

2024 Third Party Verification Kickoff Training

Office of Greenhouse Gas Programs

February 2024

Purpose

To provide important third-party verification (3PV) reminders that apply to all CFP and GHG Reporting program verifiers and verification bodies

Agenda

- Resources
- 2024 program updates
- DEQ Forms
- Important reminders

Resources

Resources for verifiers and verification bodies

www.oregon.gov/deq/ghgp/3pv/



Clean Fuels Verification

[Information for Verifiers](#)

[Information for Verification Bodies](#)

[Information for Responsible Entities](#)



GHG Reporting Verification

[Information for Verifiers](#)

[Information for Verification Bodies](#)

[Information for Responsible Entities](#)

[Your DEQ Online Reporting Resources](#)



Resources

[Program Rules \(OAR 340-272\)](#)

[Climate 2023 Rulemaking](#)

[Sign-up for program updates](#)

Verification resources

- Resources are included at the bottom of each page

This page provides important information for those who are qualified, or wish to become qualified, as verifiers for Oregon's Clean Fuels Program.

Important deadlines:

- Quarterly fuel transaction reports due - 90 days after end of each quarter
- Fuel pathway reports due - March 31
- Annual reports due - April 30
- Verification statements due - August 31

How do I become a verifier?

To become a verifier for CFP, you will need to be accredited by the California Air Resources Board Low Carbon Fuel Standard program in the areas for which you intend to perform verification,. You will also need to take and pass qualification exams for Oregon qualification.

- Course 1: General (Mandatory) requires CARB accreditation for Non Lead Verifier or Lead Verifier
- Course 2: Fuel Pathways requires CARB accreditation for Lead LCFS Verifier for Fuel Pathways
- Course 3: Quarterly Transaction Reports requires CARB accreditation for Lead LCFS Verifier for Alternative Fuel Transactions

DEQ intends to offer a training and exams period for CFP verifiers in the fall of 2024. When applications become available, they will appear on this page. CFP is not accepting verifier applications at this time.

- [Frequently Asked Questions: Verifier Applications, Training and Exams](#)

Resources for approved verifiers

- [Program Rules \(OAR 340-253\)](#)
- [Oregon Clean Fuels Program Verifier Frequently Asked Questions](#)
- [Notice of Verification Services Form](#)
- [Verification Statement Form](#)
- [Conflict of Interest Form](#)
- [2024 Verification Kickoff Training slides \(coming soon\)](#)
- [2024 Fuel Suppliers Reporting and Verification Training slides \(coming soon\)](#)

2024 program updates

Differences in process by program

Greenhouse Gas Reporting Program:

- Reporting and verification forms in Your DEQ Online for permitted sources, electricity suppliers, natural gas suppliers and natural gas systems
- YDO registration, reporting and verification user guides are now live on our website

Clean Fuels Program and liquid fuel suppliers reporting to the GHG Reporting Program:

- Hybrid manual/digital, utilizing OFRS
- COI and NOVS administered in Adobe Sign
- Verification statement administered in Adobe Sign and submitted within OFRS

Training and exams

DEQ will provide verifier qualification training in the fall of 2024.

- GHG Reporting Program verifiers
- Clean Fuels Program verifiers
- Verification body approvals

Official dates and applications will be communicated when available.

Clean Fuels Program rule updates

- In 2022, Oregon's Environmental Quality Commission adopted updates to Division 253, the Oregon Clean Fuels Program regulation
- Updates adopted in 2022 took effect Jan. 1, 2023
- **Current rule can be found on the Secretary of State website:** search "Oregon clean fuels program rules"

Climate 2023 rulemaking updates

- In 2023, Oregon's Environmental Quality Commission adopted updates to Division 215, the Greenhouse Gas Reporting Program regulation and Division 272, the Third-Party Verification Program
- Updates adopted in 2023 took effect upon adoption
- **Current version of GHG Reporting Rule can be found on Oregon SoS website:** search "Oregon greenhouse gas reporting rules"
- **Current version of 3PV rule can be found on Oregon SoS website:** search "Oregon third party verification rules"

Climate 2023 rulemaking updates

Important changes to GHG Reporting rule (OAR 340-215):

- Reporting requirements added for biomethane and hydrogen reporting.
- Updates to monitoring plan requirements for electricity suppliers.
- Changes to requirements for comingled liquid fuels in storage.

Refer to biomethane and hydrogen FAQ on our website for more information

Climate 2023 rulemaking updates

Important changes to Third-Party Verification rule:

- 3PV requirements added for biomethane and hydrogen reporting for the GHG RP (OAR 340-215-0034(7))
- 3PV expanded to include all electric companies, electricity service suppliers, regardless of emissions level
- Verification body can now submit COI form
- Minimum lead verifier requirement for verification bodies: employ or retain 2 DEQ-approved Lead Verifiers, which may include retention as subcontractors
- Clarification to transaction types subject to 3PV for CFP quarterly fuel transaction reports

Climate Protection Program

The Climate Protection program was invalidated by a court ruling in December 2023.

- DEQ is moving forward with rulemaking to re-establish the program
- Ruling does not impact implementation of Divisions 253, 215 or 272
- Verification of GHG emissions data reporting and reporting submitted to Clean Fuels program will continue as usual

Less intensive verification

2024 is the first year of less intensive verification for entities meeting the following conditions:

- No change in verification body from prior year
- No change in operational control from prior year
- Received a Positive verification statement in the prior year

Less Intensive Verification

2024	2025	2026	2027	2028	2029	2030
Less intensive verification	Less intensive verification	Full verification	Less intensive verification	Less intensive verification	Full verification	Less intensive verification

Less intensive verification applies for two years of every three for qualifying entities.

Less intensive verification means:

- A site visit is not required
- The verification body may use the risk assessment developed as part of its most recent sampling plan to complete verification.

DEQ forms

3PV form updates

For CFP verifiers and those verifying fuel supplier emissions data reports:

- Forms are still administered through Adobe Sign
- COI form may now be prepared and submitted by the verification body
 - Minor update to require co-signature by entity client
- For support, email 3PVerify@deq.oregon.gov

Adobe Sign

Note: form time limit of 60 minutes. If the form times out, try:

- Using a different web browser to open the form
- Using a private window in your browser to open the form
- Clearing your browser's cache/cookies
- Disconnecting from VPN to fill in the form

If you still have problems with the form timing out after trying these, please contact 3PVerify@deq.oregon.gov.

Adobe Sign

Option to submit a form will appear once all required fields are filled in

Forms **CANNOT** be modified once submitted- contact DEQ if you need to make a change

There is a **size limit** on file attachments: 10MB (or 100 pages)

- If you need to attach a file that exceeds these limits, please email it to us directly

Adobe Sign

Text boxes:

- Should re-size your text to fit the space allotted when the form is submitted, but if there is a lot of text, may look “cut-off”
- **DEQ will still get your full submission!**
- If you’re concerned your copy won’t have the full text:
 - Copy/paste your saved text into a separate document
 - Email us, we can send you an excel version

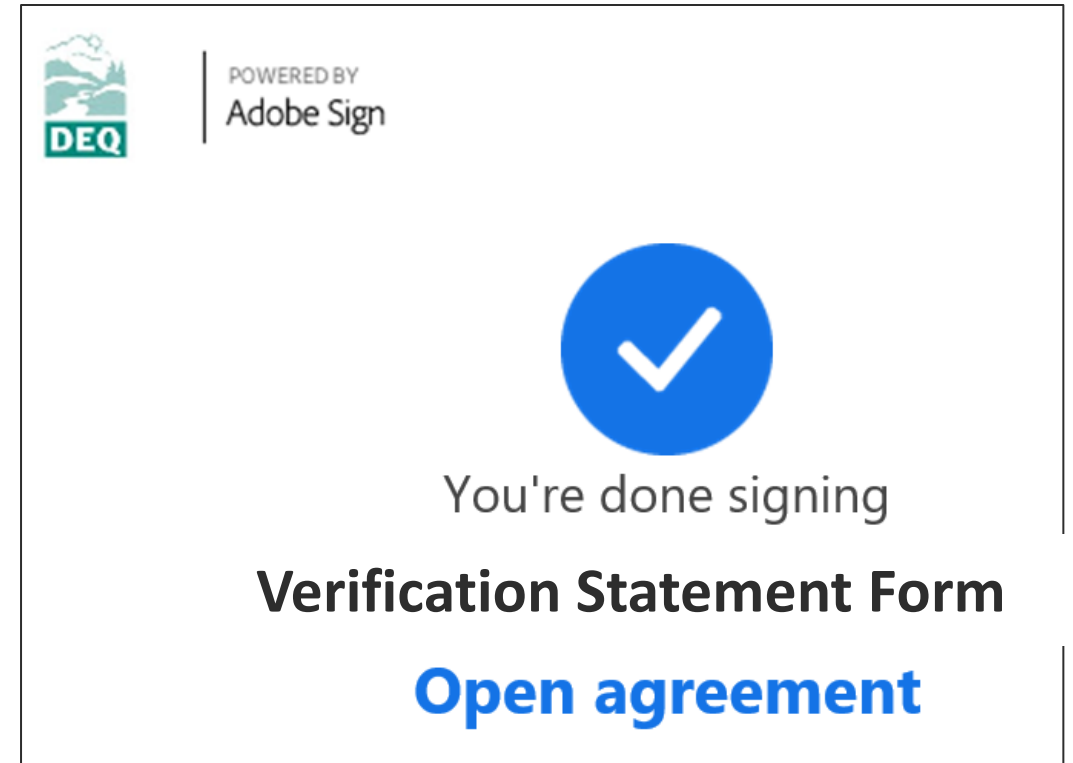
3PVerify@deq.oregon.gov

Adobe Sign

Once signed and submitted, Adobe Sign will send an authentication link to the email provided on the form.

Once you click this link, you should see an onscreen confirmation your form has been submitted.

You will also receive a confirmation email from Adobe Sign, which will include a link to save and print a copy of the form for your records.



3PV form updates

For Greenhouse Gas Reporting Program verifiers:

- Forms are administered in Your DEQ Online (YDO)
- YDO 3PV process trainings, account registration resources and user guides are now available on the "Information for verifiers" and "Information for verification bodies" pages of the GHG Reporting section of our 3PV website.

3PV form updates

How to Enter Submittals in Your DEQ Online

Modernization Project Underway:
Your DEQ Online

Programs participating in Your
DEQ Online

How to Enter Submittals in Your
DEQ Online

Your DEQ Online Account
Registration

Your DEQ Online Payments

Your DEQ Online Public Records

Your DEQ Online Public
Involvement

ABOUT YOUR DEQ ONLINE
PROJECT

Land Use Compatibility Statement

Do you need assistance with Your DEQ Online submittals? Submittals include permit, license or certification applications, renewals, reporting obligations and other services from the DEQ programs listed below. Click on any of the program menus below to see helpful resources.

If you need further assistance, please contact the [Your DEQ Online Helpdesk](#) anytime Monday through Friday from 8 a.m. to 5 p.m. We are closed during [state observed holidays](#).

User guides and program resources

Air Quality

Asbestos



Climate Protection Program



Gasoline Transporter
Permits



Greenhouse Gas Reporting
and Third-party Verification



Land Quality

Hazardous Waste Program



Login to Your DEQ
Online Public Portal

Need Help?

For technical and submittal assistance:



Contact Your DEQ
Online Helpdesk

For Your DEQ Online questions email:
YourDEQOnline@deq.oregon.gov

Water Quality

401 Certification



Industrial and Construction
Stormwater



Sewage Disposal Service
Program



Underground Injection
Control (UIC)



Wastewater Operator
Certification



Sign up for GovDelivery to receive Your
DEQ Online updates.

For Greenhouse Gas
Reporting Program verifiers

YDO support:

<https://www.oregon.gov/deq/Permits/Pages/Your-DEQ-Online-Help.aspx>

What can we help you with?



Public user request

Use this form if you are a member of the general public, but not a regulated business.



Regulated community request

Use this form if you are part of the DEQ regulated community.



DEQ staff request

Use this form only if you are a DEQ employee.

NOVS form

NOVS form change for Less Intensive Verification years:

- Verification bodies will notice the NOVS form now includes space to indicate when an entity meets the less intensive verification requirements.
- When the less intensive verification requirements are met, you will not be required to enter a site visit date.

In Adobe Sign (for CFP verifiers and liquid fuel supplier verifiers):

Less Intensive Verification Years

Beginning with 2023 data verified in 2024, entities may qualify for less intensive verification for two of every three years. Less intensive verification means all verification services required for full verification, except for site visit(s) as described under OAR 340-272-0420, and only requiring data checks and document reviews based on the analysis and risk assessment in the most recent sampling plan developed as part of the most current full verification. Less intensive verification is only available if all three requirements below are met:

- ☐ There has not been a change in the verification body since the previous verification year
- ☐ A positive verification statement was issued for the previous year, and
- ☐ No change of operational control of the responsible entity occurred in the previous year.

In YDO (for GHG verifiers):

The screenshot shows the '3PV - Notice of Verification Services' form in the YDO system. The form has a dark green header with a back arrow and the title. Below the header is a progress bar with five steps: 1 Basic Info, 2 Attachment, 3 Payment, 4 Review, and 5 Submission. The 'Basic Info' step is active. The form content includes a section for 'For each facility that will be verified by the same verification team, provide the required contact information'. This section has a table with two columns: 'Date of the site visit' and 'Facility Name'. The first row is highlighted with a blue background and contains a dropdown menu with '1' selected. Below the table, there is a checkbox labeled 'Less intensive verification year/ No in person site visit will be performed' which is checked. Below this, there are input fields for 'Date of the site visit' (with a placeholder 'mm/dd/yyyy') and 'Facility Name' (with the text 'Entity Natural Gas System').

Form reminders

- For NOVS, when a site visit is required, please include the address of the site visit
- New COI/NOVS form submittals are required if:
 - Addition to the verification team
 - Changes to the organizational structure of the verification body
 - New potential for conflict of interest has arisen
 - New verification year (save a copy of your submission)
- New form submittals are NOT required if:
 - Someone has left the verification team

Important reminders

Materiality

- **All correctible errors must be corrected**, even if they are less than 5% of reported emissions or credit/deficit calculations
- A correctible error is defined as any error that impacts reported emissions for the Greenhouse Gas Reporting program, or credit/deficit calculations for the Clean Fuels program

Related entities

Both OAR 340-253 and OAR 340-215 define related entities as follows:

“Related entity” means any direct parent company, direct subsidiary, or a company with common ownership or control.

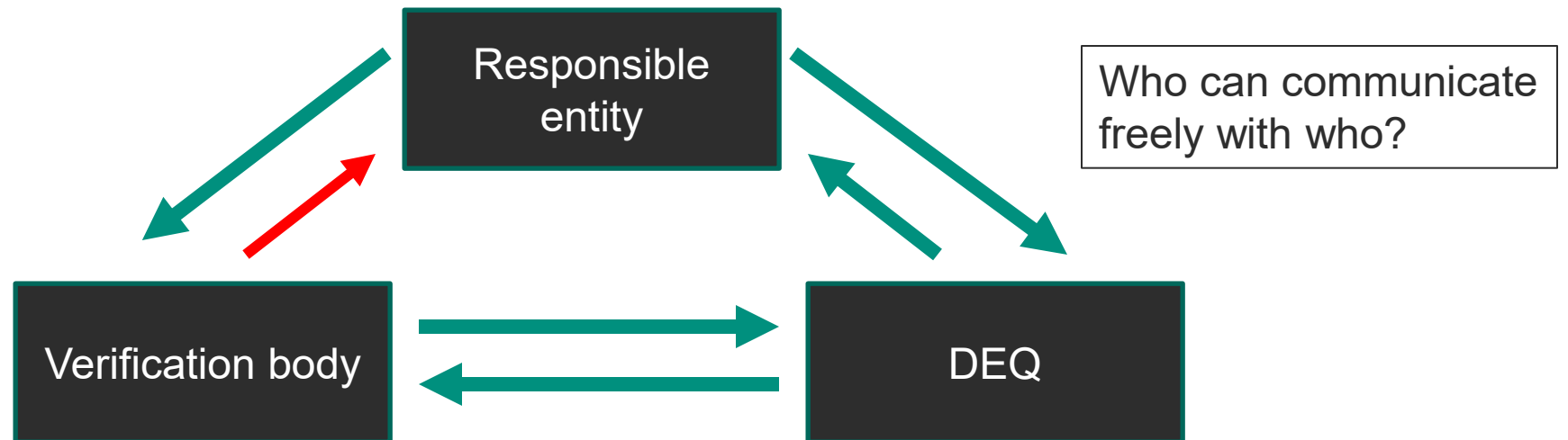
According to OAR 340-272, related entities must aggregate together when determining whether they are exempt from verification requirements.

For the purposes of determining third party verification applicability, “common ownership or control” is any percentage of ownership or control over another company.

Example: Company A and Company B each own 50% of company C, though Company C is under the complete operational control of Company A. If the three companies together meet the threshold for verification, all must have their data verified- even if one or more of them do not meet the threshold independently.

Communications

- Verifiers and verification bodies may request information from the responsible entity, but they may NOT consult during the verification process
- Consulting = offering any advice about calculating or reporting emissions, how to correct errors, fixing management systems, etc.



Communications

Please do:	Please do not:
<ul style="list-style-type: none">• Reach out to DEQ with technical questions about verification	<ul style="list-style-type: none">• Advise clients on how to correct reporting
<ul style="list-style-type: none">• Alert the client to nonconformances with the regulatory requirements	<ul style="list-style-type: none">• Communicate to DEQ on behalf of the client
<ul style="list-style-type: none">• Maintain impartiality	<ul style="list-style-type: none">• Provide regulatory interpretations

Verification team considerations

Subcontractors can be used BUT:

- Only if they are DEQ approved
- The verification body takes full responsibility for the verification services provided by the subcontractor
- Use of a subcontractor is subject to the same COI requirements as other verifiers
- Subcontractors may not further subcontract

Verifiers-in-training may be added to verification teams and do not need to be DEQ approved, BUT:

- MUST be under direct supervision of the lead verifier at all times
- Must be included on the conflict of interest disclosure and notice of verification services form

DEQ audits

- DEQ periodically audits verification bodies.
- Upon written request by DEQ, the verification body must provide to DEQ the verification report given to the responsible entity, as well as the sampling plan, contracts for verification, and any other supporting documents, within 14 calendar days.
- Upon written notification by DEQ, the verification body must make itself and its personnel available for a DEQ audit.
- DEQ may occasionally observe the verification body during a site visit.

DEQ audits

What you'll receive from DEQ:

- Brief report containing any regulatory nonconformances discovered during the verification year, by verifier.
- May include other opportunities for improvement .
- DEQ keeps these reports on file.
- Repeat violations may jeopardize the verifier's approval to provide services in Oregon.

Maintaining your DEQ approval

When to contact DEQ:	Verification Body	Verifier
Immediately if you update, lose or withdraw your CARB or ANSI accreditation	✓	✓
Immediately with updates to insurance coverage documentation or administrative or judicial actions	✓	
Within 30 days if you no longer meet the requirements for DEQ approval under OAR 340-272-0220	✓	✓
Within 30 days if there has been a change in verifier staffing at the verification body	✓	
Within 20 days of notification of a nonconformance in any other voluntary or mandatory GHG or fuels reporting program (Include the notification from the agency or body that administers the program and corrective actions taken)	✓	✓

COI monitoring

- Verification bodies and responsible entities are required to monitor the potential for conflict of interest for one year following the completion of verification services and report any new potential conflicts to DEQ.
 - Report any new contracts between the verification body and responsible entity or new conflict of interest circumstances within 30 days
 - Include information about the work to be performed
 - DEQ will determine whether the new contract or circumstance impacts the ability of the verification body to provide services for the responsible entity

Updating your info

Verifiers:

- Contact information that appears in approved lists
- Employment updates (moving verification bodies or becoming independent)

Verification bodies:

- Contact information that appears in approved lists
- Employment updates
- Insurance documentation
- Accreditation documentation

Contacting DEQ- for verifiers

Contact DEQ if:

- You have a question about a report you are verifying
 - Include enough detail for DEQ to look up the report you have a question about (at least company name and report type, and Source ID number for stationary sources)
- You are having trouble getting information from the responsible entity in a timely manner
- You have concerns about the responsible entity being able to meet the verification deadline
- Technical questions about reporting corrections should be asked by the entity

3PVerify@deq.oregon.gov

Thank you!

Title VI and alternative formats

DEQ does not discriminate on the basis of race, color, national origin, disability, age or sex in administration of its programs or activities.

Visit DEQ's [Civil Rights and Environmental Justice page](#).

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