Air Quality Permit Program Emission Fee Appropriations Report

Presented to: The Appropriations Committee of the Legislature

By the Department of Environment and Energy



DEPT. OF ENVIRONMENT AND ENERGY

December 23, 2024

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Introduction

The Department of Environment and Energy submits this report to the members of the Appropriations Committee of the Nebraska Legislature, pursuant to Neb. Rev. Stat. §81-1505.04, as amended. This report details all direct and indirect program costs incurred during the State Fiscal Year 2024 (SFY 2024) in carrying out the air quality permit program. The permit program is the result of the Federal Clean Air Act Amendments of 1990 (CAAA) and the passage of LB1257 (1992) by the Nebraska Legislature. The department is required to establish and implement a comprehensive operating permit program for major sources of certain air pollutants. The federal program is referred to as the Title V program. The State of Nebraska's "Title V program" is often referred to as the Class I program.

Pursuant to the provisions of §81-1505.04, the department is required to collect an annual fee on the emissions from major sources of air pollution in an amount sufficient to cover the costs of the implementation of the permit program. The statute provides flexibility to develop and adjust the fee according to federal regulation or "as required to pay all reasonable direct and indirect costs of developing and administering the air quality permit program." The State's Payroll and Financial Center system is utilized to document time and resources spent on the program. The purpose of this report is to document the revenue generated from emission fees and identify costs associated with the program. In addition, as required by statute, this report identifies the costs incurred by the department to administer the program for each major source and each primary activity not specific to a major source. This report verifies that revenue generated from emission fees was used by NDEE solely to offset appropriate and reasonable costs associated with the air quality permit program.

Planning for Air Quality Issues in Nebraska

National Ambient Air Quality Standards (NAAQS) are established by EPA for six pollutants: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter $(PM_{2.5} \text{ and } PM_{10})^1$, and sulfur dioxide. EPA periodically reviews the NAAQS using the most current scientific information available and revises or retains the standards as appropriate. When a new or revised standard is issued, states determine their compliance (attainment) status with respect to the standard and submit to EPA their recommendations for attainment or nonattainment designations for areas within the state. State Implementation Plans (SIPs) are then developed to describe how the state meets the CAA requirements for the NAAQS, specifically describing how the Department will implement, maintain, and enforce the standard.

At the present time, Nebraska is in attainment with each of the NAAQS. Planning activities are currently underway to address the recently revised Particulate Matter annual primary standard, which was strengthened; proposed revisions to state Air Quality regulations (Title 129); and Regional Haze. At the federal level, EPA is undertaking a new review of the ozone standard; conducting its review of the lead standard; and finalizing its review of the secondary (welfare-based) sulfur dioxide, nitrogen oxides, and particulate matter standards. EPA recently finalized its approval of Nebraska's SIP revision for Title 129.

Sulfur dioxide (SO₂)

The 2010 sulfur dioxide (SO₂) standard required states to demonstrate attainment in the areas surrounding large sources of the pollutant. EPA finalized the Data Requirements Rule (DRR) in 2015 to assist in implementation of the 2010 standard, requiring characterization of the air quality near sources that emit 2,000 tons per year or more of SO₂. Sources in Nebraska subject to this rule include coal-fired power plants, specifically Whelan Energy Center (Adams County), Sheldon Station (Lancaster County), North Omaha Station (Douglas County), Gerald Gentleman Station (Lincoln County), and Nebraska City Station (Otoe County).

¹ $PM_{2.5}$ are fine inhalable particles, with diameters that are generally 2.5 micrometers and smaller. PM_{10} are inhalable particles, with diameters that are generally 10 micrometers and smaller.

EPA issued its designations of attainment for Nebraska areas in 2016, 2018, and 2021; all areas continue to comply with this standard.

The DRR requires annual reporting (termed "ongoing requirements") for areas characterized by modeling, and this year's report was submitted as part of the Nebraska's annual Ambient Air Monitoring Network Plan in July 2024. The two areas subject to these ongoing requirements surround Whelan Energy Center and Gerald Gentleman Station; the area around Nebraska City Station was also addressed in this year's report due to an increase in emissions. Facility emissions data indicate that all areas in Nebraska continue to demonstrate attainment with the federal standard.

Ozone

EPA issued revised ozone standards in 2015, lowering the standard from 0.075 parts per million (ppm) to 0.070 ppm. In November 2017 EPA designated the entire state of Nebraska as in attainment and approved Nebraska's SIP revision for ozone in April 2020. In December 2020, following a review of the standard, EPA retained the current NAAQS; in October 2021 it announced a decision to reconsider the previous administration's retention decision. EPA is expected to release the Integrated Review Plan to describe the timeline of its review of the standard in late 2024. The plan is not yet released at the time of this report.

Particulate Matter

EPA finalized its review of the particulate matter (PM) standards, initiated based on its concern that the standards retained in 2020 are not adequate. A final rule with a revised annual $PM_{2.5}$ standard was issued in February 2024. The primary (health-based) annual standard was strengthened, and the secondary annual standard and primary and secondary 24-hour standards were retained. Because the annual primary standard is used as the lower breakpoint for the Moderate Air Quality Index (AQI) category, this revision was anticipated to result in more days with Moderate AQI during prescribed burning and wildfire season. It's important to note that Moderate AQI is reflective of elevated levels of $PM_{2.5}$ that are at or below the NAAQS.

NDEE has prepared its designation recommendations to address the revised standard (to recommend that all areas of Nebraska are in attainment) for submission to EPA. The next step will be development of a revised SIP to address the more stringent annual standard.

Lead

EPA's review of the lead standard is underway and the Risk and Exposure Assessment and Policy Assessment are expected to be completed by early 2025. Nebraska was designated in attainment with the NAAQS by EPA in 2011 and the state's SIP revision was approved in 2015.

Regional Haze

Regional Haze refers to impaired visibility at national parks and wilderness areas caused by particulates in the atmosphere. EPA issued the Regional Haze Rule in 1999 to improve visibility in these areas, requiring state and federal agencies work together to achieve this goal. Numerous amendments to the Rule have been issued addressing the Cross-State Air Pollution Rule (CSAPR) as an alternative to Best Available Retrofit Technology (BART) for particular pollutant sources, and regulatory requirements for SIPs. In addition, guidance and technical support documents were provided to assist states in preparing SIPs for the second implementation period (2019-2028). EPA is preparing to undertake a revision to the most recent rule to address the third implementation period (2029-2038).

Nebraska submitted its Regional Haze SIP for the first implementation period (2008- 2018) in July 2011; in 2012, EPA issued a partial approval/partial disapproval of the SIP. The disapproved portions include the BART analysis for sulfur dioxide for NPPD's Gerald Gentleman Station (GGS) and the state's long-term strategy for regional haze insofar as it relied on the BART determination. EPA issued a Federal Implementation Plan (FIP) that relies on the Cross-State Air Pollution Rule (CSAPR) to

satisfy BART for sulfur dioxide at GGS. This source participates in the CSAPR trading program, which allots each source an emissions budget for SO₂ and permits trading of allotments. The remaining disapproved portion (long-term strategy) is being addressed by a proposed FIP published in August 2024. Prior to this proposal, no additional control measures have been required.

The Department submitted its Regional Haze Five-Year Progress Report in April 2017, and recently submitted its SIP revision for the second implementation period on August 20, 2024. This revision addresses portions of the initial SIP and progress report, as well as state obligations for the current implementation period that ends in 2028. EPA review and rulemaking is pending.

Municipal Solid Waste Landfill Plan

On May 21, 2021, EPA finalized the federal implementation plan for municipal solid waste landfills (MSWL). The plan supports the following federal rule located at 40 CFR Part 60 Subpart Cf: Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills. The emission guidelines apply to landfills constructed prior to July 17, 2014 which accepted waste after November 8, 1987, and lowered the threshold for which facilities must install gas collection and control equipment from 50 Mg/yr to 34 Mg/yr of nonmethane organic compounds (NMOCs).

Air Toxics Program

EPA currently lists 188 substances as hazardous air pollutants, or air toxics, which are air pollutants known to cause cancer and other serious health impacts. NDEE developed the Air Toxics Notebook on the Department website as a reference tool for the air toxics program and developed a set of web pages for the New Sources Performance Standards (NSPS), which are federal rules that apply largely to new stationary sources.

Both sets of rules have been issued by EPA. The Notebooks are intended to help the regulated community and the public understand the air toxics and NSPS regulations. For each standard the Notebook contains a page that provides applicability information, regulatory citations, amendment dates, guidance documents, and forms.

Definitions

For the purposes of this report, the following definitions have been used:

Chargeable emissions: The total tonnage of regulated pollutants emitted from a major source up to and including any applicable caps. A cap of 4,000 tons per regulated pollutant applies to all major sources. A cap of 400 tons per pollutant applies to mid-size electrical generation facilities that are not under jurisdiction of a local air program and that have a nameplate capacity of between 70 and 115 megawatts.

Class I – Major Source: An air emissions source permitted to emit annually 100 tons or more of particulate matter with an aerodynamic diameter less than 10 microns (PM10), carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx), or volatile organic compounds (VOC); 10 tons or more of any single hazardous air pollutants (HAP); 25 tons of any combination of HAPs. Until the U.S. Supreme Court partially overturned the greenhouse gas (GHG) permitting rule June 2014, a source with emissions of 100 tons or more of greenhouse gases on a mass basis and 100,000 tons of carbon dioxide equivalents were also considered major sources. The court ruled that EPA may not treat GHGs as an air pollutant for purposes of determining whether a source is subject to federal permitting rules. Such sources with emissions above the thresholds are required to obtain a Class I operating permit. Some other source categories are required to obtain a Class I operating permit because of other federal requirements.

Class II – Synthetic Minor Source: A source with the potential to emit as a major source, but through enforceable limits has lowered its potential to emit to below the major source thresholds. A synthetic minor source must either obtain a Class II permit or qualify for the Low Emitter Program (see Low Emitter Source below). Synthetic minor sources are not assessed emission fees.

Compliance Assurance: Assuring compliance includes activities such as conducting facility inspections, responding to complaints, stack test observations, file reviews, voluntary compliance, and enforcement.

Direct costs: Direct program costs are those costs incurred through the direct implementation of the Title V program. Examples include costs of permit writing and review labor, staff development, training, inspector salaries and travel expenses, air monitoring equipment purchases, regulation development, small business assistance, and computer modeling software purchases.

Indirect costs: Indirect costs are the programs share of costs incurred by the department that benefit the entire agency. Examples include costs of certain administrative labor such as the director, the deputy directors, and general data management.

Low Emitter Source: A source that has a potential to emit to be a major source but has demonstrated through records and emission inventories for at least 5 years a history of actual emissions not exceeding 50% of major source thresholds for regulated pollutants and that is not otherwise required to obtain a permit.

Non-Source-Specific Costs: Those costs not specifically attributable to a single source. Examples include resources required for review of federal regulations, resources required for participation in national organizations, small business assistance, labor for drafting a general air permit, and ambient air monitoring in areas of multiple sources.

Primary Activity: A main functional area of the air program. Examples of primary activities include permitting, small business assistance, emission inventory, state regulation and program development, compliance assurance, federal policy and rulemaking, and acid rain.

Source-Specific Costs: Those costs specifically attributable to a single source. Examples include labor for drafting an operating permit for a single source, labor for inspecting a single source, and cost of publishing a public notice for a permit.

Direct and Indirect Costs – SFY2024

A. Fees Collected

Major source emissions were first subject to fees for calendar year 1994 emissions. The following table details the fee rates since state fiscal year 2006 and the total fees that were collected:

Table 1: Fees Collected

State Fiscal Year	Emission Reporting Calendar Year	Chargeable Emissions ¹ (tons per year)	Fee Rate (\$ per ton)	Total Fees Collected ²
2006	2004	42,942	\$ 38	\$ 1,634,451
2007	2005	41,908	\$ 51	\$ 2,136,050
2008	2006	42,489	\$ 57	\$ 2,410,594
2009	2007	40,812	\$ 57	\$ 2,326,284
2010	2008	39,982	\$ 62	\$ 2,478,420
2011	2009	38,093	\$ 70	\$ 2,666,552
2012	2010	38,890	\$ 66	\$ 2,566,717
2013	2011	41,260	\$ 64	\$ 2,640,609
2014	2012	40,728	\$ 65	\$ 2,588,903
2015	2013	40,192	\$ 67	\$ 2,738,257
2016	2014	40,606	\$ 70	\$ 2,832,625
2017	2015	38,965	\$ 71	\$ 2,719,339
2018	2016	38,036	\$ 78	\$ 2,959,554
2019	2017	39,237	\$ 78	\$ 3,115,348
2020	2018	41,748	\$ 70	\$ 2,941,109
2021	2019	39,840	\$ 65	\$ 2,617,991
2022	2020	37,521	\$ 50	\$ 2,157,554
2023	2021	38,726	\$ 50	\$ 1,752,308
2024	2022	38,508	\$ 51	\$ 1,963,543
2025	2023	37,589	\$ 56	\$ 2,220,635

B. General Discussion of Program Costs

The department's SFY2024 budget for the Title V program was \$3,230,436 for the Title V program. The department expended \$2,180,449, or approximately 67% of the budget. Table 2 provides a summary of SFY2027 Title V program costs.

¹When inventories are not submitted by March 31st, the NDEE does not have an accurate account of the chargeable emissions for the previous calendar year. NDEE assumes the emissions remained level from the previous year.

² Total fees collected reflect late payment fees and updates to the emissions inventory that may have occurred after the initial submittal was filed.

Table 2: Title V Program Costs for SFY2024

Category	Title V Program Costs
Personnel	\$ 1,301,477
Benefits	\$ 396,827
Equipment & Supplies	\$ 3435
Outside Services (Legal, Medical	
Assessment, Auditing, Training, Other)	\$ 100,440
Other	\$ 23,359
Travel	\$ 5,018
Total Direct Costs	\$1,830,557
Total Indirect Costs	\$ 349,893
Total Costs:	\$2,180,449

(July 1, 2023 - June 30, 2024)

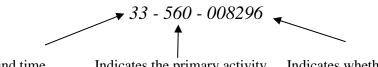
Primary Activity Costs

A. Payroll and Financial Center System

The department is required to establish a system that provides reporting of resources expended on the primary components of the air quality program, as well as resources expended for each major source. Use of a tracking system commenced in July 1996.

Under the Payroll and Financial Center system, program activities are either charged to the Title V (Class I) program, the "state" program, the federal 103 program, or to the construction permit application fee program. The emission fees paid by major sources fund the Title V program. The "state" program refers to the 105 grant program, which is funded by federal funds and state general funds. The federal 103 program is funded wholly by federal funds and is utilized only for maintaining the PM_{2.5} ambient monitoring network. The construction permit application fee program was enacted by the legislature during the 2004 session (LB449) and began January 1, 2005. When applying for an air quality construction permit, the owner or operator of the facility must submit an application fee. The fees collected under the construction permit program are used toward paying some of the costs of processing the application. There are currently no fees charged to sources for air quality operating permits.

All time spent by staff on the Title V program is recorded as program activity on timesheets in the Payroll and Financial Center system. The Title V program includes activities associated with major sources and synthetic-minor sources. Permit, planning, and compliance program staff document time by primary activity and by specific source or non-source specific activities. An example of how the Title V program activity is tracked follows:



Indicates which fund time is to be charged (Ex. Title V program) Indicates the primary activity (ex. Class I – major source permitting) Indicates whether the time is for a specific source or for a nonsource specific activity (ex. Cargill, Inc.)

В. Costs by Primary Activity

The following table details the Title V air program costs for SFY2024 by primary activity:

Primary Activity	Agency Program Costs
Administration/Management	\$ 308,252
General Office	\$ 240,999
Outside Meeting	\$ 1,937
Compliance & Enforcement	\$ 442,934
Environmental Data Collection (Ambient Air Monitoring)	\$ 27,004
Rules & Regulations / Legislation / Planning	\$ 49,242
Training	\$ 190,839
Process Improvement / Application Developm	\$ 97,763
Air Emission Inventory	\$ 80,840
Small Business Assistance / Title V/Class II – Compliance Assistance/Outreach	\$ 48,962
Construction Permits	\$ 317,197
Operating Permits	\$ 332,084
Air Quality Modeling	\$ 42,394
TOTAL	\$ 2,180,449

Table 3: Costs by Primary Activity SFY2024(July 1, 2023- June 30, 2024)

C. Costs Specific to Class I Major Sources

Table 4 contains the costs the agency incurred that were specific to individual Class I major sources.

	Facility	Facility	Time Tracking	
Facility Name	Location	ID	Code	Amount
A-1 Fiberglass, Aurora	Aurora	85312	84008917	\$330
A-1 Fiberglass, Hastings	Hastings	723	84008366	\$3,763
Ag Processing Inc.	David City	118545	84007413	\$32,071
Ag Processing Inc. Soybean	Hastings	72698	84008794	\$8,565
Alliance Municipal Power Plant	Alliance	1949	84008960	\$5,927
AltEn, LLC	Mead	84069	84000760	\$22
Anderson Grain Elevator	Anselmo	99737	84000561	\$2,114
Ansley Light Plant	Ansley	7083	84008721	\$222
Apache Manufacturing	Norfolk	53804	84008936	\$722
Archer Daniels Midland	Fremont	9169	84008265	\$3,014
Archer Daniels Midland Corn Processing	Columbus	39285	84008206	\$91
ARJO Manufacturing	Aurora	58341	84008308	\$3,947
Ash Grove Cement	Louisville	4129	84004504	\$18
Ash Grove Dakota Clay Pit	Louisville	119790	84010782	\$45
AT&T Tower Offutt AFB	Omaha	120013	84010792	\$4,424
Auburn Board of Public WOrks	Auburn	36919	84008754	\$210
Aurora Elevator West	Aurora	86801	84010120	\$45
Baldwin Filters	Kearney	2398	84008309	\$2,665
Beaver City Power Pla t	Beaver City	22856	84008286	\$7,198
Becton Dickinson	Columbus	38719	84008383	\$187
Becton Dickinson Pharmaceutical	Columbus	73007	84008938	\$7,495
Benkelman Municipal Power Plant	Benkelman	58358	84008735	\$140
Bertrand Compressor Station	Loomis	88547	84010189	\$25,677
Bridgeport Ethanol, LLC	Bridgeport	87464	84010168	\$573
Broken Bow Municipal Power Plant	Broken Bow	55093	84008722	\$431
Butler County Landfill	David City	62743	84008812	\$317
Butler County Renewal Natural Gas	Rising City	120099	84010727	\$31
Cabela's Data Center	Papillion	95681	84000893	\$2,644
Cambridge Substation	Cambridge	83871	84009051	\$135
Cargill Blair	Blair	69585	84008857	\$220
Cargill Lactic Acid	Blair	91164	84010294	\$221
Cargill Meat Solutions	Schuyler	6272	84008524	\$2,614
Cargill Polyols	Blair	64401	84008787	\$22,557
Cargill West	Wood River	25616	84008314	\$9,511
Cargill, Inc.	Albion	1446	84008310	\$58,807
Cargill, Inc.	Blair	57902	84008296	\$2,349
Case New Holland	Grand Island	24371	84008395	\$3,050

Table 4: Costs by Class I Major Source SFY2024

(July 1, 2023 - June 30, 2024)

Facility Name	Facility Location	Facility ID	Time Tracking Code	Amount
Chadron State College	Chadron	7828	84008793	\$3,950
Chappel Municipal Utilities	Chappell	58355	84008729	\$8,370
Chief Ethanol	Hastings	58049	84008315	\$663
Chief Ethanol Fuels	Hastings	58049	84002094	\$3,681
CIE Norfolk GNS, LLC	Norfolk	84534	84009076	\$1,691
City of David City	David City	4016	84008300	\$84
City of Wayne	Wayne	47263	84008426	\$8,809
City of Wilbur	Wilber	58875	84008257	\$5,289
Clean Harbors	Kimball	58562	84008319	\$2,472
Clean Harbors Mngt	Kimball	58562	84MS8319	\$3,582
Columbus Carbon Capture	Columbus	120517	84010817	\$66
ContiTech USA, Inc.	Norfolk	53867	84008391	\$3,095
Cornhusker Energy	Lexington	77755	84009010	\$142
Curtis Light and Water Department	Curtis	58332	84008712	\$194
CW Burdick Generating Station	Grand Island	54712	84008429	\$3,086
Darling Ingredients Inc.	Bellevue	41253	84008641	\$7,093
Darling International	Wahoo	58225	84008245	\$2,176
Douglas County Landfill	Omaha	59516	84008244	\$816
Dutton-Lainson	Hastings	125	84008374	\$10,243
Eaton Corporation	Kearney	2374	84008545	\$17
E-Energy Adams, LLC	Adams	86373	84010021	\$204
E-Energy Adams, LLC Mngt	Adams	86373	84M10021	\$3,278
Endicott Clay	Endicott	27355	84008389	\$8,204
Exmark Manufacturing Company	Beatrice	23151	84009016	\$292
Falls City Water and Light	Falls City	40565	84008759	\$1,920
Flexcon Inc.	Columbus	58429	84008223	\$1,477
FLowserve	Hastings	134	84008544	\$334
Fortigen	Geneva	107214	84002037	\$1,504
Franklin Light and Water	Franklin	22547	84008736	\$475
Fremont WWFSRF	Fremont	48534	84002314	\$614
Fremont WWTP	Fremont	48534	84007319	\$2,950
G&P Development	Milford	45275	84008825	\$11
Gavilon Fertilizer	Hastings	62575	84001062	\$800
Grand Island Burdick Station	Grand Island	54712	84008770	\$258
Grand Island Landfill	Shelton	62812	84008809	\$2,090
Grand Island Platte Generating Station	Grand Island	58027	84008771	\$43
Grand Island Platte Generating Station	Grand Island	58027	84008401	\$91
Great Dane Trailers	Wayne	47178	84008258	\$18,691
Green America Biofuels Ord, LLC	Ord	85861	84009091	\$973
Green Plains Wod River, LLC	Wood River	86000	84009094	\$2,235
Green Plains Wod River, LLC	Wood River	86000	84001955	\$1,344
Green Plains York, LLC	York	59094	84008291	\$4,644

Facility Name	Facility Location	Facility ID	Time Tracking Code	Amount
Hastings ASR-UIC	Hastings	55721	84008339	\$995
Hastings North Denver Station	Hastings	58345	84008530	\$2,701
Hiusker Ag, LLC	Plainview	73356	84008963	\$138
Honeywell	Nebraska City	37299	84008484	\$103
Hughes Brothers	Seward	58330	84008523	\$324
Huntsman-Sidney	Sidney	5456	84008392	\$12,397
J Bar J Landfill	Ogallala	63354	84008826	\$176
JBS Swift	Grand Island	24352	84008266	\$5,266
JWC Gothenburg LLC	Gothenburg	120154	84010795	\$280
KAAPA Ethanol (AXTELL)	Minden	75073	84008994	\$49
KAAPA Ethanol Ravenna, LLC	Ravenna	77854	84009013	\$123
KAAPA Ethanol, Aurora	Aurora	87072	84010151	\$12,364
KAAPA Partners Aurora, LLC	Aurora	59052	84008424	\$757
KANEB Pipeline	Geneva	22282	84008343	\$6,762
KANEB Pipeline	Columbus	39527	84008345	\$238
KANEB Pipeline	Osceola	58738	84008482	\$584
Kimball Power Plant	Kimball	58348	84008748	\$13,577
KN Energy	Big Springs	56628	84008297	\$227
KN Energy	Lexington	8669	84008437	\$16,592
KN Int.Gas Trans	Albion	1416	84008475	\$3,106
KN Int.Gas Trans	Holdrege	38270	84008476	\$3,978
KN Int.Gas Trans	North Platte	58735	84008477	\$26,427
KN Int.Gas Trans	Grand Island	24673	84008479	\$11,596
Koch Nitrogen	Beatrice	23383	84008411	\$60
Lincoln Premium Poultry	Fremont	76680	84002500	\$9,818
Lite-Form International	South Sioux City	85663	84009088	\$8,591
Livingston Enterprises Inc.	Fairbury	70926	84010872	\$1,365
Lon D. Wright Power Plant	Fremont	48518	84008350	\$2,896
LP Gill Landfill	Jackson	62744	84008818	\$10,156
Madison Light and Power	Madison	58359	84008751	\$1,240
Magellan Pipeline	Omaha	17738	84010587	\$55
Magellan Pipeline	Doniphan	25639	84001581	\$4,778
Magellan Pipeline Company	Omaha	17738	84008462	\$42
Magna-Lomason	Columbus	38718	84008428	\$414
MBA Broilers East	Tecumseh	84157	84010426	\$3,010
Metz Baking Company	Bellevue	59056	84008471	\$1,240
Mid America Agri Products/Wheatland	Madrid	84220	84009078	\$1,110
Midwest Renewable Energy	Sutherland	34651	84MS8854	\$9,167
Midwest Renewable Energy, LLC	Sutherland	34651	84008854	\$47
MUD Platte River Potable Water	Bellevue	61252	84000867	\$8,477
MUD Skyline Pump Station	Elkhorn	60374	84000865	\$512
Natural Gas Pipeline Company	Beatrice	23034	84008435	\$5,127

Facility Name	Facility Location	Facility ID	Time Tracking Code	Amount
Natural Gas Pipeline Company	Syracuse	37669	84008470	\$1,732
Naturally Recycled Proteins	Wakefield	80265	84009061	\$156
Nebraska City Utilities Municipal Power Plant	Nebraska City	37388	84008353	\$227
Nebraska City Utilities Municipal Power Plant #3	Nebraska City	64753	84009004	\$6,625
Nebraska Corn Processing, LLC	Cambridge	84221	84009075	\$1,037
Nebraska Machinery Company	Omaha	78293	84001049	\$27,947
Nevada Distributing	Hampton	62668	84000826	\$3,655
NNSWC Landfill	Clarkson	62779	84008811	\$871
Norfolk Crush	Norfolk	117703	84007278	\$42,022
North Platte WWTF	North Platte	57783	84010766	\$4,333
Northern Natural Gas	Beatrice	23382	84008324	\$7,006
Northern Natural Gas	Palmyra	37514	84008325	\$509
Northern Natural Gas	Fremont	103073	84000852	\$14,154
NPPD - McCook	McCook	39986	84008836	\$11
NPPD - Sutherland	Sutherland	34385	84008396	\$7,125
NPPD - Sutherland	Sutherland	34385	84001811	\$742
NPPD – York Station	York	48073	84008767	\$302
NPPD Gerald Gentleman Station	Sutherland	34385	84000098	\$15,692
NPPD-Beatrice	Beatrice	76739	84009002	\$3,491
NPPD-Canady	Lexington	8512	84008433	\$11,515
NPPD-Hebron Peaking Unit	Hebron	58034	84008708	\$1,365
NUCOR Cold Finish	Norfolk	84283	84009064	\$2,543
NUCOR Corporation	Norfolk	35548	84003987	\$2,900
NUCOR Corporation	Norfolk	35677	84008267	\$466
Offutt AFB	Bellevue	58390	84008378	\$14,436
Omaha Steel Castings	Wahoo	48716	84000638	\$197
OPPD Comb. Turbine	Plattsmouth	70919	84008870	\$906
OPPD Turtle Creek	Gretna	116017	84005085	\$7,487
OPPD-Nebraska City Station	Nebraska City	58343	84008355	\$2,463
OPPD-Sarpy County	Bellevue	42638	84008241	\$50
Oxford Municipal Light and Power	Oxford	22872	84008737	\$5,982
Papillion Creek WWRRF	Bellevue	57789	84008436	\$1,855
Pheasant Point Landfill	Bennington	64041	84008896	\$1,510
Phelps County Feeders	Bertrand	69723	84010747	\$154
Pirate Ship	Haigler	120573	84010829	\$26,511
Plainview SCS Capture	Plainview	118213	84007398	\$340
Platte Valley Fuel Center	Central City	82836	84009032	\$3,985
POET Biorefining	Fairmont	86026	84010000	\$349
Prairie Catalytic	Columbus	107024	84002041	\$12,969
Preferred Sands	Genoa	86905	84010137	\$594
Premier Industries	Mead	43396	84008221	\$194
Raven Northbrook, LLC	Omaha	108432	84010529	\$41,483

	Facility	Facility	Time Tracking	
Facility Name	Location	ID	Code	Amount
Redtail Compressor Station	Bushnell	120216	84010801	\$6,163
Rockies Express Pipeline	Steele City	86963	84010142	\$6,340
Sandhills Renewable Energy LLC	Atkinson	86416	84010027	\$175
Sargent Municipal Power Plant	Sargent	58354	84008658	\$312
Sarpy County Landfill	Springfield	48856	84008828	\$1,235
Schram LLC Data Center	Papillion	106518	84001657	\$2,086
Sidney Power Plant	Sidney	56905	84008718	\$3,973
Siouxland Concrete Company	South Sioux City	84234	84010867	\$880
Siouxland Ethanol	Jackson	85434	84007303	\$6,666
Smithfields Fresh Meats Corporation	Crete	40819	84008243	\$8,958
South Sioux City WWTF	South Sioux City	65775	84005667	\$4,206
Specialty Ag Formulations	Aurora	119576	84010765	\$2,026
Sustainable Beef LLC	North Platte	116136	84007409	\$1,146
Trenton Agri-Products,LLC	Trenton	78323	84009015	\$1,655
TY-Pro, LLC	South Sioux City	94785	84010853	\$193
Tyson Fresh Meats	Dakota City	7339	84008376	\$9,456
Tyson Fresh Meats	Lexington	8744	84008432	\$547
Tyson Fresh Meats	Madison	36107	84000583	\$7,565
Union Pacific Railroad	North Platte	60192	84005760	\$547
Union Pacific Railroad	North Platte	60192	84008481	\$192
Valero Renewable Fuels Company, LLC	Albion	85814	84009089	\$12,378
Valmont Industries	Valley	57476	84008381	\$6,573
Village of Stuart	Stuart	26807	84008683	\$13,491
Vulcraft/NUCOR	Norfolk	35548	84008406	\$341
Wahoo Municipal Department	Wahoo	43328	84008760	\$1,577
Wakefield Light Plant	Wakefield	9044	84008731	\$10,413
Waste Management RNG	Bennington	62593	84008467	\$4,673
West Point Dairy Products, LLC	West Point	6638	84008526	\$430
Western Sugar Cooperative	Scottsbluff	44141	84008225	\$5,102
Westwood Solutions LLC	Omaha	117197	84000532	\$71
Whelan Energy Center	Hastings	58048	84008338	\$189
Wholestone Farms Cooperative	Fremont	9662	84008466	\$6,052
Williams Brothers	Doniphan	25639	84008294	\$630

D. Sector-Specific Costs

Chart 1 illustrates the program costs by industry sector. The heavy industry and manufacturing sector includes facilities such as Nucor Steel and Ash Grove. The food manufacturing sector includes bread manufacturing, meat packing, rendering, and pet food manufacturing. The "non-source specific" category refers to costs associated with activities that are not related to an individual source but benefit a broad category of sources. Examples of "non-source specific" activities include, but are not limited to: Grow Nebraska Team activities, ambient monitoring, rule development, process improvement activities, outreach, training, and operating expenses. The sector with the largest program costs to NDEE during SFY2024 was the Electric Generation sector at 33%. Focus on the Rail, Pipeline, and Gas Transmission sector increased from 5% to 13% over SFY2023.

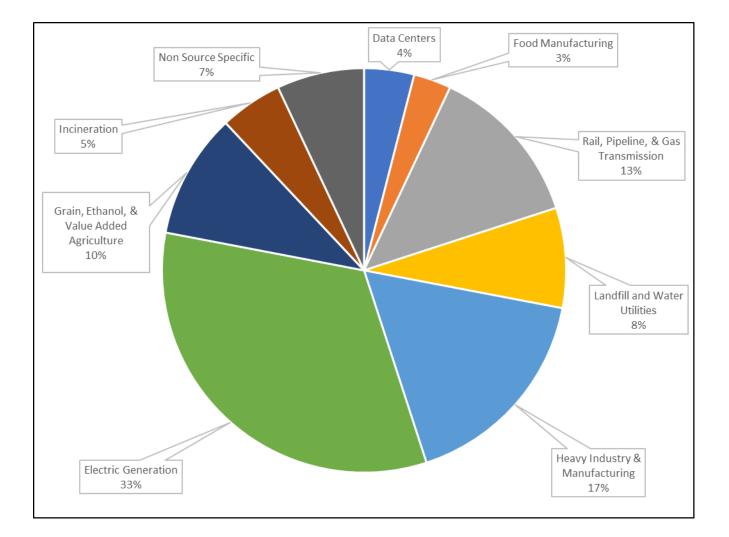


Chart 1: Costs by Sector (Percentage)