2024 Regional SO_2 Emissions and Milestone Report

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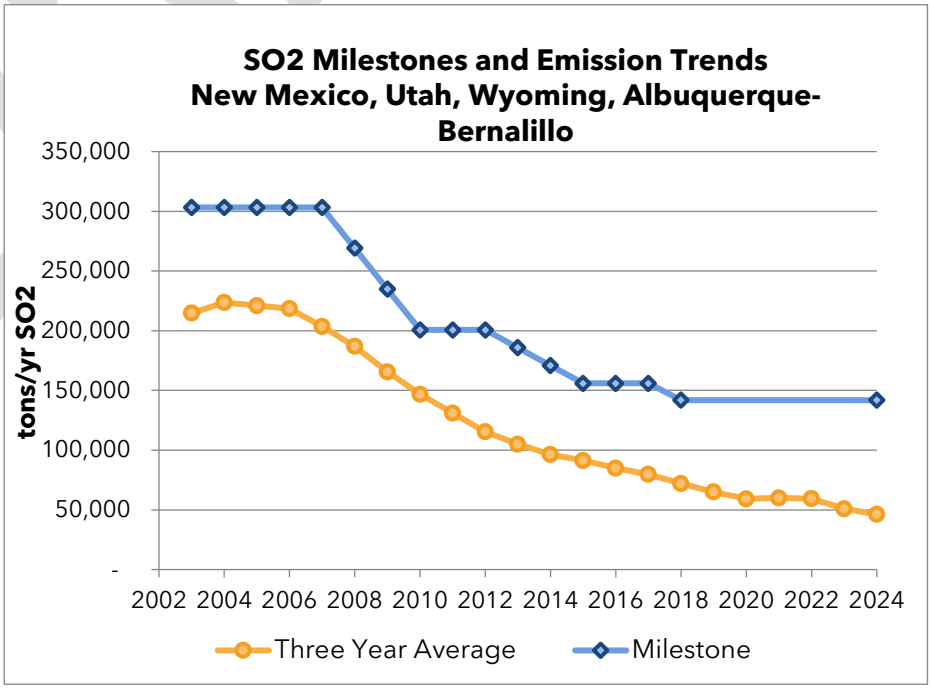
2024 Regional SO_2 Emissions and Milestone Report

Executive Summary

Under Section 309 of the Federal Regional Haze Rule, nine western states, and tribes within those states, have the option of submitting plans to reduce regional haze emissions that impair visibility at 16 Class I areas on the Colorado Plateau. Five states – Arizona, New Mexico, Oregon, Utah, and Wyoming – and Albuquerque-Bernalillo County initially exercised this option by submitting plans to the Environmental Protection Agency (EPA) by December 31, 2003. Oregon elected to cease participation in the program in 2006 and Arizona elected to cease participation in 2010. The tribes were not subject to the deadline and still can opt into the program at any time. Under the Section 309 plans, the three participating states and Albuquerque-Bernalillo County have tracked the emissions of the applicable stationary sources as part of the pre-trigger portion of the SO_2 Milestone and Backstop Trading Program. The Western Regional Air Partnership (WRAP) assists these states and county with the implementation and management of the regional emission reduction program. As used in this document, "Section 309 states" means New Mexico, Utah, Wyoming, and Albuquerque-Bernalillo County. (For CAA purposes, this report treats Albuquerque-Bernalillo County as a state because it has authority under federal and state law to administer the CAA separately from the rest of New Mexico).

As part of this program, Section 309 states must submit an annual Regional Sulfur Dioxide (SO_2) Emissions and Milestone Report that compares emissions to milestones. A milestone is a maximum level of annual emissions for a given year. The states submitted the first report in 2004 for the calendar year 2003. Over the course of the program, the states have consistently stayed below the milestones.

From 2003 to 2017 states compared the milestone to a three-year average of SO_2 emissions as required by their State Implementation Plans (SIP). The states' SIPs require them to compare the final 2018 regional milestone to 2018 emissions rather than the three-year average. The regional milestone for 2018 is 141,849 tons. Section 309 of the Regional Haze Rule requires that states continue showing compliance with the final 2018 milestone beyond the first Regional Haze implementation period. In this document, the states report the 2024 adjusted emissions as required by Section 309 of the CAA. We compared the adjusted 2024 emissions to the final 2018 milestone to determine whether the states



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continue to meet the milestone. The adjustments to reported emissions were required to allow the basis of current emission estimates to be comparable to the emissions monitoring or calculation method used in the most recent base year inventory.

As presented in Table ES-1, the Section 309 states reported 37,527 tons of SO_2 emissions for the calendar year 2024. After adjusting to account for changes in monitoring, calculation methods, and enforcement actions the total emissions increased to 46,170 tons of SO_2. The adjustments result in an additional 8,643 tons of SO_2 emissions.

Based on this adjusted annual emissions estimate, Section 309 states determined that emissions in 2024 were below the regional SO_2 milestone for 2018. The states' Section 309 plans contain provisions to adjust the milestones to account for enforcement actions (to reduce the milestones where an enforcement action identified that emissions in the baseline period were greater than allowable emissions). Based on emissions data received from the states and plan requirements regarding adjustments to the milestones, no enforcement action adjustment is required.

The plans also require that the annual report identify, first, changes in the total number of sources from year to year and, second, significant changes in a source's emissions from year to year. The significant emission changes from 2023 to 2024 are included in Section 6 of this report. A list of facilities added to, or removed from, the list of subject sources in the original base year inventories is included in Appendix B.

Table ES-1
Overview of 2024 Regional Milestones and Emissions for Section 309 Participating States

2018 Sulfur Dioxide Milestones	
Regional 2018 Milestone*	141,849 tons
Adjusted 2018 Milestone	141,849 tons
2024 Sulfur Dioxide Emissions	
Reported 2024 Emissions	37,527 tons
Adjustments**	
Emission Monitoring, Calculation Methods, and Enforcement Actions	8,643 tons
Adjusted 2024 Emissions (rounded number)	46,170 tons
Comparison of Emissions to Milestone	
2024 Adjusted Emissions	46,170 tons
Adjusted Three-State 2018 Milestone	141,849 tons
Difference (Negative Value = Emissions < Milestone)	-95,679 tons
2024 Emissions as Percent of 2018 Milestone	32.5%

* See the Regional Milestones section of each state's 309 plan.

** See the Annual Emissions Report section of each state's 309 plan.

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2024 Regional SO_2 Emissions and Milestone Report

1.0 Introduction

1.1 Background

Under Section 309 of the Federal Regional Haze Rule (40 CFR Part 51), nine western states, and the tribes within those states, have the option of submitting State Implementation Plans (SIPs) to reduce regional haze emissions that impair visibility at 16 Class I areas on the Colorado Plateau. Five states — Arizona, New Mexico, Oregon, Utah, and Wyoming — and Albuquerque-Bernalillo County exercised this option by submitting SIPs to the EPA by December 1, 2003. In October 2006, when EPA modified Section 309, Oregon elected to cease participation in the SO_2 Milestone and Backstop Trading Program by not resubmitting a SIP under 309. In 2010, Arizona elected to cease participation in the program. The tribes were not subject to this deadline and still can opt into the program at any time.

Under the Section 309 SIPs, these three states and one local air agency have been tracking emissions under the pre-trigger requirements of the SO_2 Milestone and Backstop Trading Program since 2003. The Western Regional Air Partnership (WRAP) is assisting these states with the implementation and management of this regional emission reduction program.

Under the milestone phase of the program, Section 309 states have established annual SO_2 emissions targets (from 2003 to 2018). These voluntary emissions reduction targets represent reasonable progress in reducing emissions that contribute to regional haze. If the participating sources fail to meet the milestones through this voluntary program, then the states will trigger the backstop trading program and implement a regulatory emissions cap for the states, allocate emissions allowances (or credits) to the affected sources based on the emissions cap, and require the sources to hold sufficient allowances to cover their emissions each year.

This report is the twenty-second annual report for the milestone phase of this program. The report provides background on regional haze and the Section 309 program, the milestones established under the program, and the emissions reported for 2024. Based on the last twenty-two years of data, the voluntary milestone phase of the program is meeting its reasonable progress targets, and emissions are well below the target levels.

What is Regional Haze?

Regional haze is air pollution that is transported long distances and reduces visibility in national parks and wilderness areas across the country. Over the years, this haze has reduced the visual range from 145 kilometers (90 miles) to 24 – 50 kilometers (15 – 31 miles) in the East, and from 225 kilometers (140 miles) to 56 – 145 kilometers (35 – 90 miles) in the West. The pollutants that create this haze are sulfates, nitrates, organic carbon, elemental carbon, and soil dust. Human-caused haze sources include industry, motor vehicles, agricultural and forestry burning, and windblown dust from roads and farming practices.

What U.S. EPA Requirements Apply?

In 1999, the EPA issued regulations to address regional haze in 156 national parks and wilderness areas across the country. EPA published these regulations in the Federal Register on July 1, 1999 (64 FR 35714). The goal of the Regional Haze Rule (RHR) is to prevent any future, and remedy any existing, visibility impairment from anthropogenic air pollution in certain national parks and wilderness

areas. It contains strategies to improve visibility over time and requires states to adopt implementation plans.

The EPA's RHR provides two paths to address regional haze. One is 40 CFR 51.308 (Section 308) and requires most states to develop long-term strategies out to the year 2064. States must show that these strategies make "reasonable progress" in improving visibility in Class I areas inside the state and in neighboring jurisdictions. The other is 40 CFR 51.309 (Section 309), and is an option for nine states — Arizona, California, Colorado, Idaho, Nevada, New Mexico, Oregon, Utah, and Wyoming — and the 211 tribes located within these states to adopt regional haze strategies for the period from 2003 to 2018. These strategies are based on recommendations from the Grand Canyon Visibility Transport Commission (GCVTC) for protecting the 16 Class I areas on the Colorado Plateau. Adopting these strategies constitutes reasonable progress until 2018. These nine western states and tribes can also use the same strategies to protect the other Class I areas within their own jurisdictions.

The EPA revised the RHR on July 6, 2005 (70 FR 39104), and again on October 13, 2006 (71 FR 60612) in response to two legal challenges. The October 13, 2006 revisions modified Section 309 to provide a methodology consistent with the Court's decision for evaluating the equivalence of alternatives to Best Available Retrofit Technology (BART), such as the alternative Section 309 strategy based on the GCVTC recommendations.

How Have the WRAP States Responded to EPA Requirements?

Of the nine states, and tribes within those states, that have the option under Section 309 of participating in a regional strategy to reduce SO_2 emissions, five states originally submitted Section 309 SIPs to EPA. These states were Arizona, New Mexico, Oregon, Utah, and Wyoming. In addition, Albuquerque-Bernalillo County also submitted a Section 309 SIP. Due to legal challenges, EPA did not approve the initial SIP submittals. EPA did, however, fully approve the regional milestone and backstop trading program in 2012.

Oregon and Arizona have opted out of submitting a revised Section 309 SIP under the modified RHR, which leaves three participating states and Albuquerque-Bernalillo County. To date, no tribes have opted to participate under Section 309, and the other four states of the original nine opted to submit SIPs under Section 308 of the RHR.

The following summarizes SO_2 related elements of the Section 309 process for the participating Section 309 states:

1. Section 309(d)(4)(i) requires SO_2 milestones in the SIP and includes provisions for adjusting these milestones, if necessary. The milestones must provide for steady and continuing emission reductions through 2018 and greater reasonable progress than BART.

2. Section 309(d)(4)(iii) requires monitoring and reporting of stationary source SO_2 emissions to ensure the SO_2 milestones are met. The SIP must commit to reporting to the WRAP as well as to EPA.

3. Section 309(d)(4)(iv) requires that a SIP contain criteria and procedures for activating the trading program within five years if an annual milestone is exceeded. A Section 309 SIP must also require assessments of the state’s progress in 2013 and 2018.

4. Section 309(d)(4)(vi)(A) requires that unless and until a revised implementation plan is submitted in accordance with § 51.308(f) and approved by EPA, the implementation plan shall prohibit emissions from covered stationary sources in any year beginning in 2018 that exceed the year 2018 milestone.

This report responds to Item 2, above, and provides the annual report that compares the 2023 emissions against the milestones for the states and city that have submitted Section 309 SIPs to EPA.

What Elements Must the Regional SO_2 Emissions and Milestone Report Contain?

To facilitate compliance with the Section 309 SIPs, the WRAP has committed to compiling a regional report on emissions for each year. In accordance with the SIPs, the WRAP will compile the individual state emission reports into a summary report that includes:

1. Reported regional SO_2 emissions (tons/year).
2. Adjustments to account for:
   - Changes in emissions monitoring or calculation methods; or
   - Enforcement actions or settlement agreements as a result of enforcement actions.
3. As applicable, average adjusted emissions for the last three years (which are compared to the regional milestone). Per requirements in the Section 309 SIPs, it is understood that a single year of emissions are used in the report beginning in 2018.

How Is Compliance with the SO_2 Milestone Determined?

While the WRAP assists with the preparation of this report, each Section 309 state reviews the information in the report and proposes a draft determination that the regional SO_2 milestone is either met or exceeded for that year. Each state submits the draft determination for public review and comment, in accordance with its SIP.

1.2 Report Organization

This report presents the regional SO_2 emissions and milestone information required by the 309 SIPs for the states that opted into the program. The report is divided into the following sections, including two appendices:

- Reported SO_2 Emissions in 2024;
- Emissions Adjustments Related to Monitoring Methodology or Enforcement Actions;
- 2024 Adjusted Emissions;
- Enforcement Milestone Adjustments;
- Quality Assurance (Including Source Change Information);
- Milestone Determination;
- Appendix A -- Facility Emissions and Emissions Adjustments; and
- Appendix B -- Changes to SO_2 Emissions and Milestone Source Inventory.

2.0 Reported SO_2 Emissions in 2024

The Section 309 SIPs require all stationary sources with reported emissions of 100 tons or more per year in the year 2000, or any subsequent year, to report annual SO_2 emissions. Table 1 summarizes the annual reported emissions from applicable sources in each state. The 2024 reported SO_2 emissions for each applicable source are in Appendix A, Table A-1.

Table 1. Reported 2024 SO_2 Emissions by State

State	Reported 2024 SO_2 Emissions (tons/year)
Albuquerque-Bernalillo	72
New Mexico	564
Utah	5,850
Wyoming	31,041
TOTAL	37,527

3.0 Emissions Adjustments Related to Monitoring Methodology or Enforcement Actions

The annual emissions reports for each state include proposed emissions adjustments to ensure consistent comparison of emissions to the milestone. Each state adjusted the reported emissions levels so that they are comparable to the levels that would result if the state used the same emissions monitoring or calculation method used in the base year inventory (2006). The net impact throughout the region, because of adjustments related to the monitoring methodology, is an increase of 638 tons from the reported 2024 emissions.

Utah adjusted the emissions from the Carbon Power Plant due to an enforcement action. As part of Utah's BART alternative for NO_x, they required that the Carbon Power Plant shut down. Though there is an actual emissions reduction of 8,005 tons of SO_2 per year, the Utah Air Quality Board approved a Commitment SIP stating that the emissions reductions from the closure will not be counted for both the SO_2 Milestone program and the BART alternative controls. Therefore, an additional 8,005 tons of SO_2 are included in the calculations for this milestone report. Table 2 summarizes the emissions adjustments made for changes in monitoring methodology or enforcement actions.

Table 2. Adjustments for Changes in Monitoring Methodology or Enforcement Actions

State	Source	Reported 2024 SO_2 Emissions (tons)	Adjusted 2024 SO_2 Emissions (tons)	Monitoring Methodology Adjustment (tons)	Enforcement Action Adjustment (tons)	Description
UT	Holcim-Devil's Slide Plant	45	445	400		Now using CEM data
UT	PacifiCorp -- Carbon Power Plant	0	8,005		8,005	A Utah Enforceable Commitment SIP resolves that SO_2 emissions reductions from the closure of the Carbon plant will not be counted as part of achieving the SO_2 Milestones and as part of the Alternative to BART SIP for NOx. Therefore, 8,005 tons of SO_2 are included in the emissions totals.
UT	Chevron Products Co. -- Salt Lake Refinery	38	110	72		Increase in Adjusted SO_2 Emissions is due to a correction in the calculation of Adjusted SO_2 Emissions. The previous formula used to calculate SO_2 included flowmeters and engineering judgement etc. The current formula for calculating now incorporates CEM data.
UT	Big West Oil Company - Flying J Refinery	72	238	166		Now using CEM data

4.0 2024 Adjusted Emissions

The SIPs require multi-year averaging of emissions from 2004 to 2017 for the milestone comparison. From 2005 to 2017, states compare a three-year average (which includes the reporting year and the two previous years) with the milestone. For this milestone report the SIPs require a comparison of 2024 emissions with the 2018 milestone. The adjusted emissions for 2024 are 46,170 tons. The following report sections describe the adjusted milestone determination.

5.0 Enforcement Milestone Adjustments

The SIPs require that each state report on proposed milestone adjustments due to enforcement actions, which affect baseline year emissions. The purpose of this adjustment is to remove emissions that occurred above the allowable level in the baseline year from the baseline and the annual milestones. The enforcement milestone adjustments require an EPA-approved SIP revision before taking effect. There were no proposed enforcement actions related to milestone adjustments reported for 2024.

6.0 Quality Assurance

The states provided 2024 emissions data based on their state emissions inventories. States used additional quality assurance (QA) procedures for this report to supplement the normal QA procedures the states follow for their emissions inventories. First, each state submitted a source change report, and second, the states compared their inventory data for utility sources against 40 CFR Part 75 Acid Rain Program monitoring data.

6.1 Source Change Report

The SIPs require that this annual SO_2 emissions and milestone report include a description of source changes or exceptions report to identify the following:

- Any new sources that were not contained in the previous calendar year's emissions report, and an explanation of why the sources are now included in the program.
- Identification of any sources that were included in the previous year's report and are no longer included in the program, and an explanation of why this change has occurred.
- An explanation for emissions variations at any applicable source that exceeds ± 20% from the previous year.

Appendix B provides a list of all sources added or removed from the program inventory in this and previous reporting years.

Table 3 provides explanations for the emissions variations from applicable sources from 2023 – 2024 that are greater than 20%. Plants with variations greater than 20% but reported emissions of less than 20 tons in both 2023 and 2024, are not included in Table 3. Information on these plants is provided in Appendix A.

Table 3. Sources with an Emissions Change of >±20% from the Previous Year

State	County FIPS	State Facility Identifier	Plant Name	Reported 2023 SO_2 Emissions (tons)	Reported 2024 SO_2 Emissions (tons)	% Change	Description Change > ±20% 2023 to 2024
NM	15	350150024	Agave Energy Co./Agave Dagger Draw Gas Plant AI211	299	113	-62%	The reduction in SO2 emissions is primarily attributed to decreased acid gas compressor downtime and improved compressor reliability. These enhancements allowed the plant to operate more efficiently and maintain a more stabilized process.
NM	15	350150002	Frontier Field Services /Empire Abo Plant [Old name: Arco Permian/Empire Abo Plant; BP America Production] AI 191	186	75	-59%	The reduction in SO2 emissions is primarily related to a reduction in flaring. In 2024 Frontier Field Services initiated stringent curtailment procedures for gas producers, which enabled improved management of facility line pressures and reduction of flaring.
NM	15	350150011	DCP Midstream/Artesia Gas Plant	35	13	-64%	In 2023, a flare malfunction occurred, which contributed to higher SO_2 emissions. This malfunction did not occur in 2024, resulting in lower SO_2 emissions. Additionally, SO_2 emissions from startup, shutdown, and maintenance (SSM) activities were lower in 2024 compared to 2023.
NM	25	569	Regency Field Services/Jal #3 [Old Name Southern Union Gas] /Jal #3	20*	6	-71%	There was a reduction in flared gas from 2023 to 2024. In addition, the gas analysis for 2023 had a significantly higher H_2S content than the more recent analyses from 2024 and 2025. *****Facility submitted corrected emissions for 2023. While originally submitted as 5 tons, the correct amount is 20.3 tons.
NM	25	350250061	Versado Gas Processors, LLC / Monument Plant [Old name(s): TARGA MIDSTREAM SERVICES LP, WARREN PETROLEUM/MONUMENT PLANT]	70	41	-40%	Acid gas volumes to flares F-01, F-02, and F-03 decreased by 35% from 3130 mscf to 2050 mscf.

State	County FIPS	State Facility Identifier	Plant Name	Reported 2023 SO_2 Emissions (tons)	Reported 2024 SO_2 Emissions (tons)	% Change	Description Change > ±20% 2023 to 2024
UT	29	10007	Holcim-Devil's Slide Plant	129	45	-65%	In 2024, the 65% decrease in reported SO2 emissions compared to 2023 can be attributed to changes in kiln fuel mix utilized during the reporting year. Specifically, the percentage of the total thermal energy input provided by coal decreased from approximately 60% to 20%. The fuel mix is primarily driven by economic and market factors, which may vary from year to year.
UT	7	10096	Sunnyside Cogeneration Associates -- Sunnyside Cogeneration Facility	362	436	20%	In 2023, the plant was offline for two months, September thru October.
UT	15	10238	PacifiCorp -- Huntington Power Plant	1,057	772	-27%	Heat input to both Huntington units decreased from 2023 to 2024. There was a 21% decrease of heat input to unit 1 and a 14% decrease of heat input to unit 2.
UT	27	10327	Intermountain Power Service Corporation -- Intermountain Generation Station	848	1,644	94%	The increase in SO_2 emissions at IPP in 2024 was due to several factors, including changes in coal quality—specifically, a higher percentage of sulfur in the coal burned compared to 2023—and an increase in load, as IPP produced more megawatts and burned more coal in 2024 than in the previous year. For context, SO_2 percentage of sulfur in the coal burned in 2023 had decreased by more than 50% compared to 2022, whereas 2024 the percentage of sulfur in the coal burned returned to levels similar to those seen in 2022.
UT	35	10346	Kennecott Utah Copper Corp. -- Smelter & Refinery	430	668	55%	There was an extended maintenance shutdown in 2023 of approximately 90 days which resulted in lower emissions. In 2024, the site had a typical operating schedule.

State	County FIPS	State Facility Identifier	Plant Name	Reported 2023 SO_2 Emissions (tons)	Reported 2024 SO_2 Emissions (tons)	% Change	Description Change > ±20% 2023 to 2024
WY	31	F000085	Basin Electric -- Laramie River Station	8,451	6,428	-24%	>20% change due to decreased operational time and decreased load of units 2 and 3. Heat input from unit 2 saw a 23% decrease. Heat input from unit 3 saw a 36% decrease. Unit 1 operated at about the same level from 2023 to 2024.
WY	13	F000532	Contango Resources LLC -- Lost Cabin Gas Plant	2,020	1,448	-28%	The decrease was the result of fewer emissions from the Train 2 Tail Gas Incinerator and the Train 2 and Train 3 Flares. The emissions decrease was due to fewer plant upsets and unplanned events in 2024.
WY	41	F000191	Hilcorp Energy Company -- Carter Creek Gas Plant	379	58	-85%	The 2024 SO2 emissions reflect a decrease when compared to the 2023 emissions, which is attributed to the turnaround for maintenance activities the plant underwent in 2023 and fewer unplanned emission events occurring in 2024
WY	23	F000329	Exxon Mobil Corporation -- Labarge Black Canyon Dehydration Facility	0	37	58%	58% decrease from 2023 to 2024 due to no turnaround and less acid gas flaring events at Dehy Facility
WY	23	F000327	Exxon Mobil Corporation -- Shute Creek Treating Facility	1,114	1,858	67%	67% increase in 2024 compared to 2023 was due to increased flaring as a result of a Break In Outage in October 2024 as well as multiple plant shut downs and start-ups.
WY	29	F000539	Merit Energy Company -- Oregon Basin Gas Plant	344	264	-23%	Merit did not do the same turnaround as last year, which was when there was an increase in SO2 emissions.
WY	1	F000587	Mountain Cement Company -- Laramie Cement Plant	133	221	66%	Increased number of operational stops due to maintenance events.

State	County FIPS	State Facility Identifier	Plant Name	Reported 2023 SO_2 Emissions (tons)	Reported 2024 SO_2 Emissions (tons)	% Change	Description Change > ±20% 2023 to 2024
WY	37	F000645	PacifiCorp -- Jim Bridger Plant	6,668	3,984	-40%	Change from coal to Natural Gas on 2 of 4 boilers.
WY	23	F000647	PacifiCorp -- Naughton Plant	1,439	1,027	-29%	Lower coal sulfur content and reduced fuel consumption
WY	37	F000765	American Soda LLC -- Green River Soda Ash Plant	41	5	-88%	Switched from coal to natural gas
WY	1	F000832	University of Wyoming - Heat Plant	7	39	485%	SO2 emissions for 2024 were higher than 2023 because of a planned increase in coal consumption. 2024 SO2 emissions were calculated using stack testing results from 2021. Coal used averaged .501% sulfur for the year.
WY	29	F000060	Contango Resources, LLC -- Elk Basin Gas Plant	479	661	38%	Increased flaring events because of an outage
WY	56043	F026405	Contango Resources, LLC -- Worland Gas Plant (WMS)	42	51	21%	A new sour gas well has been routed to the facility. The well's H2S content significantly increased the overall inlet low pressure gas content (~9.4% H2S); therefore, when a compressor blowdown occurs, the SO2 emissions are significantly higher than in previous years.

6.2 Part 75 Data

Federal Acid Rain Program emissions monitoring data (required by 40 CFR Part 75) were used to check reported power plant emissions.

Sources in the region subject to Part 75 emitted 65% of the region's reported emissions in 2024. We compared Acid Rain Program power plant emission data from EPA's Clean Air Markets Program Data website to plant totals reported by each state. The SIPs require the use of Part 75 methods for Part 75 sources. The reported emissions matched EPA's emission data except for three sources. The sources whose reported emissions did not match EPA's data are in Table 4. The difference between the Acid Rain Program data and reported emissions for this report for sources in Wyoming is due to emissions factors required by Wyoming Air Quality Standards and Regulations Chapter 14 Section 3 (d).

Table 4. Reported facility emissions that do not match information in the Acid Rain Database

State	Facility Name	Facility ID (ORISPL)	Year	2024 Acid Rain Database Emissions (tons SO2)	2024 Reported Emissions (tons SO2)
WY	PacifiCorp -- Naughton Plant	4162	2024	1,025	1,027
WY	PacifiCorp -- Jim Bridger Plant	8066	2024	3,986	3,984
WY	Basin Electric -- Laramie River Station	6204	2024	4,707	6,428

7.0 Milestone Determination

The Section 309 regional 2018 milestone is 141,849 tons SO_2. The 2024 adjusted emissions are 46,170 tons SO_2; therefore, the participating states met the 141,849 tons SO_2 milestone.

8.0 Public Comments

New Mexico, Albuquerque-Bernalillo, Utah, and Wyoming each published a draft of this report for public review and comment. The draft was also available on the WESTAR-WRAP website at https://westar.org/regional-haze/.

[Insert summary of public comments if any are received.]

Appendix A

Table A-1
2024 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
ABQ	1	3500100008		GCC Rio Grande Inc. - Portland Cement Manufacturer	3241	327310	72	72	0
NM	15	350150024		Agave Energy Co./Agave Dagger Draw Gas Plant AI211	1311	21112	113	113	0
NM	15	350150002		Frontier Field Services /Empire Abo Plant [Old name: Arco Permian/Empire Abo Plant; BP America Production] AI 191	1321	21113	75	75	0
NM	15	350150011		DCP Midstream/Artesia Gas Plant	1321	211112	13	13	0
NM	25	350250035		DCP Midstream/Linam Ranch Gas Plant [Old name: GPM GAS/LINAM RANCH GAS PLANT]	1321	21113	11	11	0
NM	25	350250060		VERSADO GAS PROCESSORS, LP/Eunice Gas Plant [Old name: WARREN PETROLEUM/EUNICE GAS PLANT] AI 609	1321	21113	103	103	0
NM	25	350250004		Frontier Field Services/Maljamar Gas Plant AI 565	1321	21113	105	105	0
NM	31	350310008		Western Refining Southwest Inc-Gallup Refinery {Old names: Western Refinery/Ciniza Refinery (Gallup) and GIANT REFINING/CINIZA] AI 888	2911	236220	-	-	0

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
NM	15	350150008		OXY USA WTP Limited Partnership - Indian Basin Gas Plant [Old Name -Marathon Oil/Indian Basin Gas Plant] --AI197	1321	211112	-	-	0
NM	15	350150010		Navajo Refining Co/Artesia Refinery AI 198	2911	32411	72	72	0
NM	25	569		Regency Field Services/Jal #3 [Old Name Southern Union Gas] /Jal #3	1321	21113	6	6	0
NM	25	350250051		Versado Gas Processors, LP/Eunice South Gas Plant	1321	211112	-	-	0
NM	25	350250061		Versado Gas Processors, LLC / Monument Plant [Old name(s): TARGA MIDSTREAM SERVICES LP, WARREN PETROLEUM/MONUMENT PLANT]	1321	21113	41	41	0
NM	45	350450023		Western Refining Southwest Inc./Bloomfield Products Terminal [Old name: GIANT INDUSTRIES/BLOOMFIELD REF]AI 1156	2911	42471	0	0	0
NM	25	350250075		ConocoPhillips-Midland Office / MCA Tank Battery No. 2AI 624	1311	21113	0	0	0
NM	25	350250113		ConocoPhillips-Midland Office / East Vacuum Liquid Recovery and CO2 Plant	1311	21112	25	25	0
UT	29	10007		Holcim-Devil's Slide Plant	3241	327310	45	445	400
UT	37	10034		Green Ventures, LLC (was Paradox Midstream LLC CCI Paradox Midstream LLC and Patara Midstream LLC and EnCana Oil & Gas (USA) Incorporated and Tom Brown Incorporated) - Lisbon Natural Gas Processing Plant	2911	211120	-	-	

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
UT	7	10081	3644	PacifiCorp -- Carbon Power Plant	4911	221112		8,005	8,005
UT	7	10096		Sunnyside Cogeneration Associates -- Sunnyside Cogeneration Facility	4911	221112	436	436	0
UT	11	10119		Chevron Products Co. -- Salt Lake Refinery	2911	324110	38	110	72
UT	11	10122		Big West Oil Company - Flying J Refinery	2911	324110	72	238	166
UT	11	10123		Holly Refining and Marketing Co. -- Phillips Refinery	2911	324110	12	12	0
UT	15	10237	6165	PacifiCorp -- Hunter Power Plant	4911	221112	1,993	1,993	0
UT	15	10238	8069	PacifiCorp -- Huntington Power Plant	4911	221112	772	772	0
UT	27	10311		Materion Natural resources - Delta Mill (was Brush Resources)	1099	212299	0	0	0
UT	27	10313		Graymont Western US Inc. -- Cricket Mountain Plant	1422	212312	29	29	0
UT	27	10327	6481	Intermountain Power Service Corporation -- Intermountain Generation Station	4911	221112	1,644	1,644	0
UT	35	10335		Tesoro West Coast -- Salt Lake City Refinery	2911	324110	20	20	0
UT	35	10346		Kennecott Utah Copper Corp. -- Smelter & Refinery	3331	331410	668	668	0

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
UT	35	10572		Kennecott Utah Copper Corp. -- Power Plant/Lab/Tailings Impoundment	1021	212230	0	0	0
UT	43	10676		Utelite Corporation -- Shale processing	3295	212325	120	120	0
UT	49	10790		Brigham Young University -- Main Campus	8221	611310	1	1	0
WY	11	F021196		American Colloid Mineral Co -- Colony East & West Plants	1459	212325	0	0	0
WY	5	F020818	56609	Basin Electric -- Dry Fork Station	4911	22112	813	813	0
WY	31	F000085	6204	Basin Electric -- Laramie River Station	4911	221112	6,428	6,428	0
WY	5	F030139	4150, 7504, 55479, 56596, 56319	Neil Simpson Complex - includes WYGEN I, WYGEN II, WYGEN III, Neil Simpson I, and Neil Simpson II	4911	22112	1092.5	1092.5	0
WY	13	F022325		Contango Resources LLC -- Bighorn 10-5(Formerly Bighorn Wells)	1300	21111	0	0	0
WY	13	F000532		Contango Resources LLC -- Lost Cabin Gas Plant	1311	211111	1,448	1,448	0
WY	41	F000191		Hilcorp Energy Company -- Carter Creek Gas Plant	1311	211111	58	58	0
WY	41	W000001		Northshore Exploration & Production -- Whitney Canyon/Carter Creek Wellfield	1300	21111	-	-	0

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
WY	37	F000349		Genesis Alkali Wyoming LP -- Westvaco Facility	2812	327999	1,877	1,877	0
WY	13	W000002		Devon Energy Production Co., L.P. -- Beaver Creek Gas Field	1300	21111			0
WY	13	F000058		Denbury Onshore LLC -- Beaver Creek Compressor Station	1311	211111	0	0	0
WY	23	F000329		Exxon Mobil Corporation -- Labarge Black Canyon Dehydration Facility	1300	21111	37	37	0
WY	23	F000327		Exxon Mobil Corporation -- Shute Creek Treating Facility	1311	211111	1,858	1,858	0
WY	43	F026405		Hiland Partners, LLC -- Hiland Gas Plant	1321	48621			0
WY	21	F030136		Holly Frontier Cheyenne Refining-- Cheyenne Renewable Diesel Facility	2911	32411	0	0	0
WY	29	F000539		Merit Energy Company -- Oregon Basin Gas Plant	1321	211112	264	264	0
WY	29	W000004		Merit Energy Company -- Oregon Basin Wellfield	1300	21111			0
WY	37	F000827		North Shore Exploration & Production - Brady Gas Plant (formerly Merit Energy Company)	1321	211112	-	-	0
WY	29	F026274		Vaquero Big Horn, LLC - Shoshone Unit Battery		211112			0
WY	29	F026853		Vaquero Big Horn, LLC - Frannie Unit Battery No 1		211112			0

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
WY	29	F001075		Vaquero Big Horn, LLC - Cody Unit Battery		211112			0
WY	29	F001076		Vaquero Big Horn, LLC - Frannie 2 Battery		211112			0
WY	41	W000003		Merit Energy Company -- Whitney Canyon WellField	1300	21111	-	-	0
WY	41	F000053		North Shore Exploration & Production -- Whitney Facility	1311	211111	1	1	0
WY	1	F000587		Mountain Cement Company -- Laramie Cement Plant	3241	23571	221	221	0
WY	37	F000584		P4 Production, L.L.C. -- Rock Springs Coal Calcining Plant	3312	331111	566	566	0
WY	9	F000644	4158	PacifiCorp - Dave Johnston Plant	4911	221112	6,430	6,430	0
WY	37	F000645	8066	PacifiCorp -- Jim Bridger Plant	4911	221112	3,984	3,984	0
WY	23	F000647	4162	PacifiCorp -- Naughton Plant	4911	221112	1,027	1,027	0
WY	5	F000646	6101	PacifiCorp -- Wyodak Plant	4911	221112	1,977	1,977	0
WY	37	F000746		Simplot Phosphates LLC -- Rock Springs Fertilizer Complex	2874	325312	626	626	0
WY	7	F000758		HF Sinclair Parco Refining LLC -- HF Sinclair Parco Refining LLC	2911	32411	104	104	0

State	County FIPS	State Facility Identifier	ORIS	Plant Name	Plant SIC	Plant NAICS	Reported 2024 SO2 Emissions (tons)	Adjusted 2024 SO2 Emissions (tons)	2024 General New Monitoring Calculation Method Adjustment (tons)
WY	25	F000531		HF Sinclair Casper Refining LLC -- Casper Refinery	2911	32411	23	23	0
WY	37	F000765		American Soda LLC -- Green River Soda Ash Plant	1474	325181	5	5	0
WY	37	F000361		TATA Chemicals (Soda Ash) Partners-- Green River Works (formerly General Chemical)	1474	327999	1,448	1,448	0
WY	15	F000389		The Western Sugar Cooperative -- Torrington Plant	2063	311313	-	-	0
WY	37	F000803		Genesis Alkali Wyoming, LP -- Granger Soda Ash Plant	1474	212391	0	0	0
WY	1	F000832		University of Wyoming - Heat Plant	8221	61131	39	39	0
WY	29	F000060		Contango Resources, LLC -- Elk Basin Gas Plant	1311	211111	661	661	0
WY	56043	F026405		Contango Resources, LLC -- Worland Gas Plant (WMS)	1321	211112	51	51	0
WY	45	F000980		Wyoming Refining Company -- Newcastle Refinery	2911	32411	4	4	0

Appendix B

Table B-1
Sources Added to the SO_2 Emissions and Milestone Report Inventory

State	County FIP Code	State Facility ID	Facility Name	Report Year of Change
UT	043	10676	Utelite Corporation -- Shale processing	2003
WY	011	0002	American Colloid Mineral Company -- East Colony	2003
WY	011	0003	American Colloid Mineral Company -- West Colony	2003
WY	037	0014	Chevron USA (previously owned by Anadarko E&P Company LP) -- Table Rock Gas Plant	2003
WY	005	0146	Black Hills Corporation -- Wygen 1	2003
WY	041	0002	BP America Production Company -- Whitney Canyon Well Field	2003
WY	013	0009	Burlington Resources -- Bighorn Wells	2003
WY	037	0177	Chevron USA -- Table Rock Field	2003
WY	041	0008	Chevron USA -- Whitney Canyon/Carter Creek Well field	2003
WY	013	0008	Devon Energy Corp. -- Beaver Creek Gas Plant	2003
WY	035	0001	Exxon Mobil Corporation -- Labarge Black Canyon Facility (also identified as Black Canyon Dehy Facility)	2003
WY	013	0007	Devon Energy Corp. -- Beaver Creek Gas Field	2004
WY	005	0225	Cheyenne Light, Fuel and Power (a subsidiary of Black Hills Corporation) -- Wygen II	2008
WY	005	0281	Black Hills Corporation – Wygen III	2010
WY	005	0045	Basin Electric – Dry Fork Station	2011
NM	025	350250075	ConocoPhillips-Midland Office / MCA Tank Battery No. 2	2013
NM	025	350250113	ConocoPhillips-Midland Office / East Vacuum Liquid Recovery and CO2 Plant	2013
ABQ* NM	001	3500100008	GCC Rio Grande Inc. - Portland Cement Manufacturer	2018

* ABQ NM is Albuquerque-Bernalillo County.

Table B-2
Sources Removed from the SO_2 Emissions and Milestone Report Inventory

State	County FIP Code	State Facility ID	Facility Name	1998 Baseline Emissions (tons/year)	Reason for Change	Report Year of Change
WY	043	0001	Western Sugar Company -- Worland	154	Emissions did not meet 100 TPY program criteria.	2003
WY	017	0006	KCS Mountain Resources -- Golden Eagle	942	Emissions did not meet 100 TPY program criteria.	2003
WY	003	0017	KCS Mountain Resources -- Ainsworth	845	Closed since 2000.	2003
WY	017	0002	Marathon Oil -- Mill Iron	260	Emissions did not meet 100 TPY program criteria.	2003
UT	049	10796	Geneva Steel -- Steel Manufacturing Facility	881	Plant is shut down and disassembled.	2004
WY	023	0001	Astaris Production -- Coking Plant	1,454	Plant is permanently shut down and dismantled.	2004
ABQ* NM	001	00145	Southside Water Reclamation Plant	120	Not subject to program after baseline revisions. **	2008
NM	023	350230003	Phelps Dodge Hidalgo Smelter	16,000	Facility is permanently closed.	2008
NM	017	350170001	Phelps Dodge Hurley Smelter/Concentrator	22,000	Facility is permanently closed.	2008
WY	003	00012	Big Horn Gas Processing – Bighorn/Byron Gas Plant	605	Facility is permanently closed and dismantled.	2011
NM	25	350250044	DCP Midstream/Eunice Gas Plant [Old name: GPM GAS EUNICE GAS PLANT] AI 595	1,933	Facility closed in 2021	2024
NM	15	350150138	Duke -- Magnum/Pan Energy -- Burton Flats	196	Facility closed July 2004	2024
NM	15	350150285	Duke Energy/Dagger Draw Gas Plant	233	Facility closed	2024
NM	25	350250007	Davis Gas Processing/Denton Plant AI 568	891	Permit cancelled in early 2022	2024

State	County FIP Code	State Facility ID	Facility Name	1998 Baseline Emissions (tons/year)	Reason for Change	Report Year of Change
NM	25	350250063	Versado Gas Processors, LLC/Saunders Plant [Old name(s): TARGA MIDSTREAM SERVICES, LP, WARREN PETROLEUM/SAUNDERS PLANT]	2,349	Facility shut down in 2021	2024
NM	31	350310032	Tri-State Gen & Transmission/Escalante Station	1,432	Facility closed in 2020	2024
NM	45	350450902	Public Service Co of New Mexico/San Juan Generating Station AI 1421	39,960	Facility closed in 2022	2024
NM	7	350070001	Raton Pub. Service/Raton Power Plant	159	Facility closed in 2010	2024
NM	45	350450247	CCI San Juan, LLC /San Juan River Gas Plant	980	The facility shut down	2024
WY	45	0005	Black Hills Corporation - Osage Plant	1,911	The facility shutdown in 2014	2024
WY	37	0177	Chevron USA -- Table Rock Field	N/A†	Gas Field shut down in March 2014	2024
WY	37	0014	Chevron USA -- Table Rock Gas Plant (Formerly Anadarko E&P Co LP)	N/A†	Plant shut down in April 2014	2024

* ABQ NM in Albuquerque-Bernalillo County.

** 1998 baseline emissions were based on the facilities' potential to emit (PTE), and not actual emissions. Actual annual emissions have always been below 100 tons. Once the year 2006 baseline became effective, this facility was removed from the inventory.

† Sources added in 2003, after the 1998 emissions baselines were established. See Table B-1.