

FREQUENTLY ASKED QUESTIONS

Re: The Relation of LRAPA's to EPA's Greenhouse Gas Reporting Rules

EPA requires greenhouse gas emission reporting from certain facilities beginning in 2011. LRAPA has adopted DEQ's Division 215 Greenhouse Gas Reporting (Oregon GHG) rules by reference that requires reporting from facilities beginning in 2010. Reports are for the prior year's emissions, so 2009 emissions must be reported in 2010. The Oregon GHG reporting rules contain reporting protocols that require EPA's emission quantification methods (EQMs) to be used when reporting 2009 emissions. However, since strict compliance with EPA's emissions quantification methods is not possible in all cases, DEQ's website provides some guidance about when alternatives can be used for reporting 2009 emissions www.deq.state.or.us/aq/climate/howreport.htm.

LRAPA and DEQ have received a number of questions regarding 2010 emissions reporting in 2011 and the applicability of EPA's rules to those facilities that must report to LRAPA but are not required to report to EPA. Specifically, facilities want to know if they must install any new equipment or conduct additional monitoring.

Facilities subject to LRAPA reporting, but will not be subject EPA greenhouse gas reporting in 2011 (2010 emissions):

In general, these are facilities that emit over 2,500 tons, but below 25,000 metric tons of CO₂ equivalent per year. For 2011 (2010 emissions) reporting, LRAPA does not intend to require these facilities to:

- Develop monitoring plans;
- Install new fuel or process rate meters, or calibrate meters;
- Do periodic testing of fuels or process materials for high heat value, carbon content, molecular weight, or other properties, or to obtain this information from suppliers; or
- Monitor process rates that previously did not have to be monitored.

LRAPA also intends to allow these facilities to use the Tier 1 EQMs in Subpart C of EPA's rules. Tier 1 calculations are the simplest calculations in Subpart C, and the only data that facilities must have is fuel usage, or steam production plus the ratio of the boiler's maximum rated heat input capacity to the maximum rated steam production. Alternatively, these facilities may use (but are not required to use) the Tier 2 EQMs; facilities that choose to use Tier 2 should obtain the necessary data in accordance with the requirements in EPA's rules.

In the event that installation of new equipment or implementation of more stringent monitoring is required in the future, LRAPA will provide a reasonable period of time for facilities to comply with the new requirements.

Facilities that will be subject to LRAPA and EPA greenhouse gas reporting in 2011 (2010 emissions):

In general, these are facilities that emit over 25,000 metric tons of CO2 equivalent per year and/or are in a source category listed in EPA's applicability rules.

If your facility is subject to EPA's reporting rule in 2011 (2010 emissions) you may be subject to a number of new requirements that may require **immediate action**, such as the development of monitoring plans and the installation of new fuel or process rate meters.

LRAPA strongly recommends that facilities who may be in this category visit EPA's website www.epa.gov/climatechange/emissions/ghgrulemaking.html and study EPA's rules. The website also has other resources to help better understand the reporting requirements and EPA has an applicability tool to help determine if you are subject to reporting.

EPA's rules allow existing facilities a one-calendar-quarter grace period to fully implement the new requirements. After the first quarter of 2010, facilities are expected to have fully implemented the new requirements (although additional time may be allowed by EPA in some circumstances).

If you have any questions please contact your LRAPA permit writer.