



2008 Regional SO₂ Emissions and Milestone Report

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2008 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 national parks and wilderness areas on the Colorado Plateau. Five states -- Arizona, New Mexico, Oregon, Utah, and Wyoming -- initially exercised this option by submitting plans to EPA by December 31, 2003. Oregon elected to cease participation in the program in 2006. The tribes were not subject to the deadline and still can opt into the program at anytime. Under the Section 309 plans, the four participating states 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 with the implementation and management of the regional emission reduction program.

As part of this program, the participating 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 first report was submitted in 2004 for the calendar year 2003.

The four-state region milestone for 2008 is 378,398 tons under the revised SIPs. To determine whether or not the milestone was met, the 2006, 2007, and 2008 adjusted emissions from the four reporting states were averaged, and this average was compared to the 2008 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 (2006).

The states of Arizona, New Mexico, Utah, and Wyoming reported 243,124 tons of SO₂ emissions for the calendar year 2008. The total emissions only increased to 244,189 tons SO₂ after making adjustments to account for changes in monitoring and calculation methods. The adjustments result in an additional 1,065 tons of SO₂ emissions, which is insignificant compared to the reported total emissions. Emissions adjustments are much smaller than in previous reports because of the reference to the newer 2006 baseline year that is used for this year's milestone. The adjusted emissions values for 2006 and 2007 were 279,134 tons and 273,663 tons, respectively. The average of 2006, 2007, and 2008 adjusted emissions is 265,662 tons.

Based on the adjusted milestone and emissions data, the average of 2006, 2007, and 2008 emissions is about 30% below the 2008 four state regional milestone.

Based on this average annual emissions estimate, a determination has been made that the four states have met the 2008 regional SO₂ milestone under the revised plan. The plans contain provisions to adjust the milestones to reflect variations in smelter operations, and 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 smelter or enforcement action adjustment is required.

The plans also require that the annual report identify changes in the source population from year to year and significant changes in a source's emissions from year to year. The significant emission changes from 2007 to 2008 are included in Section 7 of this report. A list of facilities added to or removed from the list of subject sources included in the original base year inventories is included in Appendix B.

Table ES-1
Overview of 2008 Regional Milestones and Emissions for Section 309 Participating States

| | |
|---|---------------|
| <u>2008 Sulfur Dioxide Milestones</u> | |
| Regional 2008 Milestone* | 378,398 tons |
| Smelter-Specific Set-Aside* | 0 tons |
| Adjusted Four-State 2007 Milestone | 378,398 tons |
| <u>2008 Sulfur Dioxide Emissions</u> | |
| Reported Four-State 2008 Emissions | 243,124 tons |
| Adjustments** | |
| Emission Monitoring and Calculation Methods | 1,065 tons |
| Adjusted Four-State 2008 Emissions (rounded number) | 244,189 tons |
| <u>Average Sulfur Dioxide Emissions (2006, 2007, & 2008)</u> | |
| Adjusted Four-State 2008 Emissions | 244,189 tons |
| Adjusted Four-State 2007 Emissions | 273,663 tons |
| Adjusted Four-State 2006 Emissions | 279,134 tons |
| Average of 2006, 2007, & 2008 Adjusted Four-State Emissions | 265,662 tons |
| <u>Comparison of Emissions to Milestone</u> | |
| Average of 2006, 2007, & 2008 Adjusted Four-State Emissions | 265,662 tons |
| Adjusted Four-State 2008 Milestone | 378,398 tons |
| Difference (Negative Value = Emissions < Milestone) | -112,736 tons |
| 2006 – 2008 Emissions Average as Percent of 2008 Milestone | 70.2% |

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

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

2008 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 plans to reduce regional haze emissions that impair visibility at 16 Class I national parks and wilderness areas on the Colorado Plateau. Five states -- Arizona, New Mexico, Oregon, Utah, and Wyoming -- and the City of Albuquerque, New Mexico exercised this option by submitting plans to 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 State Implementation Plan (SIP). The tribes were not subject to this deadline and still can opt into the program at any time.

Under the Section 309 SIPs, these four states 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, the states have established annual SO₂ emissions targets (from 2003 to 2018). These voluntary emissions reduction targets represent reasonable progress in reducing the 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 sixth 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 2008. Based on the first six years, the voluntary milestone phase of the program is working 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 Environmental Protection Agency (EPA) issued regulations to address regional haze in 156 national parks and wilderness areas across the country. These regulations were published 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 60 years, and requires states to adopt implementation plans.

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. These strategies must be shown to 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 same strategies can also be used by the nine western states and tribes to protect the other Class I areas within their own jurisdictions.

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 had originally submitted Section 309 SIPs to EPA. These states were Arizona, New Mexico, Oregon, Utah, and Wyoming. In addition, the City of Albuquerque had also submitted a Section 309 SIP. EPA, however, never approved these SIPs due to the legal challenges.

Oregon has opted out of submitting a revised Section 309 SIP under the modified RHR, which leaves four participating states. The four remaining states have revised, or are in the process of revising, their SIPs. 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 a few key elements of the Section 309 process for the four participating 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 also must provide assessments in 2013 and 2018.

This report responds to Item 2, above, and provides the annual report that compares the 2008 emissions against the milestones for the states 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.
3. As applicable, average adjusted emissions for the last three years (which are compared to the regional milestone). Since this is the sixth report, 2006, 2007, and 2008 emissions are averaged.
4. Regional milestone adjustments to account for production increases at certain smelters.

How Is Compliance with the SO₂ Milestone Determined?

While the WRAP assists with the preparation of this report, each state reviews the information in the report, and proposes a draft determination that the regional SO₂ milestone has either been met or exceeded. The draft determination is then submitted for public review and comment during the first part of 2010, culminating in a final report sent to EPA by March 31, 2010.

1.2 Report Organization

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

- Reported SO₂ Emissions in 2008;
- Monitoring Methodology Emissions Adjustments;
- Three-Year Average Emissions;
- Enforcement Milestone Adjustments;
- Smelter 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 2008

All stationary sources with reported emissions of 100 tons or more per year in 2000 or any subsequent year are required to report annual SO₂ emissions. Table 1 summarizes the annual reported emissions from applicable sources in each state. The 2008 reported SO₂ emissions for each applicable source are in Appendix A, Table A-1.

Table 1
Reported 2008 SO₂ Emissions by State

| State | Reported 2008 SO ₂ Emissions (tons/year) |
|------------|---|
| Arizona | 78,594 |
| New Mexico | 28,358 |
| Utah | 27,802 |
| Wyoming | 108,370 |
| TOTAL | 243,124 |

3.0 Monitoring Methodology Emissions Adjustments

The annual emissions reports for each state include proposed emissions adjustments to ensure consistent comparison of emissions to the milestone. The reported emissions are adjusted so that the adjusted emissions levels are comparable to the levels that would result if the state used the same emissions monitoring or calculation method that was used in the base year inventory (now 2006 for all sources). The net impact throughout the region as a result of these adjustments is an increase of 1,065 tons from the reported 2008 emissions. Table 2 summarizes

the emissions adjustments made for a total of three facilities. The state of Arizona did not report any emissions adjustments.

Table 2
Adjustments for Changes in Monitoring Methodology

| State | Source | Reported 2008 SO₂ Emissions (tons) | Adjusted 2008 SO₂ Emissions (tons) | Monitoring Methodology Adjustment (tons) | Description |
|--------------|---|--|--|---|--|
| NM | Giant Industries/Ciniza Refinery (Gallup) [Old name: GIANT REFINING/CINIZA] | 316 | 889 | 573 | Removed annual usage factors from heaters and boilers and calculated using actual fuel usage. |
| UT | Holcim-Devil's Slide Plant | 242 | 456 | 214 | Facility changed emissions calculation methodology from stack test to CEMS. |
| WY | Simplot – Rock Springs Fertilizer Plant | 1,409 | 1,687 | 278 | 9a and 9b acid plants were calculated using CEMS data in 2008, compared to the base year, which used test data and hours of operation. |

This adjustment is much smaller than in previous reports due to the updated baseline of 2006. Previous reports used a baseline of 1999 for utility sources and 1998 for all other sources. With the updated baseline, utility sources subject to the federal Acid Rain Program monitoring requirements in 40 CFR Part 75 are no longer required to adjust emissions to account for changes in continuous emission monitoring quality assurance requirements implemented after the earlier 1999 baseline. These Part 75 sources accounted for the majority of past emission adjustments.

4.0 Three-Year Average Emissions (2006, 2007, and 2008)

The SIPs require multi-year averaging of emissions from 2004 to 2017 for the milestone comparison. From 2005 to 2017, a three-year average (which includes the reporting year and the two previous years) will be calculated to compare with the milestone. The average of the three-years' emissions from 2006 to 2008 is 265,662 tons. Table 3 shows the adjusted emissions for each year and three-year average emissions. The following report sections describe the adjusted milestone determination.

Table 3
Average Sulfur Dioxide Emissions (2006, 2007, & 2008)

| Year | Adjusted SO ₂ Emissions (tons/year) |
|---------------------------------------|--|
| 2006 | 279,134 |
| 2007 | 273,663 |
| 2008 | 244,189 |
| Three-Year Average (2006, 2007, 2008) | 265,662 |

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 approved SIP revision before taking effect.

Enforcement Milestone Adjustment

There were no proposed enforcement action related milestone adjustments reported for 2008.

6.0 Smelter-Specific Set-Aside Milestone Adjustments

Smelter Adjustment Scenarios

Each state or tribe determines the amount of facility specific set-aside, if any, that will be added to the milestone to account for operational increases at the remaining smelters in the region. This set-aside is only available for use if the annual sulfur input and emissions from a copper smelter are above the baseline levels listed in the applicable SIP. The increase to the milestone is based on a smelter's proportional increase above its baseline sulfur input.

The revised Section 309 SIPs establish new updated milestones for the years 2008 – 2018. This update revised the baseline year and changed the smelter-specific set-aside. The smelter baseline has decreased, from 86,000 tons SO₂ in the 2003 SIPs to 24,000 tons SO₂ in the revised SIPs, due to the permanent closure of the BHP San Manuel, Phelps Dodge Chino, and Phelps Dodge Hidalgo smelters. The revised set-aside is only available if sulfur input and emissions from an individual smelter is above the baseline levels in Table 4 in any particular year as a result of increased capacity. The Freeport McMoRan Miami Smelter is projected to emit 10,000 tons SO₂ in the year 2018. Since the current permit limits the SO₂ emissions to 10,368 tons, no smelter-specific set-aside was allocated.

Table 4
Revised SIP -- Smelter Baselines and Set-Aside

| State | Source | Baseline Sulfur Input (tons S) | Reported 2008 SO ₂ Emissions (tons) | Baseline Allocation (tons SO ₂) | Smelter-Specific Set-Aside (tons SO ₂) |
|-------|---------------------|--------------------------------|--|---|--|
| AZ | Asarco Hayden | 235,000 | 21,742 | 23,000 | 3,000 |
| UT | Kennecott Salt Lake | 340,269 | 970 | 1,000 | 100 |
| Total | | 575,269 | 22,712 | 24,000 | 3,100 |

A smelter set-aside was not used in 2008 because SO₂ emissions at Asarco Hayden and Kennecott are each below their respective baseline allocations.

7.0 Quality Assurance

The states provided 2008 emissions data based on their state emissions inventories. For this report, additional quality assurance (QA) procedures were used 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.

7.1 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:

- 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; and
- An explanation for emissions variations at any applicable source that exceeds $\pm 20\%$ from the previous year.

The Black Hills Corporation Wygen II in Wyoming is the only facility to have been added to the program inventory for 2008. In its first year of operation in 2008, Wygen II reported 221 tons of SO₂ emissions.

The Phelps Dodge Hidalgo smelter and Phelps Dodge Hurley smelter/concentrator in New Mexico have been removed from the inventory. Both were closed in 2006, but were included in last year's report for the smelter adjustment under the 2003 SIPs. Appendix B

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

Table 5 provides explanations for the emissions variations from 2007 – 2008 that are greater than 20%. Plants with variations greater than 20%, but reported emissions of less than 20 tons in both 2007 and 2008, are not included in Table 5. Information on these plants is provided in Appendix A.

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|--|--|
| AZ | 017 | 1807 | 1,504 | 2,556 | Catalyst Paper (Snowflake) Inc. | Used coal with higher sulfur content. |
| AZ | 019 | 2869 | 48 | 6 | Arizona Portland Cement | Emissions are based on source test. Reasons for change include possible combustion variability and inherent amount of sulfur in the limestone. |
| AZ | 007 | 5129 | 9,111 | 7,091 | Freeport-McMoRan Miami Inc. Smelter | Reduced operations in 2008 – did not operate at its permitted limit. |
| AZ | 017 | 447 | 23,522 | 16,421 | Pinnacle West -- Cholla Generating Station | 100% of flue gas is now controlled due to installation of new SO ₂ control in May 2008. |
| NM | 015 | 350150024 | 65 | 0 | Agave Energy/Agave Dagger Draw Gas Plant | Plant did not produce sour gas in 2008. |
| NM | 015 | 350150002 | 300 | 1,201 | BP America Production/Empire Abo Plant [Old name: Arco Permian/Empire Abo Plant] | Operations were abnormal. A hurricane caused the plant to flare a lot of product since there was no place to move the gas. |

(cont.)

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year (cont.)

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|--|--|
| NM | 025 | 350250044 | 1,063 | 3,325 | DCP Midstream/Eunice Gas Plant [Old name: GPM GAS EUNICE GAS PLANT] | The reason for this change has not been reported- possibly due to excess emissions events (see DCP Midstream/Linam Ranch Gas Plant). |
| NM | 025 | 350250035 | 253 | 1,584 | DCP Midstream/Linam Ranch Gas Plant [Old name: GPM GAS/LINAM RANCH GAS PLANT] | A series of excess emissions events caused an increase in SO ₂ emitted. |
| NM | 025 | 350250060 | 2,355 | 3,020 | Dynegy Midstream Services/Eunice Gas Plant [Old name: WARREN PETROLEUM/EUNICE GAS PLANT] | A series of excess emissions events caused an increase in SO ₂ emitted. |
| NM | 031 | 350310008 | 1,278 | 316 | Giant Industries/Ciniza Refinery (Gallup) [Old name: GIANT REFINING/CINIZA] | Removed annual usage factors from heaters and boilers and calculated using actual fuel usage. |
| NM | 025 | 350250007 | 354 | 146 | J L Davis Gas Processing/Denton Plant | Better maintenance, decrease in plant upsets. |
| NM | 045 | 350450902 | 15,305 | 10,649 | Public Service Co of New Mexico/San Juan Generating Station | Decrease due to consent decree and environmental upgrades. |
| NM | 025 | 350250008 | 2,895 | 1,609 | Sid Richardson Gasoline/Jal #3 | Significant events resulting from SRU malfunctions. |

(cont.)

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year (cont.)

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|---|--|
| NM | 025 | 350250061 | 1,235 | 656 | Targa Midstream Services/Monument Plant [Old name: WARREN PETROLEUM/MONUMENT PLANT] | Decrease in flaring during SRU and plant shutdown and startup due to better cooperation from producers shutting in wells during plant shutdowns. |
| NM | 045 | 350450247 | 393 | 571 | Western Gas Resources/San Juan River Gas Plant | Decrease in SRU efficiency in 2008 causing more H ₂ S to be combusted at the incinerator. |
| UT | 049 | 10790 | 97 | 122 | Brigham Young University -- Main Campus | More natural gas was burned in 2007 due to an expected shortage of coal. |
| UT | 011 | 10119 | 1,104 | 592 | Chevron Products Co. -- Salt Lake Refinery | SO ₂ controls were implemented in 2008. |
| UT | 029 | 10007 | 454 | 242 | Holcim-Devil's Slide Plant | Changed methodology from stack test emission factor to CEM. |
| UT | 011 | 10123 | 579 | 453 | Holly Refining and Marketing Co. -- Phillips Refinery | Plant was shut down for two months (2008). |
| UT | 007 | 10081 | 6,511 | 5,057 | PacifiCorp -- Carbon Power Plant | Sulfur and heat content of coal, and hours burning coal decreased. Fuel oil consumption increased. |
| UT | 015 | 10238 | 4,351 | 3,362 | PacifiCorp -- Huntington Power Plant | SO ₂ controls installed. |
| UT | 007 | 10096 | 447 | 537 | Sunnyside Cogeneration Associates -- Sunnyside Cogeneration Facility | Coal sulfur content increased. |

(cont.)

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year (cont.)

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|---|---|
| WY | 011 | 0002 | 65 | 41 | American Colloid Mineral Co -- East Colony | Decrease in emissions due to decreased emissions in fluid bed dryer. |
| WY | 011 | 0003 | 46 | 58 | American Colloid Mineral Co -- West Colony | Calculation method based on 65% bentonite retention in 2008 as opposed to 70% in 2007. |
| WY | 005 | 0063 | 613 | 782 | Black Hills Corporation -- Neil Simpson II | Facility burned 531,635 tons coal in 2008 vs. 509,847 tons in 2007. |
| WY | 041 | 0012 | 1,205 | 133 | BP America Production Company -- Whitney Canyon Gas Plant | The plant shut down permanently on September 4, 2007, decreasing emissions from the incinerator and plant flare. The inlet flare emissions decreased due to reduced flaring. Inlet water treating flare emissions were calculated in 2008 using the amount of produced water. |
| WY | 013 | 0028 | 2,461 | 3,203 | Burlington Resources -- Lost Cabin Gas Plant | Emissions from the Train 3 Flare increased from 1,427 tons in 2007 to 2,284 tons in 2008 from upsets due to problems with a reducing gas generator, a faulty pressure safety valve at the inlet to the reaction furnace, and a plugged catalyst bed and plugged sulfur dip legs in the SRU. |

(cont.)

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year (cont.)

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|---|--|
| WY | 041 | 0009 | 46 | 59 | Chevron USA -- Carter Creek Gas Plant | Increase in emissions due to increased flaring. |
| WY | 037 | 0177 | 328 | 180 | Chevron USA -- Table Rock Field | Decrease in emissions due to decreased flaring. |
| WY | 037 | 0014 | 153 | 103 | Chevron USA -- Table Rock Gas Plant (Formerly Anadarko E&P Co LP) | Power boiler failures and power outages resulted in increased flaring. |
| WY | 041 | 0008 | 1 | 61 | Chevron USA -- Whitney Canyon/Carter Creek Wellfield | Increase in emissions due to increased flaring. |
| WY | 013 | 0008 | 84 | 44 | Devon Gas Services, L.P. -- Beaver Creek Gas Plant | Decrease in emissions due to decreased flaring. |
| WY | 023 | 0001 | 133 | 37 | Exxon Mobil Corporation -- Labarge Black Canyon Facility | Decrease in emissions due to decreased flaring. |
| WY | 023 | 0013 | 846 | 1,538 | Exxon Mobil Corporation -- Shute Creek | Tail Gas incinerators did not operate in 2007. |
| WY | 037 | 0049 | 249 | 305 | FMC Wyoming Corporation -- Granger Soda Ash Plant | SO ₂ emissions increased due to an increase in soda ash production. |
| WY | 021 | 0001 | 1,033 | 786 | Frontier Oil & Refining Company -- Cheyenne Refinery | The FCCU regenerator operated 700 fewer hours in 2008 than in 2007, resulting in 33.44 fewer tons of SO ₂ emitted. FCCU regenerator and sulfur incinerator upsets were responsible for 291 tons in 2007, compared to 73.4 tons in 2008. |

(cont.)

Table 5
Sources with an Emissions Change of > ± 20% from the Previous Year (cont.)

| State | County FIPS | State Facility Identifier | Reported 2007 SO ₂ Emissions (tons) | Reported 2008 SO ₂ Emissions (tons) | Plant Name | Description/ Comments |
|-------|-------------|---------------------------|--|--|---|---|
| WY | 029 | 0010 | 164 | 367 | Marathon Oil Co -- Oregon Basin Wellfield | Increase in emissions due to increased flaring. |
| WY | 001 | 0002 | 94 | 147 | Mountain Cement Company -- Laramie Plant | The company reports that the higher SO ₂ emissions are due to "industry fluctuations". |
| WY | 037 | 0022 | 2,052 | 1,409 | Simplot Phosphates LLC -- Rock Springs Plant | The 2008 inventory was calculated using CEMS data instead of source test operating hours, as in previous years. Also, source 9b was shut down for 1,196 hours in 2008, compared to 491 in 2007. |
| WY | 007 | 0001 | 1,035 | 1,448 | Sinclair Oil Company -- Sinclair Refinery | 712 tons of SO ₂ was flared in 2008 compared to 73 tons in 2007. |
| WY | 025 | 0005 | 792 | 622 | Sinclair Wyoming Refining Company -- Casper Refinery | As measured by the CEM, the FCC Unit emitted 481 tons of SO ₂ in 2008, compared to 306 tons of SO ₂ in 2007. |
| WY | 037 | 0005 | 56 | 44 | Solvay Chemicals -- Soda Ash Plant (Green River Facility) | The reason for this change has not been reported. |

7.2 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 about 65% of the region's reported emissions in 2008. 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 with EPA's emission data.

8.0 Preliminary Milestone Determination

The four state 2008 milestone in the revised SIPs is 378,398 tons SO₂, which represents the average regional emissions milestone for the years 2006, 2007, and 2008. No adjustment is required for changes in smelter operation. The average of 2006, 2007, and 2008 adjusted emissions was determined to be 265,662 tons SO₂. Therefore, the participating states have met the 378,398 tons SO₂ milestone.

9.0 Public Comments

Arizona, New Mexico, Utah, and Wyoming each published a draft of this report for public review and comment. Only Arizona received any written comments, which are listed below:

Comment 1: In Section 6.0, Smelter-Specific Set-Aside Milestone Adjustments, contextual revisions indicated that the Phelps Dodge Miami smelter has been renamed “Freeport McMoRan Miami (Inc.) Smelter.” The comments further indicated that the smelter is projected to emit 10,000 tons SO₂ in the year 2018. Since the current permit limits SO₂ emissions to 10,368 tons, no smelter-specific set-aside was allocated for this smelter.

Response: WRAP revised the text in Section 6.0, Smelter-Specific Set-Aside Milestone Adjustments, for the Freeport McMoRan Miami Smelter. The revision shows that no smelter-specific set-aside was allocated because the Freeport McMoRan Miami Smelter is projected to operate below its permitted limit. In addition, in Table 5, page 8, as well as in Table A-1, Appendix A, page A-1, the plant name was revised to Freeport McMoRan Miami Inc. Smelter, in order to reflect this name change.

Comment 2: In Table 5, Sources with an Emissions Change of $> \pm 20\%$ from the Previous Year, the “Description/Comments” field for Freeport McMoRan Miami Inc. Smelter shows reduced operations in 2008. A comment indicated that this facility did not operate at its permitted limit, which should also be reflected in the “Description/Comments” field of Table 5.

Response: WRAP revised the “Description/Comments” field of Table 5 for the Freeport McMoRan Miami Inc. Smelter. The addition shows that the facility did not operate at its permitted limit.

The U.S. EPA also offered a comment regarding a potential contextual change to this 2008 Milestone Report. No change was required to be made to this report in response to the comment, which is listed below:

Comment: In Table ES-1, page ES-2, U.S. EPA requested clarification regarding the Regional 2008 Milestone, which is 378,398 tons SO₂ according to Table ES-1. U.S. EPA also noted that the proposed 2008 emissions milestone from the revised Section 309 SIPs is 293,921 tons SO₂.

Response: U.S. EPA is correct in asserting that the proposed emissions milestone, or "step-down", for the year 2008 is 293,921 tons SO₂. However, the WRAP Milestone Report compares a three-year average of adjusted SO₂ emissions to a three-year average of emissions milestones, so the value of 378,398 tons SO₂ in Table ES-1 is correct. It is calculated by averaging 2006 and 2007 emissions milestones (420,637 tons SO₂ for each year) with the negotiated "step-down" value of 293,921 tons SO₂ for 2008. For more information, refer to the Regional Milestone section of each state's revised Section 309 SIP.

Appendix A

Table A-1
2008 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 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|--|-----------|-------------|--|--|---|
| AZ | 003 | 3532 | 160 | AEPCO -- Apache Generating Station | 4911 | 221112 | 2,454 | 2,454 | - |
| AZ | 019 | 2869 | | Arizona Portland Cement | 3241 | 32731 | 6 | 6 | - |
| AZ | 007 | 2435 | | ASARCO -- Hayden Smelter | 3331 | 331411 | 21,742 | 21,742 | - |
| AZ | 017 | 1807 | | Catalyst Paper (Snowflake) Inc. | 2621 | 322121 | 2,556 | 2,556 | - |
| AZ | 003 | 2148 | | CLC -- Douglas Lime Plant | 3274 | 32741 | 1,013 | 1,013 | - |
| AZ | 025 | 5992 | | CLC -- Nelson Lime Plant | 3274 | 32741 | 1,955 | 1,955 | - |
| AZ | 007 | 5129 | | Freeport-McMoRan Miami Inc. Smelter | 3331 | 331411 | 7,091 | 7,091 | - |
| AZ | 025 | 2393 | | Phoenix Cement | 3241 | 32731 | 10 | 10 | - |
| AZ | 017 | 447 | 113 | Pinnacle West -- Cholla Generating Station | 4911 | 221112 | 16,421 | 16,421 | - |
| AZ | 001 | 4477 | 6177 | SRP -- Coronado Generating Station | 4911 | 221112 | 15,900 | 15,900 | - |
| AZ | 019 | 1052 | 126 | TEP -- Irvington Generating Station | 4911 | 221112 | 2,884 | 2,884 | - |
| AZ | 001 | 3222 | 8223 | TEP -- Springerville Generating Station | 4911 | 221112 | 6,562 | 6,562 | - |
| NM | 015 | 350150024 | | Agave Energy/Agave Dagger Draw Gas Plant | 1311 | 211111 | 0 | 0 | - |
| NM | 015 | 350150002 | | BP America Production/Empire Abo Plant [Old name: Arco Permian/Empire Abo Plant] | 1321 | 211112 | 1,201 | 1,201 | - |
| NM | 015 | 350150011 | | DCP Midstream/Artesia Gas Plant | 1321 | 211112 | 78 | 78 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|--|-----------|-------------|--|--|---|
| NM | 025 | 350250044 | | DCP Midstream/Eunice Gas Plant [Old name: GPM GAS EUNICE GAS PLANT] | 1321 | 211112 | 3,325 | 3,325 | - |
| NM | 025 | 350250035 | | DCP Midstream/Linam Ranch Gas Plant [Old name: GPM GAS/LINAM RANCH GAS PLANT] | 1321 | 211112 | 1,584 | 1,584 | - |
| NM | 015 | 350150138 | | Duke -- Magnum/Pan Energy -- Burton Flats | 1321 | 211112 | 0 | 0 | - |
| NM | 015 | 350150285 | | Duke Energy/Dagger Draw Gas Plant | 1321 | 211112 | 0 | 0 | - |
| NM | 025 | 350250060 | | Dynege Midstream Services/Eunice Gas Plant [Old name: WARREN PETROLEUM/EUNICE GAS PLANT] | 1321 | 211112 | 3,020 | 3,020 | - |
| NM | 025 | 350250004 | | Frontier Field Services/Maljamar Gas Plant | 1321 | 211112 | 2,499 | 2,499 | - |
| NM | 031 | 350310008 | | Giant Industries/Ciniza Refinery (Gallup) [Old name: GIANT REFINING/CINIZA] | 2911 | 32411 | 316 | 889 | 573 |
| NM | 025 | 350250007 | | J L Davis Gas Processing/Denton Plant | 1311 | 211111 | 146 | 146 | - |
| NM | 015 | 350150008 | | Marathon Oil/Indian Basin Gas Plant | 1321 | 211112 | 722 | 722 | - |
| NM | 015 | 350150010 | | Navajo Refining Co/Artesia Refinery | 2911 | 32411 | 50 | 50 | - |
| NM | 045 | 350450902 | 2451 | Public Service Co of New Mexico/San Juan Generating Station | 4911 | 221112 | 10,649 | 10,649 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|--|-----------|-------------|--|--|---|
| NM | 007 | 350070001 | | Raton Pub. Service/Raton Power Plant | 4911 | 221112 | 0 | 0 | - |
| NM | 025 | 350250008 | | Sid Richardson Gasoline/Jal #3 | 1321 | 211112 | 1,609 | 1,609 | - |
| NM | 025 | 350250051 | | Targa Midstream Services/Eunice South Gas Plant | 1321 | 211112 | 0 | 0 | - |
| NM | 025 | 350250061 | | Targa Midstream Services/Monument Plant [Old name: WARREN PETROLEUM/MONUMENT PLANT] | 1321 | 211112 | 656 | 656 | - |
| NM | 025 | 350250063 | | Targa Midstream Services/Saunders Plant [Old name: WARREN PETROLEUM/SAUNDERS PLANT] | 1321 | 211112 | 309 | 309 | - |
| NM | 031 | 350310032 | 87 | Tri-State Gen & Transmission/Escalante Station | 4911 | 221112 | 1,202 | 1,202 | - |
| NM | 045 | 350450247 | | Western Gas Resources/San Juan River Gas Plant | 1321 | 211112 | 571 | 571 | - |
| NM | 045 | 350450023 | | Western Refining Southwest Inc./San Juan Refinery (Bloomfield) [Old name: GIANT INDUSTRIES/BLOOMFIELD REF] | 2911 | 32411 | 421 | 421 | - |
| UT | 049 | 10790 | | Brigham Young University -- Main Campus | 8221 | 611310 | 122 | 122 | - |
| UT | 027 | 10311 | | Brush Resources Inc. -- Delta Mill | 1099 | 212299 | 0 | 0 | - |
| UT | 011 | 10119 | | Chevron Products Co. -- Salt Lake Refinery | 2911 | 324110 | 592 | 592 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|---|-----------|-------------|--|--|---|
| UT | 037 | 10034 | | EnCana Oil & Gas (USA) Incorporated (was Tom Brown Incorporated) -- Lisbon Natural Gas Processing Plant | 2911 | 211111 | 85 | 85 | - |
| UT | 011 | 10122 | | Flying J Refinery -- (Big West Oil Company) | 2911 | 324110 | 377 | 377 | - |
| UT | 049 | 10796 | | Geneva Steel -- Steel Manufacturing Facility | 3312 | 331221 | 0 | 0 | - |
| UT | 027 | 10313 | | Graymont Western US Inc. -- Cricket Mountain Plant | 1422 | 212312 | 31 | 31 | - |
| UT | 029 | 10007 | | Holcim-Devil's Slide Plant | 3241 | 327310 | 242 | 456 | 214 |
| UT | 011 | 10123 | | Holly Refining and Marketing Co. -- Phillips Refinery | 2911 | 324110 | 453 | 453 | - |
| UT | 027 | 10327 | 6481 | Intermountain Power Service Corporation -- Intermountain Generation Station | 4911 | 221112 | 5,692 | 5,692 | - |
| UT | 035 | 10572 | | Kennecott Utah Copper Corp. -- Power Plant/Lab/Tailings Impoundment | 1021 | 212234 | 3,145 | 3,145 | - |
| UT | 035 | 10346 | | Kennecott Utah Copper Corp. -- Smelter & Refinery | 3331 | 331411 | 970 | 970 | - |
| UT | 007 | 10081 | 3644 | PacifiCorp -- Carbon Power Plant | 4911 | 221112 | 5,057 | 5,057 | - |
| UT | 015 | 10237 | 6165 | PacifiCorp -- Hunter Power Plant | 4911 | 221112 | 6,072 | 6,072 | - |
| UT | 015 | 10238 | 8069 | PacifiCorp -- Huntington Power Plant | 4911 | 221112 | 3,362 | 3,362 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|-------|--|-----------|-------------|--|--|---|
| UT | 007 | 10096 | | Sunnyside Cogeneration Associates -- Sunnyside Cogeneration Facility | 4911 | 221112 | 537 | 537 | - |
| UT | 035 | 10335 | | Tesoro West Coast -- Salt Lake City Refinery | 2911 | 324110 | 932 | 932 | - |
| UT | 043 | 10676 | | Utelite Corporation -- Shale processing | 3295 | 212399 | 133 | 133 | - |
| WY | 011 | 0002 | | American Colloid Mineral Co -- East Colony | 1459 | 212325 | 41 | 41 | - |
| WY | 011 | 0003 | | American Colloid Mineral Co -- West Colony | 1459 | 212325 | 58 | 58 | - |
| WY | 031 | 0001 | 6204 | Basin Electric -- Laramie River Station | 4911 | 221112 | 10,745 | 10,745 | - |
| WY | 003 | 0012 | | Big Horn Gas Proc -- Big Horn/Byron Gas Plant | 1311 | 22121 | 0 | 0 | - |
| WY | 005 | 0002 | 4150 | Black Hills Corporation -- Neil Simpson I | 4911 | 22112 | 932 | 932 | - |
| WY | 005 | 0063 | 7504 | Black Hills Corporation -- Neil Simpson II | 4911 | 22112 | 782 | 782 | - |
| WY | 045 | 0005 | 4151 | Black Hills Corporation -- Osage Plant | 4911 | 22112 | 2,509 | 2,509 | - |
| WY | 005 | 0146 | 55479 | Black Hills Corporation -- Wygen 1 | 4911 | 22112 | 653 | 653 | - |
| WY | 005 | 0225 | | Black Hills Corporation -- Wygen II | 4911 | 22112 | 221 | 221 | - |
| WY | 041 | 0012 | | BP America Production Company -- Whitney Canyon Gas Plant | 1311 | 211111 | 133 | 133 | - |
| WY | 041 | 0002 | | BP America Production Company -- Whitney Canyon WellField | 1311 | | 4 | 4 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|---|-----------|-------------|--|--|---|
| WY | 013 | 0009 | | Burlington Resources -- Bighorn Wells | 1311 | | 0 | 0 | - |
| WY | 013 | 0028 | | Burlington Resources -- Lost Cabin Gas Plant | 1311 | 211111 | 3,203 | 3,203 | - |
| WY | 041 | 0009 | | Chevron USA -- Carter Creek Gas Plant | 1311 | 211111 | 59 | 59 | - |
| WY | 037 | 0177 | | Chevron USA -- Table Rock Field | 1311 | | 180 | 180 | - |
| WY | 037 | 0014 | | Chevron USA -- Table Rock Gas Plant (Formerly Anadarko E&P Co LP) | 1321 | 211111 | 103 | 103 | - |
| WY | 041 | 0008 | | Chevron USA -- Whitney Canyon/Carter Creek Wellfield | 1311 | | 61 | 61 | - |
| WY | 013 | 0007 | | Devon Energy Production Co., L.P. -- Beaver Creek Gas Field | | | 21 | 21 | - |
| WY | 013 | 0008 | | Devon Gas Services, L.P. -- Beaver Creek Gas Plant | 1311 | 211111 | 44 | 44 | - |
| WY | 029 | 0012 | | Encore Operating LP -- Elk Basin Gas Plant | 1311 | 211111 | 1,106 | 1,106 | - |
| WY | 023 | 0001 | | Exxon Mobil Corporation -- Labarge Black Canyon Facility | 1311 | | 37 | 37 | - |
| WY | 023 | 0013 | | Exxon Mobil Corporation -- Shute Creek | 1311 | 211111 | 1,538 | 1,538 | - |
| WY | 037 | 0048 | | FMC Corp -- Green River Sodium Products (Westvaco facility) | 2812 | 327999 | 3,620 | 3,620 | - |
| WY | 037 | 0049 | | FMC Wyoming Corporation -- Granger Soda Ash Plant | 1474 | 212391 | 305 | 305 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|---|-----------|-------------|--|--|---|
| WY | 021 | 0001 | | Frontier Oil & Refining Company -- Cheyenne Refinery | 2911 | 32411 | 786 | 786 | - |
| WY | 037 | 0002 | | General Chemical -- Green River Plant (Facility Name: General Chemical) | 1474 | 327999 | 5,382 | 5,382 | - |
| WY | 043 | 0003 | | Hiland Partners, LLC -- Hiland Gas Plant | 1321 | 48621 | 122 | 122 | - |
| WY | 029 | 0007 | | Marathon Oil Co -- Oregon Basin Gas Plant | 1321 | 211112 | 408 | 408 | - |
| WY | 029 | 0010 | | Marathon Oil Co -- Oregon Basin Wellfield | | | 367 | 367 | - |
| WY | 037 | 0008 | | Merit Energy Company -- Brady Gas Plant (formerly Anadarko E&P Co LP) | 1321 | 211112 | 85 | 85 | - |
| WY | 001 | 0002 | | Mountain Cement Company -- Laramie Plant | 3241 | 23571 | 147 | 147 | - |
| WY | 037 | 0003 | | P4 Production, L.L.C. -- Rock Springs Coal Calcining Plant | 3312 | 331111 | 715 | 715 | - |
| WY | 009 | 0001 | 4158 | Pacificorp - Dave Johnston Plant | 4911 | 221112 | 19,534 | 19,534 | - |
| WY | 037 | 1002 | 8066 | Pacificorp -- Jim Bridger Plant | 4911 | 221112 | 19,686 | 19,686 | - |
| WY | 023 | 0004 | 4162 | Pacificorp -- Naughton Plant | 4911 | 221112 | 22,109 | 22,109 | - |
| WY | 005 | 0046 | 6101 | Pacificorp -- Wyodak Plant | 4911 | 221112 | 8,196 | 8,196 | - |
| WY | 037 | 0022 | | Simplot Phosphates LLC -- Rock Springs Plant | 2874 | 325312 | 1,409 | 1,687 | 278 |
| WY | 007 | 0001 | | Sinclair Oil Company -- Sinclair Refinery | 2911 | 32411 | 1,448 | 1,448 | - |

(cont.)

Table A-1
2008 Reported and Adjusted Emissions for Sources Subject to
Section 309 -- Regional Haze Rule (cont.)

| State | County FIPS | State Facility Identifier | ORIS | Plant Name | Plant SIC | Plant NAICS | Reported 2008 SO ₂ Emissions (tons) | Adjusted 2008 SO ₂ Emissions (tons) | General New Monitoring Calculation Method Adjustment (tons) |
|-------|-------------|---------------------------|------|---|-----------|-------------|--|--|---|
| WY | 025 | 0005 | | Sinclair Wyoming Refining Company -- Casper Refinery | 2911 | 32411 | 622 | 622 | - |
| WY | 037 | 0005 | | Solvay Chemicals -- Soda Ash Plant (Green River Facility) | 1474 | 325181 | 44 | 44 | - |
| WY | 015 | 0001 | | The Western Sugar Cooperative -- Torrington Plant | 2063 | 311313 | 180 | 180 | - |
| WY | 001 | 0005 | | University of Wyoming -- Heat Plant | 8221 | 61131 | 79 | 79 | - |
| WY | 045 | 0001 | | Wyoming Refining -- Newcastle Refinery | 2911 | 32411 | 696 | 696 | - |

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 | 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 Wellfield | 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 |
| AZ | 019 | 2869 | Arizona Portland Cement | 2004 |
| WY | 013 | 0007 | Devon Energy Corp. -- Beaver Creek Gas Field | 2004 |
| WY | 005 | 0225 | Black Hills Corporation -- Wygen II | 2008 |

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 |
| AZ | 021 | 15582 | BHP -- San Manuel Smelter | 10,409 | Facility is permanently closed. | 2004 |
| 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 |
| NM | 001 | 00008 | GCC Rio Grande Cement | 1,103 | Not subject to program after baseline revisions.* | 2008 |
| 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 |

* 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.