



Oregon Department of Environmental Quality

Greenhouse Gas Reporting and Plant Site Emission Limits

Overview

Some sources are required to report their greenhouse gas emissions to the Greenhouse Gas Reporting Program. Which sources? Who does what with those emissions? What about GHG PSELs? What do you have to do? This guide is intended to help answer these questions.

GHG Reporting

Any permitted facility that emits $\geq 2,500$ metric tons CO₂ equivalent GHG emissions is required to register and report to the GHG Reporting Program. Biogenic and anthropogenic greenhouse gas emissions are **BOTH** used in determining if the facility meets the reporting threshold.

- Biogenic emissions typically come from the use of biofuels like landfill gas or wood.
- Anthropogenic emissions come from the use of fossil fuels and other sources like landfill fugitive emissions.

Verifying Compliance with GHG Reporting Condition

The GHG reporting conditions are found in Simple and Standard Air Contaminant Discharge Permits and in Title V permits. Permit writers verify compliance using these reporting conditions. If the facility is over the reporting threshold of 2,500 metric tons CO₂ equivalent and isn't reporting yet, the permit writer will inform the GHG program at GHGReport@deq.oregon.gov and provide the facility's responsible official with the [Greenhouse Gas Reporting Protocols for AQ Permit Holders document](#).

ACDP and Title V greenhouse gas permit conditions

- a. If the calendar year greenhouse gas emissions (CO₂e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with the DEQ in accordance with OAR 340 division 215.
- b. If the calendar year greenhouse gas emissions (CO₂e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions for the five years following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions if the calendar year greenhouse gas emissions (CO₂e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.



An important note: GHG emissions reports are now submitted in [Your DEQ Online \(YDO\)](#).

Translation or other formats

[Español](#) | [한국어](#) | [繁體中文](#) | [Русский](#) | [Tiếng Việt](#) | [العربية](#)

800-452-4011 | TTY: 711 | deqinfo@deq.oregon.gov

Once the GHG Reporting Program has been notified, they will work with the responsible official to provide assistance setting up their YDO user account, linking their new account with the correct facility, and will keep track of the reporting obligations.

During an inspection for a Title V or synthetic minor source (SM80), the inspector will need to determine compliance with every permit condition.

Enforcement actions may occur if a facility:

- fails to report
- reports late
- fails to respond to a records request
- fails to correct reporting errors within the allotted time, or
- any other GHG-related compliance issue

Enforcement may include a warning letter (WL), a warning letter with opportunity to correct (WLOC), or penalties (PENs) with referrals to the Office of Compliance and Enforcement (OCE).

When a facility is out of compliance and enforcement actions are taken, the GHG Reporting Program will notify the permit writer and the regional air quality manager.

Calculation of greenhouse gas plant site emission limits

If a facility emits more than the de minimis level for greenhouse gases, they are required to have a GHG PSEL in their permit. The de minimis level is CO₂e = 2,756 tons per year (tpy). If they are required to report, facilities should include GHG emissions in their applications. This includes new permit applications, renewals, and modification applications. GHG emissions will also be required in annual reports. The GHG PSEL should be calculated using the same basis (production, throughput, usage) that is used to calculate other facility PSELs.

NOTE: After March 1, 2023, DEQ is no longer using Generic PSELs (74,000 tpy for GHGs).

Greenhouse gases are calculated differently depending on fuel or steam combustion. The spreadsheets used by DEQ can be found here:

- [GHG Fuel Combustion Calculator](#)
- [GHG Steam Combustion Calculator](#)

Information on EPA's GHG reporting [methodologies](#) are located in 40 C.F.R. Part 98 [Subparts D through UU](#). These are used to determine emissions from industrial processes at the facility.

What does DEQ do with GHG reporting data?

All GHG data collected from permitted facilities are used to support the [Climate Protection Program](#) (CPP). In addition to supporting the CPP, the data collected are also used to inform decision makers, both internal and external, on the status of Oregon's greenhouse gas inventories and to determine any actions that may be required. These actions may include requests for reductions or regulatory measures as needed to meet the State's GHG emissions reduction goals.

Contact

Small Business Assistance Program
Hillary Sales
BAP@deq.oregon.gov

Non-discrimination statement

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](#).