

APPENDIX A

Consultation Process and Documentation

CONSULTATION PROCESS AND DOCUMENTATION

The following table outlines DEQ communications with federal, state, and local partners as well as stakeholders on Regional Haze.

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
December 5–7, 2017	In-Person Workshop	States, Federal Land Managers, EPA National and Regional Offices	Lessons learned from Planning Period I States Planning Needs and Responsibilities Regional Consultation	States shared lessons learned from approaches during the first planning period and how to apply those lessons to Planning Period II. EPA provided updates on Rule changes and litigation. CenSARA states consultation process began for Planning Period II.	http://www.westar.org/Docs/regional%20haze%20workshop%202017/Dec5-7 2017national-regional-stateRegionalHazeWorkshop_final.pdf
February 20, 2019	Webinar	EPA, Tribal Entities, Federal Land Managers, States	EPA hosted; “Technical Guidance on Tracking Visibility Progress for the 2nd Implementation Period of the Regional Haze Program” release by EPA	Q&A and review of the guidance	https://www.epa.gov/visibility/technical-guidance-tracking-visibility-progress-second-implementation-period-regional
March 5, 2019	Web-Conference	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Screening Methods discussion	Demonstration and discussion of the Arkansas Potential Screening Methods worksheet, Updates	CenSARA States and Federal Partners Communication
April 9, 2019	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Early planning discussion	Further discussion of screening methods, EPA Technical Guidance	CenSARA States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
May 7th, 2019	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Early planning discussion	Nat'l Reg. Haze meeting discussion; Updates; Information sharing with neighboring states	CenSARA States and Federal Partners Communication
June 4, 2019	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	National RH Meeting Planning Discussion	Revised agenda for National RH Meeting; State & Federal partner RH planning updates	CenSARA States and Federal Partners Communication
June 25, 2019	Conference Call	States, Federal Land Managers, EPA National and Regional Offices	Emissions platform and modeling for RH	Update on development of 2016 v1 emissions platform and projects (including 2020 mobile emissions estimates), EPA and state modeling of the 2016 platform, Update on EPA's regional haze modeling	Federal/State Technical Work Collaboration Group
July 9, 2019	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	National RH Meeting Planning Discussion; Updates	Logistics for National RH Meeting; State & Federal partner RH planning updates	CenSARA States and Federal Partners Communication
August 13, 2019	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	National RH Meeting Planning Discussion; Updates	VISTAS data not to be used until updated; RH Guidance with OMB to be released soon	CenSARA and VISTAS States and Federal Partners Communication
September 3, 2019	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	National RH Meeting Planning Discussion; Updates	Review of the RH Guidance; Discussion of which inventory year to use for anthropogenic emissions	CenSARA and VISTAS States and Federal Partners Communication
September 10, 2019	Webinar	EPA, States	Guidance on Regional Haze State Implementation Plans for the Second Implementation Period	EPA-led webinar for newly released RH Guidance	--

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
October 28–30, 2019	In-Person Meeting	States, Federal Land Managers, EPA National and Regional Offices	National RH Meeting: Guidance Approaches for Planning Period II, Planning Period II progress	Check-in on progress, identify needs for state-to-state, state-to-FLM, and state-to-EPA informal consultation	Federal and State Partners Communication
November 5, 2019	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Discussion of drafting a regional timeline; Wrap-up discussions from National RH Meeting	CenSARA and VISTAS States and Federal Partners Communication
December 3, 2019	Web-Conference	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Discussion of planning—next steps; AR presentation of possible screening tool	On-the-books emission reductions; regional timeline/state goals; 4-factor analysis source identification methods; AR shared draft Consultation Plan and possible Screening Tool	CenSARA and VISTAS States and Federal Partners Communication
December 30, 2019	Modified Methodology PowerPoint Presentation & Email Invitation to Schedule Consultation Meeting	Arkansas DEQ to: Indiana DEM Illinois DEQ Kentucky DEQ Oklahoma DEQ	Arkansas 4-Factor Analysis and Affected Sources	Arkansas DEQ received EPA’s, FLMs’, and other states’ feedback during round one discussions regarding the Arkansas’s draft 4-Factor Analysis Methodology; Arkansas DEQ presented revised methods and results, and invited other states to schedule formal consultation meetings	Interstate Consultation
January 7, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	State plans for approaching 4-factor analyses source identification; Consultation plan updates; VISTAS Modeling Protocol; Timelines updates	CenSARA and VISTAS States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
January 16, 2020	Conference Call	EPA Region 6 and Oklahoma DEQ	Planning Period II progress and updates	Next steps/timeline	EPA Consultation
January 29, 2020	Web-Conference	Arkansas DEQ and Oklahoma DEQ	Discussion of Visibility Threshold Selection Methodology and Affected Facilities in Oklahoma	Arkansas DEQ shared its methodology for what sources to pull forward for four-factor analysis as contributing to Arkansas Class I areas and preview of anticipated asks	Interstate Consultation
February 4, 2020	Letter	Arkansas DEQ and Oklahoma DEQ	"Asks" from Arkansas DEQ	Arkansas requested DEQ determine if 4-factor analysis is appropriate for three sources	Interstate Consultation
February 4, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	State progress on 4-factor analyses source identification; Consultation plan updates; Timelines updates	CenSARA and VISTAS States and Federal Partners Communication
March 3, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Regional timeline with state specific approaches – individual state status; Progress on source ID for 4-factor analysis; Consultation plan progress; VISTAS sharing modeling protocol with CenSARA states	CenSARA and VISTAS States and Federal Partners Communication
March 19, 2020	Conference Call	OG&E and Oklahoma DEQ	Planning Period II progress and updates	Next steps/timeline	Stakeholder Engagement
March 25, 2020	Conference Call	EPA Region 6 and Oklahoma DEQ	Discussion of Visibility Threshold Selection Methodology	EPA provided feedback on potential revisions to improve the source selection methodology	EPA Consultation

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
April 2, 2020	Web-Conference	Texas CEQ and Oklahoma DEQ	Texas presentation on modeled impacts on Class I areas and source selection methodology	Discussion of Texas contributions to Oklahoma	Interstate Consultation
April 7, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	States' progress on 4-factor ID, consultation plans, facility notification (ICRs); IMPROVE dataset discussion (2017 or 2019); EPA R6 is proposing to discuss the FLM consultation requirements with OAQPS and OGC and then come back to talk to the states	CenSARA and VISTAS States and Federal Partners Communication
April 9, 2020	Conference Call	EPA Region 6 and Oklahoma DEQ	Discussion of Visibility Threshold Selection Methodology	EPA provided feedback on potential revisions to improve the source selection methodology	EPA Consultation
April 14, 2020	Conference Call	National Park Service, U.S. Forest Service, U.S. Fish and Wildlife Service, and Oklahoma DEQ	Initial Discussion of Visibility Threshold Selection Methodology	FLMs provided feedback on potential revisions to improve the source selection methodology	Federal Land Manager Consultation
April 15, 2020	Web-Conference	AR, LA, OK RH Discussion	EPA R6 feedback on source selection methodology	States discussed EPA feedback and discussed technical basis for adjustments, if any to source selection methodology	Interstate Consultation
April 20, 2020	Webinar	States & EPA	Ask CAMD Session on CAMD Data Products	CAMD presentation & demonstration of tools useful in RH planning	--
April 20, 2020	Conference Call	National Parks Conservation Association and Oklahoma DEQ	Share Methodology	Next steps/Timelines	Stakeholder Engagement

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
April 21, 2020	Webinar	VISTAS & MJOs states	VISTAS Modeling Results to MJOs and States	VISTAS presentation	--
April 21, 2020	Conference Call	Louisiana DEQ and Oklahoma DEQ	Discussion of Louisiana's Source Selection Methodology	No Louisiana Sources Identified by Louisiana DEQ as contributing to Oklahoma	Interstate Consultation
April 20, 2020	Web-Conference	National Parks Conservation Association and Oklahoma DEQ	Presentation by NPCA of Point and Non-point sources in Oklahoma	Next steps/Timelines	Stakeholder Engagement
May 5, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Status report from states of progress on SIP development and FLM and EPA updates	CenSARA and VISTAS States and Federal Partners Communication
May 7, 2020	Email	OK DEQ, MO DNR, and Arkansas DEQ	Notification of Data Availability	ICR Responses shared; requested input for upcoming 4-factor analyses	Interstate Consultation
May 12, 2020	Conference Call	Texas CEQ and Oklahoma DEQ	Discussion of Visibility Threshold Selection Methodology	Preliminary Consultation	Interstate Consultation
May 19-20, 2020	Webinar	WESTAR-WRAP & MJOs states	WRAP Modeling Results	Monitoring (May 19) and Emissions (May 20) data and display tools	--
May 20, 2020	Webinar	VISTAS & MJOs states	VISTAS regional haze stakeholder briefing	revised glidepaths showing progress in five Class I areas outside but near the VISTAS region; expected "asks"	--
May 29, 2020	Conference Call	EPA Region 6 and Oklahoma DEQ	Discussion of Oklahoma's Current Calculation Methodology	EPA provided feedback on potential revisions to improve the source selection methodology	EPA Consultation

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
June 2, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	States discussed EPA feedback and discussed technical basis for adjustments, if any, to source selection methodology	CenSARA and VISTAS States and Federal Partners Communication
June 3, 2020	Web-Conference	National Park Service, U.S. Forest Service, U.S. Fish and Wildlife Service, and Oklahoma DEQ	Source Selection Methodology	FLMs provided feedback on potential revisions to improve the source selection methodology	Federal Land Manager Consultation
June 22, 2020	Conference Call	OG&E and Oklahoma DEQ	Discussion of RH analyses	Next steps/timelines	Stakeholder Engagement
June 23, 2020	Webinar	WESTAR-WRAP & MJOs states	WRAP Modeling Results	TSS Orientation; Recap / progress on Monitoring and Emissions Data display tools for Regional Haze plans; Modeling and Visibility Projections results access and display topics for weight of evidence	https://www.wrapair2.org/calendar/viewitem.jsp?&cal_item_id=31183
June 25, 2020	Webinar	WESTAR-WRAP & MJOs states	WRAP Modeling Results	Modeling Results and Applications presentations – methodology and “how-to-use”; Next steps on modeling results delivery and continuing updates to TSS	https://www.wrapair2.org/calendar/viewitem.jsp?&cal_item_id=32183
July 7, 2020	Conference Call	Grand River Dam Authority and Oklahoma DEQ	Discussion of 4-factor Analysis	Next Steps	Stakeholder Engagement

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
July 17, 2020	Letter	Oklahoma DEQ to Texas CEQ	“Ask” Letter	Oklahoma requests that Texas consider 14 SO ₂ sources and 4 NO _x sources for further analysis	https://www.deq.ok.gov/wp-content/uploads/air-division/RH_2021_ConsultationRequest_TX.pdf
July 17, 2020	Letter	Oklahoma DEQ to Nebraska DEE	“Ask” Letter	Oklahoma requests that Nebraska consider one source for further analysis (OPPD Nebraska City Station)	https://www.deq.ok.gov/wp-content/uploads/air-division/RH_2021_ConsultationRequest_NE.pdf
July 17, 2020	Letter	Oklahoma DEQ to Louisiana DEQ	“Ask” Letter	Oklahoma requests that Louisiana consider one source for further analysis (Cleco Power)	https://www.deq.ok.gov/wp-content/uploads/air-division/RH_2021_ConsultationRequest_LA.pdf
July 17, 2020	Letter	Oklahoma DEQ to Arkansas DEQ	“Ask” Letter	Oklahoma requests that Arkansas consider two sources for further analysis (White Bluff & Independence)	https://www.deq.ok.gov/wp-content/uploads/air-division/RH_2021_ConsultationRequest_AR.pdf
July 21, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	States completing source selection, ICRs, and reaching out to other states for info	CenSARA and VISTAS States and Federal Partners Communication
August 4, 2020	Webinar	VISTAS agencies, EPA, FLMs, RPOs and surrounding states	2028 Regional Haze Modeling Results	Provide update on regional haze modeling conducted by VISTAS	---

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
August 11, 2020	Web-Conference	TCEQ and Oklahoma DEQ	Consultation on Texas proposed Regional Haze plan	Texas communicated their planned recommendations for their Commission	Interstate Consultation
August 17, 2020	Conference Call	Missouri DNR and Oklahoma DEQ	"Asks" from Missouri DNR	Missouri requested DEQ perform 4-factor analysis for sources already on Oklahoma list	Interstate Consultation
September 1, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	States are drafting SIPs, finalizing ICR analysis, reaching out to other states for info	CenSARA and VISTAS States and Federal Partners Communication
September 10, 2020	Conference Call	Panhandle Eastern and Oklahoma DEQ	Discussion of 4-factor Analysis	Next Steps	Stakeholder Engagement
September 11, 2020	Letter	Missouri DNR and Oklahoma DEQ	"Asks" From Missouri DNR	Missouri formally requested DEQ perform 4-factor analysis for sources already on Oklahoma list	Interstate Consultation
September 24, 2020	Conference Call	Oxbow and Oklahoma DEQ	Discussion of 4-factor Analysis	Next Steps	Stakeholder Engagement
October 6, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states beginning EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
November 3, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states beginning EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
November 20, 2020	Email	National Park Service, U.S. Forest Service, U.S. Fish and Wildlife Service, and Oklahoma DEQ	Notification of 4-Factor Requests and Responses Posted to Website	FLMS given opportunity to begin reviewing 4-Factor Analyses Responses	Federal Land Manager Consultation
December 1, 2020	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states beginning EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
December 14, 2020	Conference Call	Nebraska DEE and Oklahoma DEQ	Consultation	Discussion of	Interstate Consultation
February 5, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states under EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities); others still developing drafts	CenSARA and VISTAS States and Federal Partners Communication
March 2, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states beginning EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
April 12, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states addressing comments from EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
May 4, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states addressing comments from EPA, FLM, and/or Public review stages; Others wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
June 1, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA by deadline; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
July 6, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
July 13, 2021	Webinar	States, Federal Land Managers, EPA National and Regional Offices	EPA hosted; “Clarifications Regarding Regional Haze State Implementation Plans for the Second Implementation Period” release by EPA	Q&A of new guidance memo	https://www.epa.gov/system/files/documents/2021-07/clarifications-regarding-regional-haze-state-implementation-plans-for-the-second-implementation-period.pdf
August 3, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
September 7, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
October 4, 2021	Email	Arkansas, Louisiana, Missouri, Nebraska, Texas	Shared draft RH SIP	--	--
October 5, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
November 2, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA and VISTAS States and Federal Partners Communication
December 7, 2021	Conference Call	CenSARA States, VISTAS States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Some states are in the review process, getting ready to submit a draft for comment or addressing previous comments	CenSARA and VISTAS States and Federal Partners Communication
December 17, 2021	Conference Call	Region 6	Comments on draft SIP	Reviewed some of EPA's comments and Oklahoma's initial thoughts	EPA comments dated November 30, 2021

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
January 4, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication
February 1, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication
March 1, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in public review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication
April 5, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in various review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication
May 5, 2022	Conference Call	CenSARA, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in various review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication

Date	Method	Entities Involved	Topic/Problem/	Outcome	Notes/Links
June 7, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in various review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication
July 5, 2022	Conference Call	CenSARA States, Tribal Entities, Federal Land Managers, and EPA Region Offices 6 and 7	Planning Period II progress and updates	Several states in various review stages; Some finalizing for submittal to EPA; Others still wrapping up consultations (with facilities and/or other entities)	CenSARA States and Federal Partners Communication



ARKANSAS ENERGY & ENVIRONMENT

February 4, 2020

Melanie Foster
Rules and Planning Section
Air Quality Division
Oklahoma Department of Environmental Quality

Sent Via Electronic Mail

Dear Ms. Foster:

The Arkansas Department of Energy and Environment, Division of Environmental Quality (DEQ), seeks consultation with Oklahoma Department of Environmental Quality (ODEQ) to develop a coordinated emission management strategy for Regional Haze State Implementation Plan (SIP) Revisions due on July 31, 2021 as required under 40 CFR 51.308(f)(2)(ii) for Caney Creek and Upper Buffalo wilderness areas.

The key pollutants from anthropogenic sources impairing visibility at Caney Creek and Upper Buffalo are ammonium sulfate and ammonium nitrate.¹ Ammonium sulfate is formed by chemical reactions between ammonia and sulfur dioxide (SO₂) in the atmosphere. Ammonium nitrate is formed by chemical reactions between ammonia and nitrogen oxides (NO_x) in the atmosphere. Environmental Protection Agency (EPA) modeling projects that these two pollutants will continue to be the key pollutants contributing to visibility impairment at Arkansas Class I areas in 2028.²

The states in the Central States Air Resources Agencies (CENSARA) organization, which includes Arkansas, contracted with Ramboll US Corporation (Ramboll) to produce a study examining the impact of stationary sources of NO_x and SO₂ on each Class I area in the central region of the United States. For each Class I area, the study took into account light extinction-weighted wind trajectory residence times, 2016 sulfur dioxide and nitrogen oxides facility emissions, and distance from sources of nitrogen oxides and sulfur dioxide to Class I Areas. The study produced an area of influence (AOI) for each Class I area, which shows the geographic areas with a high probability of contributing to anthropogenic visibility impairment.

Based on the results of the AOI study, DEQ has identified sources in your state that are reasonably anticipated to impact visibility conditions at Upper Buffalo, Caney Creek, or both. The table on the next page lists each source and the Class I Area for which the source was identified.

¹ <http://vista.cira.colostate.edu/Improve/improve-data/>

² <https://www.epa.gov/visibility/visibility-guidance-documents>

Facility	Class I Area
Muskogee Generating Station	Caney Creek, Upper Buffalo
Hugo Generating Station	Caney Creek, Upper Buffalo
Grand River Energy Center	Upper Buffalo

Therefore, DEQ requests that ODEQ consider whether performing a four-factor analysis is appropriate for each of these sources in accordance with 40 CFR 51.308(f)(2)(i) and, if so, whether any control measures for sulfur dioxide or nitrogen oxides are necessary to make reasonable progress towards natural visibility at Caney Creek and Upper Buffalo during the 2021–2028 planning period.

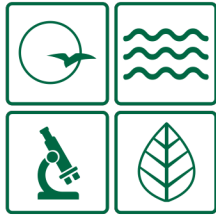
We look forward to working with you on this important effort. We request that you share with DEQ the results of your analysis, including any technical supporting documentation, and provide an opportunity for consultation on the analysis and your state's long-term strategy early enough in the process for DEQ to provide feedback to ODEQ and for DEQ to incorporate emission reductions anticipated from ODEQ's long-term strategy affecting Caney Creek and Upper Buffalo into DEQ's reasonable progress goals for Caney Creek and Upper Buffalo.

Should you have any questions, please contact Tricia Treece at 501-682-0055 (treecep@adeq.state.ar.us) or David Clark at 501-682-0070 (clarkd@adeq.state.ar.us).

Sincerely,



William K. Montgomery
Interim Associate Director
Office of Air Quality



Missouri Department of dnr.mo.gov
NATURAL RESOURCES
Michael L. Parson, Governor Carol S. Comer, Director

September 11, 2020

Kendall Stegmann
Division Director
Oklahoma Department of Environmental Quality
Air Quality Division
Email: kendal.stegmann@deq.ok.gov

Sent Via Electronic Mail

Dear Kendall Stegmann

The Missouri Department of Natural Resources' Air Pollution Control Program (Air Program) is in the process of developing Missouri's State Implementation Plan (SIP) for the Second Implementation Period under the Regional Haze Rule, which is due on July 31, 2021. The SIP must address reasonable progress in mitigating visibility impairment in federal Class I areas from air pollution sources. There are two federal Class I areas located in Missouri, including the Mingo National Wildlife Refuge (Mingo) and the Hercules-Glades Wilderness area (Hercules-Glades).

The key air pollutants from anthropogenic sources impairing visibility at Mingo and Hercules-Glades are ammonium sulfate and ammonium nitrate. Ammonium sulfate is formed by chemical reactions between ammonia and sulfur dioxide (SO₂) in the atmosphere. Ammonium nitrate is formed by chemical reactions between ammonia and nitrogen oxides (NO_x) in the atmosphere. U.S. Environmental Protection Agency (EPA) modeling projects that these two pollutants will continue to be the key pollutants contributing to visibility impairment at Missouri's Class I areas in 2028, which is the future year being evaluated in this Regional Haze SIP.

The states in the Central States Air Resources Agencies (CENSARA) organization, which includes Missouri, contracted with Ramboll US Corporation to produce a study examining the impact of point sources of NO_x and SO₂ on each Class I area in the central region of the United States and nearby states. For each Class I area, the study took into account light extinction-weighted wind trajectory residence times, 2016 sulfur dioxide and nitrogen oxides facility emissions, and distance from sources of nitrogen oxides and sulfur dioxide to Class I Areas. The study produced an area of influence (AOI) for each Class I area, which shows the geographic areas with a high probability of contributing to anthropogenic visibility impairment.

Based on the results of the AOI study, the Air Program performed a screening analysis to identify specific sources in Missouri and other states that warrant further analysis and evaluation



Kendall Stegmann
Page Two

for potential emission controls. As discussed with your staff during a phone call on August 17, 2020, the Air Program's screening analysis identified the following sources in your state that are reasonably anticipated to impact visibility conditions at the Hercules-Glades Class I area.

Muskogee Generating Station
Grand River Energy Center

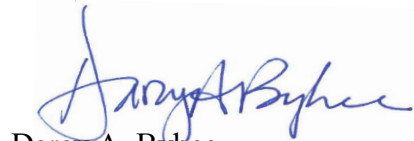
Therefore, the Air Program requests that Oklahoma consider whether performing a four-factor analysis is appropriate for each of these sources in accordance with 40 CFR 51.308(f)(2)(i) and, if so, whether any control measures for sulfur dioxide or nitrogen oxides are necessary to make reasonable progress towards natural visibility at Hercules-Glades during the second planning period.

We look forward to working with you on this important effort. We request that you share with the Air Program your determinations and reasoning for performing or not performing a four-factor analysis on each of the above-listed sources. For any of these sources in which Oklahoma performs a four-factor analysis, the Air Program requests that Oklahoma share the results of the analysis, including any technical supporting documentation, and provide an opportunity for consultation on the analysis, your state's long-term strategy, and the anticipated impact on visibility at Hercules-Glades.

Thank you for your attention to this matter. If you have any questions, please contact Emily Wilbur with the Missouri Department of Natural Resources' Air Pollution Control Program at P.O. Box 176, Jefferson City, MO 65102, at (emily.wilbur@dnr.mo.gov) or by telephone at (573) 751-4817.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Darcy A. Bybee
Director

DAB:sdc

c: William (Cooper) Garbe, Oklahoma DEQ (cooper.garbe@deq.ok.gov)



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

July 17, 2020

William Montgomery, Interim Associate Director
Arkansas Department of Energy and Environment
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Subject: Oklahoma request to analyze sources for reasonable progress under the Regional Haze Rule

Dear Mr. Montgomery:

The Oklahoma Department of Environmental Quality (DEQ) is in the process of developing a state implementation plan covering the period of 2021 – 2028 under the U.S. Environmental Protection Agency's Regional Haze Rule, specifically requirements set forth in 40 C.F.R. § 51.308(f). As part of the requirements under this rule, DEQ must develop a long-term strategy for making reasonable progress at Oklahoma's Class I area, the Wichita Mountains Wilderness Area. 40 C.F.R. § 51.308(f)(2), 40 C.F.R. § 81.424.

Pursuant to 40 C.F.R. § 51.308(f)(2)(ii):

The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

In its source evaluation, DEQ identified two sources located in Arkansas with SO₂ emissions that are reasonably anticipated to contribute to visibility impairment at the Wichita Mountains Wilderness Area. DEQ requests that Arkansas consider the following sources for further analysis:

- Entergy White Bluff
- Entergy Independence



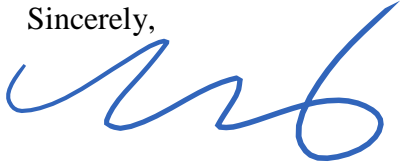
William Montgomery

July 17, 2020

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Oklahoma is requesting that the Arkansas Department of Energy and Environment continue in consultation with DEQ regarding its Regional Haze long-term strategy, and specifically any resulting analyses or measures at the above-listed sources. Should you have any questions about this request, please contact Cooper Garbe at 405-702-4169 or Melanie Foster at 405-702-4218.

Sincerely,

A handwritten signature in blue ink, appearing to read 'KStegmann', with a stylized, cursive script.

Kendal Stegmann

Director, Air Quality Division



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

July 17, 2020

Jason Meyers, Administrator
Louisiana Department of Environmental Quality
Air Planning and Assessment
P.O. Box 4314
Baton Rouge, LA 70821-4314

Subject: Oklahoma request to analyze sources for reasonable progress under the Regional Haze Rule

Dear Mr. Meyers:

The Oklahoma Department of Environmental Quality (DEQ) is in the process of developing a state implementation plan covering the period of 2021 – 2028 under the U.S. Environmental Protection Agency's Regional Haze Rule, specifically requirements set forth in 40 C.F.R. § 51.308(f). As part of the requirements under this rule, DEQ must develop a long-term strategy for making reasonable progress at Oklahoma's Class I area, the Wichita Mountains Wilderness Area. 40 C.F.R. § 51.308(f)(2), 40 C.F.R. § 81.424.

Pursuant to 40 C.F.R. § 51.308(f)(2)(ii):

The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

In its source evaluation, DEQ identified one source located in Louisiana with SO₂ emissions that are reasonably anticipated to contribute to visibility impairment at the Wichita Mountains Wilderness Area. DEQ requests that Louisiana consider the following source for further analysis:

- Cleco Power – Dolet Hills Station

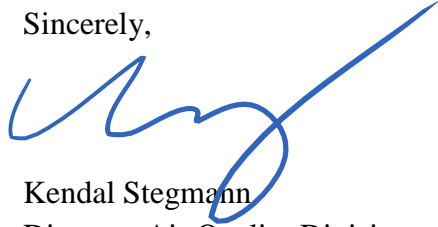
Oklahoma is requesting that the Louisiana Department of Environmental Quality continue in consultation with DEQ regarding its Regional Haze long-term strategy, and specifically any



Jason Meyers
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resulting analyses or measures at the above-listed sources. Should you have any questions about this request, please contact Cooper Garbe at 405-702-4169 or Melanie Foster at 405-702-4218.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kendal Stegmann', with a long, sweeping line extending upwards and to the right.

Kendal Stegmann
Director, Air Quality Division



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

July 17, 2020

Kevin Stoner, Air Quality Division Administrator
Nebraska Department of Environment and Energy
1200 N Street, Suite 400
PO Box 98922
Lincoln, NE 68509-8922

Subject: Oklahoma request to analyze sources for reasonable progress under the Regional Haze Rule

Dear Mr. Stoner:

The Oklahoma Department of Environmental Quality (DEQ) is in the process of developing a state implementation plan covering the period of 2021 – 2028 under the U.S. Environmental Protection Agency's Regional Haze Rule, specifically requirements set forth in 40 C.F.R. § 51.308(f). As part of the requirements under this rule, DEQ must develop a long-term strategy for making reasonable progress at Oklahoma's Class I area, the Wichita Mountains Wilderness Area. 40 C.F.R. § 51.308(f)(2), 40 C.F.R. § 81.424.

Pursuant to 40 C.F.R. § 51.308(f)(2)(ii):

The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

In its source evaluation, DEQ identified one source located in Nebraska with SO₂ emissions that are reasonably anticipated to contribute to visibility impairment at the Wichita Mountains Wilderness Area. DEQ requests that Nebraska consider the following source for further analysis:

- OPPD Nebraska City Station

Oklahoma is requesting that the Nebraska Department of Environment and Energy continue in consultation with DEQ regarding its Regional Haze long-term strategy, and specifically any



Kevin Stoner
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Page 2

resulting analyses or measures at the above-listed sources. Should you have any questions about this request, please contact Cooper Garbe at 405-702-4169 or Melanie Foster at 405-702-4218.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kendal Stegmann', with a large, stylized loop at the end.

Kendal Stegmann
Director, Air Quality Division



SCOTT A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT
Governor

July 17, 2020

Donna Huff, Director, MC 206
Texas Commission on Environmental Quality
Air Quality Division
P.O. Box 13087
Austin, TX 78711-3087

Subject: Oklahoma request to analyze sources for reasonable progress under the Regional Haze Rule

Dear Ms. Huff:

The Oklahoma Department of Environmental Quality (DEQ) is in the process of developing a state implementation plan covering the period of 2021 – 2028 under the U.S. Environmental Protection Agency's Regional Haze Rule, specifically requirements set forth in 40 C.F.R. § 51.308(f). As part of the requirements under this rule, DEQ must develop a long-term strategy for making reasonable progress at Oklahoma's Class I area, the Wichita Mountains Wilderness Area. 40 C.F.R. § 51.308(f)(2), 40 C.F.R. § 81.424.

Pursuant to 40 C.F.R. § 51.308(f)(2)(ii):

The State must consult with those States that have emissions that are reasonably anticipated to contribute to visibility impairment in the mandatory Class I Federal area to develop coordinated emission management strategies containing the emission reductions necessary to make reasonable progress.

In its source evaluation, DEQ identified 14 sources with SO₂ emissions and 4 sources with NO_x emissions located in Texas that are reasonably anticipated to contribute to visibility impairment at the Wichita Mountains Wilderness Area. DEQ requests that Texas consider the following sources for further analysis:

SO₂

- Martin Lake Electric Station
- WA Parish Electric Station



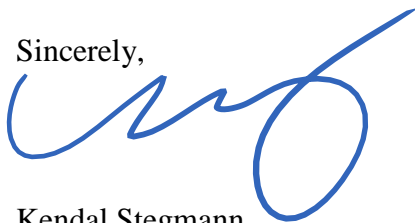
- Limestone Electric Station
- Welsh Power Plant
- Oklaunion Power Station
- Oxbow Calcining
- Oak Grove Electric Station
- Calaveras Plant
- Coletto Creek Power Station
- San Miguel Electric Plant
- AEP Pirkey Power Plant
- Streetman Plant
- Twin Oaks
- Works No. 4

NO_x

- Limestone Electric Station
- Oklaunion Power Station
- Works No. 4
- Dallas/Ft. Worth International Airport

Oklahoma is requesting that the Texas Commission on Environmental Quality continue in consultation with DEQ regarding its Regional Haze long-term strategy, and specifically any resulting analyses or measures at the above-listed sources. Should you have any questions about this request, please contact Cooper Garbe at 405-702-4169 or Melanie Foster at 405-702-4218.

Sincerely,



Kendal Stegmann
Director, Air Quality Division