Greenhouse Gas Reporting Program

Frequently Asked Questions for Air Quality Permit Holders

Additional Instructions for Reporting Greenhouse Gas Emissions to DEQ.

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 CO2 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 CO2 equivalent for a consecutive three-year period. If your emissions exceed 2,500 metric tons CO2 equivalent any time after ceasing reporting, you are required to resume reporting.

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

All sources must report annual greenhouse gas emissions in Your DEQ Online. A Users guide to reporting emissions in YDO can be found in the "Air Quality Stationary Source Holders" tab on the Greenhouse Gas Reporting Resources and Forms page.

3. What is the role of the responsible official (RO) in the YDO system?

The responsible official is the designated representative responsible for certifying, signing, and submitting a greenhouse gas emissions data report in the YDO system on behalf of a regulated entity.

4. Who is the designated representative?

The designated representative is 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).

5. Can a consultant sign, certify, and submit my GHG report using my account?

No. A Consultant may prepare a submittal form for a Responsible Official (RO). To prepare submittals for an RO, a "Consultant" account must be associated with an RO account (by the RO). Only an RO may certify and submit submittals.

6. 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 CO2 equivalent who have ALSO experienced an increase or decrease of 5% between reporting years are required to provide an explanation for these changes.

Translation or other formats

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State of Oregon
DEQ Department of Environmental Quality

7. 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 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.

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

Check yes to the question "Did your facility combust natural gas in the previous calendar year?" found on the "Additional Questions" tab of the GHG – Permitted Facilities Annual Report, click on the +Add Natural Gas Supplier button, then fill in the required data entry fields.

9. What is an Electricity Generating Unit (EGU)? How do I report the additional information required for sources that operate EGU's?

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. To report the additional information required for sources that operate EGU's check yes to the question "Do you have an electricity generating unit at your facility?" found on the "Additional Questions" tab of the GHG – Permitted Facilities Annual Report and click on the **+Add Electricity Generating Unit** button, and then fill in the required data entry fields.

10. What is a Cogeneration Unit? How to I report the additional information required for sources that operate 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. To report the additional information required for sources that operate a cogeneration check yes to the question "Do you have a cogeneration unit at your facility?" found on the "Additional Questions" tab of the GHG – Permitted Facilities Annual Report, click on the **+Add Cogeneration Unit** button, and then fill in the required data entry fields.

11. 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 by checking yes to the question "Did you combust any liquid and/or gaseous biomass-derived fuel in the past calendar year? (This includes blended biodiesel.)" found on the "Additional Questions" tab of the GHG – Permitted Facilities Annual Report, click on the +Add source button, and then fill in the required data entry fields.

12. 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) when reporting process emissions in the Basic Info tab of the GHG – Permitted Facilities Annual Report.

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

If an error has been made, and your report is already submitted, you can submit a request to amend your report. Begin by going to the **Submitted Submittal Info** page by clicking on the **Track Submittal Status** button found in the **Insights** panel of the user dashboard. Then select the report or reports that required edits by clicking on the **View Submittal Detail** button (orange eye icon). When the submittal summary for the chosen report opens the user can submit a request to Amend the report by clicking on the **Amend** button and providing a brief explanation of the reason for the request to the administrator. Once GHG staff has reviewed the request the report will be sent back to the user for revisions. For reports that are subject to third party verification as described in OAR 340-272 it is required to first enlist the services of a third party verifier to track the changes in the log of issues before making the revisions.

14. My facility operates an emergency generator. How do I report emissions from emergency generator use?

Emissions from emergency generators and pumps are considered a categorically insignificant activity if used only during loss of primary equipment or utility service due to circumstances beyond the reasonable control of the owner or operator, to address a power emergency, or for routine testing, and the combined horsepower rating for all your emergency generators is below 3,000 horsepower. If the emergency generators were operated for reasons other than emergency power generation, such as when the facility had utility service, or the combined horsepower rating for all of 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 as emissions from stationary combustion.

15. What is a categorically insignificant activity, and how do I know which pollutant emitting activities at my facility may be considered categorically insignificant?

Categorically insignificant activities are pollutant emitting activities that principally support the source or the major industrial group that are not required to be reported in the annual greenhouse gas emissions report. Please review OAR 340-200-0020(23)(a)-(fff) to determine if any of the pollutant emitting activities at your facility are considered categorically insignificant.

16. EPA is currently proposing amendments to 40 CFR Part 98, the Greenhouse Gas Reporting Rule. If those amendments are adopted by EPA, how would this impact reporting to Oregon DEQ?

Oregon's Greenhouse Gas Reporting Rules, division 215, currently incorporates, by reference, EPA's 40 C.F.R. part 98 quantification methodology as published in the Federal Register on December 9, 2016. Regulated entities must continue to use the quantification methodology prescribed in that version of EPA's rule.
If EPA adopts the currently proposed amendments, DEQ may conduct a rulemaking to amend division 215 and align with changes made to the federal reporting rule. However, reporting entities should use the version referenced in division 215 for the reporting of emissions in Oregon.

17. 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 many as seven years for third party verification purposes.

18. Is my facility's emissions report subject to the third-party verification process?

To determine if your facility is subject to the third-party verification requirements as described in OAR chapter 340 Division 272 and to learn more about the Oregon Third Party Verification Program visit the program website.

Contact Us

Email GHGReport@deq.oregon.gov. Sector specific program contact information and phone numbers are available on our program contacts website.

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