

New 2020 GHG Reporting Requirements (OAR 340-215)

Greenhouse Gas Reporting Program, Oregon Department of Environmental Quality

Presentations February 3rd and 4th, 2021

Remote Presentation

Disclaimer

The following presentation and included resource are intended for air quality permit holders only. **There will be future trainings for fuel suppliers and electricity suppliers.**

Agenda

- Review current reporting requirements:
 - *Reporting threshold (2,500 MTCO_{2e})*
 - *Reporting stationary combustion emissions*
 - *Reporting process emissions*
- Review changes to [OAR 340-215](#), including new data elements and how to report:
- Introduce tier 2, 3, and 4 stationary combustion (subpart C) reporting
- Supplementary Reporting form overview and demonstration
- Submission by the Designated Representative
- Questions

GHG Reporting Program 2020 Overview

The majority of the 2020 updates impact facilities reporting *OVER 25,000 MTCO₂e* and facilities reporting emissions *OTHER THAN* general stationary combustion.

Many of the GHG reporting requirements remain the same including:

- Applicability for reporting: Applies to all permitted sources that emit over 2,500 MTCO₂e
- Calculation methodology: Require the use of EPA calculation methodology with the exception of producers of fluorinated GHG.
- Report using EZ-Filer and DEQ forms
- Submission of supporting documentation

New reporting requirements primarily focus on providing additional details and information on currently reported emissions data

DEQ delayed the reporting deadline from March 31st to **April 30th** for the reporting of 2020 emissions in 2021

Updates to OAR 340-215 Reporting Requirements

Beginning in 2021, sources are required to report **new** additional information with their annual 2020 GHG emissions report, including:

- Natural gas supplier information;
- Any significant changes in annual GHG emissions from year-to-year for large sources ONLY (annual GHG emissions \geq 25,000 MTCO₂e);
- Cogeneration & electricity generating unit information;
- Additional information from liquid and gaseous biomass-derived fuels; and
- Itemized fuel emissions for sources using subparts H, W, and AA

All of the above data elements will be collected using a supplementary reporting form that must be uploaded into EZ-Filer (we will cover the details of this form later in the presentation).

Reporting Emissions from Natural Gas Combustion

[OAR 340-215-0105\(8\):](#)

When reporting emissions from the use of natural gas, sources are now ***required*** to report:

- The name(s) of the supplier(s) of natural gas;
- Natural gas customer account information; and
- Annual MMBtu delivered to each account according to the billing statement.

Reporting Significant Changes in Annual Emissions

[OAR 340-215-0044\(4\)\(a\) and \(b\):](#)

- Sources with annual GHG emissions greater than or equal to 25,000 MTCO₂e MUST provide an explanation of any increase or decrease (i.e., *change*) in emissions of 5% or more between years.
- This requirement ONLY applies to large sources that emit greater than or equal to 25,000 MTCO₂e annually.

Reporting Information from Cogeneration & Electricity Generating Units

[OAR 340-215-0105\(4\)\(a\)\(b\)\(c\) and \(d\):](#)

Electricity Generating Unit: any combination of physically connected generator(s), reactor(s), boiler(s), combustion turbine(s), or other prime mover(s) operated together to produce electric power.

Cogeneration Unit: a unit that produces electric energy and useful thermal energy for industrial, commercial, or heating and cooling purposes through the sequential or simultaneous use of the original fuel energy and waste heat recovery.

Reporting Information from Cogeneration & Electricity Generating Units

[OAR 340-215-0105\(4\)\(a\)\(b\)\(c\) and \(d\):](#)

In addition to following the reporting protocols contained within 40 CFR part 98, subparts C and D, sources must report the following information:

- Name, address, contact person and phone number for each facility (if more than one facility is listed on the air contamination permit) with a cogeneration or electricity generating unit (or both).
- Facility Identification Numbers (FINs) assigned by the US Energy Information Administration, CARB, and FERC's PURPA Qualifying Facility program.
- Net and gross electricity generated in MWh for EGUs
- Thermal energy (MMBtu) generated by a cogeneration unit, reported separately for the following categories:
 - Thermal energy provided to off-site end users; and
 - Thermal energy for on-site uses not related to electricity generation.

Reporting Information from Cogeneration & Electricity Generating Units

[OAR 340-215-0105\(4\)\(a\)\(b\)\(c\) and \(d\):](#)

DEQ requires reporting total emissions by source permit; in some cases a large source (>25,000 MTCO₂e) may include more than one *facility* and report emissions from those facilities separately to EPA. In this case, data must be separated out by facility. Sources must will report under a single source permit.

Facility means any physical property, plant, building, structure, source, or stationary equipment located on one or more contiguous or adjacent properties in actual physical contact or separated solely by a public roadway or other public right-of-way and under common ownership or common control, that emits or may emit any greenhouse gas. **When more than one facility is covered under a single air contaminant discharge or title V permit, report emissions from cogeneration and electricity generating units by facility (not in aggregate).**

Additional Requirements for Liquid & gaseous Biomass-Derived Fuels

[OAR 340-215-0105\(8\):](#)

Sources must report the following information when reporting the emissions from gaseous or liquid biomass-derived fuels:

- Name and address of the vendor from which the fuel was purchased;
- Name, address, and type of facility where the fuel was produced;
- Annual amount delivered by each vendor in MMBtu for biomethane, scf for gaseous fuels, and gallons for liquid fuels.

Reporting Emissions for Subparts H, W, or AA

[OAR 340-215-0105\(2\)](#):

Sources reporting emissions under subparts H ([cement manufacturing](#)), W ([petroleum and natural gas systems](#)), or AA ([pulp and paper manufacturing](#)) must *separately* report fuel types, quantities, and emissions from fuel combustion using the [supplemental reporting form](#).

Stationary Combustion, Multiple Tier Reporting

Sources MUST report stationary combustion emissions using calculation methodologies tiers 1 through 4 from [subpart C of 40 CFR part 98](#).

For sources that report to both EPA and DEQ, submit data to DEQ using the same tier methodology as reported to EPA, for the same emissions year.

[Most sources will continue to use tier 1:](#)

- This methodology uses default emissions factors and default HHV of the fuel to calculate emissions from fuel combustion.
- EZ-Filer automatically calculates emissions using tier 1 methodology based on fuel types and quantities reported by the source.

Stationary Combustion, Multiple Tier Reporting

Sources reporting stationary combustion emissions using calculation methodologies tiers 2 through 4 from [subpart C of 40 CFR part 98](#) must calculate emissions outside of EZ-Filer, report in total MTCO₂e, and submit emissions and supporting documentation to DEQ.

Carbon dioxide emissions from biomass-derived fuels must be reported separately.

Tier Descriptions:

- [Tier 2](#): Uses default emissions factors and measured annual average high heat value of the fuel (the result of fuel sampling) to calculate emissions from fuel combustion;
- [Tier 3](#): Uses annual average carbon content of the fuel to calculation emissions from fuel combustion;
- [Tier 4](#): Uses a CEMS or similar technology to measure emissions directly from stack gas.

Review Supplementary Reporting Form in EZ-Filer

[Supplemental Reporting Form](#)

Click on the above embedded Supplementary Reporting Form to follow along during the presentation.

Submission by the Designated Representative

Each registration or emissions data report submitted by a regulated entity must contain certification by a **designated representative** of the truth, accuracy, and completeness of the submission. [OAR 340-215-0040\(1\)](#)

“Designated representative” means the person responsible for certifying, signing, and submitting a greenhouse gas emissions data report, and any registration or report required to be submitted under this division, on behalf of a regulated entity. For owners or operators of Oregon Title V Operating Permits the designated representative is the responsible official and certification must be consistent with OAR 340-218-0040(5).

Remember...

ALWAYS submit supplemental documentation when reporting emissions not automatically calculated in EZ-Filer.

Questions

*Questions may always be directed to the GHG program inbox,
GHGReport@DEQ.state.or.us*

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.

Program Contact Information

Questions regarding 2020 emissions reporting should be sent to the program at GHGReport@DEQ.state.or.us or reporters may contact Jackson Dougan for technical assistance by phone at 503-839-5499

Additional sector specific contact information is available at
<https://www.oregon.gov/deq/air/programs/Pages/ghg-contacts.aspx>

Jackson Dougan
Air Permitted Sources Contact
GHG Reporting Program, Oregon DEQ
503-839-5499

Elizabeth Elbel
GHG Program Manager
GHG Reporting Program, Oregon DEQ
503-229-6476

Reporting Resources

Reporting Guidance

- [Reporting Protocols for Air Permitted Sources](#)
- [Frequently Asked Questions for Air Permitted Sources](#)
- [Supplementary Reporting Form for Air Permitted Sources](#)

Reporting Tool

- [EZ-Filer](#)
- [EZ-Filer User Guide to Reporting](#)

Reporting Resources

- [Calculating GHG Emissions from Steam Production](#)
- [Fuel Combustion GHG Calculator](#)
- [EPA GHG Reporting Program](#)
- [EPA GHG Reporting Program Resources by Subpart](#)