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OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

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January 31, 2022

Sunni Stephenson  
Mustang Gas Products  
9800 N. Oklahoma Ave.  
Oklahoma City, OK 73114

Subject: Additional clarifications on Mustang's Binger Gas Plant 4-factor analysis on control scenarios under the Clean Air Act Regional Haze Program

Dear Ms. Stephenson:

In a letter dated July 1, 2020, the Oklahoma Department of Environmental Quality (DEQ) identified the Binger Gas Plant located in Caddo County, Oklahoma, as subject to a four-factor reasonable progress analysis under the Regional Haze Rule as part of DEQ's development process for the state implementation plan covering the second planning period (Round 2) of 2021 – 2028.

On September 1, 2020, Mustang submitted its four-factor analysis to DEQ. Mustang included in its response that non-selective catalytic reduction (NSCR) is the most cost-effective nitrogen oxides (NO<sub>x</sub>) control measure available for the engines. Three engines already have NSCR installed, and Mustang committed to applying for installation of NSCR on engine CM-2322 as well. DEQ included these conclusions in its draft Regional Haze SIP for Planning Period 2 that was shared with the Federal Land Managers (FLM) and the U.S. Environmental Protection Agency (EPA) for their review and comment. DEQ requests that Mustang review its four-factor analysis for potential NO<sub>x</sub> control measures and respond to the following questions, which are based on EPA's review of Oklahoma's draft SIP. We understand that some of the requested data/analysis may be gleaned or explained from DEQ's permitting and compliance files, and/or Mustang's submittal. However, your response will allow Mustang to document the information that best explains and supports the conclusions of Mustang's four-factor analysis. DEQ intends to continue its analysis in parallel.

1. Please provide additional justification for the elimination of an air fuel ratio controller (AFRC), which is a type of Clean Burn Technology, from further consideration without evaluating this control option in the four-factor analysis. The company states that due to the cost associated with retrofitting the engines with this control, limited operational flexibility, and an increase in regulatory requirements, Mustang does not believe it is feasible to control the engines using an AFRC. However, it appears this control option was identified as a technically feasible control option for these engine types based on the company's review of the RACT/BACT/LAER clearinghouse. Please explain whether there are unique circumstances or conditions at this plant that make AFRC technically infeasible.

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2. Additional discussion is needed for the elimination of selective catalytic reduction (SCR) from further consideration without evaluating it under the four factors. The company states that it does not believe SCR is feasible due to anticipated issues with controlling this type of engine with SCR. However, the company's review of the RACT/BACT/LAER clearinghouse revealed that a number of similar engine types are currently equipped with SCR for the control of NO<sub>x</sub> emissions. Did the company reach out to any SCR vendors to investigate whether this control option would be technically feasible for the units at the Binger Gas Plant?
3. The company compared actual 2019 emissions inventory data to the maximum potential to emit (PTE) rate to calculate the emission reductions for the NSCR control scenario. Please explain how the maximum PTE rate of the units was estimated/calculated for the NSCR control scenario.
4. The company states that engines CM-2324 and CM-2325 are already operated with "properly functioning NSCRs as well as with good combustion practices." The company notes that the existing control equipment has a 90% control efficiency and that it believes additional controls for these two engines would therefore be uneconomical and unnecessary. Please provide a discussion of recent actual NO<sub>x</sub> emissions from these two engines as well as any available report or other documentation of the study/testing that was conducted to determine the control efficiency of the existing NSCR.

DEQ respectfully requests that Mustang respond to EPA's questions no later than February 28, 2022. Thank you for your assistance with this matter. Please contact Melanie Foster at 405-702-4218 for any questions or clarification.

Sincerely,



Kendal Stegmann

Director, Air Quality Division