

# Greenhouse Gas Reporting Protocols

## Air quality permit holders

### Instructions for reporting greenhouse gas emissions to DEQ

#### Overview

Certain facilities that hold an air contaminant discharge permit (ACDP) or Title V operating permit (under OAR Chapter 340 Divisions 216 and 218, respectively) are required to report greenhouse gas emissions to DEQ under [OAR Chapter 340 Division 215](#). This document describes the types of sources required to report, reporting deadlines and the methodologies required for calculation and reporting for entities subject to reporting under [OAR 340-215-0030\(2\)\(a\) and \(b\)](#). Other sources described in Division 215 should visit the [greenhouse gas reporting page](#) for information applicable to their source category.

#### Applicability

Oregon's greenhouse gas reporting rules require the owner or operator of a source holding an ACDP or Title V permit with total direct emissions of 2,500 metric tons or more of carbon dioxide equivalent (mtCO<sub>2</sub>e) during a year to report greenhouse gas emissions to DEQ. The reporting threshold is assessed by summing all emissions from fuel combustion and industrial processes (e.g. cement production or pulp and paper manufacturing) with emissions calculation methodology described in [40 C.F.R. part 98 subparts C through UU](#) occurring at a source during an emissions year.

As a guide, a source that uses less than the following amounts of fuel, does not report to the EPA, and does not produce greenhouse gas emissions from other sources is probably below the reporting threshold.

Fuel type	Approximate fuel quantity per 2,500 mtCO <sub>2</sub> e
Natural gas	45,000,000 cubic feet
Distillate fuel oil	244,000 gallons
Residual fuel oil	211,000 gallons
Wood	1,700 tons at 12 percent moisture
Propane	445,000 gallons

#### Emissions exempt from reporting

Permit holders are not required to report emissions from categorically insignificant activities defined in OAR 340-200-0020(23). If a source cannot separate categorically insignificant activities from other activities it is acceptable to report aggregate emissions that include categorically insignificant activities.

#### Reporting deadlines

All sources subject to the reporting program must annually report by March 31 following the emission calendar year unless otherwise established by DEQ.



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restoring, maintaining  
and enhancing the  
quality of Oregon's air,  
land and water.

## Reporting protocols

Each source subject to Oregon's greenhouse gas reporting rules must report using the protocols in this document and in compliance with Division 215. The source must report greenhouse gas emissions from fuel combustion and report total emissions in metric tons carbon dioxide equivalent from each industrial process performed by the source (e.g. cement production or pulp and paper manufacturing). Sources must use EPA's emission quantification methodologies in [40 C.F.R. part 98](#) to determine emissions. In-state producers of goods containing fluorinated greenhouse gases must also use OAR 340-215-0105 (6).

At present, a source subject to Oregon's greenhouse gas reporting rules must report emissions to DEQ using EZ-Filer and submit all required supporting documentation.

## Online Reporting

[EZ-Filer](#) is DEQ's greenhouse gas reporting tool. It is designed to make the reporting process easy and reliable by automating the tier 1 calculation process for fuel combustion, retaining source information so a reporter does not have to re-enter this information in future years and providing a simple structure to complete the annual emissions report.

## Stationary Fuel Combustion

- Facilities may use EZ-Filer to automatically calculate and report emissions from fuel combustion utilizing subpart C, General Stationary Combustion tier 1 methodology.
- EZ-Filer does not automatically calculate stationary combustion emissions if reporting using subpart C tier 2, 3, or 4 calculation methodology. Data must be calculated outside of the tool and entered into EZ-Filer in total metric tons carbon dioxide equivalent, similar to how process emissions data are entered into the online system. Sources who report to EPA should report to DEQ utilizing the same stationary combustion methodology reported to EPA.

Facilities equipped with continuous emission monitoring systems (CEMS) must utilize 40 CFR Part 98 subpart C tier 4 methodology to determine greenhouse gas emissions from fuel combustion for the purposes of reporting. Those sources that report stationary combustion emissions to EPA using a CEMS must use the same methodology to report emissions to DEQ.

Please see the guide on [reporting emissions from stationary combustion](#) for step by step instructions on entering stationary combustion emissions utilizing tier 2, 3, or 4 quantification methodology.

## Process Emissions

Sources must use EPA's [methodologies](#) in [subparts D through UU](#) to determine emissions from industrial processes at the source; the source may use the lowest available tier in EPA's methodologies to determine emissions from each applicable industrial process. Data must be entered into EZ-Filer in total metric tons carbon dioxide equivalent. Please see review the EZ-Filer User Guide for specific information on how to enter emissions data from industrial processes into the electronic tool.

## Additional Requirements

Beginning with the reporting of 2020 emissions in 2021 most facilities must also upload the DEQ GHG Supplemental Reporting form in addition to submitting data in EZ-Filer. This document collects new data elements including:

- For sources reporting emissions equal to or in excess of 25,000 mtCO<sub>2</sub>e annually that report a change of more than 5% between years, a brief narrative description of what caused the increase or decrease in emissions.
- For sources that report emissions from natural gas combustion, the company names and supporting account-identifier information of their natural gas supplier(s) including but not limited to natural gas marketers and natural gas utilities.
- For electricity generating facilities, the total net and gross MWh generated from electricity generating units and cogeneration units in accordance with [OAR 340-215-0105\(4\)\(a\)\(b\)\(c\) and \(d\)](#).
- For sources reporting emissions from liquid or gaseous biomass derived fuels, information about the vendor and facility from which the fuel was produced.
- For sources reporting emissions under subpart H - Cement Manufacturing, subpart W - Petroleum & Natural Gas Systems, or subpart AA - Pulp & Paper Manufacturing, the fuel types, quantities, and emissions from fuel combustion that are included in the calculation methodologies under those identified subparts.

## Supporting documentation

Sources must submit documentation that includes data inputs used in the equations to calculate emissions. Data inputs include but are not limited to fuel throughput, emission factors, and production volumes or product usage that are used to calculate emissions from industrial processes and stationary combustion not automatically calculated in EZ-Filer.

Sources reporting to EPA may upload a full copy of their EPA report provided it contains all data elements needed for verification. If the source makes subsequent changes to its federal report, it must email a revised report to DEQ within thirty days of submitting its revisions to EPA; it must also contact DEQ about resubmitting its EZ-Filer report.

All sources must upload documentation in EZ-Filer. EZ-Filer accepts certain file formats such as Adobe .PDF and Microsoft .XLS and .DOC files.

## Recordkeeping requirements

Pursuant to Oregon's greenhouse gas reporting rules (specified in OAR 340-215-0042), each source must retain records of all information used to calculate and report emissions, including inputs to equations. Sources must retain records sufficient to document and allow for verification of each emissions data report submitted to DEQ and make such information available for verification upon request.

Beginning in 2022 for the reporting of 2021 emissions, reporters subject to the requirements under OAR chapter 340, division 272 must have their annual GHG emission data report verified by accredited [third party verifiers](#). Verifiers rely on these records and other relevant information to verify all emissions reports in accordance with [OAR Chapter 340, Division 272](#).

## **Circumstances under which a source can stop reporting**

Pursuant to Oregon rule, once a source must report greenhouse gas emissions, it must report in subsequent years regardless of the quantity of emissions reported unless the source meets at least one of the following criteria:

- Oregon rules allow a source that reduces emissions below the threshold to stop reporting, but prevent the situation where a source near the threshold could move in and out of reporting due to small variations in emissions from one year to the next. Oregon rules provide for a source to cease reporting if its direct emissions are below the 2,500 MTCO<sub>2e</sub> threshold for three consecutive years.

If a source reduces emissions below the threshold for three consecutive years it must notify DEQ that it is no longer subject to the reporting requirements by March 31 to avoid the requirement to report emissions from the previous year.

- A source can stop reporting if it ceases all operations that lead to direct emissions of greenhouse gases throughout the entire calendar year, such as if the source closes permanently prior to the beginning of the year. This does not apply to seasonal or other temporary cessation of operations and does not apply to landfills that are required to report greenhouse gas emissions to EPA;

The person that owns or operates the source must submit an emissions data report for the year in which the source's greenhouse gas emitting processes and operations ceased to operate and must announce the cessation of reporting and certify the cessation of all greenhouse gas emitting processes and operations by March 31.

- Sources that meet the above cessation of reporting requirements must notify DEQ in writing of their reason(s) for ceasing to report no later than March 31 of the applicable reporting year.

The person that owns or operates the source must submit an emissions data report for the year in which the source's greenhouse gas emitting processes and operations ceased to operate and must announce the cessation of reporting and certify the cessation of all greenhouse gas emitting processes and operations by March 31.

## **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](#).

## **Accessibility**

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).

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