Regional Haze State Implementation Plan for the Second Planning Period

Public Hearing
July 1, 2022
9:00am
Hearing Protocol

➤ For those in-person, please complete a form at the registration table if you wish to speak on the record.
➤ When called upon, please state your name and affiliation for the record.
➤ Speakers will have 5 minutes each to provide testimony.
➤ DEQ staff will not respond to the oral comments.
➤ Virtual observers will not be able to speak but may submit written comments via email to AQDSIPComments@deq.ok.gov until 4:30pm today, July 1, 2022.
Regional Haze State Implementation Plan for the Second Planning Period

DEQ Hearing Presentation

Melanie Foster, Rules & Planning Section Manager
Background

Regional Haze Program established by Congress under Sections 169A and 169B of the Clean Air Act

Goal is to restore visibility to natural conditions at all mandatory Class I federal areas by 2064

States required to periodically submit implementation plans that address visibility impairment at all Class I areas—both those within the state and those outside the state

DEQ charged with developing a long-term strategy for meeting a reasonable progress goal for each planning period
Oklahoma’s Class I Area: Wichita Mountains Wilderness Area

Courtesy: U.S. EPA

Courtesy: Kent Stafford
Background cont.

- Interagency Monitoring of Protected visual Environments (IMPROVE) monitor located in Wildlife Refuge
- Filter-based samples collected every three (3) days
- 20% clearest days and 20% most impaired days are determined
- Analysis reveals majority of contribution at Wichita Mountains Wilderness Area is from particulates of sulfate and nitrate
- Man-made emissions are sulfur dioxide (SO$_2$) and nitrogen oxides (NO$_x$)
Class I Areas in Other States

- Arkansas
  - Caney Creek Wilderness Area
  - Upper Buffalo Wilderness Area

- Missouri
  - Hercules-Glades Wilderness Area

- Texas
  - Big Bend National Park
  - Guadalupe Mountains National Park
Background cont.

- 40 C.F.R. Part 51, Subpart P
- Planning Period 1 covered 2010-2018
- Significant visibility improvement made from reductions achieved from Planning Period 1 RH SIP and other air quality programs
  - Best Available Retrofit Technology (BART)
  - Cross-State Air Pollution Rule (CSAPR) and CSAPR Update
  - New Source Performance Standards (NSPS)
  - National Emission Standards for Hazardous Air Pollutants (NESHAP)
Second Planning Period 2018-2028

- DEQ began working on second planning period in 2016
- 40 C.F.R. § 51.308(f) related to periodic reports was amended on January 10, 2017
  - Submittal deadline moved from July 31, 2018, to July 31, 2021
  - Allowed for adjustments due to wildland fires and international contributions
- Consultation with surrounding states through CenSARA
Source Selection

- CenSARA Ramboll Environ Area of Influence (AOI) Study
- Fewer sources with larger individual contributions of SOx
- More sources with smaller individual contributions of NOx
- Twelve (12) Oklahoma sources ultimately selected for further analysis
- Sent “Ask” letters to Arkansas, Louisiana, Nebraska, and Texas
- Received “Ask” letters from Arkansas and Missouri
Source Selection cont.

5 sources selected for SOx
- Oxbow Kremlin Calcining
- Grand River Dam Authority
- Western Farmers Hugo Generating Plant
- Holcim Ada Cement Plant
- Continental Carbon Ponca City

7 sources selected for NOx
- Mustang Binger Gas Plant
- DCP Chitwood Gas Plant
- ONEOK Maysville Gas Plant
- OG&E Mustang PP
- OG&E Horseshoe Lake PP
- ONEOK Lindsay Booster Station
- Panhandle Eastern Cashion Station
Four-factor Analysis

Regulatory requirements to consider:
1. The cost of compliance
2. The time necessary for compliance
3. The energy and non-air quality environmental impacts of compliance
4. The remaining useful life of any potentially affected source

Selected sources were requested to provide DEQ with a four-factor analysis for their units
- Some sources committed to install controls on affected units
- Some sources shutdown and/or removed affected units or committed to do so
- Some sources found there were no cost-effective control technologies for their units
Long-term Strategy (LTS)

- Reductions committed to by sources through 4-factor process
- Existing Oklahoma statutes and rules
- Smoke Management Plan
- EPA rules that have been proposed are expected to provide additional reductions in Planning Period 2 but these have not been relied upon in Oklahoma’s LTS
Uniform Rate of Progress (URP): Glidepath

- DEQ requesting adjustment of the glidepath for wildland fires and international sources
  - Resulting URP trendline for 2028 is 17.36 deciviews
- Projected visibility, based on EPA modeling, is 16.93 deciviews on the 20% most impaired days in 2028

<table>
<thead>
<tr>
<th>Metric</th>
<th>Clearest 20% days (dv)</th>
<th>Most impaired 20% days (dv)</th>
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</thead>
<tbody>
<tr>
<td>Baseline</td>
<td>9.92</td>
<td>22.18</td>
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<tr>
<td>2015-2019</td>
<td>8.65</td>
<td>17.58</td>
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<tr>
<td>2028 Reasonable Progress Goal</td>
<td>8.14</td>
<td>16.93</td>
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<tr>
<td>Natural Conditions</td>
<td>4.20</td>
<td>10.19</td>
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</tbody>
</table>
Consultation on Draft Plan

- Federal Land Managers
  - Formal comments received from U.S. Forest Service
- U.S. Environmental Protection Agency
  - Informal comments received from Region 6
- Tribal Partners
- Neighboring “ask” states
Next Steps for DEQ

- Comment period closes at 4:30pm today, July 1, 2022
- Review all public comments received
- Create Comments & Responses document
- Revise RH SIP if/where necessary
- Submit Planning Period 2 RH SIP and all supporting materials to EPA by August 15, 2022
Public Comments

➤ Per the Public Notice, only those people who are in-person at the hearing will be able to make oral comments.

➤ Anyone viewing the hearing virtually may submit written comments via email to AQDSIPComments@deq.ok.gov through 4:30pm today, July 1, 2022.

➤ Speakers will be limited to 5 minutes each.

➤ Speakers are encouraged to also submit their oral comments in writing.

➤ The public hearing will conclude at 11am but may be on recess if no public commenters desiring to speak are present.
Regional Haze Public Hearing Recessed

- There are currently no public commenters desiring to speak.
- The public hearing will resume when someone from the public wants to provide oral comments.
- Please indicate your desire to provide oral comments by filling out a form at the sign-in table.
- This hearing is still being recorded. Please refrain from holding conversations in the room during recess.
- Anyone viewing the hearing virtually may submit written comments via email to AQDSIPComments@deq.ok.gov through 4:30pm today, July 1, 2022.
- The public hearing will conclude at 11am.