

Reporting Greenhouse Gas Emissions

This publication provides information for fuel suppliers who may need to report greenhouse gas emissions.

Q: What are greenhouse gases?

A: Greenhouse gases are chemicals that contribute to climate change by trapping heat in the atmosphere. Fuel supplier reporting is limited to the most common greenhouse gas -- carbon dioxide (CO₂).

Q: Where does CO₂ come from?

A: CO₂ is released during fuel combustion. This occurs whenever someone burns the fuels you supply to drive a vehicle or fly a plane.

Q: Who must report emissions from supplied fuels?

A: You are responsible for reporting CO₂ emissions associated with the fuels you supply in Washington if you are required to file periodic tax reports for:

- supplying or importing motor vehicle fuel under RCW 82.36.031; or
- supplying or importing special fuel under RCW 82.38.150; or
- distributing aircraft fuel under RCW 82.42.040.

Q: How do you know if you need to report?

A: To determine whether you will be required to report the CO₂ emissions associated with the fuels you supply, you need to figure out whether your operations meet the *reporting threshold* (the amount of emissions when reporting is required).

You are required to report if the total annual CO₂ emissions associated with the fuels you supply in Washington is equal or greater than:

- 10,000 metric tons (1 metric ton equals 2,204 pounds) per calendar year.

WHY IT MATTERS

Emissions reporting is an important tool in understanding the sources of greenhouse gas in Washington. Greenhouse gases contribute to climate change. Washington is especially vulnerable to climate change because:

- We depend on snow pack for much of our public water supply and for hydroelectricity.
- Our nearly 3,000 miles of coastline are vulnerable to the expected rise in sea levels, threatening our coastal communities.
- Losses in coastline habitat threaten our fish and wildlife.
- Eastern Washington relies on irrigation. Drought can have a catastrophic effect on agriculture.

For general information, go to Ecology's Climate Change web site:

www.ecy.wa.gov/climatechange/ .

For more information about the reporting rule, go to:

www.ecy.wa.gov/programs/air/globalwarm_RegHaze/GreenHouseGasreporting_rule.html .

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Special accommodations:

If you need this publication in an alternate format, call the Air Quality Program at (360) 407-6800. Persons with hearing loss, call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

Q: How do I calculate my emissions?

A: All supplied fuels are assumed to be used or combusted completely. The emissions associated with the fuels you supply are calculated by multiplying the gallons of fuel you supply in a calendar year by the emissions factors listed below. Each fuel type has a different emissions factor, so you calculate emissions for each type separately. Then add all the emissions together to see if you meet the reporting threshold.

Fuel Type	Emissions Factor (kg CO ₂ / gallon)
Gasoline	8.960
Ethanol	5.767
Diesel	10.23
Biodiesel	9.421
Jet Fuel	9.750
Aviation Gasoline	8.310

Q: How much fuel do I have to supply to meet the threshold?

A: Reporting requirements are established by the 10,000 MT CO₂ per calendar year threshold, not by how many gallons you supply. However, you can use the table below to figure out if you are close to the reporting threshold. Any of the values listed below are enough to require reporting. You can also use the emissions factors listed above to calculate if you meet the reporting threshold.

Fuel Type	Approximate Fuel Sold in WA to Meet 10,000 MT CO ₂ Threshold (gallons / year)
Gasoline	1,100,000
Ethanol	1,700,000
Diesel	970,000
Biodiesel	1,000,000
Jet Fuel	1,000,000
Aviation Gasoline	1,200,000

Q: What do you have to do to comply?

A: If you meet the threshold, you must report the CO₂ emissions associated with the fuels your organization supplies each year.

Q: How and to whom do you report?

A: Ecology hasn't determined this yet. We are working to establish the annual reporting process in the regulation.

Q: When do you need to report?

A: You must report each calendar year. Reports are due on October 31 of the year after the fuel is supplied. Your reporting obligation begins as early as calendar year 2009 emissions, but Ecology is looking into phasing the start of reporting for fuel suppliers to a later date. Ecology will establish additional deadlines for submitting reports and keeping records in its regulation.

Q: How does this relate to what I am reporting to the Washington State Department of Licensing?

A: Ecology is working with the Washington State Department of Licensing (DOL) to make reporting as simple as possible. You will not need to collect additional data. The fuel volumes you report to Ecology will be the same that you report to DOL.

Q: Why is Ecology doing this?

A: The Governor's 2007 Executive Order about climate change set goals to reduce greenhouse gas emissions within Washington over the next several decades. In 2008, the Legislature passed the Greenhouse Gas Emissions Bill, requiring Ecology to adopt a mandatory greenhouse gas reporting rule. A new bill was passed in 2010 requiring certain fuel suppliers to report. In order to meet those goals, we need to determine what sources are emitting greenhouse gases and how much they are emitting. This will help us determine what actions to take to reduce greenhouse gas emissions in Washington.

Q: How much will this cost (a) the state, and (b) reporting organizations?

A: We currently do not know what the cost will be. Ecology will establish fees in its regulation to pay for the costs of administering the reporting program.

Q: What, if anything, are other states doing?

A: Several other states (including California and Oregon) as well as EPA are developing regulations for reporting greenhouse gas emissions. Washington's rule is different from these reporting programs, but we are working to make the regulations as consistent as possible with EPA's and DOL's programs.

Q: How is Washington developing its rule for this?

A: The proposed rule will follow the Administrative Procedures Act. Ecology staff started working with a stakeholder advisory group in August 2008 to develop a draft rule. A new advisory group that includes representatives from the fuel supplier industry will begin meeting in June 2010. Updates and rule drafts will be posted on the Ecology web site at www.ecy.wa.gov/programs/air/globalwarm_RegHaze/GreenHouseGasreporting_rule.html, and will be provided to interested parties.

Q: Who can be involved in the rule development process, and how?

A: Stakeholders and the public can submit written or verbal comments throughout the rule making process. Ecology will hold public meetings for fuel suppliers and other reporters that will provide technical assistance and give you an opportunity to comment on the rule. The final chance will be during

the public comment period or at a public hearing about this rule. Information about the meetings, public comment period, and public hearings will be posted on Ecology's web site at www.ecy.wa.gov/programs/air/globalwarm_RegHaze/GreenHouseGasreporting_rule.html.

Q: What happens next?

A: The draft rule developed during this process will be available for review and comment in summer 2010. Ecology expects to adopt a final rule in late 2010.

Q: Where can you get copies of regulation and guidance documents?

A: See Ecology's web site at www.ecy.wa.gov/programs/air/globalwarm_RegHaze/GreenHouseGasreporting_rule.html.

Q: Who can you contact with questions?

A: If you need more information, contact Neil Caudill at (360) 407-6811 or neil.caudill@ecy.wa.gov.