



United States  
Department of  
Agriculture

Forest  
Service

Ouachita, Ozark and St. Francis  
National Forests

P.O. Box 1270  
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File Code: 2580

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Ms. Cheryl E. Bradley  
Oklahoma Department of Environmental Quality  
Air Quality Division  
P.O. Box 1677  
Oklahoma City, OK 73101-1677

**RECEIVED**  
MAY 20 2013  
AIR QUALITY

Dear Ms. Bradley:

The U.S. Forest Service (FS) appreciates the opportunity to review and comment on the Oklahoma Department of Environmental Quality (ODEQ) Proposed Best Available Retrofit Technology (BART) Determinations for American Electric/Public Service Company of Oklahoma (AEP/PSO) Northeastern Power Station Units 3 and 4.

We are providing these comments to ODEQ and ask that they be placed in the official public record. We look forward to your response as per section 40 CFR51.308(i)(3) and we are willing to work with ODEQ staff towards addressing any of the issues discussed in this letter.

Again, we appreciate the opportunity to work closely with ODEQ, and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

JUDITH L. HENRY  
Forest Supervisor

NORMAN L. WAGONER  
Forest Supervisor



**FS Comments regarding ODEQ's Proposed Regional Haze Implementation Plan Revision  
of March 20, 2013**

The Forest Service appreciates the opportunity to comment on the proposed Regional Haze plan revision.

Oklahoma submitted a Regional Haze (RH) plan to the Environmental Protection Agency (EPA) on February 19, 2010. On March 22, 2011, EPA proposed to partially approve and partially disapprove certain elements of Oklahoma's State Implementation Plan (SIP) (76 FR 16168) regarding six units at the following Electrical Generating Units (EGUs): Units 4 and 5 of the Oklahoma Gas and Electric Muskogee plant in Muskogee County; Units 1 and 2 of the Oklahoma Gas and Electric Sooner plant in Noble County; and Units 3 and 4 of the American Electric Power/Public Service Company of Oklahoma Northeastern plant in Rogers County. In EPA's subsequent Federal Implementation Plan (FIP), with regard to their March 22, 2011 partial disapproval, to meet Best Available Retrofit Technology (BART), those six units are required to reduce their SO<sub>2</sub> pollution to an emission rate of 0.06 lb/mmBTU. To accomplish this, EPA suggested that these units be retrofitted with Dry Flue Gas Desulfurization/Spray Dry Absorber (DFGD/SDA) technology.

It is our understanding that the Proposed Regional Haze Implementation Plan Revision submitted by ODEQ on March 20, 2013 addresses only control modifications at Units 3 and 4 of the American Electric Power/Public Service Company of Oklahoma Northeastern plant in Rogers County. Therefore, we are limiting our comments to the efficacy of those proposed controls.

As proposed by ODEQ, the SO<sub>2</sub> emission rates for Units 3 & 4 will each be lowered from the present 0.9 lb/mmBTU, utilizing dry sorbent injection (DSI) to 0.65 lb/mmBTU by January 21, 2014, and then to 0.60 lb/mmBTU by December 21, 2014. And, by April 26, 2016, the SO<sub>2</sub> emission rate for Unit 3 is proposed for further reduction to 0.4 lb/mmBTU (Table II-2), while Unit 4 will be shut down. While these proposed reductions would be a clear improvement from present levels, all are considerably less stringent than EPA's and the Forest Service's preferred BART level of 0.06 lb/mmBTU, utilizing DFGD/SDA. It appears ODEQ rejects the use of DFGD/SDA asserting on page 11 of its revised BART determination that the incremental reductions in emissions will not result in "perceptible improvement" in visibility. Based on the preamble to EPA's BART Guidelines:

"Even though the visibility improvement from an individual source may not be perceptible, it should still be considered in setting BART because the contribution to haze may be significant relative to other source contributions in the Class I areas."<sup>1</sup>

Thus, we disagree that the degree of impairment should be contingent upon perceptibility. Failing to consider less-than-perceptible contributions to visibility impairment would ignore the Clean Air Act's (CAA) intent to have BART requirements apply to sources that contribute to, as well as cause, such impairment.

Therefore, the perceptibility of improvement should not be a factor in determining BART. It is also noted that the cost per deciview of visibility improvement that is stated for each control alternative is consistent with other states' determinations of reasonable cost per deciview, and the

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<sup>1</sup> See Federal Register, July 6, 2005, 70FR30129, middle column.

\$1,544 cost per ton of SO<sub>2</sub> control is reasonable when compared with options utilized across the country. Further, while the cost per ton for DSI is 65% of the more cost effective DFGD/SDA option, the utilization of DFGD/SDA is well over six times more efficient at removing SO<sub>2</sub> (See Table 8 in ODEQ's March 20, 2013 Revised BART Determination).