List of Parties with Greenhouse Gas Emissions Above Threshold for the Clean Air Rule

The following list was prepared based on the assumptions noted below. The list is not a determination of parties that will be ultimately covered by the Clean Air Rule.

Businesses and organizations that emit 10,000 metric tons of carbon dioxide equivalent (MT CO_2e) per year or more in Washington are required to report their greenhouse gas (GHG) emissions on an annual basis. These reporting data were submitted to the Department of Ecology beginning with the 2012 emissions year¹.

To evaluate the potential scope and size of the program, Ecology reviewed GHG reporting data from 2012 through 2014 to identify facilities with average emissions equal to or exceeding the compliance threshold. They are on the list below. Ecology used different types of information, including GHG data submitted to EPA², to identify additional parties with emissions above this level that may be covered by the Clean Air Rule.

One factor Ecology is considering when determining who is covered by the Clean Air Rule (CAR) is limiting the obligation to reduce GHG emissions to parties with average annual emissions equal to or exceeding 100,000 MT CO_2e (with some exemptions). This threshold would decrease by 5,000 MT CO_2e every three years until it reaches 70,000 MT CO_2e in 2035.

Ecology proposes to begin GHG emissions reduction requirements for some parties with the 2017 emissions year. Energy intensive and trade exposed facilities and transportation fuel importers will join the program in emissions year 2020. Parties with emissions between 70,000 and 100,000 MT CO₂e would join the program when they exceed the declining threshold.

Depending on a variety of factors, additional parties may have an obligation while others on this list may fall off. This list is Ecology's best estimate of covered parties based on currently available data, and may change with future data availability.

¹ Washington Mandatory Greenhouse <u>Gas Reporting Program — Reported Emissions for 2012 and 2013</u>

² EPA GHG Reporting Data

Covered Parties Beginning with Emissions Year 2017

Name	Sector
Avista Corporation LDC - statewide**	Natural Gas Distributor
	Refineries and Petroleum Fuel
BP Cherry Point Refinery - Blaine*	Producers/Importers
Cascade Natural Gas Corporation LDC - statewide**	Natural Gas Distributor
Cowlitz County Headquarters Landfill - Castle Rock	Waste
Frederickson Power LP – Tacoma	Power Plants
Grays Harbor Energy Center – Elma	Power Plants
King County Solid Waste Cedar Hills Landfill - Maple Valley	Waste
Land Recovery Landfill Industrial – Graham	Waste
NW Natural - Washington - statewide**	Natural Gas Distributor
PacifiCorp Energy - Chehalis Generating Facility – Chehalis	Power Plants
	Refineries and Petroleum Fuel
Phillips 66 Ferndale Refinery - Ferndale*	Producers/Importers
Puget Sound Energy - Ferndale Generating Station – Ferndale	Power Plants
Puget Sound Energy - Goldendale Generating Station – Goldendale	Power Plants
Puget Sound Energy - Mint Farm Generating Station - Longview	Power Plants
Puget Sound Energy - Sumas Generating Station - Sumas	Power Plants
Puget Sound Energy LDC - statewide**	Natural Gas Distributor
River Road Generating Plant – Vancouver	Power Plants
Roosevelt Regional Landfill – Roosevelt	Waste
	Refineries and Petroleum Fuel
Shell Puget Sound Refinery - Anacortes*	Producers/Importers
Spokane Waste to Energy Facility – Spokane	Waste
Terrace Heights Landfill – Yakima	Waste
	Refineries and Petroleum Fuel
Tesoro Refining & Marketing Company LLC - Anacortes*	Producers/Importers
	Refineries and Petroleum Fuel
U.S. Oil & Refining Co Tacoma*	Producers

^{*} Owners of refineries will be in the program as both a facility and as a petroleum fuel producer/importer.

^{**} Natural gas distributors will be responsible for the fuel they supply to customers that is not already covered in the program.

Covered Parties Beginning After Emissions Year 2017

Name	Sector
Agrium Kennewick Fertilizer Operations (KFO) - Kennewick @	Chemicals
Alcoa Intalco Works - Ferndale @	Metals
Alcoa Wenatchee Works - Malaga @	Metals
Ardagh Glass Inc Seattle @	Minerals
Ash Grove Cement Company - Seattle @	Minerals
Boeing Commercial Airplanes - Everett @	Manufacturing
Boise Paper - Wallula @	Pulp and Paper
Cardinal FG Company - Winlock @	Minerals
Enwave - Seattle	Power Plants
Gas Transmission Northwest, LLC - Compressor Station 6 – Rosalia	Petroleum and Natural Gas Systems Petroleum and Natural Gas
Gas Transmission Northwest, LLC - Compressor Station 8 - Wallula	Systems
Georgia-Pacific Consumer Products LLC - Camas @	Pulp and Paper
Graymont Western US. Inc Tacoma @	Minerals
H.W. Hill Landfill Gas Power Plant - Roosevelt	Power Plants
JR Simplot - Othello @	Food Production
Kaiser Aluminum Washington, LLC (Trentwood Works) - Spokane	
Valley @	Metals
Longview Fibre Paper and Packaging, Inc/KapStone Kraft - Longview @	Pulp and Paper
McCain Foods - Othello @	Food Production
	Petroleum and Natural Gas
Northwest Pipeline C/S - Sumas	Systems
Nucor Steel Seattle, Inc, - Seattle @	Metals
Port Townsend Paper Corporation - Port Townsend @	Pulp and Paper
Puget Sound Energy - Encogen Generating Station - Bellingham	Power Plants
Puget Sound Energy LDC - statewide %	Petroleum and Natural Gas Systems
REC Silicon - Moses Lake @	Manufacturing
RockTenn Tacoma Mill - Tacoma @	Pulp and Paper
University of Washington Seattle Campus - Seattle	Government
US Army Joint Base Lewis-McChord - Pierce Co.	Government
WaferTech LLC - Camas @	Manufacturing
Weyerhaeuser NR Company - Longview @	Pulp and Paper
Associated Petroleum Products, Inc. #	Petroleum Fuel Importer
C/N Ethanol Marketing Corp #	Petroleum Fuel Importer
CHS Inc. #	Petroleum Fuel Importer
CityServiceValcon LLC #	Petroleum Fuel Importer
ECO-Energy LLC #	Petroleum Fuel Importer
ExxonMobil #	Petroleum Fuel Importer
Fred Meyer Stores Inc #	Petroleum Fuel Importer

Name	Sector
Green Plains Trade Group LLC #	Petroleum Fuel Importer
IPC (USA) #	Petroleum Fuel Importer
Pettit Oil Co #	Petroleum Fuel Importer
RPMG, Inc. #	Petroleum Fuel Importer
SEI Fuel Services, Inc. #	Petroleum Fuel Importer
Southern Counties Oil Co Ltd #	Petroleum Fuel Importer
Suncor #	Petroleum Fuel Importer
Valero Marketing and Supply Company #	Petroleum Fuel Importer
Vitol Inc. #	Petroleum Fuel Importer
Wilson Oil Inc #	Petroleum Fuel Importer
World Fuel Services, Inc. #	Petroleum Fuel Importer

[@] Energy intensive and trade exposed facility. Joins the program in emissions year 2020 or when their emissions exceed the threshold, whichever comes later.

[%] Puget Sound Energy LDC - statewide will likely be part of the program as a natural gas distributor and later as a facility.

[#] Petroleum Fuel Importers are preliminary estimate.