

**Oklahoma Chapter of the Sierra Club Comments
Regarding Oklahoma Draft Regional Haze
State Implementation Plan
December 13, 2004**

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On October 5, 2009, the State of Oklahoma submitted its Draft State Implementation Plan (SIP) Revision for the Regional Haze Program, pursuant to 40 C.F.R. Part 51 et seq. As the local representative for the oldest and largest public interest environmental organization in the United States, the Oklahoma Chapter of the Sierra Club has reviewed the Oklahoma Draft SIP and offers the following comments regarding the adequacies of the SIP.

The leadership of the Oklahoma Chapter of the Sierra Club would like to recognize the diligent efforts put forth by the Oklahoma Department of Environmental Quality (ODEQ) in drafting its Regional Haze SIP. Addressing air quality issues is a critical component to preservation of our nation's natural resources, public health, and citizen opportunities to enjoy our national parks, forests, and wildlife areas. Identifying the causes and nature of factors that influence air quality and visibility is an extremely complex and resource-intensive process; however, the ODEQ utilized its resources effectively in identifying both the causes and potential solutions to these issues in its SIP. The Sierra Club appreciates the opportunity to comment on the revised SIP and looks forward to working with the ODEQ on identifying and implementing solutions to the aforementioned problems.

Collectively, the draft SIP effectively identifies the major causal factors for regional haze within the Class 1 area in Oklahoma, namely the Wichita Mountains Wildlife Refuge. The presentation of data regarding the Wichita Mountains is in depth; however, the draft SIP would be more effective in combating regional haze if it more thoroughly considered the impact of emissions from Oklahoma on Class 1 areas neighboring Oklahoma, namely Caney Creek and Upper Buffalo Wilderness Areas. As demonstrated in tables VI-10 & VI-11, the impacts of required Best Available Retrofit Technology (BART) sources in Oklahoma are not limited to the Wichita Mountains Wildlife Refuge, but have a significant impact upon Caney Creek and Upper Buffalo Wilderness Areas. Therefore, the SIP and its BART analyses would present a more accurate impact upon regional haze if such an in-depth analyses were extended to the aforementioned areas in Arkansas.

Likewise, an important component to the revised SIP is ODEQ's consistent recognition of influential factors from jurisdictions outside of the State of Oklahoma. ODEQ cites in each discussion of particulates and chemical compounds impacting the Class 1 area within Oklahoma the overwhelming impact from point source emissions, area emissions, road and non-road vehicles, and burning that occur primarily in Texas and other jurisdictions. Unlike the thorough explanation provided for Oklahoma based BART sources, non-BART sources, and solutions included in the impending Oklahoma Smoke

Management Program, the draft SIP offers little to no explanation of its efforts to address interstate impacts upon air quality and visibility in the Wichita Mountains.

The programs outlined in the draft SIP for addressing BART and BART exempt point source emissions have been thought through carefully, especially considering the constraints upon ODEQ's monitoring and enforcement capabilities. Acknowledging the impact of particulate transport from Texas, the SIP should offer an explanation of its efforts to address its impact on Oklahoma's Class 1 areas, beyond the impact of the Clean Air Interstate Rule Reductions.

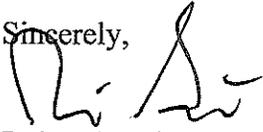
In its sections addressing the impact of BART implementation through 2018 and its conclusive section on attaining maximum visibility standards, the ODEQ stipulates that all steps taken towards implementing BART controls within Oklahoma will have a limited impact upon visibility and regional haze, although compliant with the reasonable progress goals. Considering that between 8,000 and 11,000 Megawatts of new electric generation, largely from coal-fired sources, are either under construction or in the permitting process at the Texas Commission on Environmental Quality, the most significant potential impact Oklahoma can have upon regional haze is through addressing such development and its subsequent effect upon Oklahoma's Class 1 area. Therefore, it is imperative that Oklahoma's SIP include substantive discussions on addressing its role in regional impact mitigation both within and without the State of Oklahoma.

Regarding application of BART emission standards for qualifying facilities in Oklahoma, the Sierra Club applauds ODEQ's analysis provided in its SIP and included Appendices. While the Sierra Club ultimately supports the implementation of BART and Best Available Control Technologies (BACT) for the enhancement of air quality and prevention of significant deterioration, more analysis should be spent on approvable alternatives for BART-eligible sources to comply with Part 70 air quality permits and SIP provisions. Specifically, more analysis is necessary regarding potential fuel-switching from coal-fired steam facilities to natural gas powered facilities, and other portfolio diversification initiatives, such as adoption of renewable energy generation.

As one of the largest contributors to regional haze and air quality degradation, electric generating facilities should be encouraged to utilize the vast wind, solar, and natural gas resources available in Oklahoma. Available controls for natural gas electric generating facilities are substantially more cost effective and generally capture larger amounts of harmful emissions. Additionally, the extrinsic costs of waste disposal for both dry and wet scrubber captured materials via water treatment or landfill disposal make implementation of such technologies for coal-fired electric facilities less attractive to both the consumers and the citizens of Oklahoma. Therefore, if fuel-switching proposals are offered by BART-eligible sources with detailed timelines that could achieve the objectives of the regional haze SIP, they should be considered in lieu of mandatory BART implementation at the existing coal-fired steam facilities. However, until such proposals are offered with guaranteed timelines, the Sierra Club supports the implementation of BART.

Again, the Sierra Club appreciates the efforts put into developing the regional haze SIP by the ODEQ and applauds their analysis. We look forward to working with all stakeholders involved in the process to develop the most effective rules for preserving air quality and visibility in our nation's protected spaces. Thank you for the opportunity to comment on the Regional Haze SIP.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Scott". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping underline.

Robert "Bud" Scott, Esq.
Government Affairs Director
Oklahoma Chapter
Sierra Club