

# 2018 Regional SO2 Emissions and Milestone Report

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| Wyoming Ryan Beavers  Wyoming Department of Environmental Quality  Air Quality Division  200 West 17th Street, Suite 3  Cheyenne, Wyoming 82002  Phone: 307-777-6126  Fax: 307-777-5616  [ryan.beavers@wyo.gov](mailto:ryan.beavers@wyo.gov) | Utah Jay Baker  Utah Department of Environmental Quality Division of Air Quality  195 North 1950 West  Salt Lake City, UT 84114-4820  Phone: 801-536-4015  Fax: 801-536-0085  [jbaker@utah.gov](mailto:jbaker@utah.gov) |
| New Mexico Roslyn Higgin  New Mexico Environment Department  Air Quality Bureau  525 Camino de los Marquez, Suite 1  Santa Fe, NM 87505  Phone: 505-476-4319  Fax: 505-476-4375  [Roslyn.higgin@state.nm.us](mailto:Roslyn.higgin@state.nm.us) | Albuquerque-Bernalillo County Ed Merta  City of Albuquerque  Environmental Health Department  Air Quality Program  P.O. Box 1293  Albuquerque, NM 87103  Phone: 505-768-2660  Fax: 505-768-2617  [emerta@cabq.gov](mailto:emerta@cabq.gov) |

# 2018 Regional SO2 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 SO2 Milestone and Backstop Trading Program. The Western Regional Air Partnership (WRAP) is assisting these states and county with the implementation and management of the regional emission reduction program. As used in this document, “Section 309 states” means the states of New Mexico, Utah, and 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, the Section 309 states must submit an annual Regional Sulfur Dioxide (SO2) 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 SO2 emissions as required by the states’ SIPs. 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. In this document the states report the 2018 adjusted emissions as required by Section 309 of the CAA. We compared the adjusted 2018 emissions to the 2018 milestone to determine whether the states met 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 62,754 tons of SO2 emissions for the calendar year 2018. The total emissions increased to 71,994 of SO2 after making adjustments to account for changes in monitoring, calculation methods, and enforcement actions. The adjustments result in an additional 9,241 tons of SO2 emissions.

Based on this adjusted annual emissions estimate, the Section 309 states determined that emissions in 2018 were below the regional SO2 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 2017 to 2018 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 2018 Regional Milestones and Emissions for Section 309 Participating States

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| --- |
| **2018 Sulfur Dioxide Milestones**  Regional 2018 Milestone\* 141,849 tons  Adjusted 2018 Milestone 141,849 tons |
| **2018 Sulfur Dioxide Emissions**  Reported 2018 Emissions 62,754 tons  Adjustments\*\*  Emission Monitoring, Calculation Methods, and Enforcement Actions 9,241 tons  Adjusted 2018 Emissions (rounded number) 71,994 tons |
| **Comparison of Emissions to Milestone**  2018 Adjusted Emissions 71,994 tons  Adjusted Three-State 2018 Milestone 141,849 tons  Difference (Negative Value = Emissions < Milestone) -69,854 tons  2018 Emissions as Percent of 2018 Milestone 51% |

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

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

# 2018 Regional SO2 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 SO2 Milestone and Backstop Trading Program by not resubmitting a Section 309 SIP. 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 SO2 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 SO2 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 sixteenth 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 2018. Based on the first fifteen years, 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 eliminate human-caused visibility impairment in national parks and wilderness areas across the country. It contains strategies to improve visibility over the next six decades, 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 SO2 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 SO2 related elements of the Section 309 process for the participating Section 309 states:

1. Section 309(d)(4)(i) requires SO2 milestones in the SIP and includes provisions for making adjustments to 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 SO2 emissions in order to ensure the SO2 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 provide for assessments of the state’s progress in 2013 and 2018.

This report responds to Item 2, above, and provides the annual report that compares the 2018 emissions against the milestones for the states and city that have submitted Section 309 SIPs to EPA.

##### What Elements Must the Regional SO2 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 SO2 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.

1. As applicable, average adjusted emissions for the last three years (which are compared to the regional milestone). Per requirements in the Section 309 SIPs, only 2018 emissions are used in the report.

##### How Is Compliance with the SO2 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 SO2 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, during the first part of 2020, culminating in a final report sent to EPA by March 31, 2020.

## 1.2 Report Organization

This report presents the regional SO2 emissions and milestone information required by the 309 SIPs for the Section 309 states. The report is divided into the following sections, including two appendices:

* Reported SO2 Emissions in 2018;
* Emissions Adjustments Related to Monitoring Methodology or Enforcement Actions;
* 2018 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 SO2 Emissions and Milestone Source Inventory.

## 2.0 Reported SO2 Emissions in 2018

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 SO2 emissions. Table 1 summarizes the annual reported emissions from applicable sources in each state. The 2018 reported SO2 emissions for each applicable source are in Appendix A, Table A-1.

Table 1. Reported 2018 SO2 Emissions by State

|  |  |
| --- | --- |
| **State** | **Reported 2018 SO2 Emissions (tons/year)** |
| Albuquerque-Bernalillo | 126 |
| New Mexico | 7,979 |
| Utah | 9,411 |
| Wyoming | 45,238 |
| TOTAL | 62,754 |

## 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 1,236 tons from the reported 2018 emissions.

Utah adjusted the emissions from the Carbon Power Plant due to an enforcement action. As part of Utah’s BART alternative for NOx, they required that the Carbon Power Plant shut down. Though there is an actual emissions reduction of 8,005 tons of SO2 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 SO2 Milestone program and the BART alternative controls. Therefore, an additional 8,005 tons of SO2 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 2018 SO2 Emissions (tons)** | **Adjusted 2018 SO2 Emissions (tons)** | **Monitoring Methodology Adjustment**  **(tons)** | **Enforcement Action Adjustment (tons)** | **Description** |
| ABQ | GCC Rio Grande Inc. - Portland Cement Manufacturer | 126 | 33 | 93 | -- | Increase in the reported 2018 SO2 emissions was based on actual stack test results and are more accurate in estimating SO2 emissions compared to 2006 emissions calculation methodology. In 2015 old baghouses were replaced with new state of the art baghouses and a new stack was added. Old 2006 calculation methodology was based on emissions testing by taking physical measurements inside the old baghouses where emissions were vented through the baghouses' mono-vents. In 2006 there was no stack to conduct emissions testing. |
| UT | Chevron Products Co. -- Salt Lake Refinery | 47 | 857 | 810 | -- | Increase in Adjusted SO2 Emissions is due to a correction in the calculation of Adjusted SO2 Emissions. The previous formula used to calculate SO2 included flow meters and engineering judgment etc. The current formula for calculating now incorporates CEM data. |
| UT | Big West Oil Company - Flying J Refinery | 65 | 211 | 146 | -- | Now using CEM data |
| UT | Holcim-Devil's Slide Plant | 91 | 464 | 373 | -- | Facility changed emissions calculation methodology from stack tests to CEM. |
| UT | PacifiCorp -- Carbon Power Plant | 0 | 8,005 | -- | 8,005 | An Utah Enforceable Commitment SIP resolves that SO2 emissions reductions from the closure of the Carbon plant will not be counted as part of achieving the SO2 Milestone and as part of the Alternative to BART SIP for NOx. |

## 4.0 2018 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 2018 emissions with the 2018 milestone. The adjusted emissions for 2018 are 71,994. 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 action related milestone adjustments reported for 2018.

## 6.0 Quality Assurance

The states provided 2018 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 SO2 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.

Table 3 provides explanations for the emissions variations from applicable sources from 2017 – 2018 that are greater than 20%. Plants with variations greater than 20%, but reported emissions of less than 20 tons in both 2017 and 2018, are not included in Table 3. Information on these plants is provided in Appendix A.

Appendix B provides a list of all sources added or removed from the program inventory in this and previous reporting years. Albuquerque-Bernalillo County added one source to this 2018 report.

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

| **State** | **County FIPS** | **State Facility Identifier** | **Plant Name** | **Reported 2017 SO2 Emissions (tons)** | **Reported 2018 SO2 Emissions (tons)** | **% Change** | **Description Change > ±20% 2017 to 2018** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| NM | 15 | 350150011 | DCP Midstream/Artesia Gas Plant | 9 | 124 | 1328% | At Artesia plant, we have Acid Gas Injection Well (AGI) that all of compressed acid gas (high H2S/High CO2) coming off of Amine unit is injected into. Whenever plant encounters unexpected malfunction event with the AGI system, the plant has to route the acid gas to the acid gas flare while the issue with AGI system is addressed. (H2S content of acid gas completely oxidizes to SO2 when combusted) |
| NM | 25 | 350250044 | DCP Midstream/Eunice Gas Plant [Old name: GPM GAS EUNICE GAS PLANT] | 1,385 | 1,767 | 28% | The 28% increase in SO2 emission for 2018 at Eunice Gas Plant, in comparison to 2017, is due to higher amount of H2S/overall volume processed at the facility. Also, based on the H2S content of the inlet gas to the plant and sulfur recovery efficiency of the SRU unit, the amount of sulfur content that remains in Tail Gas routed to TGI varies. And as explained in Artesia email, sulfur (H2S) oxidizes to SO2 emission when burned (whether through a flare or an incinerator). In conclusion, SO2 emission variability can be impacted by multiple factors but in the case of 2017 vs 2018, biggest contributing factor was sulfur content/volume processed at the facility (increase in operation). |
| NM | 25 | 350250035 | DCP Midstream/Linam Ranch Gas Plant [Old name: GPM GAS/LINAM RANCH GAS PLANT] | 393 | 114 | -71% | DCP implemented several projects in 2017 to achieve emission reductions and improved reliability. DCP worked with 3rd party power company to install dedicated electrical line to the Linam gas plant and a separate electrical line to the AGI site. This project nearly eliminated plant upsets associated with 3rd party power interruptions. Installed suction control valves on the inlet to the AGI compressors, improving reliability. Rewired all instrumentation and controls for AGI compressors. |
| NM | 15 | 350150008 | OXY USA WTP Limited Partnership - Indian Basin Gas Plant [Old Name -Marathon Oil/Indian Basin Gas Plant] | 16 | 28 | 78% | The Plant’s total SO2 emissions increased from 15.78 tons in 2017 to 28.10 tons in 2018. This was mainly due to a scheduled maintenance performed on the acid gas compressor in May, 2018 which accounted for 16.37 tons of SO2. |
| NM | 45 | 350450902 | Public Service Co of New Mexico/San Juan Generating Station | 4,535 | 1,247 | -73% | The primary reason for the decrease is that two of the four units were permanently shut down at the end of 2017.In 2018, only two units remained in service and consequently, the tons of SO2 emitted and reported were significantly less than in 2017. |
| NM | 25 | 350250008 | Regency Field Services/Jal #3 [Old Name Southern Union Gas] /Jal #3 | 207 | 1,444 | 597% | I did a review on the flaring events for 2017 and 2018. It looks like in early 2018 (January, March, and May) we had 9 major flaring events that lasted for several days each (the largest event lasting for 8 days), resulting in a large amount of SO2 emissions. |
| NM | 25 | 350250061 | Versado Gas Processors, LLC / Monument Plant[Old name(s):TARGA MIDSTREAM SERVICES LP, WARREN PETROLEUM/MONUMENT PLANT] | 1,007 | 406 | -60% | In August of 2016, the Monument facility experienced an AGI well failure. As a result of the well failure, a new well had to be permitted and drilled. On August 8, 2016, the AGI well was shut down at Monument. A new well was permitted and drilled. On March 23, 2017, the new well was complete, with all equipment back in service, and injection began. During this time period, acid gas was flared continually to achieve maximum destruction efficiency from the flare. Therefore, from 2017 to 2018, a decrease in flared emissions contributed to an overall decrease in SO2 emissions at Monument. |
| NM | 25 | 350250063 | Versado Gas Processors, LLC/Saunders Plant [Old name(s): TARGA MIDSTREAM SERVICES, LP,WARREN PETROLEUM/SAUNDERS PLANT] | 568 | 256 | -55% | From 2017 to 2018, a decrease in emissions from the thermal incinerator contributed to an overall decrease in SO2 emissions at the Saunders facility. The SO2 emissions decreased following a shutdown to replace the catalyst in the Sulfur Recovery Unit which resulted in higher SO2 recoveries. |
| NM | 31 | 350310032 | Tri-State Gen & Transmission/Escalante Station | 729 | 880 | 21% | There was an economic shutdown in 2017 that started in the middle of March and coming back online in early June. That is why there is a significant increase in 2018 compared to 2017. |
| NM | 45 | 350450247 | CCI San Juan, LLC /San Juan River Gas Plant | 272 | 425 | 56% | The SO2 increases were related more to the feed gas composition than to feed gas quantity. The plant began to process a new type of feed gas with higher CO2 concentrations compared to typical historical feed gas compositions. The higher CO2 concentrations in the feed gas contributed to the increased rate of acid gas flaring in 2017.This situation was resolved just prior to November 2018 and emissions have declined in late 2018 and 2019. |
| NM | 25 | 350250113 | ConocoPhillips-Midland Office / East Vacuum Liquid Recovery and CO2 Plant | 38 | 21 | -45% | In 2017, ConocoPhillips commissioned an additional process Train (2) at the plant, and to sustain process reliability completed a maintenance turn-around. Flaring was required in 2017 to complete the commissioning and turn around when the plant was taken off line. Since completion of these efforts, the plant has experience over 90% process reliability with associated flared gas and SO2 reductions. |
| UT | 11 | 10119 | Chevron Products Co. -- Salt Lake Refinery | 32 | 47 | 45% | From 2017 to 2018 Western Canadian Select crude input increased from 10% to 14% This crude contains more sulfur than other crudes processed. |
| UT | 11 | 10122 | Big West Oil Company - Flying J Refinery | 33 | 65 | 97% | Increase in SO2 emissions is due to aligning emissions calculations with the RATA methodology which source believes to be more conservative. |
| UT | 27 | 10313 | Graymont Western US Inc. -- Cricket Mountain Plant | 18 | 26 | 44% | The emission factor for 2017 was 2.0 lb/hr for SO2, while the 2018 SO2 emission factor was 5.3 lb/hr. Given that the SO2 emissions are largely fuel driven, it appears that sulfur in their coal increased during 2018 (Kiln 4 saw similar increases in the SO2 emission factor, also supporting that the sulfur in coal was higher in 2018). |
| UT | 29 | 10007 | Holcim-Devil's Slide Plant | 196 | 91 | -54% | Decrease in SO2 emissions which appears to be due to an decrease in the CEM value. In 2018, the plant did not use Pet Coke as a fuel. Use of one primary fuel in the fuel mix allows for better burnability of the fuel mix which most likely led to lower SO2 emissions for the year. |
| UT | 11 | 10123 | Holly Refining and Marketing Co. -- Phillips Refinery | 44 | 18 | -59% | SO2 values decreased due to lower CEMS values in 2018 as opposed to 2017.This was due to a reduced sulfur concentration in our fuel gas as measured by a continuous emission monitor (CEM). |
| UT | 35 | 10572 | Kennecott Utah Copper Corp. -- Power Plant/Lab/Tailings Impoundment | 1,036 | - | -100% | The UPP SOx emissions are lower in 2018 because the facility was operated in a care & maintenance mode while other power supply options were investigated for their impacts to facility costs. Care & maintenance operations do not require the use of coal as a fuel source, thus SO2 emissions were less than years with normal power supply operations. |
| UT | 35 | 10335 | Tesoro West Coast -- Salt Lake City Refinery | 499 | 43 | -91% | Decrease in SO2 emissions due to installation of Wet Gas Scrubber at the beginning of calendar year 2018. |
| WY | 31 | 1 | Basin Electric -- Laramie River Station | 6,522 | 8,670 | 33% | Change in Calculation Method |
| WY | 5 | 281 | Black Hills Corporation - Wygen III | 281 | 361 | 29% | Data Substituted form Acid Rain Program |
| WY | 13 | 28 | Burlington Resources -- Lost Cabin Gas Plant | 1,209 | 1,632 | 35% | Higher emissions due to increased flare use caused by unplanned grid outages and then installation of a new incinerator |
| WY | 41 | 9 | Chevron USA -- Carter Creek Gas Plant | 55 | 145 | 164% | The 2018 SO2 emissions reflect a 163.81% increase due to a Plant Turnaround occurring in 2018 compared to the emissions in 2017 |
| WY | 37 | 48 | Tronox Alkali Wymoing Corporation -- Green River Sodium Products (Westvaco facility) | 1,456 | 2,328 | 60% | Change due to increase in operation outs and higher average sulfur content coal |
| WY | 23 | 1 | Exxon Mobil Corporation -- Labarge Black Canyon Facility | 25 | 19 | -25% | Fewer equipment malfunctions compared to 2017 |
| WY | 23 | 13 | Exxon Mobil Corporation -- Shute Creek | 1,582 | 474 | -70% | Multiple processes upsets in 2017 caused by extreme weather condition and unavoidable equipment malfunctions resulting in flaring form AGI and increased SO2 |
| WY | 21 | 1 | Holly Frontier Oil & Refining Company -- Cheyenne Refinery | 250 | 306 | 22% | Higher emissions from Sulfur Incinerator upset events, higher emissions from coker upsets |
| WY | 29 | 7 | Marathon Oil Co -- Oregon Basin Gas Plant | 227 | 303 | 34% | Higher Emissions due to turnaround being complete |
| WY | 29 | 0010 | Marathon Oil Co -- Oregon Basin Wellfield | 49 | 222 | 349% | Higher Emissions due to turnaround being complete |
| WY | 37 | 8 | Merit Energy Company - Brady Gas Plant (formerly Anadarko E&P Co LP) | 0 | 23 | 230900% | Increase due to flare use |
| WY | 29 |  | Merit Energy Company - Shoshone Unit Battery | 18 | - |  | Facility is does not have Chapter 14 requirements and was sending in data voluntarily. New owner has not decided to keep doing this |
| WY | 29 |  | Merit Energy Company - Frannie Unit Battery No 1 | 4 | - |  | Facility is does not have Chapter 14 requirements and was sending in data voluntarily. New owner has not decided to keep doing this |
| WY | 29 |  | Merit Energy Company - Cody Battery | 11 | - |  | Facility is does not have Chapter 14 requirements and was sending in data voluntarily. New owner has not decided to keep doing this |
| WY | 29 |  | Merit Energy Company - Frannie 2 Battery | 0 | - |  | Facility is does not have Chapter 14 requirements and was sending in data voluntarily. New owner has not decided to keep doing this |
| WY | 1 | 2 | Mountain Cement Company -- Laramie Plant | 162 | 128 | -21% | Lower Kiln operating hours |
| WY | 37 | 1002 | Pacificorp -- Jim Bridger Plant | 10,264 | 8,156 | -21% | Reduction Caused by drop in operating hours |
| WY | 7 | 1 | Sinclair Oil Company -- Sinclair Refinery | 77 | 148 | 91% | New Boiler Started up |
| WY | 37 | 5 | Solvay Chemicals -- Soda Ash Plant (Green River Facility) | 33 | 70 | 115% | Change due to varying effectiveness of wet scrubbers in unit# 19 |
| WY | 1 | 5 | University of Wyoming - Heat Plant | 53 | 35 | -34% | Lower Sulfur Coal Used |
| WY | 56043 | 397 | Washakie Midstream Services - Worland Gas Plant (WMS) | 71 | 30 | -57% | Less compressor maintenance needed because there were less equipment malfunctions and repairs needed. |
| WY | 45 | 1 | Wyoming Refining -- Newcastle Refinery | 14 | 4 | -69% | Decrease due to removal of emission units and a decrease in flaring events. |

## 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 2018. We compared Acid Rain Program power plant emission data from EPA's Data and Maps 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 with the exception of four sources. The sources whose reported emissions did not match EPA’s data are in Table 4.

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

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **State** | **Facility Name** | **Facility ID (ORISPL)** | **Year** | **2018 Acid Rain Database Emissions (tons SO2)** | **2018 Reported Emissions (tons SO2)** |
| WY | Laramie River | 6204 | 2018 | 6,436 | 8,670 |
| WY | Naughton | 4162 | 2018 | 4,141 | 4,143 |
| WY | Neil Simpson II | 7504 | 2018 | 403 | 402 |
| WY | Wygen II | 56319 | 2018 | 1,030 | 260 |

## 7.0 Milestone Determination

The Section 309 regional 2018 milestone is 141,849 tons SO2. The 2018 adjusted emissions are 79,709 tons SO2; therefore, the participating states have met the 141,849 tons SO2 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 WRAP website.

[Any comments during the comment period will be summarized here.]

## Appendix A

Table A-1

2018 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 2018 SO2 Emissions (tons)** | **Adjusted 2018 SO2 Emissions (tons)** | **2018 General New Monitoring Calculation Method Adjustment (tons)** |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| ABQ | 1 | 3500100008 |  | GCC Rio Grande Inc. - Portland Cement Manufacturer | 3241 | 327310 | 126 | 33 | 93 |
| NM | 15 | 350150024 |  | Agave Energy Co./Agave Dagger Draw Gas Plant | 1311 | 21112 | 36.57 | 36.57 |  |
| NM | 15 | 350150002 |  | Frontier Field Services /Empire Abo Plant [Old name: Arco Permian/Empire Abo Plant; BP America Production] | 1321 | 21113 | 76.9 | 76.9 |  |
| NM | 15 | 350150011 |  | DCP Midstream/Artesia Gas Plant | 1321 | 211112 | 124.40 | 124.40 |  |
| NM | 25 | 350250044 |  | DCP Midstream/Eunice Gas Plant [Old name: GPM GAS EUNICE GAS PLANT] | 1321 | 21113 | 1,767 | 1,767 |  |
| NM | 25 | 350250035 |  | DCP Midstream/Linam Ranch Gas Plant [Old name: GPM GAS/LINAM RANCH GAS PLANT] | 1321 | 21113 | 114 | 114 |  |
| NM | 15 | 350150138 |  | Duke -- Magnum/Pan Energy -- Burton Flats | 1321 | 211112 |  |  |  |
| NM | 15 | 350150285 |  | Duke Energy/Dagger Draw Gas Plant | 1321 | 211112 |  |  |  |
| NM | 25 | 350250060 |  | VERSADO GAS PROCESSORS, LP/Eunice Gas Plant [Old name: WARREN PETROLEUM/EUNICE GAS PLANT] | 1321 | 21113 | 76 | 76 |  |
| NM | 25 | 350250004 |  | Frontier Field Services/Maljamar Gas Plant | 1321 | 21113 | 94 | 94 |  |
| NM | 31 | 350310008 |  | Western Refining Southwest Inc-Gallup Refinery {Old names: Western Refinery/Ciniza Refinery (Gallup) and GIANT REFINING/CINIZA] | 2911 | 236220 | 52 | 52 |  |
| NM | 25 | 350250007 |  | Davis Gas Processing/Denton Plant | 1311 | 21113 | 740 | 740 |  |
| NM | 15 | 350150008 |  | OXY USA WTP Limited Partnership - Indian Basin Gas Plant [Old Name -Marathon Oil/Indian Basin Gas Plant] | 1321 | 211112 | 28 | 28 |  |
| NM | 15 | 350150010 |  | Navajo Refining Co/Artesia Refinery | 2911 | 32411 | 51 | 51 |  |
| NM | 45 | 350450902 | 2451 | Public Service Co of New Mexico/San Juan Generating Station | 4911 | 221112 | 1,247 | 1,247 |  |
| NM | 7 | 350070001 |  | Raton Pub. Service/Raton Power Plant | 4911 | 221112 |  |  |  |
| NM | 25 | 350250008 |  | Regency Field Services/Jal #3 [Old Name Southern Union Gas] /Jal #3 | 1321 | 21113 | 1,444 | 1,444 |  |
| NM | 25 | 350250051 |  | Versado Gas Processors, LP/Eunice South Gas Plant | 1321 | 211112 |  |  |  |
| NM | 25 | 350250061 |  | Versado Gas Processors, LLC / Monument Plant[Old name(s):TARGA MIDSTREAM SERVICES LP, WARREN PETROLEUM/MONUMENT PLANT] | 1321 | 21113 | 406 | 406 |  |
| NM | 25 | 350250063 |  | Versado Gas Processors, LLC/Saunders Plant [Old name(s): TARGA MIDSTREAM SERVICES, LP,WARREN PETROLEUM/SAUNDERS PLANT] | 1321 | 21113 | 256 | 256 |  |
| NM | 31 | 350310032 | 87 | Tri-State Gen & Transmission/Escalante Station | 4911 | 221112 | 880 | 880 |  |
| NM | 45 | 350450247 |  | CCI San Juan, LLC /San Juan River Gas Plant | 1321 | 21113 | 425 | 425 |  |
| NM | 45 | 350450023 |  | Western Refining Southwest Inc./Bloomfield Products Terminal [Old name: GIANT INDUSTRIES/BLOOMFIELD REF] | 2911 | 42471 | 0.15 | 0.15 |  |
| NM | 25 | 350250075 |  | ConocoPhillips-Midland Office / MCA Tank Battery No. 2 | 1311 | 21113 | 140 | 140 |  |
| NM | 25 | 350250113 |  | ConocoPhillips-Midland Office / East Vacuum Liquid Recovery and CO2 Plant | 1311 | 21112 | 21 | 21 |  |
| UT | 49 | 10790 |  | Brigham Young University -- Main Campus | 8221 | 611310 | 0 | 0 |  |
| UT | 11 | 10119 |  | Chevron Products Co. -- Salt Lake Refinery | 2911 | 324110 | 47 | 857 | 810 |
| UT | 11 | 10122 |  | Big West Oil Company - Flying J Refinery | 2911 | 324110 | 65 | 211 | 146 |
| UT | 27 | 10313 |  | Graymont Western US Inc. -- Cricket Mountain Plant | 1422 | 212312 | 26 | 26 |  |
| UT | 29 | 10007 |  | Holcim-Devil's Slide Plant | 3241 | 327310 | 91 | 464 | 373 |
| UT | 11 | 10123 |  | Holly Refining and Marketing Co. -- Phillips Refinery | 2911 | 324110 | 18 | 18 |  |
| UT | 27 | 10327 | 6481 | Intermountain Power Service Corporation -- Intermountain Generation Station | 4911 | 221112 | 2,485 | 2,485 |  |
| UT | 35 | 10572 |  | Kennecott Utah Copper Corp. -- Power Plant/Lab/Tailings Impoundment | 1021 | 212234 | 0 | 0 |  |
| UT | 35 | 10346 |  | Kennecott Utah Copper Corp. -- Smelter & Refinery | 3331 | 331411 | 689 | 689 |  |
| UT | 27 | 10311 |  | Materion Natural resources - Delta Mill (was Brush Resources) | 1099 | 212299 | 0 | 0 |  |
| UT | 7 | 10081 | 3644 | PacifiCorp -- Carbon Power Plant | 4911 | 221112 | 0 | 8,005 | 8,005 |
| UT | 15 | 10237 | 6165 | PacifiCorp -- Hunter Power Plant | 4911 | 221112 | 3,133 | 3,133 |  |
| UT | 15 | 10238 | 8069 | PacifiCorp -- Huntington Power Plant | 4911 | 221112 | 2,202 | 2,202 |  |
| UT | 37 | 10034 |  | Paradox Midstream, LLC (was CCI Paradox Midstream LLC and Patara Midstream LLC and EnCana Oil & Gas (USA) Incorporated and Tom Brown Incorporated) - Lisbon Natural Gas Processing Plant | 2911 | 211111 | 0 | 0 |  |
| UT | 7 | 10096 |  | Sunnyside Cogeneration Associates -- Sunnyside Cogeneration Facility | 4911 | 221112 | 472 | 472 |  |
| UT | 35 | 10335 |  | Tesoro West Coast -- Salt Lake City Refinery | 2911 | 324110 | 43 | 43 |  |
| UT | 43 | 10676 |  | Utelite Corporation -- Shale processing | 3295 | 212399 | 140 | 140 |  |
| WY | 11 | 2 |  | American Colloid Mineral Co -- Colony East & West Plants | 1459 | 212325 | 99 | 99 |  |
| WY | 5 | 45 | 56609 | Basin Electric -- Dry Fork Station | 4911 | 22112 | 923 | 923 |  |
| WY | 31 | 1 | 6204 | Basin Electric -- Laramie River Station | 4911 | 221112 | 8,670 | 8,670 |  |
| WY | 3 | 12 |  | Big Horn Gas Proc -- Big Horn/Byron Gas Plant | 1311 | 22121 |  |  |  |
| WY | 5 | 2 | 4150 | Black Hills Corporation - Neil Simpson I | 4911 | 22112 |  |  |  |
| WY | 5 | 63 | 7504 | Black Hills Corporation - Neil Simpson II | 4911 | 22112 | 402 | 402 |  |
| WY | 45 | 5 | 4151 | Black Hills Corporation - Osage Plant | 4911 | 22112 |  |  |  |
| WY | 5 | 146 | 55479 | Black Hills Corporation - Wygen 1 | 4911 | 22112 | 430 | 430 |  |
| WY | 5 | 281 | 56596 | Black Hills Corporation - Wygen III | 4911 | 221112 | 361 | 361 |  |
| WY | 13 | 0009 |  | Burlington Resources -- Bighorn Wells | 1300 | 21111 |  |  |  |
| WY | 13 | 28 |  | Burlington Resources -- Lost Cabin Gas Plant | 1311 | 211111 | 1,632 | 1,632 |  |
| WY | 41 | 9 |  | Chevron USA -- Carter Creek Gas Plant | 1311 | 211111 | 145 | 145 |  |
| WY | 37 | 0177 |  | Chevron USA -- Table Rock Field | 1300 | 21111 |  |  |  |
| WY | 37 | 14 |  | Chevron USA -- Table Rock Gas Plant (Formerly Anadarko E&P Co LP) | 1321 | 211111 |  |  |  |
| WY | 41 | 0008 |  | Chevron USA -- Whitney Canyon/Carter Creek Wellfield | 1300 | 21111 |  |  |  |
| WY | 5 | 225 | 56319 | Cheyenne Light Fuel and Power Company – Wygen II | 4911 | 22112 | 260 | 260 |  |
| WY | 37 | 48 |  | Tronox Alkali Wymoing Corporation -- Green River Sodium Products (Westvaco facility) | 2812 | 327999 | 2,328 | 2,328 |  |
| WY | 13 | 0007 |  | Devon Energy Production Co., L.P. -- Beaver Creek Gas Field | 1300 | 21111 |  |  |  |
| WY | 13 | 8 |  | Devon Gas Services, L.P. -- Beaver Creek Gas Plant | 1311 | 211111 | 0 | 0 |  |
| WY | 23 | 1 |  | Exxon Mobil Corporation -- Labarge Black Canyon Facility | 1300 | 21111 | 19 | 19 |  |
| WY | 23 | 13 |  | Exxon Mobil Corporation -- Shute Creek | 1311 | 211111 | 474 | 474 |  |
| WY | 43 | 3 |  | Hiland Partners, LLC -- Hiland Gas Plant | 1321 | 48621 |  |  |  |
| WY | 21 | 1 |  | Holly Frontier Oil & Refining Company -- Cheyenne Refinery | 2911 | 32411 | 306 | 306 |  |
| WY | 29 | 7 |  | Marathon Oil Co -- Oregon Basin Gas Plant | 1321 | 211112 | 303 | 303 |  |
| WY | 29 | 0010 |  | Marathon Oil Co -- Oregon Basin Wellfield | 1300 | 21111 | 222 | 222 |  |
| WY | 37 | 8 |  | Merit Energy Company - Brady Gas Plant (formerly Anadarko E&P Co LP) | 1321 | 211112 | 23 | 23 |  |
| WY | 29 |  |  | Merit Energy Company - Shoshone Unit Battery |  | 211112 | - | - |  |
| WY | 29 |  |  | Merit Energy Company - Frannie Unit Battery No 1 |  | 211112 | - | - |  |
| WY | 29 |  |  | Merit Energy Company - Cody Battery |  | 211112 | - | - |  |
| WY | 29 |  |  | Merit Energy Company - Frannie 2 Battery |  | 211112 | - | - |  |
| WY | 41 | 0002 |  | Merit Energy Company -- Whitney Canyon WellField | 1300 | 21111 | - | - |  |
| WY | 41 | 12 |  | Merit Energy Company -- Whitney Facility | 1311 | 211111 | 1 | 1 |  |
| WY | 1 | 2 |  | Mountain Cement Company -- Laramie Plant | 3241 | 23571 | 128 | 128 |  |
| WY | 37 | 3 |  | P4 Production, L.L.C. -- Rock Springs Coal Calcining Plant | 3312 | 331111 | 743.1 | 743.1 |  |
| WY | 9 | 1 | 4158 | Pacificorp - Dave Johnston Plant | 4911 | 221112 | 6,983 | 6,983 |  |
| WY | 37 | 1002 | 8066 | Pacificorp -- Jim Bridger Plant | 4911 | 221112 | 8,156 | 8,156 |  |
| WY | 23 | 4 | 4162 | Pacificorp -- Naughton Plant | 4911 | 221112 | 4,143 | 4,143 |  |
| WY | 5 | 46 | 6101 | Pacificorp -- Wyodak Plant | 4911 | 221112 | 2,163 | 2,163 |  |
| WY | 37 | 22 |  | Simplot Phosphates LLC -- Rock Springs Plant | 2874 | 325312 | 1,159 | 1,159 |  |
| WY | 7 | 1 |  | Sinclair Oil Company -- Sinclair Refinery | 2911 | 32411 | 148 | 148 |  |
| WY | 25 | 5 |  | Sinclair Wyoming Refining Company -- Casper Refinery | 2911 | 32411 | 164 | 164 |  |
| WY | 37 | 5 |  | Solvay Chemicals -- Soda Ash Plant (Green River Facility) | 1474 | 325181 | 70 | 70 |  |
| WY | 37 | 2 |  | TATA Chemicals (Soda Ash Partners)-- Green River Plant (formerly General Chemical) | 1474 | 327999 | 3917 | 3917 |  |
| WY | 15 | 1 |  | The Western Sugar Cooperative -- Torrington Plant | 2063 | 311313 | 7 | 7 |  |
| WY | 37 | 49 |  | Tronox Alkali Wyoming Corporation  -- Granger Soda Ash Plant | 1474 | 212391 | 218 | 218 |  |
| WY | 1 | 5 |  | University of Wyoming - Heat Plant | 8221 | 61131 | 35 | 35 |  |
| WY | 29 | 12 |  | Vanguard Operating, LLC -- Elk Basin Gas Plant | 1311 | 211111 | 572 | 572 |  |
| WY | 56043 | 397 |  | Washakie Midstream Services - Worland Gas Plant (WMS) | 1321 | 211112 | 30 | 30 |  |
| WY | 45 | 1 |  | Wyoming Refining -- Newcastle Refinery | 2911 | 32411 | 4 | 4 |  |

# Appendix B

Table B-1   
Sources Added to the SO2 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 means Albuquerque-Bernalillo County.

Table B-2   
Sources Removed from the SO2 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 | 00008 | GCC Rio Grande Cement | 1,103 | Not subject to program after baseline revisions.\*\* | 2008 |
| 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 |

\* ABQ NM means 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, these facilities were removed from the inventory.