

May 20, 2013

Public Hearing

Regional Haze & Transport State Implementation Plan Revision

My name is Jeremy Jewell. I am a Principal with Trinity Consultants, a worldwide environmental consulting firm, and I manage Trinity's operations in Oklahoma.

I was responsible for completing, or overseeing the completion of, the technical analyses for PSO's BART reevaluation. It was these analyses that, after review and approval by the ODEQ, led to the proposed SIP revision that presents a BART determination involving the shutdown of one unit, the installation of Dry Sorbent Injection (or "DSI") on the second unit, and the incremental decrease in capacity utilization leading to the ultimate shutdown of the second unit.

I would like to briefly address our execution of and results of the two analyses that led to the proposed BART determination: (1) estimating the costs of the emissions control and (2) atmospheric modeling of both pre-control and post-control emission scenarios to determine visibility impacts in the nearby Class I areas, which are the Wichita Mountains National Wildlife Refuge in south-west Oklahoma, the Caney Creek Wilderness Area in south-~~east~~^{west} Arkansas, the Upper Buffalo Wilderness Area in north-central Arkansas, and the Hercules Glades Wilderness Area in south-central Missouri.

First, in regards to the modeling analyses, I want to point out four facts.

1. The modeling methods we used to evaluate the revised BART determination were largely the same as those relied upon in the original BART determination. For example, the same CALPUFF processor was used. CALPUFF is the dispersion model used in the multi-step process of conducting visibility modeling. Also, the same meteorological dataset was used. To the extent possible, everything related to the modeling analyses was kept consistent with the previously reviewed and approved analyses.
2. The primary change from the original modeling methods to the updated modeling methods involved the use of the CALPOST processor. CALPOST is the processor that converts the output from CALPUFF into visibility values. Since the original BART determination, EPA developed and now requires the use of a newer version of CALPOST. This newer, EPA-required version was used. Additionally, we used the latest EPA and Federal Land Manager guidance in regards to both the CALPOST algorithm (or "method") and the background concentrations for parameters such as humidity that are fed into CALPOST.

3. The details of all the modeling methods, inputs, and outputs, all of which were based on the latest EPA regulation or guidance, were provided to ODEQ in a protocol for review on or about September 25, 2012. *including baseline and post-control emission rates,*
4. EPA's stated threshold for attributing visibility impairment to any single source of emissions is 0.5 delta deciviews on a daily average 98th percentile basis. The results of the updated modeling show that predicted post-control visibility impacts are less than this threshold for all Class I areas.

In regards to the cost of controls estimates, I will mention three facts.

1. The original BART determination and SIP were based on costs developed by PSO's project engineers. In the Technical Support Document published with EPA's disapproval of the original SIP, EPA presented an alternative cost analysis based largely on its Control Cost Manual, a guidance document most recently published in January 2002.
2. In the BART reevaluation, for all cost effectiveness calculations, we strictly used EPA's Control Cost Manual in the same way that it was used by EPA in the Technical Support Document. We also presented PSO's engineering cost estimates for comparative purposes only, i.e., these were not used directly in the BART determination.
3. The results of the control cost evaluations *show that the scenario presented in the proposed SIP revision is the most cost effective scenario that also achieves the necessary visibility improvement goal mentioned previously.* *-regardless of which method is employed-*

Thank you for your consideration of these comments.