

## Frequently Asked Questions For Air Quality Permit Holders

### Additional Instructions for Reporting Greenhouse Gas Emissions to DEQ



State of Oregon  
Department of  
Environmental  
Quality

**Greenhouse Gas  
Reporting Program**  
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DEQ is a leader in  
restoring, maintaining  
and enhancing the  
quality of Oregon's air,  
land and water.

#### 1. Am I required to report greenhouse gas emissions to Oregon DEQ?

Any air contamination source (holding an Air Contaminant Discharge Permit or Title V Operating Permit) with direct emissions of 2,500 metric tons CO<sub>2</sub> equivalent or more must report annual greenhouse gas emissions to the Greenhouse Gas Reporting Program. You may cease reporting **ONLY** after direct emissions are below 2,500 metric tons CO<sub>2</sub> equivalent for a consecutive three-year period. If your emissions exceed 2,500 metric tons CO<sub>2</sub> equivalent any time after ceasing reporting, you are required to resume reporting.

#### 2. How long must I maintain records supporting my annual greenhouse gas emissions report?

You are required to retain all records of emissions data for at least five years and in some instances as much as seven years for verification purposes.

#### 3. How do I report my greenhouse gas emissions to the Greenhouse Gas Reporting Program?

All sources must report annual greenhouse gas emissions using the program's online reporting tool, [EZ-Filer](#). A guide to reporting in EZ-Filer or located [HERE](#).

#### 4. Who is the designated representative?

The designated representative is the person responsible for certifying, signing, and submitting a greenhouse gas emissions data report on behalf of a regulated entity. For owners or operators of Oregon Title V Operating Permits, the designated representative is the responsible official.

#### 5. Does everyone need to provide an explanation of changes in emission totals between years?

No. Only large reporters with annual emissions greater than 25,000 metric tons CO<sub>2</sub> equivalent who have **ALSO** experienced an increase or decrease of 5% between reporting years are required to provide an explanation for these changes.

#### 6. Am I required to report information about who supplies natural gas to my facility?

Yes, if your company used natural gas to fuel some or all of its operations in the past calendar year you must report the name(s) of the entity who sold the gas to your facility, customer account information, and annual MMBtu delivered to each account during the past calendar year.

## **7. How do I report information about the company that supplies natural gas to my facility to the Greenhouse Gas Reporting Program?**

Complete tab “1. NG Supplier Information” of the supplemental reporting form. The supplemental reporting form is located on the “Upload Required Attachments” page of EZ-Filer.

## **8. What is an Electricity Generating Unit (EGU)? How to I report greenhouse gas emissions from an EGU?**

An electricity generating unit is 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. If reporting emissions using a continuous emissions monitoring system (CEMS), you must also report total fuel usage by fuel type and quantity used to power your EGU(s). Use the supplementary reporting form located on the “Upload Required Attachments” section of [EZ-Filer](#), tab “3. EGU & Cogen Reporting Form” to report required data elements.

## **9. What is a Cogeneration Unit? How to I report greenhouse gas emissions from a cogeneration unit?**

A cogeneration unit is 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. Emissions from a cogeneration unit must be reported using the supplemental reporting form located on the “Upload Required Attachments” section of [EZ-Filer](#), tab “3. EGU & Cogen Reporting Form”. Upload the supplemental reporting form along with any other required additional reporting documents on the “Upload Required Attachments” section of EZ-Filer.

## **10. My emissions data report includes emissions from the combustion of liquid and/or gaseous biomass-derived fuels. How do I report the required vendor and facility information for these fuel types?**

Vendor and facility information for these fuel types must be reported separately using tab “4. Biomass Fuel Emissions Form” of the supplementary reporting form located on the “Upload Required Attachments” section of [EZ-Filer](#). You must provide both vendor identifying information for the company that provided you the fuel(s) and fuel production facility information for the company that initially produced the fuel(s).

## **11. I am a (1) cement manufacturer, (2) pulp and paper manufacturer, or (3) a natural gas systems operator. How do I report emissions by fuel type to the Greenhouse Gas Reporting Program?**

Report emissions by fuel type for subparts H (cement manufacturing), AA (pulp & paper manufacturing), and W (natural gas systems) using the tab “5. Reporting Form Sub H,W,AA” of the supplementary reporting form located on the “Upload Required Attachments” section of [EZ-Filer](#). Upload the supplemental reporting form along with any other required additional reporting documents on the “Upload Required Attachments” section of EZ-Filer.

## **12. How do I submit the new supplemental reporting form?**

Upload the supplemental reporting form along with any other required additional reporting documents on the “Upload Required Attachments” section of EZ-Filer prior to submitting your report.

## **13. I think I made an error on my greenhouse gas report. How do I correct the error after submittal to DEQ?**

Contact the Greenhouse Gas Reporting Program ([GHGReport@DEQ.state.or.us](mailto:GHGReport@DEQ.state.or.us)) to have your report unlocked. If an error has been made, and your report is already submitted, you will have to cancel your submission, correct the report, and resubmit your report in [EZ-Filer](#).

## **14. I am responsible for multiple permits. How do I report for more than one source in EZ-Filer?**

If you do not already have an account in [EZ-Filer](#), please register by following the steps in the [EZ-Filer guidance document](#). Once you are registered in the system, click “Add a Source” on the right hand side of the page under your name. Complete the required information on the next page and click “Send Request”. Log out of EZ-Filer and log back in. Your account should now be linked to a second source. Repeat this process as needed for multiple source reporting.

## **15. My facility operates an emergency generator. Are these units considered electricity generating units (EGUs)? How do I report emissions from emergency generator use?**

Emission from emergency generators are considered [categorically insignificant](#) and should not be included with your GHG emissions report if the *combined* horsepower rating for all your emergency generators is below 3,000 horsepower. If the combined horsepower rating for all your emergency generators meets or exceeds 3,000 horsepower the emissions are NOT considered categorically insignificant and MUST be included with your annual GHG emissions report. Emissions from emergency generator use should be reported as emissions from stationary combustion if the equipment was operated solely during the loss of utility service or for routine testing. If the emergency generators were operated for reasons other than emergency power generation, such as when the facility had utility service, please contact the Greenhouse Gas Reporting Program ([GHGReport@DEQ.state.or.us](mailto:GHGReport@DEQ.state.or.us)) for additional reporting guidance.

## **16. Do I report total natural gas received or total natural gas combusted on the supplementary reporting form?**

Both. In some instances a source may store natural gas for subsequent use. In these cases the total amount of natural gas received and the total amount of natural gas combusted may not align. Report both values to our program and provide an explanation of any discrepancy between the values in the space provided on the [supplementary reporting form](#).

## **17. Can the Designated Representative sign, certify, and submit my GHG report using my account?**

No. Unless the person preparing the report is also the Designated Representative for the source, the Designated Representative MUST create their own profile in EZ-Filer and submit the

emissions report using their log-in credentials. Although the Designated Representative does not need to be the one to compile the report, they must be the individual to submit the report in [EZ-Filer](#).

**18. Should I report vendor and fuel producer information on the supplementary reporting form for any liquid and/or gaseous biomass-derived fuels that were originally produced by my source** (such as capturing biomethane from an on-site industrial waste landfill and using this gas to power operations at the site)?

Yes. You should list the same permitted facility that produced the fuel as both the fuel producer and vendor of the fuel on the [supplementary reporting form](#).

### **Contact Us**

For assistance with reporting please email the program at [GHGReport@DEQ.state.or.us](mailto:GHGReport@DEQ.state.or.us). Sector specific program contact information and phone numbers are available on our program contacts [website](#).

### **Alternative formats**

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).