

Comments to Oklahoma Department of Environmental Quality  
on Proposed Regional Haze & Transport  
State Implementation Plan Revision  
05/20/13

The Governor, Office of the Attorney General, Secretary of the Environment, Secretary of Energy, Corporation Commission staff and Oklahoma Sierra Club support American Electric Power/Public Service Company's compliance plan as a common sense approach for complying with federal regulatory safeguards and setting firm dates for retirement of both AEP-PSO coal units.

I support the proposed revision of the Best Available Retrofit Technology (BART) for the AEP-PSO Northeastern Units 3 and 4, which provide for the first coal-burning unit to be phased out by April 16, 2016. The second unit will remain in use with pollution control technology installed by April 16, 2016. Between 2021 and 2026, AEP-PSO will significantly reduce the amount of coal burned at the unit until the plant is decommissioned no later than December 31, 2026.

This option is more cost effective than retrofitting coal units with expensive scrubbers. Continuing to run the outdated, aging plants until 2041 would raise rates for residential customers by 14.3% compared to a projected 11% under PSO's cost-effective plan.

Dangerous sulfur dioxide emissions from the Northeastern power plant near Oologah will be reduced by more than half in 2016 and fully eliminated by 2026.

Oklahomans' health will benefit from cumulative reductions in carbon dioxide, the primary cause of climate disruption, and sulfur dioxide, mercury, nitrogen oxides and other toxins.

To address the visibility impairment at the Wichita Mountains Class I area, under the First Amended Regional Haze Agreement, AEP-PSO will develop a monitoring program to test operating profiles to determine if sulphur dioxide can be successfully removed during normal operations. In the event this is not achieved, I am relieved to read that sulphur dioxide emissions reductions will be obtained through enforceable emission limits or control equipment requirements if necessary to realize the visibility benefits estimated in regional haze modeling.

Coal-fired energy generation is poisoning our water and air, wrecking our health and shortening lives in Oklahoma. The proposed SIP revision for the AEP-PSO Northeastern Units 3 and 4 avoids the risks of expensive investments in outdated technology. It allows AEP-PSO flexibility in transitioning to cleaner energy sources over a reasonable period of time. And it enables Oklahoma to comply with federal regulatory safeguards while ensuring that we will have cleaner energy future

Jody Harlan, Chair  
Oklahoma Sierra Club  
426 Poplar Avenue  
Yukon, OK 73099-2659  
(405) 354-3189 mobile (405) 326-3600 hwinc@cox.net