



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

Gerald Butcher
Western Farmers Electric Cooperative
3000 S. Telephone Rd.
Moore, OK 73160

July 1, 2020

Subject: Notification of request for 4-factor analysis on control scenarios under the Clean Air Act
Regional Haze Program

Dear Mr. Butcher:

This letter is to inform you that the Oklahoma Department of Environmental Quality (DEQ) has identified the Western Farmers Hugo Power Plant as a facility subject to a four-factor reasonable progress analysis under the Regional Haze Rule. DEQ is in the development process for the state implementation plan covering the second planning period (Round 2) of 2021 – 2028.

The states in the Central States Air Resources Agencies (CenSARA) organization, which include Oklahoma, contracted with Ramboll US Corporation (Ramboll) to produce a study examining the impact of stationary sources of NO_x and SO₂ on each Class 1 area in the central region of the United States. DEQ used a method based on this study to determine which sources may have the greatest potential for contributing to visibility impairment at Oklahoma's Class 1 area: the Wichita Mountains Wilderness Area.

DEQ must develop a long-term strategy to address visibility impairment and make "reasonable" progress toward a goal of no anthropogenic visibility impairment by 2064. The Regional Haze Rule provides four factors (40 CFR §51.308(f)(2)(i)) by which a state must consider potential control measures for the long-term strategy: 1) the cost of compliance; 2) the time necessary for compliance; 3) the energy and non-air quality environmental impacts of compliance; and 4) the remaining useful life of existing sources subject to this requirement.

DEQ requests that Western Farmers perform a four-factor analysis of all potential control measures for SO₂ on the following emission units:

1. HU-Unit 1

For any technically feasible control measure, the following information should be provided in detail:

- I. Emission reductions achievable by implementation of the measure
 - a. Baseline emission rate (lb/hr, lb/MMBTU, etc)
 - b. Controlled emission rate (same form as baseline rate)
 - c. Control effectiveness (percent reduction expected)
 - d. Annual emission reductions expected (ton/year)





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- II. Time necessary to implement the measure
- III. Remaining useful life
 - a. Remaining useful life of the control measure, or
 - b. The corresponding life of the unit may be used if an enforceable shutdown date of the emission unit is no later than 2028.
- IV. Energy and non-air quality environmental impacts of the measure.
 - a. Detail any cost of energy, waste disposal, regulatory requirement, etc. incurred with implementation of the control measure.
- V. Cost of implementing the measure
 - a. Capital costs
 - b. Annual operating and maintenance costs
 - c. Annualized costs

DEQ respectfully requests that your company submit a report containing the complete 4-factor analysis no later than September 1, 2020. This will allow DEQ to review and identify any potential cost-effective control measure to be incorporated into the Regional Haze state implementation plan prior to the submission deadline of July 31, 2021.

Please contact DEQ if you have any questions about the method for conducting a 4-factor analysis under the Regional Haze Rule. We encourage your questions in order to help expedite the technical review required under the Rule.

Thank you for your assistance with this matter. Please contact Cooper Garbe at 405-702-4169 or Melanie Foster at 405-702-4218 for your questions or clarification.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kendal Stegmann', is written over the word 'Sincerely,'.

Kendal Stegmann
Director, Air Quality Division

