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1 **Inconsistencies in sulphur dioxide emissions from the Canadian oil** 2 **sands and potential implications**

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27 **Abstract.**

28 Satellite-derived and reported sulphur dioxide (SO₂) emissions from the Canadian oil
29 sands are shown to have been consistent up to 2013. Post-2013, these sources of
30 emissions data diverged, with reported emissions dropping by a factor of two, while
31 satellite-derived emissions for the region remained relatively constant, with the
32 discrepancy (satellite-derived emissions minus reported emissions) peaking at 50
33 kT(SO₂) yr⁻¹ around 2016. The 2013-2014 period corresponds to when new flue-gas
34 desulphurization units came on-line. Previous work has established a high level of
35 consistency between at-stack SO₂ emissions observations and satellite estimates, and
36 surface monitoring network SO₂ concentrations over the same multi-year period show
37 similar trends as the satellite data, with a slight increase in concentrations post-2013. No
38 clear explanation for this discrepancy currently exists. The implications of the
39 discrepancy towards estimated total sulphur deposition to downwind ecosystems were
40 estimated relative to 2013 emissions levels, with the satellite-derived values leaving the
41 area of regional critical load exceedances of aquatic ecosystems largely unchanged from
42 2013 values, 335,000 km², and reported values potentially decreasing this area to 185,000
43 km².

45 **Introduction**

46 Space-based sensors have been widely used to derive or constrain emissions of air
47 pollutants since the mid-1990s (e.g., Streets *et al.*, 2013). Most of these early “top-down”
48 efforts involved a form of inverse modelling in which emissions are derived such that
49 simulation of the satellite observations from an atmospheric model agree with the satellite
50 observations. More recently, direct approaches have been developed, in which the
51 satellite observations are paired with winds from a meteorological reanalysis (Beirle *et*
52 *al.*, 2011; Fioletov *et al.*, 2015). This newer approach is best suited for short(er)-lived
53 species, but it has also proved useful for intermediate (CO; Pommier *et al.*, 2013) and
54 long-lived (CO₂; Nassar *et al.*, 2017) pollutants.

55 One successful application of this direct approach has been in deriving emissions
56 of sulfur dioxide (SO₂) from the Ozone Monitoring Instrument (OMI; Levelt *et al.*, 2005;
57 2018; Krotkov *et al.*, 2016). A global catalogue consisting of roughly 500 sources and

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3 58 their annual emissions was compiled using this methodology (Fioletov *et al.*, 2016b;
4 59 NASA, 2019), is updated annually and includes sources not captured in bottom-up
5 60 inventories (McLinden *et al.*, 2016), and recently was merged with a leading bottom-up
6 61 gridded inventory (Liu *et al.*, 2018). The ability of OMI to capture annually varying
7 62 emissions has been demonstrated for many sources globally, including power plants
8 63 (Fioletov *et al.*, 2016b), smelters (Iolongo *et al.*, 2018), and volcanos (McLinden *et al.*,
9 64 2016).

10 65 This methodology was applied to the Athabasca Oil Sands Region (AOSR) in the
11 66 Canadian province of Alberta, and in particular the surface mining region in the
12 67 northwest corner of the AOSR (roughly 57°N, 111°W; just north of the community of
13 68 Fort McMurray). Large deposits of bitumen (a viscous form of oil) reside within the
14 69 AOSR. Extraction of bitumen, and its subsequent upgrading to a synthetic crude oil, has
15 70 increased rapidly in recent years. In 2018, production from the AOSR was (the
16 71 equivalent of) 3.0 million barrels of oil per day (mBPD) from bitumen, a number
17 72 expected to rise to 4.2 mBPD by 2028 (AER, 2019). The process of upgrading can lead
18 73 to the release of large amounts of SO₂ (McLinden *et al.*, 2012; 2016), and other pollutants
19 74 (Li *et al.*, 2018; Gordon *et al.*, 2015). According to the bottom-up reported emissions of
20 75 the Canadian National Pollutant Release Inventory (NPRI), the surface mining region
21 76 emitted 90-100 kt[SO₂]/yr (hereafter kt/yr will be used) prior to 2013, but less than half
22 77 of that in subsequent years due to the installation of control devices. In contrast, and as
23 78 will be elucidated below, our evaluation using OMI observations finds emissions similar
24 79 before and after installation of the devices, in broad agreement with measurements of
25 80 surface concentrations in the vicinity of the emissions sources.

26 81 In this work, SO₂ data from multiple sources – emissions monitoring, surface *in-*
27 82 *situ*, surface remote sensing, and satellites – are brought together in an attempt to
28 83 understand this discrepancy. Previous work (Makar *et al.*, 2018) found exceedances of
29 84 critical loads associated with AOSR emissions were occurring over a region greater than
30 85 320,000 km²: the extent to which subsequent emissions levels have been reduced thus
31 86 has a critical impact on potential long-term environmental damage in the region. Here, a
32 87 critical load is a quantitative estimate of an exposure to one or more pollutants below
33 88 which significant harmful effects on specified sensitive elements of the environment do

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3 89 not occur (Nilsson and Grennfelt, 1988). Estimates of the potential impacts of the top-
4 90 down versus bottom-up emissions estimates are provided as part of the analysis.

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7 8 92 **Datasets and methods**

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11 94 **Oil Sands Emissions data**

12 95 Reported SO₂ emissions in the oil sands include hourly emissions measured by
13 96 continuous emissions monitoring systems (CEMS) on the main stacks (AG, 1998), which
14 97 emit most of the SO₂ at upgrading facilities, as well as engineering estimates for
15 98 emissions from other sources SO₂, such as flaring. Facility-level emissions data were
16 99 retrieved from the Canadian National Pollutant Release Inventory (NPRI, 2019). Further,
17 100 monthly and hourly emissions estimates and related quantities from CEMS and industrial
18 101 monitoring reports, which include CEMS, flaring estimates and other SO₂ emission
19 102 sources, were also used (AG, 2016). The emissions data in the NPRI and the industrial
20 103 monitoring reports are generated using similar datasets and methodologies and are
21 104 therefore consistent.

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23 106 Figure 1 shows an image of the oil sands surface mining region. There are smaller
24 107 amounts of SO₂ emitted from mobile sources, but the vast majority of emissions come
25 108 from three upgraders with the two largest responsible for more than 90% of total
26 109 emissions in the area over this 2005-2018 period. These are Syncrude-Mildred Lake
27 110 (referred to here as SML; NPRI ID 2274; main stack height is 183 m) and Suncor (SUN,
28 111 NPRI ID 2230; main stack height is 137 m), shown in Figure 1, and emit in roughly a 3:1
29 112 (SML:SUN) ratio. The height of secondary and flaring stacks, and those at the smaller
30 113 CNRL upgrader, are in the range of 50-110 m. In the mid-2000s SML undertook the
31 114 Sulphur Emission Reduction Plan (SERP), an initiative to retrofit flue gas desulfurization
32 115 facilities, or “scrubbers”, into the operation of Syncrude’s two original cokers.
33 116 Completed and brought online in late 2013, SML reported emissions fell from 73 kt/yr in
34 117 2012 to 28 kt by 2014. A decline at SUN was also reported, 22 to 13 kt/yr, between
35 118 2010-2015 which is attributed to a series of improvement initiatives and plant

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3 119 optimizations. Since 2009 or so, the total amount of bitumen mined at SUN and SML, a
4 120 good proxy for bitumen upgraded, has remained roughly constant (AER, 2020).

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7 8 122 **In-situ monitoring**

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10 123 The Wood Buffalo Environmental Association (WBEA, 2019) monitors the environment
11 124 of the Regional Municipality of Wood Buffalo in north-eastern Alberta, including robust
12 125 passive and continuous surface monitoring networks in and around the surface mines
13 126 (Percy, 2013; Bari and Kindzierski, 2015; Hsu, 2013). Identified in Figure 1, there are a
14 127 dozen stations within a 50 km radius of the SML/SUN upgraders outfitted with
15 128 continuous Thermo Scientific 43i SO₂ analyzers (sampling height of 4 m), including four
16 129 stations within 10 km (Lower Camp, Mildred Lake, Buffalo Viewpoint, and Mannix).

17 130 The peak levels of SO₂ (annual 99th percentile of hourly averages) increased sharply in
18 131 2014, primarily at Lower Camp, prompting the government of Alberta to study the issue
19 132 (AEP, 2018).

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22 134 WBEA also operates a network of Maxxam Analytics passive SO₂ monitors (sampling
23 135 height are variable, see SM; Tang, 2001), which are deployed for approximately 1-2
24 136 months during which air pollutants are adsorbed onto a filter. The ambient concentration
25 137 of SO₂ is calculated from the mass of SO₂ on the filter, analyzed in a laboratory, and an
26 138 estimated rate of uptake. Annual average SO₂ from passive samplers was compared
27 139 against continuous analyzers across Alberta and are in good agreement, as discussed in
28 140 the Supplemental Material (SM).

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31 142 **Satellite observations and Emissions**

32 143 Satellite remote sensing can be used to derive SO₂ abundances by measuring the intensity
33 144 of back-scattered Sunlight in the ultraviolet where SO₂ absorbs. The two nadir-viewing
34 145 (down-looking) spectrometers used in this work are OMI on the Aura satellite (2004-
35 146 present; Levelt *et al.*, 2006; 2018) and the Tropospheric Monitoring Instrument
36 147 (TROPOMI) on-board the Sentinel-5 precursor (2017-present; Veefkind *et al.*, 2012).

37 148 Retrievals are performed by first matching laboratory-measured SO₂ absorption cross-
38 149 sections and other relevant parameters to these observed spectra which provide a

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3 150 determination of the SO₂ slant column densities (SCDs), or the SO₂ number density
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5 151 integrated along the path of the sunlight through the atmosphere. SCDs were then
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7 152 converted to the more physically-meaningful vertical column density (VCD), the
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9 153 vertically-integrated SO₂ number density, using an air mass factor (AMF) which
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11 154 quantifies the sensitivity of the satellite to a particular scene. In practical terms, a
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13 155 multiple-scattering model is used to calculate AMFs (Palmer *et al.*, 2001) which depends
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15 156 on factors such as solar and viewing geometry, the presence of clouds, scene reflectivity
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17 157 and the vertical distribution of the SO₂. VCDs are then determined through
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19 158 $VCD=SCD/AMF$.

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21 159 OMI observations date back to late 2004, and hence are extremely useful to track
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23 160 the temporal evolution of SO₂ and its emissions. With a spatial resolution of 13×24 km²
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25 161 at best, and more typically 15×35 km² – distances that are comparable to the entirety of
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27 162 the surface mining region – data spanning multiple years are analyzed together. The
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29 163 OMI SO₂ product used here is version 3.1, which utilizes the Principle-Component
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31 164 Analysis (PCA) retrieval algorithm developed by Li *et al.* (2013). The standard NASA
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33 165 OMI SO₂ product uses a spatial and temporally invariant AMF, calculated for
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35 166 summertime conditions in the eastern US (AMF=0.36; Li *et al.*, 2013). TROPOMI, the
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37 167 successor to OMI, has a much shorter data record (effectively March 2018 to present) but
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39 168 with its much higher spatial resolution (3.5×7 km²) it can better capture details of the
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41 169 spatial distribution. The official European Space Agency TROPOMI SO₂ data product is
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43 170 used here (RPRO version 010105) (Theys *et al.*, 2017) and is calculated using scene-
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45 171 specific AMFs based on input information at a spatial resolution of 1.0°.

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47 172 To improve the effective spatial resolution, OMI and TROPOMI AMFs were
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49 173 reprocessed using higher resolution input information (McLinden *et al.*, 2014) as
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51 174 discussed further in the SM. Also, our analysis was limited to observations between
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53 175 April and October where Sun angles are high (see Figure S4). A further examination of
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55 176 this approximation and details on data screening are given in the SM.

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57 177 Satellite observations were also used to derive emissions using methods
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59 178 developed for point-sources (Fioletov *et al.*, 2015) and multiple or area sources (Fioletov
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179 *et al.*, 2017). As is expanded upon in the SM, these methods are based on the observed
180 VCDs combined with coincident winds from a meteorological reanalysis. Emissions

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3 181 were obtained by fitting the satellite observations and winds to an Exponentially
4 182 Modified Gaussian (EMG) plume function (Fioletov *et al.*, 2015) based on an effective
5 183 lifetime, derived as part of the analysis, of 4.0 hours. Multiple years of observations and
6 184 winds are analyzed together in order to reduce noise. Further details on the emissions
7 185 calculations and a detailed error budget are provided in the SM.
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13 187 **Pandora Spectrometer**

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15 188 In addition to the traditional *in-situ* ground-based SO₂ instruments, a Pandora
16 189 spectrometer has been operating at the Oski-Otin (see Figure 1) monitoring site in Fort
17 190 McKay since August 2013 (with intermittent gaps) (Fioletov *et al.*, 2016a). Pandora is a
18 191 remote sensing instrument that measures direct UV-visible sunlight transmitted through
19 192 the atmosphere in the ultraviolet (Herman *et al.*, 2009). Unlike the satellite-sensors,
20 193 conversion of direct-Sun SCD to VCD is straightforward and based purely on geometry,
21 194 making it a more accurate method. One clear advantage of observing VCD as opposed to
22 195 surface concentrations is that it is sensitive to plumes aloft.
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29 196 Here observations from Pandora #104 (Aug-Oct 2013; Oct 2014-Feb 2016) and
30 197 #122 (Sept 2017-Dec 2018, except May 2018) were considered. While #122 replaced
31 198 #104, the monthly-calibration procedure (Fioletov *et al.*, 2016a) ensures there are no
32 199 appreciable inter-instrument offsets and no distinction will be made between the two
33 200 instruments in our interpretation. It is noted that the Pandora monitors are located to the
34 201 N/NW of the SML/SUN upgraders, and that winds at the Pandora site originate from that
35 202 direction during 15-20% of the data record.
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43 204 **Results**

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46 206 Figure 2 shows reported annual SO₂ emissions from the AOSR surface mining area, total
47 207 and flaring. In the second half of 2013, additional scrubbers came online at SML with
48 208 the impact of these scrubbers being the inferred cause for the reported factor of three
49 209 decrease beginning in 2014, and a factor of two decrease in overall emissions from the
50 210 upgraders. However, this decrease in reported emissions is not matched by a decrease in
51 211 ambient SO₂ levels. Figure 2 also shows the time series of annual mean SO₂ from several
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3 212 continuous WBEA surface stations in the area with the multi-station averages indicating a
4 213 slow decline between 2002 and 2013, broadly consistent with emissions. Subsequent to
5 214 this, however, there is an increase of 20-30%, peaking in 2016, before a subsequent
6 215 decrease back to 2013-2014 levels. These surface concentration trends are followed
7 216 whether one considers the four continuous stations in the immediate vicinity of the
8 217 upgraders (<10 km) or all continuous stations throughout the surface mining area.
9 218 Nearby WBEA passive SO₂ sensors are broadly consistent with the continuous
10 219 monitoring although their post-2013 increase is less pronounced.
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19 221 In an effort to understand this apparent discrepancy, which was also noted by Edgerton et
20 222 al. (2019), satellite remote sensing was utilized as it provides an integrated view of the
21 223 area. Previous analyses of OMI SO₂ revealed elevated VCDs (or “hot-spots”) within 30-
22 224 40 km of the upgraders (McLinden *et al.*, 2012; 2016) although these studies only
23 225 considered observations up to 2014. An updated analysis is presented here: average
24 226 (April-October) OMI SO₂ VCD are shown in Figure 3 for two four-year periods: 2010-
25 227 2013 and 2014-2017, which roughly coincide to the pre- and post- drop in reported
26 228 emissions. A more detailed view is provided in the Figure S0 which shows running 3-
27 229 year means, spanning 2005-2007 to 2017-2019. Consistent with the previous studies,
28 230 Figure 3 shows a maximum near the two large upgrading sources, SML and SUN. Most
29 231 importantly, it also shows a modest increase in SO₂ for 2014-2017, relative to 2010-2013.
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39 233 Also shown in Figure 3 are maps derived from the WBEA station observations. Multi-
40 234 annual (2010-2013 and 2014-2017) mean SO₂ from the passive and continuous stations
41 235 were taken together and then averaged onto the same 2 × 2 km grid using an inverse
42 236 distance-squared weighting. When both continuous and passive observations were made
43 237 at the same station, their mean was used, and only grid-boxes where 3 or more stations
44 238 were within 30 km were retained. These interpolated maps show the same general
45 239 characteristics as the OMI maps, including a hot spot around the SML and SUN
46 240 upgraders, as well as a slight increase in the latter period.
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3 242 In addition to mapping spatial distributions, OMI observations were used to derive
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5 243 emissions, thereby enabling a quantitative comparison with reported emissions. Running
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7 244 three-year emissions time series from OMI are compared with the reported emissions in
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9 245 Figure 4a. The three different OMI emissions algorithm variants, as mentioned above
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11 246 described in more detail in the SM, were used. These are (i) assuming a single point
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13 247 source located between SUN and SML, (ii) a multi-source approach assuming emissions
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15 248 from the three (SML, SUN, CNRL) upgrader locations, and (iii) a multi-source approach
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17 249 allowing for a 3×3 grid of potential emission locations which does not assume the
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19 250 location of emissions but lets the algorithm determine where to place them to best match
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21 251 observations. These three variants produce emissions that are all quite consistent with
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23 252 each other, and with the two multi-source approaches, (ii) and (iii), well within the point-
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25 253 source uncertainty estimate, for which a detailed error budget was developed (See Table
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27 254 S2). It is worth noting here that OMI has demonstrated its ability to track changes in SO₂
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29 255 emissions at other locations (e.g., Fioletov *et al.*, 2016; Iolongo *et al.*, 2018). Two
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31 256 specific examples at a latitude comparable to the oil sands, shown in Figure S3, are a
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33 257 copper smelter in Flin Flon, Manitoba, Canada, in which OMI captures the rapid decrease
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35 258 resulting from its decommissioning, and a nickel smelter in Thompson, Manitoba where
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37 259 both OMI and NPRI indicate an approximate 5%/year decline.

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41 261 From Figure 4a, up until 2013, OMI compares well with the reported emissions which
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43 262 suggests there are no significant systematic errors in the OMI emissions. This is
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45 263 important as the largest potential source of uncertainty in OMI emissions are systematic,
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47 264 and manifest as a relative error that is largely time independent. The decrease in reported
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49 265 emissions beginning in 2014 is not apparent in the OMI-estimated emissions. Rather,
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51 266 OMI emissions estimates show a similar trend to WBEA monitoring of ambient SO₂; flat,
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53 267 or increasing, then decreasing in the last 1-2 years. An estimate of the additional SO₂
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55 268 emissions required to reconcile this difference was obtained simply by subtracting the
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57 269 reported emissions from those estimated from OMI. Near zero for the first several years,
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59 270 the magnitude of this difference reaches 50 kt/yr in 2016. To place this into context, the
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271 discrepancy's magnitude is similar to that of some of the largest emissions sources in
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273 Canada with only two other operations Canada-wide reporting SO₂ emissions in excess of

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3 273 30 kt/yr for 2017 (NPRI, 2019). Figure 4b is a synthesis of Figures 2 and 4a, better
4 274 demonstrating the contrast between the various sources of SO₂ information (reported
5 275 emissions, OMI emissions, and surface monitoring) by showing relative changes. Figure
6 276 4b further highlights the gap between reported emissions and the observation-based
7 277 quantities. However, by 2017-2018, OMI does suggest a decrease in emissions of about
8 278 30% relative to pre-2014 values, which bridges much of the gap with the reported
9 279 emissions. By contrast, the surface monitoring continues to show no significant decrease
10 280 relative to pre-2014. The cause for the better agreement between OMI and reported
11 281 emissions remains unclear.
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21 283 There is one additional source of multi-year SO₂ observations from the area: Pandora
22 284 spectrometer observations from the Oski-Otin monitoring site in Fort McKay, roughly 20
23 285 km N/NW of the upgraders (see Figure 1). When analyzed as a function of wind
24 286 direction, as in Figure S7, there is a clear peak in VCD only for winds originating from
25 287 the general direction of the SML and SUN upgraders (Fioletov *et al.*, 2016a). The two
26 288 periods of Pandora data are late-2013 to 2015 (referred to as P1), and late-2017-2018
27 289 (P2), each with multiple months where the instrument was not operating. Considering
28 290 only observations with the wind from the SML/SUN upgraders (130-190°), average
29 291 Pandora VCD dropped by 23±14% between P1 and P2. This might appear as evidence of
30 292 the expected drop in emissions from the scrubbers except that (i) for the large majority (if
31 293 not all) of P1 the scrubbers were on-line and (ii) this appears to be sampling artifact based
32 294 on the specific months the Pandora was operating for each period. Considering only the
33 295 months of Pandora operation, the average monthly reported emissions were virtually
34 296 unchanged between P1 and P2. By contrast, the average amount of bitumen produced at
35 297 SML and SUN – generally an excellent proxy for emissions – dropped by 16% from P1
36 298 to P2, making it consistent with Pandora within uncertainties. Sampling the four
37 299 continuous WBEA stations nearest the upgraders in the same way, there is a 19%
38 300 decrease between P1 and P2. When annual totals or averages are considered, bitumen
39 301 production was flat while the four continuous WBEA stations showed an increase (see,
40 302 e.g., Figure 2) from P1 to P2, substantiating the claim that Pandora sampling was an
41 303 issue. All told, Pandora is able to corroborate that significant emissions originate only
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3 304 from the SML/SUN direction and is consistent with the other SO₂ observations, but given
4 305 a lack of observations from the pre-scrubber period, it cannot specifically address the
5 306 question of how emissions changed as a result.
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10 308 While OMI is ideal to track the evolution of SO₂ due to its long data record, the
11 309 TROPOMI satellite sensor, owing to its superior spatial resolution, is much better suited
12 310 to help isolate the location of the current emissions. Figure 5 shows the TROPOMI 2018
13 311 (April-Oct.) average SO₂. Here SCDs are first presented as converting SCD to VCD
14 312 requires an assumption about the location of the sources. Thus, SCD is preferred when
15 313 there may be some uncertainty as to the source location(s). To better delineate the
16 314 location of origin, averages were calculated considering only wind speeds (between 950-
17 315 900 hPa) below the median value to limit how far the emitted SO₂ can travel before
18 316 chemical transformation or deposition. The distribution of TROPOMI VCD, shown in
19 317 Figure 5b, is very similar to SCD. This combination of higher resolution and low winds
20 318 indicates the location of all significant sources of SO₂ to be isolated to the immediate
21 319 vicinity of the Syncrude and Suncor upgraders, or somewhere in between, within roughly
22 320 a 10 × 10 km² box, as shown in Figure 5c. This source area is completely consistent with
23 321 the sector identified by the Pandora, also shown in Figure 5c.
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35 323 **Discussion**

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38 325 The atmospheric observations considered here, collectively, suggest that total SO₂
39 326 emissions in the surface mining region did not decline in 2014 as suggested by the
40 327 emission reports, although there is mixed evidence that a more modest decline occurred
41 328 around 2018. They also confirm that any sources of SO₂ are limited to a small region in
42 329 the immediate vicinity of the SUN or SML upgraders. While, at present, no satisfactory
43 330 explanation exists that reconciles the reported and top-down emissions, it is nonetheless
44 331 worthwhile exploring the potential explanations.
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54 333 One possible reason, differences in meteorological conditions, can be ruled out
55 334 immediately as distributions of wind speeds and direction show no significant differences
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3 335 for the 2010-2013 and 2014-2017 periods. This is true when examining the
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5 336 meteorological reanalyses and the WBEA station data (see Figure S5). The efficacy of
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7 337 the scrubbers is considered next. The majority, roughly 80-90% (see Figure 2), of the
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9 338 reported SML and SUN SO₂ emissions are from the stacks in which SO₂ has been
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11 339 scrubbed and monitored using CEMS, a direct and reliable measurement of stack
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13 340 emissions. According to monthly emission reports (AG, 2016), the remaining SO₂ is
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15 341 emitted from flaring stacks in which the high temperature of emissions prevents the use
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17 342 of CEMS, and emissions estimates for these sources are consequently based on
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19 343 engineering estimates rather than direct observation, and have a higher degree of
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21 344 uncertainty. Since the SML CEMS indicates an approximate three-fold decrease in
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23 345 emissions, the scrubbers appear to be operating as expected, reducing SO₂ reaching the
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25 346 main, non-flaring stacks.

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348 This decrease and the broad consistency between atmospheric observations and reported
349 emissions up until 2014 suggests that any explanation must include some kind of
350 transition towards higher emissions from non-CEMS sources in 2013-2014. One
351 possibility is that a completely new source emerged around this time, with a magnitude
352 sufficient to cancel whatever reductions were gained from the scrubbers. For example,
353 tailings ponds are known to emit a mixture of air pollutants (Galarneau *et al.*, 2014), as
354 do the surface mines themselves (Liggio *et al.*, 2016). However, this possibility seems
355 unlikely given the required magnitude of the source, 10's of kt/yr, and the need for an
356 explanation for its absence prior to 2014 given similar types of activities in the mines
357 before and after that time. Another non-CEMS source is flaring. This source cannot, at
358 present, be discounted but yet there is no clear evidence pointing to this possibility.

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360 It is reiterated that (i) both the surface and satellite SO₂ observations employed here agree
361 in their trends before and after 2014 and (ii) the CEMS monitors are reporting the SO₂
362 concentrations with significant reductions from upstream emissions. It is further assumed
363 that (iii) no new significant sources of SO₂ emerged in 2013-2014 and (iv) that the
364 process of upgrading contributes most of the facilities' SO₂ emissions (as evidenced by
365 the regulatory requirement of scrubbers). If these statements are all valid, they suggest

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3 366 that a significant fraction of SO₂ upgrading emissions originate from a pathway not
4 367 connected to the scrubbers.
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8 369 Concentrations of SO₂ in the region are controlled by emissions, and hence both dry and
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10 370 wet total sulphur deposition. The latter are used to determine exceedances of critical
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12 371 loads, which are used to assess risk of potential future ecosystem damage associated with
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14 372 acidifying deposition (Makar et al, 2018). A difference of 60% in emissions levels has a
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16 373 significant impact on the size of the region at risk of future ecosystem damage, as we
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18 374 demonstrate here. Previous work (Makar *et al.*, 2018) combined observation-corrected
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20 375 modelled deposition fields, and internationally established protocols for the creation of
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22 376 critical loads, to estimate the potential damage to downwind terrestrial and aquatic
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24 377 ecosystems associated with acidifying deposition. Exceedances of critical loads for
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26 378 aquatic ecosystems (a measure of the potential for eventual aquatic ecosystem damage, if
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28 379 emissions continue at a given level) were predicted for a large region (334,000 km² for
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30 380 aquatic ecosystems; approximately half of the size of the provinces of Alberta or
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32 381 Saskatchewan; see Figure 6a). However, the study made use of 2013 emissions data,
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34 382 i.e., just prior to the large decrease in the reported SO₂ emissions. Using this
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36 383 combination of observation-corrected model output and critical loads, an estimate of the
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38 384 size of the area in exceedance resulting from a 40% reduction in emissions (the percent
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40 385 reduction between 2013 and 2016 in the reported emissions data) is shown in Figure 6b.
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42 386 The latter is an approximation with the assumptions that SO₂ surface concentrations (and
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44 387 hence SO₂ deposition fluxes) will be linearly proportional to SO₂ emissions levels, and
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46 388 that all SO₂ emissions in the model domain were reduced by 40%. The area in
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48 389 exceedance would decrease by 44.5% relative to 2013, a substantial reduction in potential
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50 390 environmental impacts associated with the emissions. However, if no change in
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52 391 emissions has occurred (as implied by the satellite-derived emissions and the surface
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54 392 concentration monitoring network data), then the area in exceedance of critical loads will
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56 393 be the same as predicted in Figure 6a.
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58 394
59 395 Finally, we note that recent work examining sulphur uptake to multiple forms of
60 396 vegetation in the oil sands region on a yearly basis between 2009 and 2016 is in accord

397 with our results (Wieder et al, 2020). In that work, no decrease in sulphur uptake was
398 observed between the years 2014 to 2016, despite the factor of two decrease in reported
399 SO₂ emissions. We thus have three independent sources of information (satellite
400 observations, surface concentration observation, and sulphur uptake in vegetation) which
401 show no evidence of a decrease in SO₂ loading within the 2014 to 2016 time period.

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407 Monitoring Program and is a contribution to the Program but does not necessarily reflect
408 the position of the Program.

410 **Data Availability**

411 WBEA continuous station data are available from [https://wbea.org/historical-monitoring-](https://wbea.org/historical-monitoring-data/)
412 [data/](https://wbea.org/historical-monitoring-data/) and data from the passive stations from [https://wbea.org/resources/reports-](https://wbea.org/resources/reports-publications/air-monitoring-reports/integrated-samples-lab-results/)
413 [publications/air-monitoring-reports/integrated-samples-lab-results/](https://wbea.org/resources/reports-publications/air-monitoring-reports/integrated-samples-lab-results/). The OMI level 2
414 SO₂ data product is available from the NASA Earth Observing System Data and
415 Information System
416 (https://aura.gesdisc.eosdis.nasa.gov/data/Aura_OMI_Level2/OMSO2.003/). The
417 TROPOMI level 2 SO₂ data are available from Sentinel-5p Pre-Operations data hub
418 (<https://s5phub.copernicus.eu/dhus/#/home>). Reanalyses can be downloaded from the
419 ECMWF portal (<https://apps.ecmwf.int/datasets/>). NPRI annual emissions data can be
420 obtained from [https://www.canada.ca/en/services/environment/pollution-waste-](https://www.canada.ca/en/services/environment/pollution-waste-management/national-pollutant-release-inventory.html)
421 [management/national-pollutant-release-inventory.html](https://www.canada.ca/en/services/environment/pollution-waste-management/national-pollutant-release-inventory.html). The re-processed level 2 OMI
422 and TROPOMI data, with the ECCC air mass factors, and the Pandora SO₂ data can be
423 downloaded from
424 http://collaboration.cmc.ec.gc.ca/cmc/arqi/OilSands_Satellite_SO2datasets/.

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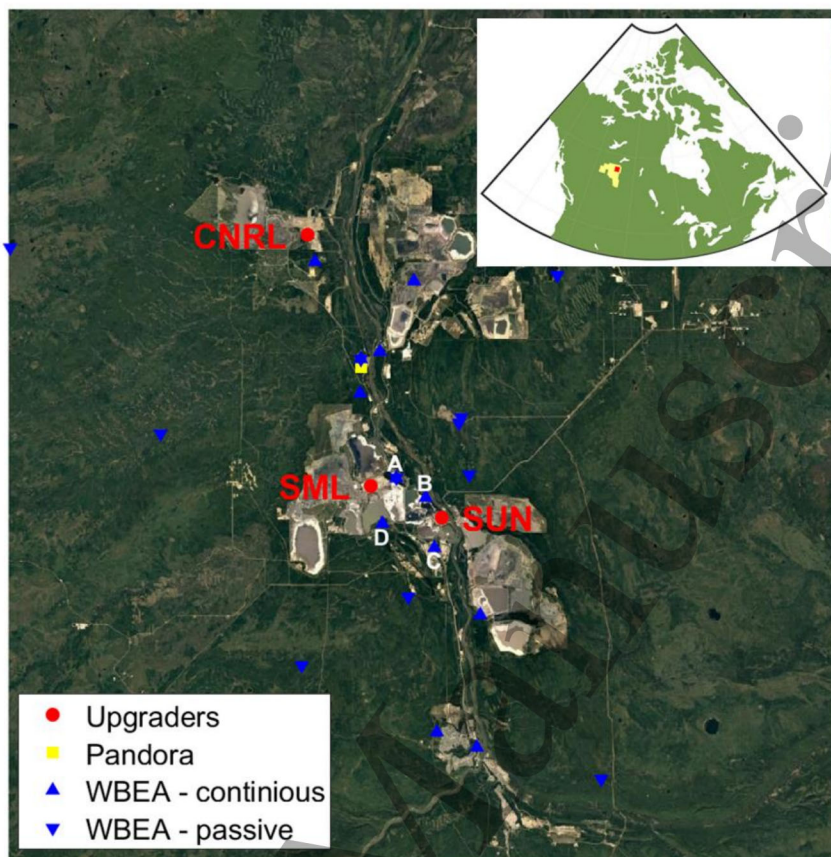
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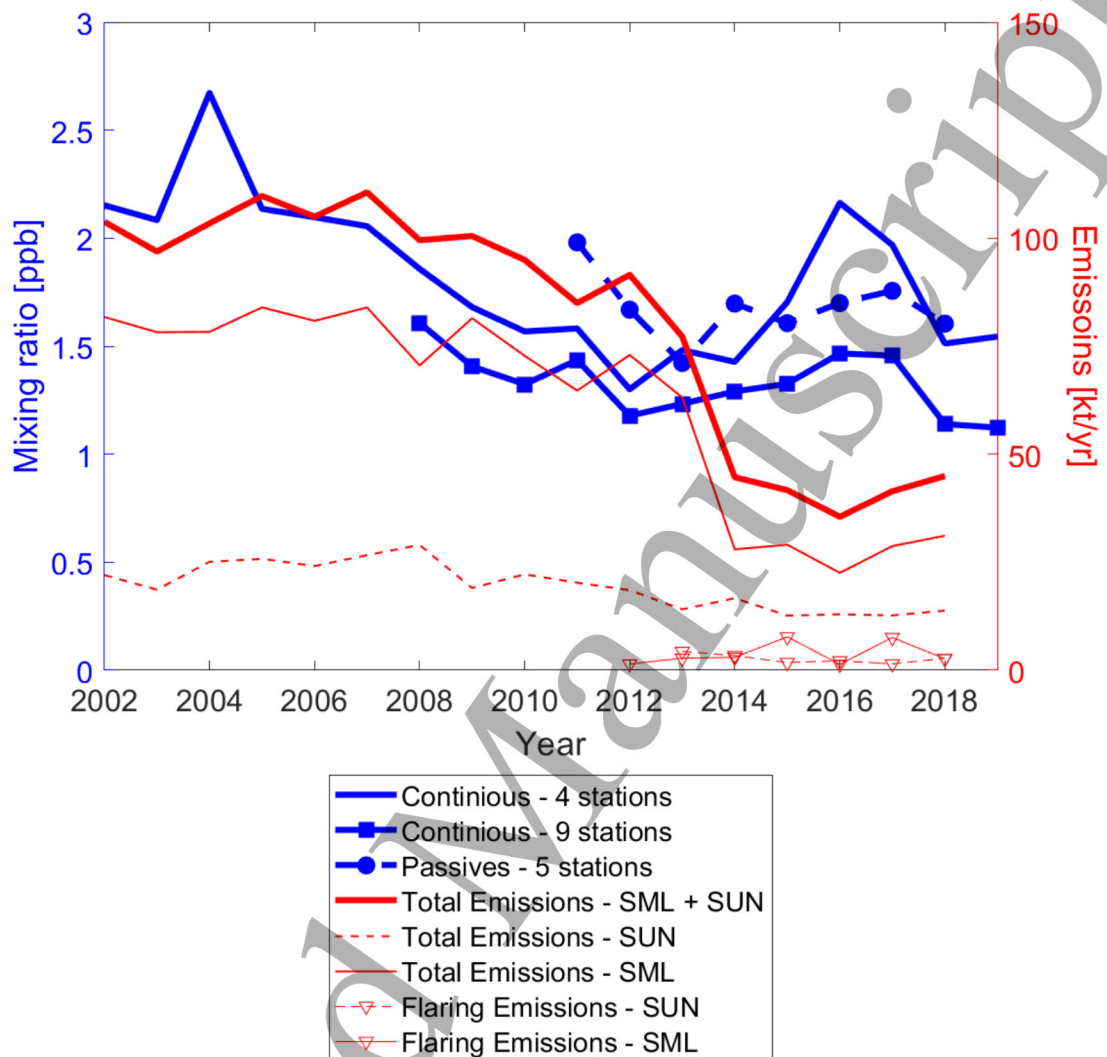


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640 Figure 1: The surface mining domain of the AOSR. Shown are the locations of the bitumen
641 upgraders, the only known significant source of SO_2 in the region (SUN=Suncor,
642 SML=Syncrude-Mildred Lake, and CNRL=Canadian Natural Resources Limited, with
643 SUN+SML contributing over 90% of the emissions), the Pandora spectrometer located at the
644 Oski-Otin monitoring station, and the continuous and passive WBEA *in-situ* SO_2 monitors. The
645 letters denote the WBEA monitoring stations nearest the SML and SUN upgraders (A is Mildred
646 Lake, B is Lower Camp, C is Mannix, and D is Buffalo Viewpoint). Inset: Canada-wide map
647 showing the AOSR (yellow) and the domain of the main map shown here (red).

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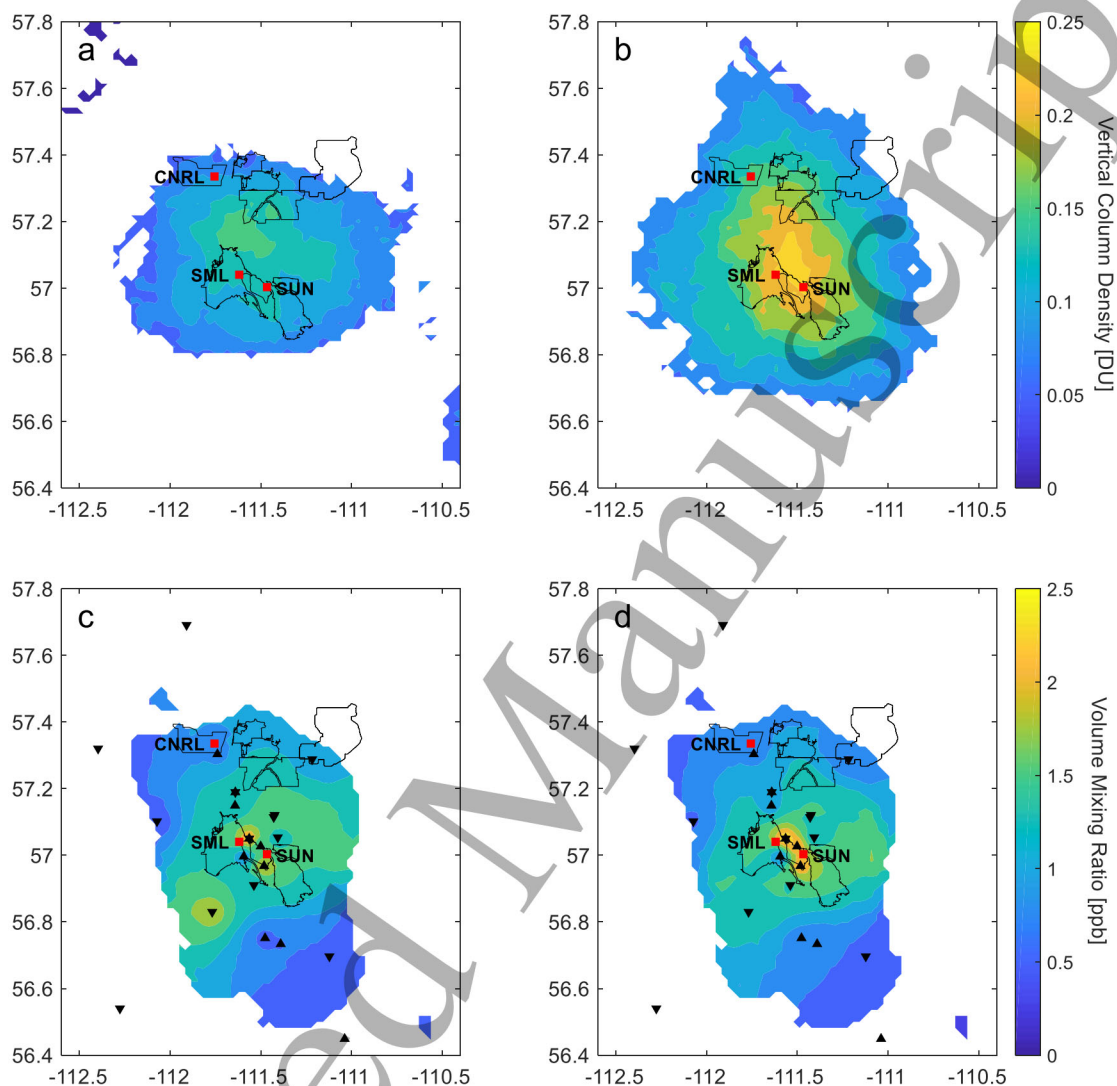


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650 Figure 2: Time series of annual mean SO₂ averaged over different groupings of WBEA continuous and
 651 passive stations, including the four continuous stations within 10 km of the SML and SUN upgraders
 652 (Mildred Lake, Lower Camp, Buffalo Viewpoint, Mannix). Also shown (right axis) are the SO₂ emissions
 653 reported to NPRI for the SML and SUN upgraders and their flaring emissions.

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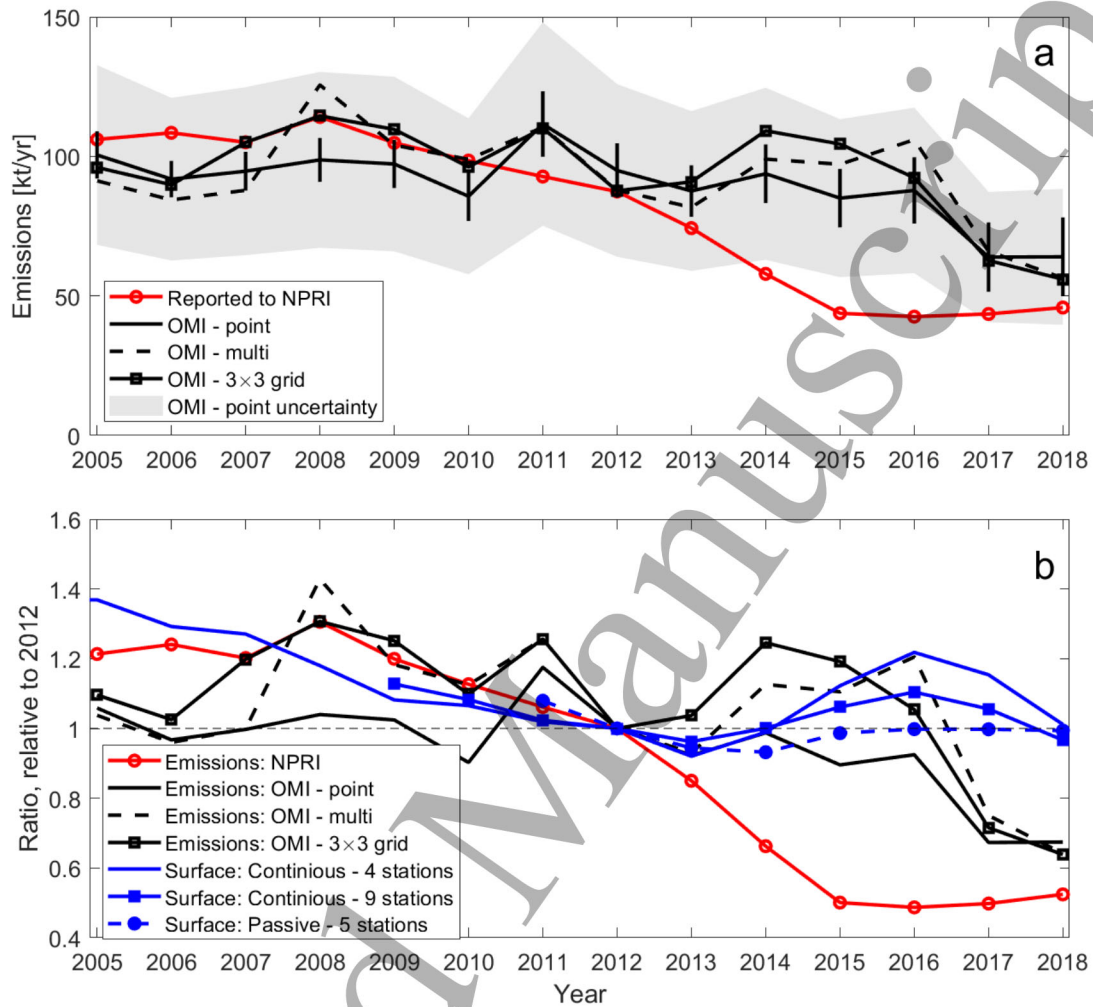
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Figure 3: Multi-year average SO₂ for two four-year periods over the surface mines (outlined in black): (a) 2010-2013 and (b) 2014-2017 April-October OMI vertical column densities (in Dobson Units); (c) 2010-2013 and (d) 2014-2017 WBEA volume mixing ratios from continuous and passive observations. The red squares indicate the location of the upgraders. In (a) and (b) only locations in which the average VCD is at least 3 times larger than the standard error of the mean are shown. The locations of continuous (Δ) and passive (▽) observations are indicated in (c) and (d).

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667 Figure 4: (a) Annual 3-year running mean SO₂ emissions from OMI and NPRI. (For example: OMI data

668 from 2008-2010 were used to determine OMI 2009 emissions whereas for NPRI 2009 emissions, 2008-

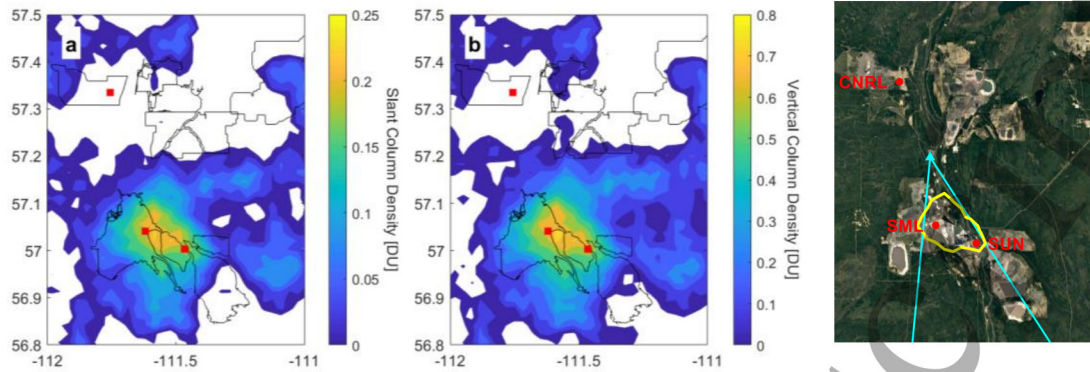
669 2010 values were simply averaged.) The black lines represent three different variations of emissions

670 algorithms applied to OMI, with the grey shading indicating the total estimated uncertainty for the point

671 source method and the error bars the variability. (b) Variation of annual emissions from panel (a) and 3-

672 year mean surface concentrations (adapted from Figure 2), all relative to their value in 2012.

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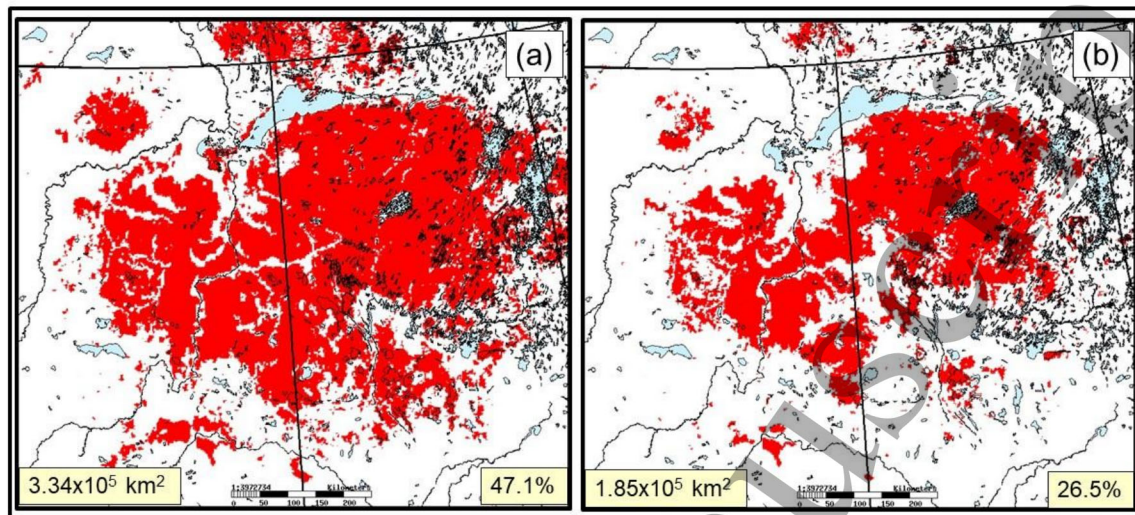


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675 Figure 5: (a) April-October 2018 average TROPOMI SO₂ slant column density over the surface mines
676 (outlined in black). White indicates SCDs that are slightly negative. The red squares are the location of the
677 upgraders. (b) Same as (a) except showing VCDs. (c) True colour image showing estimated location of
678 SO₂ emissions according to TROPOMI (yellow polygon) and Pandora (blue lines). The TROPOMI outline
679 represents the contour corresponding to 75% of the peak SO₂ VCD.

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683 Figure 6: (a) Area in exceedance of aquatic critical loads using 2013 emissions data (from Makar et al.,
684 2018). (b) Area in exceedance assuming all SO_2 emissions in the region are reduced by 40% (equivalent to
685 the reported reduction between 2013 and 2016), and that SO_2 concentrations and hence deposition fluxes
686 scale linearly with SO_2 emissions. Areas on the figure are the area in exceedance, percentages are the
687 percent of the total area of aquatic ecosystems for which critical loads were available that is estimated to be
688 in exceedance and are based on observation-corrected model output.