

Environmental Solutions

Greenhouse Gas Reporting Update

EQC Proposed Rule Adoption

December 9, 2015

Agenda

- ❖ **Purpose of the Rulemaking**
- ❖ **Reporting Program Overview**
- ❖ **Results & Program Benefits**
- ❖ **Proposed Rule Changes**
- ❖ **Staff Recommendation**

Purpose of the rulemaking

Update the definition of greenhouse gas

- Includes all internationally recognized greenhouse gases
- Align DEQ's definition with the federal program

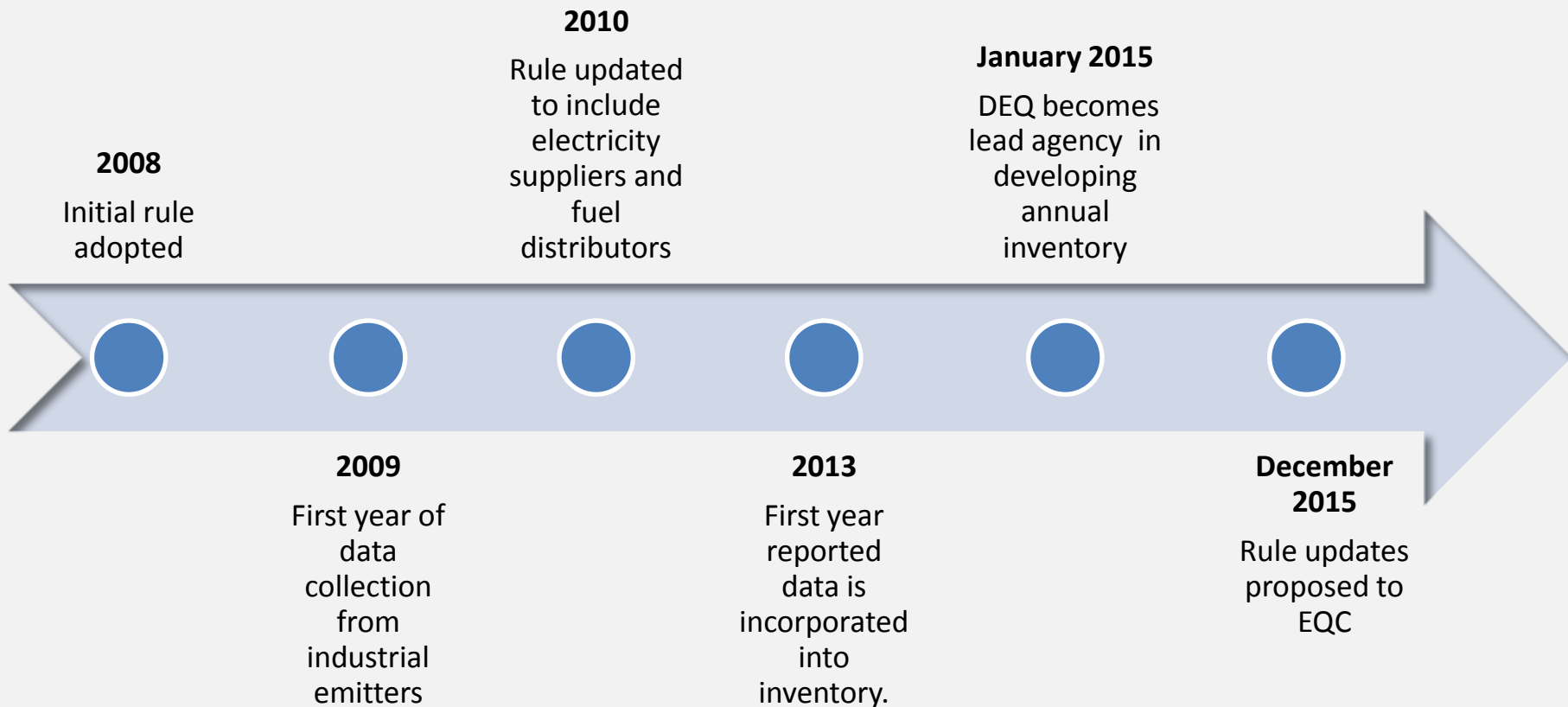
Clarify reporting requirements

- Simplify rule language
- Clearly identify the requirements in rule

General housekeeping

- Reducing reporting and paperwork burden

History



Who is responsible for reporting?

Wastewater treatment facilities



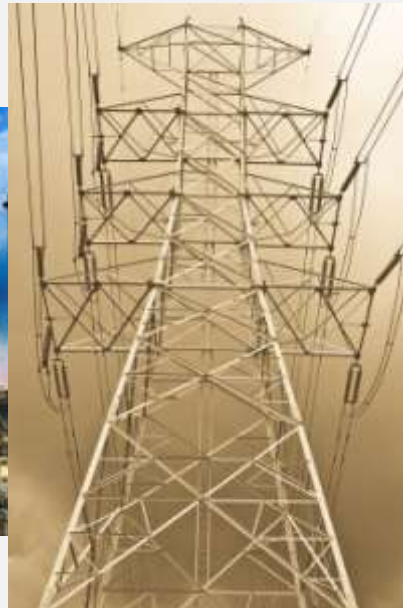
Natural Gas importers



Fuel importers



Electricity Suppliers



Industrial facilities



Propane importers



Landfills



Industrial Facilities

State threshold = 2,500mtCO₂e

A 2010 DEQ analysis of sources determined that only 1% of emissions would be lost if the threshold was placed at 2,500 mtCO₂e and the total number of sources required to report would be reduced by half.

Federal threshold = 25,000 mtCO₂e

220 industrial facilities report annually to Oregon DEQ of those facilities **65** also report to the federal reporting program.

Data collection

“I would not change a thing, it’s the easiest report I have. I wish they were all that easy.” – Thomas Baker, Pacific Wood Preserving of Oregon

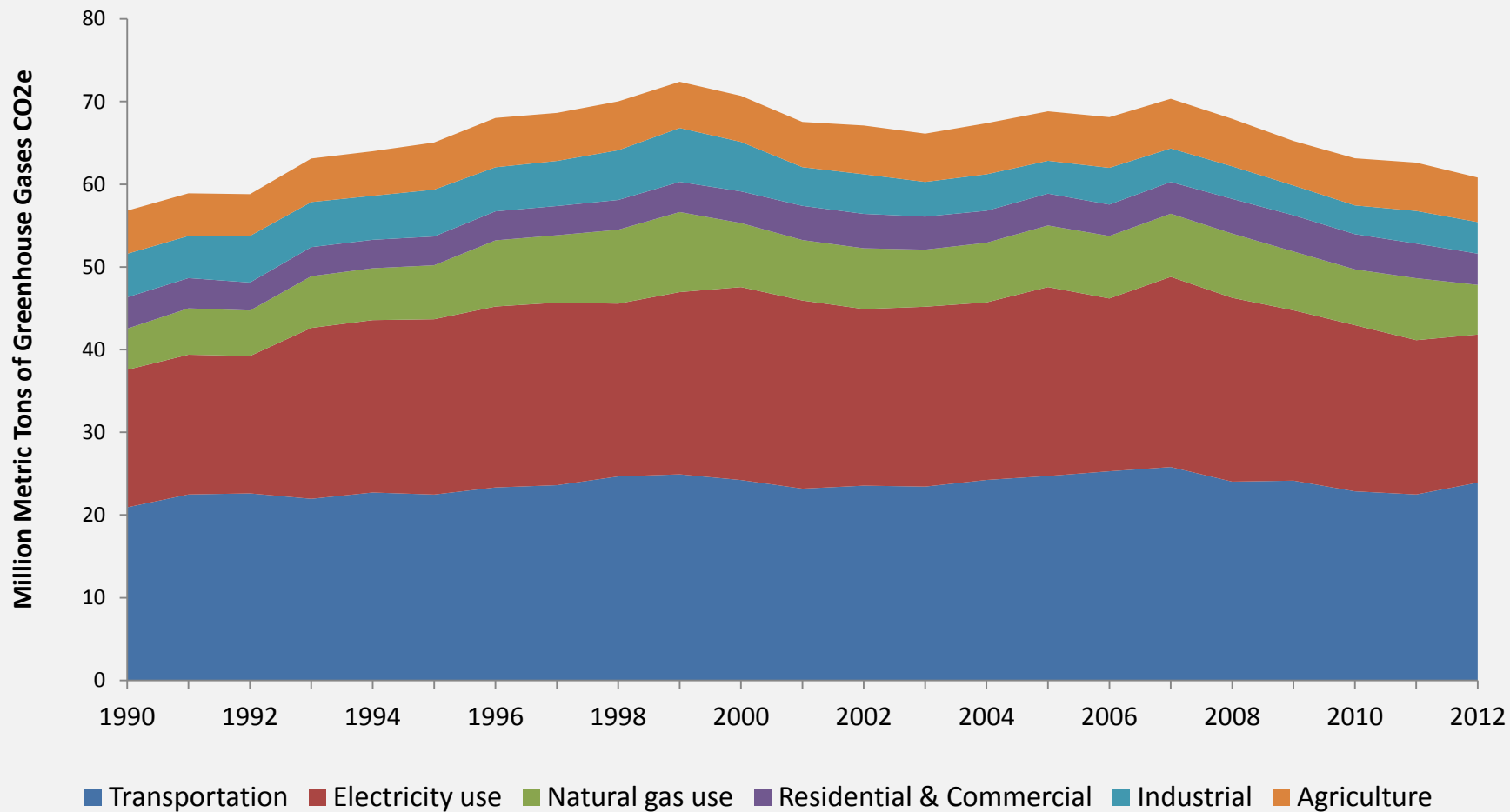
“This is the most user friendly program I have encountered in my 20 years of managing environmental programs for a large company.” – Glenn Dollar, Ash Grove

“I don’t know how you could make it simpler. Easy.” – Dave Ernst, Graphic Flexible Packaging, LLC

Program benefits and successes

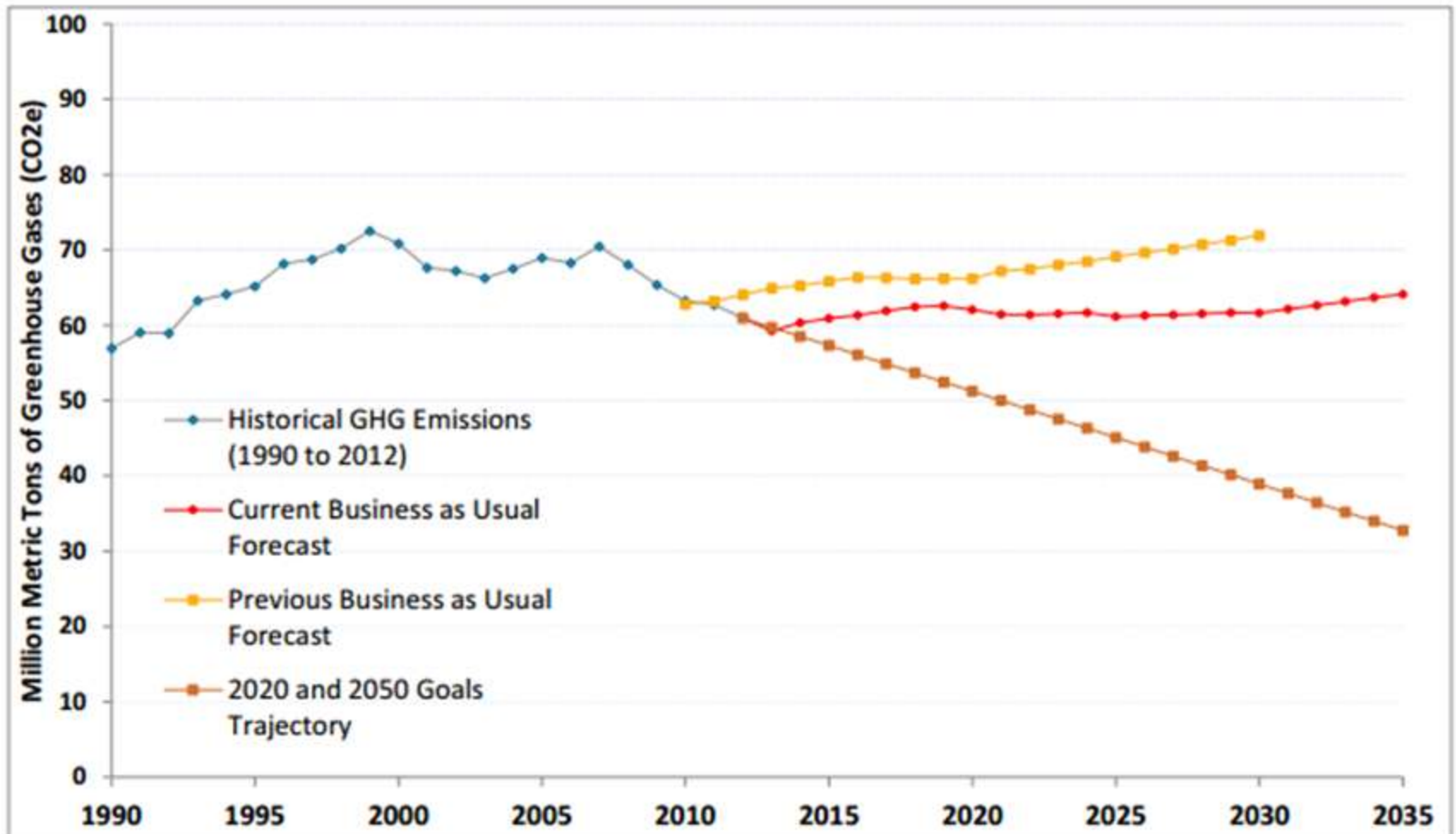
- State level greenhouse gas data for key sectors
- Additional auditing of national data
- Full compliance since 2010 with no need for enforcement
- Opportunity to engage sources and provided technical assistance

Greenhouse gas inventory



2012 Greenhouse gas projection

Current and Previous Business as Usual Forecasts



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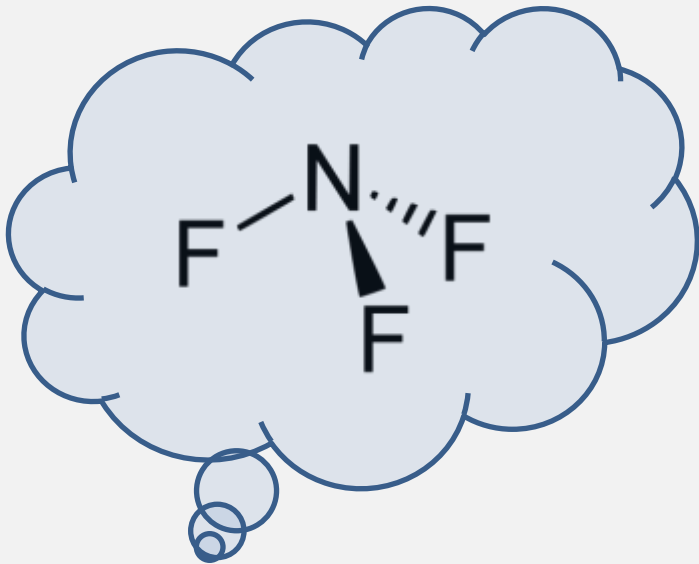
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General housekeeping

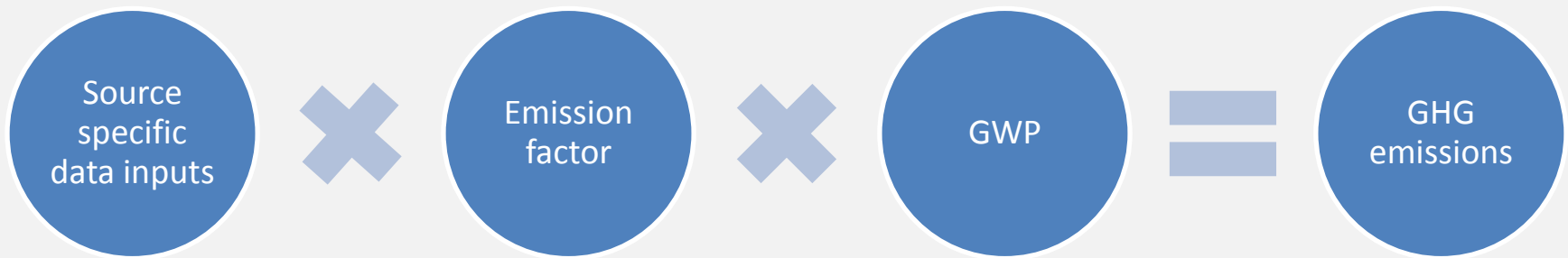
- Reducing reporting and paperwork burden

Greenhouse gas definition

(7) “Greenhouse gas or GHG” means carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O) **and fluorinated greenhouse gases** as defined in this section.



Clarifying reporting requirements: Calculating emissions

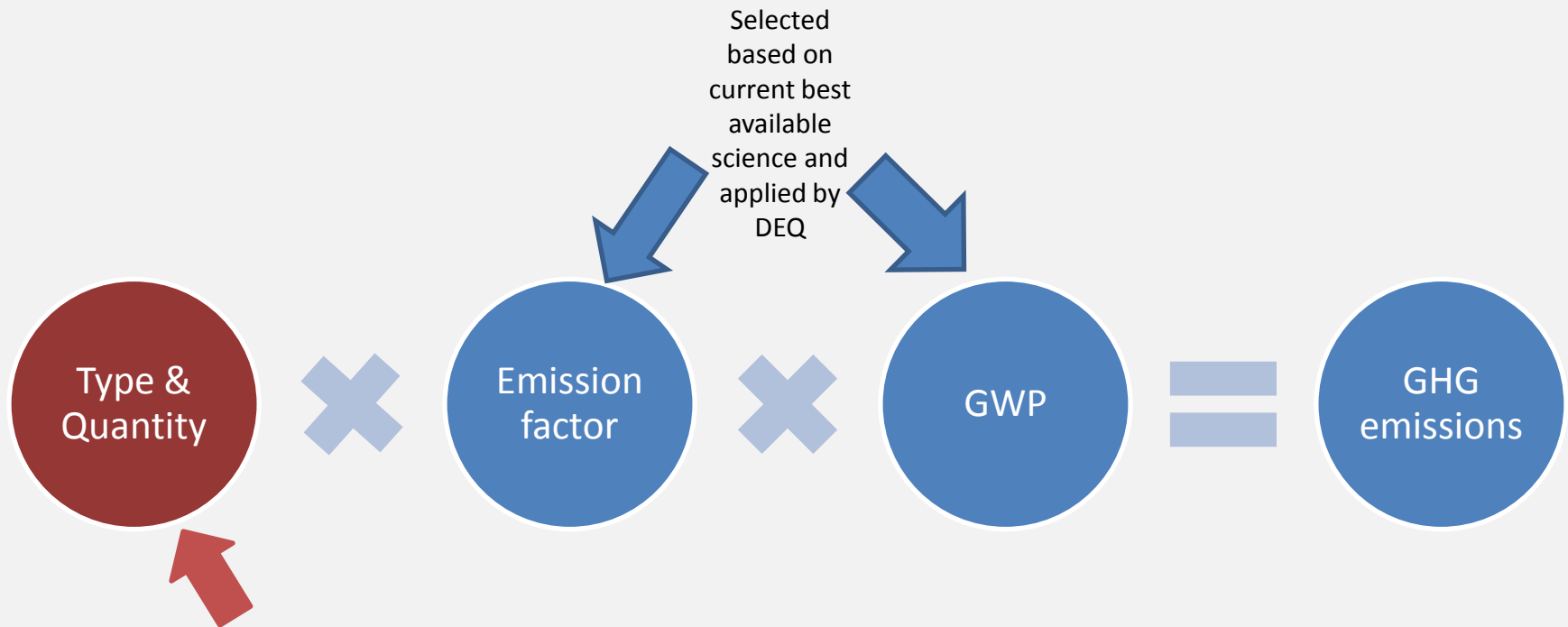


Global Warming Potentials and Emissions factors change as climate science develops

Internationally recognized GWP from 1990 through 2013:

Greenhouse Gas	1990	1995	2001	2007	2013
Carbon Dioxide (CO ₂)	1	1	1	1	1
Methane (CH ₄)	21	21	23	25	28
Nitrous Oxide (N ₂ O)	290	310	296	298	265

Proposed rule reporting requirements



Data elements required in rule and necessary for calculating emissions. These can only be supplied by the source and are most commonly fuel type and quantity imported and distributed within the state.

Reducing the burden

- ❖ General housekeeping
- ❖ Plan language review
- ❖ Reducing reporting and paperwork burden

Public engagement

- No advisory committee was convened. However, the rulemaking relied on past advisory committee reports.
- DEQ hosted one public hearing but received no oral comments.
- DEQ received five written statements on seven different topics. All of the commenter's supported DEQ's efforts to simplify and clarify the rule language.

Staff recommendation

DEQ recommends that the Environmental Quality Commission adopt the amendments as proposed in attachment A as part of chapter 340 of the Oregon Administrative Rules.

Questions?