

Reporting 2009 Greenhouse Gas Emission in 2010

Who Must Report

Permitted facilities that must report emissions for calendar year 2009 include:

Facilities that have a Title V permit and emit 2,500 metric tons of combined greenhouse gases (GHG) measured as CO₂ equivalents (mtCO₂e) per year
Facilities with ACDPs if they are listed in LRAPA 37-0030, Table 1 or Table 2 and emit 2500 mtCO₂e per year.

When Are Reports Due and to Whom Do I Submit the Report?

If required to report, your greenhouse gas emissions report for 2009 is due early this year and should be submitted with your annual Title V or Air Contaminant Discharge Permit annual report, or March 15, 2010 if your permit does not contain an annual reporting requirement.

All affected LRAPA sources turn in the GHG report to LRAPA. You do not need to submit the GHG report to ODEQ or EPA. LRAPA has adopted the ODEQ Division 215 Greenhouse Gas Reporting Requirements by reference and implements these requirements in Lane County. However, facilities that emit greater than 25,000 mtCO₂e are required to submit that information directly to EPA in accordance with the federal rule. LRAPA does not administer the federal GHG reporting requirements.

Forms

Affected sources that are permitted by LRAPA are required to report emissions using the **R1001-G forms** that may be obtained from ODEQ's website at:
<http://www.deq.state.or.us/aq/climate/howreport.htm#keep>

Sources permitted by LRAPA are **not** able to use the EZ Filer system at this time due to database issues. We hope that electronic reporting for Lane County sources will be an option in a future reporting year(s).

Emission Factors and Quantification Methods

The GHG emission factors are located in the EPA's Mandatory Reporting of Greenhouse Gases rule (40 CFR Part 98) and can be viewed by click on the following link. The link opens the EPA final GHG reporting rule including the preamble and it is a lengthy 261 page and 2.6 MB document.

Nearly all sources will use the emission factors in Table C-1 to Part 98 (on page 151 of 261 in the PDF copy and/or Page 56409 in the federal register):

<http://www.epa.gov/climatechange/emissions/downloads09/GHG-MRR-Full%20Version.pdf>

Fees

On December 11, 2009 the Environmental Quality Commission adopted fees to fund the first year of Oregon's greenhouse gas reporting program. The greenhouse gas reporting fee is fifteen percent (15%) of your 2009 Title V or Air Contaminant Discharge Permit fees. The fee is capped at a maximum of \$6,000 for any individual source (facility). If your facility is required to submit a report as noted above, your facility should expect an invoice from LRAPA for the greenhouse gas reporting fees by June 30, 2010. Title V source fees have been adopted by reference for LRAPA sources in OAR 340 Division 220 – Title V Fees. Air Contaminant Discharge Permit fees greenhouse gas reporting will need to be established in Title 37 Table 2 of LRAPA's Rules and Regulations through rulemaking in 2010.

Please contact your permit writer if you have questions about reporting or fees for greenhouse gas emissions.