



STATE OF OKLAHOMA  
OFFICE OF THE  
SECRETARY OF ENVIRONMENT  
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May 20, 2013

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

**Re: Revision to Regional Haze State Implementation Plan Including Revisions to Affected Portions of the Interstate Transport SIP for the 1997 8-hour Ozone and 1997 PM<sub>2.5</sub> NAAQS**

Dear Ms. Bradley:

In March of 2011, the Environmental Protection Agency (EPA) announced its intention to partially approve and partially disapprove Oklahoma's State Implementation Plan (SIP) to come into compliance for Regional Haze, and to promulgate a Federal Implementation Plan (FIP). Within days I was asked by Governor Mary Fallin to work with the affected utilities to try to develop an Oklahoma-based solution that achieved regulatory compliance, while also addressing concerns of the utilities, recognizing the unique nature of their generation structure and their customers' needs.

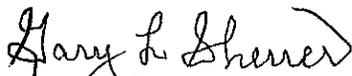
AEP/PSO contacted my office and expressed an interest in working to develop an alternative to the FIP. AEP/PSO wished to work on a plan to achieve compliance with the Regional Haze Rule and a number of other air rules that were at various stages of development. For over a year my staff and I worked with representatives of AEP/PSO and the Oklahoma Department of Environmental Quality to develop an Oklahoma plan. This plan was memorialized as the final settlement agreement that was announced by Governor Fallin in April 2012 and formally signed last fall, which called for development of the new SIP for AEP/PSO that is being considered today.

I am pleased to say that the settlement agreement that was reached allowed AEP/PSO the ability to chart their own course and identify emission control technologies that work best for their plant, rather than installing dry scrubbers as called for in the FIP, while also providing regulatory certainty in planning for compliance with future air rules. After extensive modeling of the Oklahoma plan we have been able to determine that these technologies provide for comparable results and meet all requirements set out in the Regional Haze rule.

This Oklahoma-based plan and the resulting SIP were carefully crafted and vetted to be in both technical and legal compliance with the Clean Air Act and to serve as the replacement for the FIP. This SIP allows for compliance, while also putting AEP/PSO on a path that works best for them and their customers. In addition to meeting Regional Haze requirements, the settlement agreement also is designed to bring AEP/PSO into compliance with the Mercury and Air Toxics Rules and various other air rules.

Once again, thank you for the opportunity to provide comments, and in closing I want to emphasize that I believe that the proposed SIP is in full compliance with both the Clean Air Act and the signed settlement agreement and look forward to it being delivered to EPA for review.

Sincerely,



Gary L. Sherrer  
Secretary of Environment  
State of Oklahoma