 2022. Intel stores various gases in tanks or cylinders for use in its semiconductor manufacturing operations. Some of these gases contain high global warming potential greenhouse gases such as sulfur hexafluoride (SF₆). The gas tanks inventory is used as the basis for reporting greenhouse gas emissions to DEQ pursuant to 40 CFR part 98, subpart I, incorporated into Oregon's Greenhouse Gas Reporting Program at Oregon Administrative Rule (OAR) Chapter 340, Division 215.

Intel's emissions data report for the 2022 data year was also subject to the third-party verification requirements under OAR Chapter 340, Division 272. On August 24, 2023, Intel's third-party verifier submitted a positive verification statement for the 2022 emissions data report to DEQ. Because the reporting inaccuracy described above was identified after submission of the verification statement, DEQ hereby rejects the verification statement received on August 24, 2023, according to OAR 340-272-0350(1)(a). DEQ is requiring full re-verification of the corrected emissions data report for the 2022 data year within 90 days of the date of this Warning Letter according to OAR 340-272-0350(2)(a)(D). Intel must contract a different verification body to perform this work.

VIOLATION:

DEQ has determined that Intel Corporation is responsible for the following violation:

1. Failing to timely submit an accurate emissions data report under OAR 340-215-0105(1) and OAR 340-215-0046(1)(a). This is a Class I violation according to OAR 340-012-0054(1)(ii).

Class I violations are the most serious violations; Class III violations are the least serious. Timely and accurate greenhouse gas information is critical to the integrity of DEQ's greenhouse gas emissions inventory and helps inform climate policy decisions at the State level.

Corrective Action(s) Required:

1. Revise and resubmit the greenhouse gas emissions data report for emissions data year 2022 to reflect the actual metric tons of CO2 equivalent produced at the source. The revisions must be made online using the [EZ-FILER](#) reporting tool. This submission must be made to the DEQ Office of Greenhouse Gas Programs no later than May 27, 2024, as per OAR 340-215-0044(2)(c).
2. Have the corrected emissions data report for data year 2022 fully re-verified by a different verification body, including a site visit, and submit a verification statement to DEQ within 90 days of receipt of this warning letter, no later than July 11, 2024 per OAR 340-272-0350(2)(a)(D).

Should these violations remain uncorrected, or should you repeat any of these violations, this matter may be referred to DEQ's Office of Compliance and Enforcement for formal enforcement action, including assessment of civil penalties and/or a department order. Civil penalties can be assessed for each day of violation.

If you believe any of the facts in this Warning Letter are in error, you may provide information to me by sending an email to GHGReport@deq.oregon.gov. DEQ will consider any new information you submit and take appropriate action.

DEQ endeavors to assist you in your compliance efforts. If you have any questions, please feel free to contact me directly at bill.brady@deq.oregon.gov or by phone at (503) 847-7529.

Sincerely,

Bill Brady

Bill Brady
Greenhouse Gas Reporting Specialist
Office of Greenhouse Gas Programs
Oregon Department of Environmental Quality

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