



Navigating New York's Mandatory GHG Reporting Rule (6 NYCRR Part 253)

Presenters: Cambre Codington & Louise Shaffer

Moderator: Daniel Brese



Webinar Logistics

How can I ask questions?

- Please enter your questions in the Questions box.
- There will be a Q&A at the end.

Will I get a certificate of completion?

- Yes, all attendees will automatically be sent a certificate of completion later this afternoon.

Will I get a recording of the webinar?

- Yes, we will post a recording of the webinar and a copy of the slides on our website. A link will be emailed to all registrants tomorrow.



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& Next Steps





New York Regulatory Update

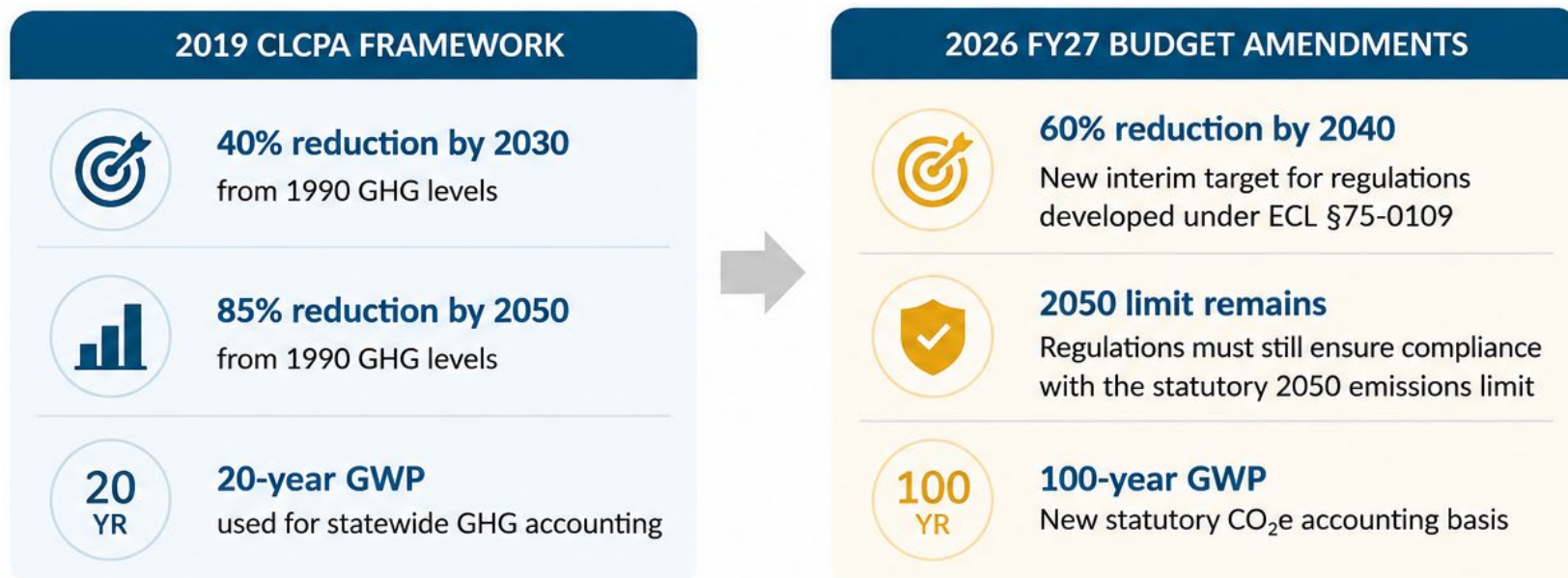
2026 CLCPA Revisions: What Changed?



On July 18, 2019, New York enacted the Climate Leadership and Community Protection Act (CLCPA), establishing legally binding targets to reduce GHG emissions, shift to renewable energy, and direct funding to disadvantaged communities.



On May 28, 2026, Governor Hochul signed the Fiscal Year (FY) 2027 Enacted Budget, which included amendments to the CLCPA addressing the regulatory timeline, emissions accounting methodology, affordability and feasibility, and disadvantaged-community investments.



Part 253 note: DEC's current Mandatory GHG Reporting materials continue to specify **20-year global warming potential (GWP)** for Part 253 reporting.

New York GHG Reporting Update

Recent developments and what they mean for Part 253



1

Why NY Adopted Part 253

As part of New York's ongoing efforts to collect information on greenhouse gas emission sources and support implementation of the CLCPA, NYSDEC adopted 6 NYCRR Part 253, consistent with recommendations in the Climate Action Council's Scoping Plan.



2

Impact of CLCPA Amendments

The changes to the CLCPA will affect Part 253—specifically, the GWP being used. This will take time for NYSDEC to modify the rule and go through public comment.



3

Enforcement Discretion in Place

Therefore, NYSDEC issued an enforcement discretion letter on July 31, 2026, modifying the enforcement approach for Part 253 and extending certain compliance deadlines.



What This Means:

Part 253 reporting remains in effect. Facilities should continue monitoring requirements and prepare for future rule changes.



Part 253 Overview

What is New York's Mandatory GHG Reporting Rule?

6 NYCRR Part 253 established a statewide program for collecting greenhouse gas (GHG) emissions data from covered entities.



RULE FINALIZED

December 1, 2025



FIRST REPORTING YEAR

Calendar year 2026



DATA COLLECTION & REPORTING

Submit annual GHG reports
per rule requirements



IMPORTANT: Part 253 establishes reporting requirements.

It **does not** itself require emissions reductions or the purchase of emissions allowances.

Who Must Report Under Part 253?

You are subject to the rule if you meet **ANY** of the following:

1



FACILITY THRESHOLD

Any facility located in New York
that emits

10,000+
MTCO₂e/year

2



LISTED SOURCE CATEGORIES

Facilities in one of the following
source categories:

- ✓ Fuel suppliers (natural gas, liquid fuels, petroleum products, coal)
- ✓ Waste haulers
- ✓ Electric power entities
- ✓ Anaerobic digestion and liquid waste storage
- ✓ Suppliers of fertilizer and lime
- ✓ Out-of-state liquefied NG and NG fuel suppliers

3



LARGE EMITTERS

Facilities that emit

25,000+
MTCO₂e/year

may have additional
reporting requirements.



Applicability Lookback:

Based on the past three years of emissions inventory data (2023-2025).

Who Qualifies as a Large Emission Source?

Large emission source status is based on the applicable annual emissions or supply threshold.

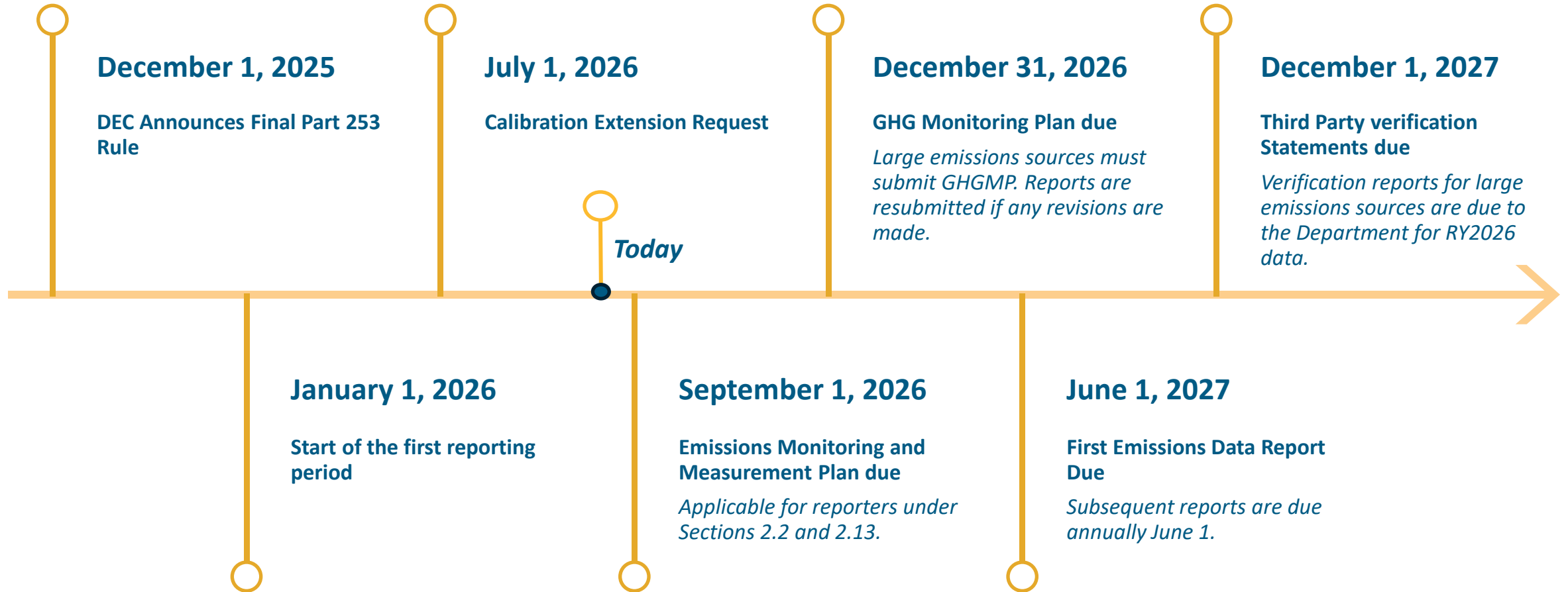


Federal reporters: Facilities reporting under 40 CFR Part 98 fall within the large emission source category, depending on the applicable Part 253 criteria.

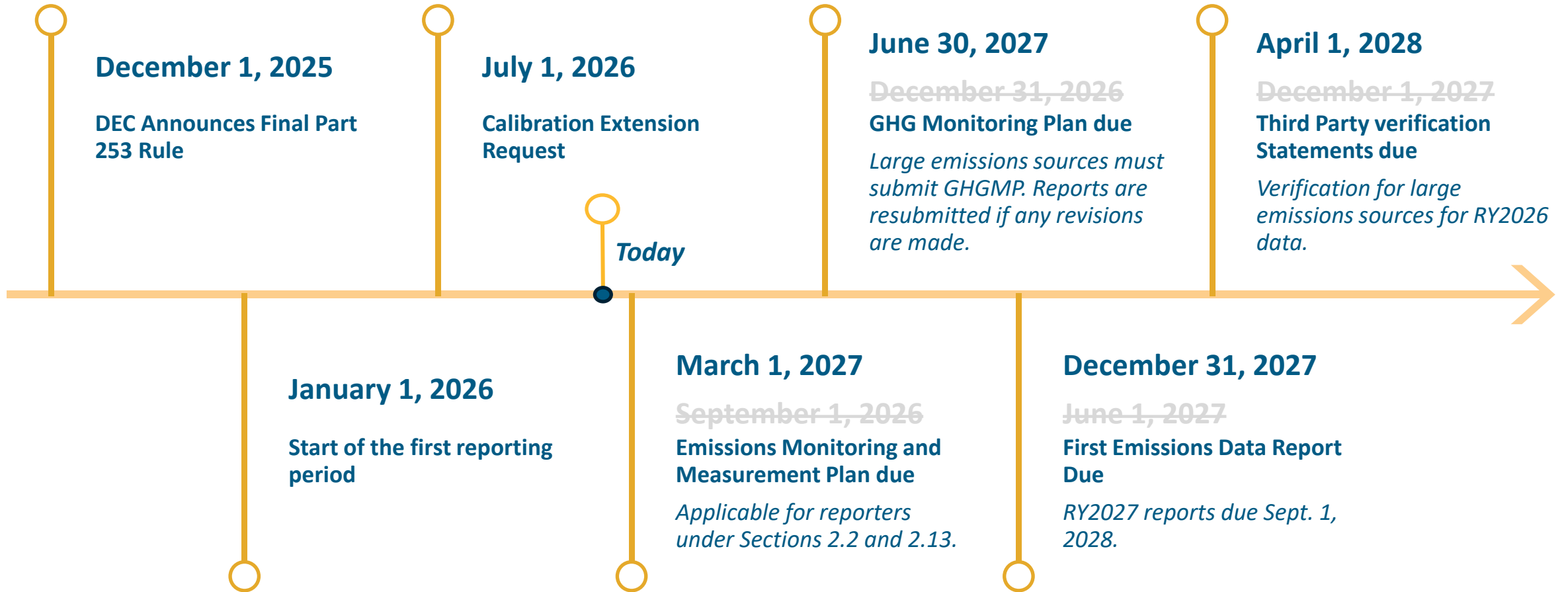


Reporting Requirements

Original Regulatory Timeline



Current Timeline Under Enforcement Discretion



Enforcement discretion changes the dates through which NYSDEC will exercise discretion; the underlying regulatory deadlines remain unchanged.

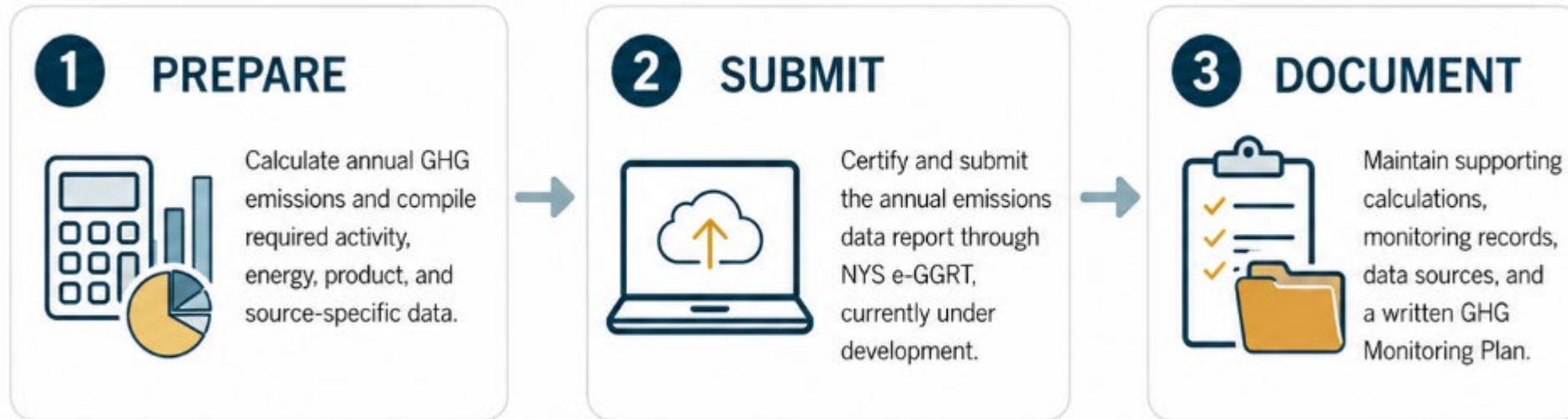
Part 253 Enforcement Discretion: Extended Compliance Dates

Requirement	Regulatory Deadline (Original)		Enforcement Discretion Through (Extended)
2026 Emissions Data Report	June 1, 2027	→	 December 31, 2027
2027 Emissions Data Report	June 1, 2028	→	 September 1, 2028
2026 Verification Statement	December 1, 2027	→	 April 1, 2028
GHG Monitoring Plan – Large Emission Sources	December 31, 2026	→	 June 30, 2027
Registration of Anticipated Electricity Sources	February 1, 2027	→	 August 31, 2027
Emissions Monitoring & Measurement Plan – Waste Facilities	September 1, 2026	→	 March 1, 2027

Note: These are enforcement-discretion dates; the underlying regulatory deadlines have not been amended.

What Must a Reporting Entity Do?

Core reporting requirements under 6 NYCRR Part 253.



Large emission sources: Submit the GHG Monitoring Plan to DEC
Third-party verification is covered separately.

GHG Monitoring Plans (GHGMP)

A GHGMP must document three core elements:



1 Roles and Responsibilities

Identify the positions responsible for collecting, reviewing, and maintaining data.



2 Data Collection and Calculation Methods

Describe the processes, calculation methods, and source data used to calculate GHG emissions.



3 Quality Assurance

Document quality assurance, maintenance, and repair procedures for CMS, flow meters, and other measurement equipment.



Goal: Establish a consistent and auditable process for compiling data reported under Part 253.

Third-Party Verification Requirements

The verification will include (but is not limited to) the following:

	PLANNING	A verification plan and planned meetings with the facility.
	UNDERSTANDING	Site visits and review of the facility's operations and information.
	TESTING & EVALUATION	Sampling plan, data checks, and review of production data, as applicable.
	ASSESSMENT	Material misstatement assessment and review of missing data substitution.
	RESOLUTION & REPORTING	Log of issues, emissions data report modifications, and issuance of the verification statement.

Facilities should be prepared to provide supporting records, explain calculation methodologies, and address discrepancies identified during verification.



Monitoring Requirements

Developing the Monitoring Framework

Build the Monitoring Framework

1 Identify Monitoring Parameters

Map each applicable source category to the parameter used to calculate emissions or product data.

2 Document Data Sources

Link each parameter to its supporting source, such as a meter, invoice, laboratory analysis, CEMS record, or production record.

3 Apply Required Methods

Use the applicable Part 253 method and any incorporated monitoring procedures under 40 CFR Parts 98 and Part 75.

4 Maintain QA/QC Records

Retain documentation supporting calculations, missing-data substitutions, and verification review.

Common Monitoring Inputs



Fuel and Energy Data

Fuel types, quantities, heating values, carbon content, and energy usage records.



Process Data

Steam production rates and process flows, feedstock, throughputs, and other process information.



Continuous Monitoring Systems

CEMS, Part 75 quality-assurance records, and other continuous monitors providing real-time emissions data.



Source-Specific Plans

Monitoring plans, test plans, and other documents that define requirements for specific sources (like EMMPs).

Calibration and Accuracy Requirements



What Must Be Calibrated

All flowmeters, fuel meters, process steam meters, product measuring devices, scales, and any other device used to gather data for the emissions report.



Accuracy Standard

Devices must maintain an accuracy within $\pm 5\%$.



Calibration Frequency

Calibration frequency must be the shortest of the following:

- Every 36 months
- Part 98 calibration frequency
- Manufacturer recommendations
- After replacement or repair



Facility Specific Requirements

Reporter Categories Under Part 253

Industrial Facilities

Part 253-2.1	Aluminum Production
Part 253-2.2	Anaerobic Digestion and Liquid Storage of Waste
Part 253-2.3	Cement Production
Part 253-2.4	Electric Power Entities
Part 253-2.5	Electricity Generation and Cogeneration Units
Part 253-2.6	Electronics Manufacturing
Part 253-2.7	Facility Fuel Utilization and Combustion Source
Part 253-2.8	Glass Production
Part 253-2.9	Hydrogen Production
Part 253-2.10	Iron and Steel Production
Part 253-2.11	Lead Production
Part 253-2.12	Oil and Gas Systems
Part 253-2.13	Solid Waste Management

Suppliers

Part 253-2.14	Suppliers of Agricultural Lime and Fertilizer
Part 253-2.15	Suppliers of Coal
Part 253-2.16	Suppliers of Liquid Fuels and Petroleum Products
Part 253-2.17	Suppliers of Natural Gas, Natural Gas Liquids, Compressed Natural Gas, & Liquefied Natural Gas
Part 253-2.18	Upstream Out-of-State Emissions from Fossil Fuels of Products

Other Reporting Categories

Part 253-2.19	Waste Haulers and Transporters
Part 253-2.20	Additional Methane Data Collection
Part 253-2.21	Fluorinated Greenhouse Gas
Part 253-2.22	Industrial Production Data Report Requirements

Part 253-2.7 Facility Fuel Utilization and Combustion Source



PURPOSE

Applicable emissions units must report GHG emissions from stationary fuel combustion using 40 CFR Part 98, Subpart C, with New York-specific modifications.



CALCULATION METHOD

Select the appropriate CO₂ calculation tier based on fuel type and unit size. Higher-tier methods may apply to certain fuels or units.



FUEL SUPPLIER DATA

Report fuel supplier information, annual MMBtu delivered, and whether fuel is supplied to downstream users.



EQUIPMENT INCLUDED

Includes emergency generators, non-permanent equipment, non-road equipment, and portable equipment—unless the fuel was purchased from an off-site retail location.

Calculation Tiers for Stationary Combustion Units

Fuel or Operating Scenario	Unit Size	Permitted or Required Method
Steam-producing unit combusting municipal solid waste or solid biomass	Any size	Equation C-2c permitted unless Federal requirements mandate Tier 3 or Tier 4
Other biomass combustion units or biomass-derived fuels not eligible for the steam-unit provision	Any size	Tier 3 or Tier 4 required
Fuels listed in Part 253 Table 2-3	Unit $\leq$ 250 MMBtu/hr	Tier 1 or Tier 2 , subject to Federal limitations
Pipeline-quality natural gas	Any size	Tier 2 ; Tier 1 permitted when supplier data are provided in therms or MMBtu
Distillate fuels listed in Table 2-3	Any size	Tier 2
Non-pipeline-quality natural gas or other fuel not addressed above	Any size	Tier 3 or Tier 4 required
Units meeting Federal Tier 4 criteria	Any size	Tier 4 required

Emissions Monitoring and Measurement Plans (EMMPs)

An EMMP is a specialized, operation- or facility-specific plan for certain methane-intensive sources under Section 253-2.20.

Who Must Prepare an EMMP?



Anaerobic Digestion and Liquid Waste Storage

Operators required to report under Section 253-2.2(a)(1), including closed tanks containing more than **600 MT** of degradable organic carbon.



Solid Waste Landfills

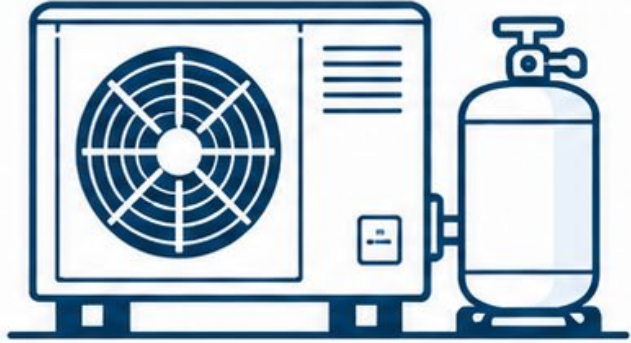
Operators of landfills with reported annual emissions exceeding **300,000 MT CO₂e**.



Submission Frequency:

EMMPs must be submitted every three years.

Part 253-2.21 Fluorinated GHG



≥ 50 lb

fluorinated GHG refrigerant

1 Covered Equipment



Commercial air-conditioning or heat-pump equipment



Industrial process equipment or systems



Other commercial refrigeration equipment or systems

2 Calculation Method

Quantity of refrigerant leaked (in mass) $\times$ GWP



Quantity of refrigerant leaked is determined using the rolling-average method under 40 CFR § 82.152.



How New York's GHG Reporting Requirements Differ from the Federal Program

Program-Level Differences

Category	New York GHG Reporting Rule (6 NYCRR Part 253)	Federal GHG Reporting Rule (40 CFR Part 98)
Applicability	Facilities: $\geq 10,000$ MT CO ₂ e/year or Part 242 budget units. Separate activity-based triggers apply to certain suppliers and entities.	Listed source categories and/or $\geq 25,000$ MT CO ₂ e/year. Listed supplier source categories are also subject to reporting.
CO ₂ e Basis	20-year GWP basis. [CO ₂ : 1, CH ₄ : 84, N ₂ O: 264]	100-year GWP basis under Table 1-A. [CO ₂ : 1, CH ₄ : 28, N ₂ O: 265]
Verification	Accredited third-party verification for large emission sources, subject to specified exemptions.	EPA validation and verification; no reporter-obtained third-party verification requirement.
Reporting Deadline	June 1: The first report, for RY 2026, is due June 1, 2027 (September 1, 2028 enforcement)	March 31 st generally. The RY 2025 deadline is extended to October 30, 2026.
Industrial Production Data	Required for large emissions sources in the industrial sectors listed in Part 253 Table 2-9.	Production and activity data requirements vary by source-category subpart but are generally not reported.

Source Specific Differences

Category	New York GHG Reporting Rule (6 NYCRR Part 253)	Federal GHG Reporting Program (40 CFR Part 98)
Fugitive Refrigerants	Subject facilities report fugitive emissions from heat-transfer equipment containing ≥ 50 lbs of fluorinated GHG refrigerant.	No general facility-wide Part 98 requirements for ordinary HVAC or refrigeration leaks; specific fluorinated-gas source and supplier subparts may apply. ($> 25,000$ MT CO ₂ e will require reporting under 40 CFR Part 98, Subpart DD)
On-site Electricity Generation	Subject facilities report generating and cogeneration units using Part 98 methods as modified, plus additional facility, unit, and energy-flow data.	Subpart D covers Acid Rain and Part 75 units; other applicable on-site combustion is generally reported under Subpart C.
Emergency and Portable Equipment	Include fuel delivered for emergency generators, non-road, non-permanent, and portable equipment. Fuel purchased at an offsite retail location is exempt.	Emergency generators, emergency equipment, and portable equipment are excluded from Subpart C; Subpart D also excludes emergency generators and portable equipment.
Enforcement	Each day of a late, incomplete, or inaccurate report - and each unreported MT of CO ₂ e - may be a separate violation.	Part 98 violations are Clean Air Act violations, and each day of a violation is a separate violation.

Essential Things to Know About the Rule



1

Penalties may apply for noncompliance

Fines may be assessed for unsubmitted or late reports, as well as for every MT CO₂e not reported.



2

Measurement devices must be calibrated

All flow meters and other measurement devices used to provide data for GHG emissions calculations or industrial product data must be calibrated prior to the year data collection.



3

Fuel supplier information and production data must be reported

Report required fuel supplier information and applicable production data.



Takeaways

Key Business Risks



Higher compliance costs



Additional resource and staffing demands



Data management and system upgrades



Potential penalties for non-compliance

How ALL4 Can Help

01

Applicability and Compliance Strategy

Evaluate the applicability of Part 253, reporting pathways, and compliance obligations.

02

Monitoring Plan Development

Develop GHG Monitoring Plans and source-specific monitoring approaches.

03

Data Systems & Recordkeeping

Improve spreadsheets, digital tools, and supporting records for reporting and verification.

04

Technical Monitoring Support

Assess CEMS, calibration, QA/QC, and data collection requirements.



Questions or Comments?

Contact Information:

Louise Shaffer // lshaffer@all4inc.com // PHL

Cambre Codington // ccodington@all4inc.com // WDC

Daniel Brese // dbrese@all4inc.com // PHL

www.all4inc.com