



July 15, 2020

E-MAILED

Ms. Kendal Stegmann, Director, Air Quality Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

**Re: Notification of request for 4-factor analysis on control scenarios under the Clean Air Act
Regional Haze Program
Facility: Mustang Generating Station**

Dear Ms. Stegmann:

On July 1, 2020, OG&E received a request from the Oklahoma Department of Environmental Quality (ODEQ) requesting that Oklahoma Gas and Electric (OG&E) perform a 4-factor analysis of all potential control measures for nitrogen oxides (NO_x) on Electric Generating Units (EGUs) 3 and 4 at our Mustang Generating Station (Mustang).

Units 3 and 4 at Mustang were permanently retired on December 31, 2017 and have not operated since as required by Permit No. 2011-1008-C (M-1) issued December 11, 2015. In addition to the retirement being required by the Permit, Units 3 and 4 have been permanently disconnected from their fuel source and are no longer physically operable. OG&E submitted a Retired Unit Exemption on January 18, 2018 regarding the cessation of operation for Units 3 and 4 (see attachment).

No additional reduction of NO_x emissions is possible from Units 3 and 4 at Mustang because they have been permanently retired. OG&E believes that this information satisfies ODEQ's request of July 1, 2020 for information on cost effective NO_x reductions at Mustang Units 3 and 4.

In fact, OG&E believes that the retirement of Units 3 and 4 is well beyond what would have been deemed cost effective if the units continued to operate. Their retirement is contributing to the observed visibility conditions in Wichita Mountains being well below the Uniform Rate of Progress. OG&E hopes that this contribution to visibility improvement will be credited by DEQ in determining what, if any, additional contribution is reasonable from OG&E in connection with the 2021 regional haze SIP. If you need additional information or have questions, please contact me at (405)553-3221.

Sincerely,

A handwritten signature in blue ink that reads "Ford Benham".

Ford Benham
Director Environmental Operations

OGE Energy Corp. PO Box 321
Oklahoma City, Oklahoma 73101-0321
405-553-3000
www.oge.com



January 18, 2018

CERTIFIED MAIL: 7015 3010 0000 9575 2302

Mr. Raymond Magyar (6EN-AA)
Air Enforcement Section
EPA Region 6
1445 Ross Avenue
Dallas, Texas 75202-2733

**Re: Oklahoma Gas & Electric Co. (OG&E)
Mustang Generating Station, Unit 3 & 4
Retired Unit Exemption**

Dear Mr. Magyar:

In accordance with 40 CFR 72.8(b)(2) OG&E is submitting the attached Retired Unit Exemption forms, for Mustang Generating Station's Units 3 & 4 (ORIS 2953). The units have ceased operation and were permanently retired December 31, 2017.

Both Units 3 & 4 have been isolated and will be left in place until it becomes necessary to remove them from their current location. The units have been permanently disconnected from their fuel source and are no longer physically operable. OG&E will make appropriate changes to the facility permits during the next renewal cycle. OG&E will also continue to comply with the requirements of §72.8(d) for this unit.

If you have any questions, please contact me at (405)553-3031.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael Hixon".

Michael Hixon
Alternate Designated Representative

Cc: U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Mail Code 6204M
Attn: Retired Unit Exemption
Washington, DC 20460

IXOS: T. Shook
R. Butler