

## DRAFT/PROPOSED

### OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY AIR QUALITY DIVISION

#### MEMORANDUM

June 10, 2021

**TO:** Phillip Fielder, P.E., Chief Engineer

**THROUGH:** Rick Groshong, Environmental Manager, Compliance and Enforcement

**THROUGH:** Phil Martin, P.E., Manager, Existing Source Permits Section

**THROUGH:** Joseph K. Wills, P.E., Engineering Section

**FROM:** Ryan Buntyn, P.E., Existing Source Permits Section

**SUBJECT:** Evaluation of Permit Application No. **2018-0201-TVR2**  
Western Farmers Electric Cooperative  
Hugo Power Plant (FAC ID 1700)  
SE/4 Section 21, T6S, R19E, Choctaw County  
Directions: Three miles west of Ft. Towson on US-70 and 12 miles east of Hugo  
Latitude: 34.01633°N, Longitude: 95.32188°W

#### SECTION I. INTRODUCTION

Western Farmers Electric Cooperative (WFEC) has requested renewal of the Title V operating permit for their Hugo Power Plant (SIC 4911 / NAICS 221112). The facility is currently operating under Permit No. 2008-337-TVR (M-7), issued December 2, 2019. The facility is an electric generating station located in an attainment area. The Hugo Power Plant was constructed in 1978 under Permit No. PSD-OK-053.

Since the facility is a major source of SO<sub>2</sub>, NO<sub>x</sub>, CO, and PM<sub>10</sub>, a Title V operating permit is required to incorporate all applicable requirements for the facility. The facility is operating under Acid Rain Permit No. 2018-0916-ARR4, issued January 10, 2020. The facility is a PSD major source and a major source of HAPs.

#### SECTION II. FACILITY DESCRIPTION

The coal-fired complex at the Hugo Power Plant consists of one main boiler unit (HU-Unit1). HU-Unit1 primarily combusts sub-bituminous coal to produce steam used to generate electric power.

Coal is brought to the facility by railcar and truck. The incoming coal is distributed to HU-Unit1 by a coal handling system that includes unloading, active and inactive coal storage, coal reclaim operations, and coal crushing.

Particulate emissions from the facility arise from material handling, storage of coal, and disposal of fly ash and bottom ash. Other pollutant emissions at the facility arise from combustion of coal and distillate fuel oil. The flue gas that exits HU-Unit1 contains PM in the form of fly ash. An

electrostatic precipitator controls the fly ash emissions from the flue gas with a 99.9% control efficiency. The fly ash contained in the precipitator is collected and stored in fly ash silos from where it is transported to an ash disposal area by truck. Bottom ash and economizer ash from HU-Unit1 are collected by the bottom ash system and are sent to the landfill.

Other ancillary activities include a 450,000 gallon distillate fuel oil storage tank and cooling towers. The facility cooling towers facilitate cooling of various plant equipment by dissipating waste heat to the atmosphere. The cooling towers do not use chrome-based water treatment chemicals.

**SECTION III. PERMIT HISTORY**

Permits	Date Issued	Description
2008-337-TVR	8/13/2013	First renewal permit; addressed CAM and added two diesel powered firewater pumps.
2008-337-TVR (M-1)	1/2/2014	Minor modification to conduct a field trial for a system for control of mercury emissions.
2008-337-TVR (M-2)	9/16/2015	Significant modification to limit the auxiliary boiler to a 10% capacity factor.
2008-337-AD (M-3)	1/7/2016	Applicability determination for replacement of reheater inlet boiler tubes on the coal-fired Main Boiler.
2008-337-AD (M-4)	5/31/2018	Applicability determination for a replacement of the #3 low pressure boiler feedwater heater associated with the coal-fired Main Boiler.
2008-337-TVR (M-5)	9/19/2018	Minor modification to remove the current bottom ash water sluicing system and add a new bottom ash conveyor.
2008-337-AD (M-6)	6/4/2019	Applicability determination for a replacement of boiler tube bundles associated with the coal-fired Main Boiler.
2008-337-TVR (M-7)	12/2/2019	Minor modification to replace two diesel fire pump engines.

**SECTION IV. REQUESTED CHANGES**

WFEC has requested the following changes in the permit:

- Remove the auxiliary boiler (EUG 2, P-2, HU-Aux) from the permit. The boiler was removed from service in 2017;
- Update tank emissions from EPA Tanks 4.0.9d to AP-42 (6/20), Sect. 7.1 in accordance with EPA and DEQ guidance;
- Add additional requirements to Specific Condition 6 regarding startup, shutdown, and malfunction events and excess emissions. No new limits are being added, the addition is to clarify how Subchapter 9 reporting applies to the facility;
- Minor typographical errors throughout the memo.

**SECTION V. EQUIPMENT**

Emission units (EUs) have been arranged into Emission Unit Groups (EUGs) in the following outline.

**EUG 1. Coal-fired Main Boiler**

<b>EU and Point ID#</b>	<b>Make</b>	<b>Heat Capacity (MMBTUH)</b>	<b>Serial #</b>	<b>Installed Date</b>
HU-Unit1, P-1	Babcock & Wilcox	4,600	RB-575	1978

**EUG 3. Coal Handling Activities**

<b>EU and Point ID#</b>	<b>Activities</b>	<b>Installed Date</b>
HU-Coal1, P-3	Railcar Unloading – Rotary Dump	1978
HU-Coal2, WC-1	Conveying (from Railcar)	1978
HU-Coal3, WC-2	Crushing	1978
HU-Coal4, P-6	Active Storage Pile-Load in by Conveyor	1978
HU-Coal5, P-7	Active Storage Pile-Load out under Pile Reclaim	1978
HU-Coal6, P-8	Inactive Storage Pile-Load in by Conveyor	1978

**EUG 4. Ash Handling Activities**

<b>EU and Point ID#</b>	<b>Activities</b>	<b>Installed Date</b>
HU-Ash1, P-13	Fly Ash Truck Loading and Unloading	1978
HU-Ash2, P-14	Fly Ash Conveying/Storage	1978
HU-Ash3, P-15	Fly Ash Silo (Load Out)	1978
HU-Ash5, P-17	Bottom Ash Truck Loading and Unloading	2018
HU-Ash6, P-18	Bottom Ash Conveyor Discharge	2018

**EUG 5. Plant Traffic**

<b>EU and Point ID#</b>	<b>Activities</b>	<b>Installed Date</b>
HU-PT, P-18	General Motor/MP36A	1978

Most plant roads are paved, so PM emissions from plant traffic will be negligible.

**EUG 6. Storage Tanks**

<b>Point and EU ID#</b>	<b>Capacity (gallons)</b>	<b>Material Stored</b>	<b>Installed Date</b>
HU-T, P-19	450,000	Distillate Fuel Oil	1980
HU-T, P-20	2,030	Unleaded Gasoline	1980
HU-T, P-21	12,000	Diesel	1980

**EUG 7. Emergency Engine**

<b>Point and EU ID#</b>	<b>Capacity (hp)</b>	<b>Make/Model</b>	<b>Installed Date</b>
HU-G, P-22	630	Black Start Diesel Generator	1980

**EUG 7A. Emergency Engines Subject to NSPS Subpart IIII**

Point and EU ID#	Capacity (hp)	Make/Model	Installed Date
HU-G, P-24A	600	Caterpillar 18HH0-UFAD176-600	2019
HU-G, P-25A	600	Caterpillar 18HH0-UFAD176-600	2019

**EUG 8. Mercury Control Additives Silos**

EU and Point ID#	Activities	Installed Date
Silo 1	Additive A (175 tons/year)	2014
Silo 2	Powdered activated carbon (920 tons/year)	2014

**SECTION VI. EMISSIONS**

**Criteria Pollutants**

Maximum criteria pollutant emissions have been estimated from the following factors:

Unit ID	Emission Unit	Pollutant	Emission Factor	Factor Reference
HU-Unit 1	Main Boiler (4,600 MMBTUH, 280 TPH coal)	NOx	0.461 lb/MMBTU	NSPS “Modification” threshold
		CO	11,977 lb/hr	Highest CEM reading plus 20% safety margin
		VOC	0.0075 lb/MMBTU	Stack test
		PM/PM <sub>10</sub>	0.0136 lb/MMBTU	NSPS “Modification” threshold
		PM <sub>2.5</sub>	0.0051 lb/MMBTU	2011 Stack Test Results
		SO <sub>2</sub>	0.998 lb/MMBTU	NSPS “Modification” threshold
HU-Coal1, P-3	Railcar Unloading – Rotary dump	PM <sub>10</sub>	0.00283 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
		PM <sub>2.5</sub>	0.000428 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
HU-Coal2, WC-1 / WC-2	Conveying (from Railcar)	PM <sub>10</sub>	0.00283 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4

Unit ID	Emission Unit	Pollutant	Emission Factor	Factor Reference
HU-Coal2, WC-1 / WC-2	Conveying (from Railcar)	PM <sub>2.5</sub>	0.000428 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
HU-Coal3, WC-1 / WC-2	Crushing	PM <sub>10</sub> /PM <sub>2.5</sub>	0.006 lb/ton 95% control 200% safety factor	WebFire
HU-Coal4, P-6	Active Storage Pile-Load in by conveyor	PM <sub>10</sub>	0.00283 lb/ton	AP-42 (1/95) Section 13.2.4
		PM <sub>2.5</sub>	0.000428 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
HU-Coal5, P-7	Active Storage Pile-Load out under pile reclaim	PM <sub>10</sub>	0.00283 lb/ton / 99.9% control	AP-42 (1/95) Section 13.2.4
		PM <sub>2.5</sub>	0.000428 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
HU-Coal6, P-8	Inactive Storage Pile-Load in by conveyor	PM <sub>10</sub>	0.00283 lb/ton / 75% control	AP-42 (1/95) Section 13.2.4
		PM <sub>2.5</sub>	0.000428 lb/ton / 95% control 300% safety factor	AP-42 (1/95) Section 13.2.4
HU-Ash1, P-13	Fly Ash Truck Loading and Unloading	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	25 lb/ton / 99.9% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); baghouse vendor guarantees
HU-Ash2, P-14	Fly Ash Conveying/Storage	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	25 lb/ton / 99.9% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); baghouse vendor guarantees

Unit ID	Emission Unit	Pollutant	Emission Factor	Factor Reference
HU-Ash3, P-15	Fly Ash Silo (Load Out)	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	25 lb/ton / 99.9% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); baghouse vendor guarantees
HU-Ash5, P-17	Bottom Ash Truck Loading and Unloading	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	25 lb/ton / 99.9% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); Wet nature of bottom ash
HU-Ash6, P-18	Bottom Ash Conveyor Discharge	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	25 lb/ton / 99% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); Wet nature of bottom ash
HU-T, P-19	Distillate Fuel Oil Tank	VOC	AP-42 (6/20), Sect. 7.1	AP-42 (6/20), Sect. 7.1
HU-T, P-20	Unleaded Gasoline Tank			
HU-T, P-21	Diesel Tank			
HU-G, P-22	Black Start Generator	NO <sub>x</sub>	0.024 lb/hp-hr	AP-42 (10/96), Sect. 3.4
		CO	0.0055 lb/hp-hr	
		VOC	0.000705 lb/hp-hr	
		PM <sub>10</sub> /PM <sub>2.5</sub>	0.0007 lb/hp-hr	
		SO <sub>2</sub>	0.000405 lb/hp-hr	
HU-G, P-24A HU-G, P-25A	Fire Water Pump (600-hp) (9,000 Btu/hp-hr)	NO <sub>x</sub>	3.00 g/hp-hr	NSPS III Table 4
		CO	0.34 g/hp-hr	Manufacturer’s Data
		VOC	0.07 g/hp-hr	Manufacturer’s Data
		PM <sub>10</sub> /PM <sub>2.5</sub>	0.15 g/hp-hr	NSPS III Table 4
		SO <sub>2</sub>	5.88E-04 lb/MMBtu	AP-42 (7/00), Sect. 3.2
Silo 1 Silo 2	Mercury control additives	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	25 lb/ton / 99% control	“Fugitive Emissions from Coal-Fired Power Plants” (EPRI, 6/84); baghouse vendor guarantees

<sup>1</sup>Annual emission rates for the Main Boiler (EUG-1) were specified in Permit No. 97-058-C (M-2) PSD, issued on February 9, 2007. These emission rates were derived from stack testing and were set to keep a modification from exceeding PSD levels of significance. Annual emission rates are calculated on a different basis from hourly emission rates. The stack test did not differentiate PM from PM<sub>10</sub> and PM<sub>2.5</sub>. For the purposes of this memorandum, all PM is PM<sub>10</sub> and PM<sub>2.5</sub>.

Annual emission rates for the fire water pumps and the emergency generator were all calculated based on maximum hours of operation of 500 hours per year each.

**EUG 1: Main Boiler**

EU ID#	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
HU-Unit1	1,872.6	4,498.9	11,977.0	4,689.3	34.5	86.02	4,591.8	16,404.1

EU ID#	PM <sub>10</sub>		PM <sub>2.5</sub>	
	lb/hr	TPY	lb/hr	TPY
HU-Unit1	62.5	223.7	23.46	102.75

**EUG 3: Coal Handling Activities**

EU ID#	Activities	PM <sub>10</sub>		PM <sub>2.5</sub>	
		lb/hr	TPY	lb/hr	TPY
HU-Coal1	Railcar Unloading-Rotary Dump	0.14	0.62	0.02	0.09
HU-Coal2	Conveying	0.14	0.62	0.02	0.09
HU-Coal3	Crushing	0.23	0.99	0.23	0.99
HU-Coal4	Active Storage Pile-Load in by Conveyor	0.79	3.47	0.12	0.52
HU-Coal5	Active Storage Pile-Load out under Pile Reclaim	0.01	0.04	0.01	0.01
HU-Coal6	Inactive Storage Pile-Load in by Conveyor	0.20	0.87	0.03	0.13
<b>TOTALS</b>		<b>1.51</b>	<b>6.61</b>	<b>0.42</b>	<b>1.84</b>

**EUG 4: Ash Handling Activities**

EU ID#	Activities	PM/PM <sub>10/2.5</sub>	
		lb/hr	TPY
HU-Ash1	Fly Ash Truck Loading and Unloading	0.35	1.53
HU-Ash2	Fly Ash Conveying/Storage	0.35	1.53
HU-Ash3	Fly Ash Silo (Load Out)	0.35	1.53
HU-Ash5	Bottom Ash Truck Loading and Unloading	0.35	1.53
HU-Ash6	Bottom Ash Conveyor Discharge	0.35	1.53
<b>TOTALS</b>		<b>1.75</b>	<b>7.65</b>

**EUG 5: Plant Traffic**

EU ID#	Activities	PM <sub>10/2.5</sub>	
		lb/hr	TPY
--	Paved Roads	--	--

**EUG 6: Storage Tanks**

EU ID#	Activities	VOC	
		lb/hr	TPY
HU-T, P-19	Distillate Fuel	0.02	0.10
HU-T, P-20	Unleaded Gasoline	0.26	1.13
HU-T, P-21	Diesel Fuel	<0.01	0.01
<b>TOTALS</b>		<b>0.29</b>	<b>1.14</b>

**EUG 7: Emergency Engine**

EU ID#	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>		PM/PM <sub>10/2.5</sub>	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
HU-G, P-22	15.75	3.94	3.46	0.87	0.44	0.11	0.26	0.06	0.44	0.11

**EUG 7A: Emergency Engines Subject to NSPS Subpart IIII**

EU ID#	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>		PM/PM <sub>10/2.5</sub>	
	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
HU-G, P-24A	3.97	0.99	0.45	0.11	0.09	0.02	0.01	0.01	0.20	0.05
HU-G, P-25A	3.97	0.99	0.45	0.11	0.09	0.02	0.01	0.01	0.20	0.05
<b>TOTALS</b>	<b>7.94</b>	<b>1.98</b>	<b>0.90</b>	<b>0.22</b>	<b>0.18</b>	<b>0.04</b>	<b>0.02</b>	<b>0.02</b>	<b>0.40</b>	<b>0.10</b>

**EUG 8. Mercury Control Additives Silos**

EU ID#	Activities	PM/PM <sub>10/2.5</sub>	
		lb/hr	TPY
Silo 1	Additive A (175 tons/year)	0.00	0.02
Silo 2	Powdered activated carbon (920 tons/year)	0.03	0.12
<b>TOTALS</b>		<b>0.03</b>	<b>0.14</b>

**Total Emissions**

EUG	EUG ID	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>		PM <sub>10</sub>	
		lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY	lb/hr	TPY
EUG-1	Main Boiler	1,872.6	4,498.9	11,977.0	4,689.3	34.5	86.02	4591.8	16,404.1	62.5	223.7
EUG-3	Coal Handling	-	-	-	-	-	-	-	-	1.51	6.61
EUG-4	Ash Handling	-	-	-	-	-	-	-	-	1.75	7.65
EUG-5	Roads	-	-	-	-	-	-	-	-	-	-
EUG-6	Tanks	-	-	-	-	-	-	-	-	-	-
EUG-7	Emergency Engine	15.75	3.94	3.46	0.87	0.44	0.11	0.26	0.06	0.44	0.11
EUG-7	Emergency Engines (NSPS)	7.94	1.98	0.90	0.22	0.18	0.04	0.02	0.02	0.40	0.10



EUG	EUG ID	NO <sub>x</sub>		CO		VOC		SO <sub>2</sub>		PM <sub>10</sub>	
		lb/hr	TPY	lb/hr	TPY	lb/hr	lb/hr	TPY	lb/hr	TPY	lb/hr
EUG-8	Mercury Control Additives	-	-	-	-	-	-	-	-	0.03	0.14
<b>Totals</b>		<b>1,896.3</b>	<b>4,504.8</b>	<b>11,981.4</b>	<b>4,690.4</b>	<b>35.1</b>	<b>86.2</b>	<b>4,592.1</b>	<b>16,404.2</b>	<b>66.6</b>	<b>238.3</b>

**Emissions of Hazardous Air Pollutants (HAPs)**

HAP emissions that exceed the major source levels are emitted from the coal-fired main boiler. HAP emissions from other emission units are insignificant. HAP emissions reflecting continuous operation are calculated based on a maximum of 347.5 tons/hr coal combustion and the emission factors from AP-42 (9/98), Table 1.1-14 and Table 1.1-18.

**HAP Emissions from the Main Boiler**

Pollutant	CAS#	Potential Emissions	
		lb/hr	TPY
Arsenic	7440382	0.142	0.624
Cadmium	7440439	0.0177	0.0776
Chromium	7440473	0.0904	0.396
Mercury	7439976	0.0288	0.126
Hydrochloric Acid	7647010	660.25	2,891.9
Hydrogen Fluoride	7664393	79.925	350.07
Nickel	7440020	0.0973	0.426
Formaldehyde	50000	0.0834	0.365

**Greenhouse Gas Emissions**

Emissions of CO<sub>2</sub>e have been calculated at a potential of 4,343,020 TPY.

**SECTION VII. INSIGNIFICANT ACTIVITIES**

The insignificant activities identified and justified in the application are duplicated below. Appropriate recordkeeping of activities indicated below with a “\*” is specified in the Specific Conditions.

1. Space heaters, boilers, process heaters, and emergency flares less than or equal to 5 MMBTU/hr heat input (commercial natural gas). None identified but may occur in the future.
2. \* Storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature. None identified but may occur in the future.
3. \* Emissions from fuel storage/dispensing equipment operated solely for facility owned vehicles if fuel throughput is not more than 2,175 gallons/day, averaged over a 30-day period. Tanks P-20 and P-21 supply fuels at rates lower than 2,175 gallons per day.

4. \* Welding and soldering operations utilizing less than 100 pounds of solder and 53 tons per year of electrodes. However, welding is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the Specific Conditions.
5. Hand wiping and spraying of solvents from containers with less than 1 liter capacity used for spot cleaning and/or degreasing in ozone attainment areas. The facility performs small amounts of hand wiping and spraying of solvents. Solvent usage is conducted as a part of routine maintenance and is considered a trivial activity and recordkeeping will not be required in the Specific Conditions.
6. \* Activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant. This includes the disposal of wastes generated from boiler cleaning and the fly ash collection, storage, and truck-loading operations of EUG-4.

## SECTION VIII. OKLAHOMA AIR POLLUTION CONTROL RULES

OAC 252:100-1 (General Provisions) [Applicable]  
Subchapter 1 includes definitions but there are no regulatory requirements.

OAC 252:100-2 (Incorporation by Reference) [Applicable]  
This subchapter incorporates by reference applicable provisions of Title 40 of the Code of Federal Regulations. These requirements are addressed in the "Federal Regulations" section.

OAC 252:100-3 (Air Quality Standards and Increments) [Applicable]  
Primary Standards are in Appendix E and Secondary Standards are in Appendix F of the Air Pollution Control Rules. At this time, all of Oklahoma is in attainment of these standards.

OAC 252:100-5 (Registration, Emissions Inventory and Annual Operating Fees) [Applicable]  
Subchapter 5 requires sources of air contaminants to register with Air Quality, file emission inventories annually, and pay annual operating fees based upon total annual emissions of regulated pollutants. Emission inventories were submitted and fees paid for previous years, as required.

OAC 252:100-8 (Permits for Part 70 Sources) [Applicable]  
Part 5 includes the general administrative requirements for part 70 permits. Any planned changes in the operation of the facility which result in emissions not authorized in the permit and which exceed the "Insignificant Activities" or "Trivial Activities" thresholds require prior notification to AQD and may require a permit modification. Insignificant activities mean individual emission units that either are on the list in Appendix I (OAC 252:100) or whose actual calendar year emissions do not exceed the following limits:

- 5 TPY of any one criteria pollutant
- 2 TPY of any one hazardous air pollutant (HAP) or 5 TPY of multiple HAPs or 20% of any threshold less than 10 TPY for a HAP that the EPA may establish by rule

Emission limitations for all the sources are taken from the permit application and previous permit.

OAC 252:100-9 (Excess Emission Reporting Requirements) [Applicable]  
Except as provided in OAC 252:100-9-7(a)(1), the owner or operator of a source of excess emissions shall notify the Director as soon as possible but no later than 4:30 p.m. the following

working day of the first occurrence of excess emissions in each excess emission event. No later than thirty (30) calendar days after the start of any excess emission event, the owner or operator of an air contaminant source from which excess emissions have occurred shall submit a report for each excess emission event describing the extent of the event and the actions taken by the owner or operator of the facility in response to this event. Request for mitigation, as described in OAC 252:100-9-8, shall be included in the excess emission event report. Additional reporting may be required in the case of ongoing emission events and in the case of excess emissions reporting required by 40 CFR Parts 60, 61, or 63. WFEC is incorporating an alternative reporting schedule for excess emissions for the Main Boiler to be consistent with NSPS Subpart D requirements, only, which has been incorporated into this permit.

OAC 252:100-13 (Open Burning) [Applicable]  
 Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in this subchapter.

OAC 252:100-19 (Particulate Matter) [Applicable]  
 This subchapter specifies maximum allowable emissions of particulate matter (PM). The Main Boiler is rated at 4,600 MMBTUH. In accordance with this subchapter, the allowable emissions (as calculated using Appendix C) are 0.13 lb/MMBTU for boilers with a heat input of 4,600 MMBTUH. The permit establishes a PM limitation of 0.1 lb/MMBTU for the Main Boiler pursuant to NSPS Subpart D, which is more stringent than the maximum allowable emissions rate specified in this subchapter. AP-42 (9/98), Table 1.3-1 lists the PM emissions for distillate fuel oil combustion as 0.014 lb/MMBTU, which is less than the NSPS Subpart D limit of 0.1 lb/MMBTU. For the emergency diesel generator (P-22), AP-42 (10/96) Table 3.4-1 lists the PM emissions for diesel combustion as 0.1 lb/MMBTU, which is in compliance with the Subchapter 19 limit of 0.6 lb/MMBTU for units smaller than 10 MMBTUH. For the emergency fire pump engines (P-24A and P-25A), manufacturer data guarantees compliance with the NSPS Subpart III limit in Table 4 of 0.15 g/hp-hr, or approximately 0.04 lb/MMBTU, which is in compliance with the applicable limit of 0.60 lb/MMBTU for units smaller than 10 MMBTUH.

This subchapter also specifies the allowable rate of emissions from industrial processes based on process rate. The table following lists the applicable processes, their process weight rate, and allowable emissions rate (as calculated using Appendix G). As shown all units are in compliance with their applicable emission limits.

Unit ID	Process	Process Rate (tons/hr)	Allowable Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)
HU-Coal1	Railcar Unloading – Rotary Dump	251.77	61.04	0.14
HU-Coal2	Conveying (from Railcar)	251.77	61.04	0.14
HU-Coal3	Crushing	251.77	61.04	0.23
HU-Coal4	Active Storage Pile-Load in by Conveyor	251.77	61.04	0.79
HU-Coal5	Active Storage Pile-Load out under Pile Reclaim	251.77	61.04	0.01
HU-Coal6	Inactive Storage Pile-Load in by Conveyor	251.77	61.04	0.20
HU-Ash1	Fly Ash Truck Loading and Unloading	12.59	22.38	0.35
HU-Ash2	Fly Ash Conveying/Storage	12.59	22.38	0.35

Unit ID	Process	Process Rate (tons/hr)	Allowable Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)
HU-Ash3	Fly Ash Silo (Load Out)	12.59	22.38	0.35
HU-Ash5	Bottom Ash Truck Loading and Unloading	12.59	22.38	0.35
HU-Ash6	Bottom Ash Conveyor Discharge	12.59	22.38	0.35
Mercury Additives	PAC Additive	0.13	1.05	0.03

OAC 252:100-25 (Visible Emissions and Particulates) [Applicable]  
 No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. Units subject to an opacity standard under NSPS are exempt from this subchapter. Therefore, the Main Boiler (HU-Unit1) and coal handling activities (HU-Coal1 to HU-Coal6) are exempt from this subchapter. The ash handling activities (HU-Ash1, HU-Ash2, HU-Ash3 HU-Ash5, and HU-Ash-6) are subject to this requirement and visible emissions observations for these emission points are required by this permit. A continuous opacity monitoring system (COMS) is required for fossil fuel-fired steam generators as specified in paragraph 2.1 of 40 CFR Part 51, Appendix P. This also applies to any fuel-burning equipment with a design heat input value of 250 MMBTUH or more, that does not burn gaseous fuel exclusively, and that was not in being on or before July 1, 1972, or that is modified after July 1, 1972. This requirement does not apply to sources subject to a NSPS. The coal fired fossil fuel-fired steam generator HU-Unit 1 is subject to NSPS and is not subject to this rule.

OAC 252:100-29 (Fugitive Dust) [Applicable]  
 No person shall cause or permit the discharge of any visible fugitive dust emissions beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards. Fugitive dust emissions that could be caused by coal and fly ash handling and storage are minimized by extensive use of fabric filters, wet suppression, closed systems and other measures. Confining the active disturbance to a very small area minimizes fugitives from the coal piles. This permit also requires that reasonable precautions be taken to minimize fugitive dust.

OAC 252:100-31 (Sulfur Compounds) [Applicable]  
Part 2 limits emissions of hydrogen sulfide (H<sub>2</sub>S) from new and existing equipment, sources, or facilities. Emissions of H<sub>2</sub>S shall not cause an ambient air concentration of H<sub>2</sub>S greater than 0.2 ppm, on a 24 hour average, at standard conditions. The plant is not known to be a source of emissions of H<sub>2</sub>S. Fuel-burning equipment fired with pipeline natural gas or No. 2 diesel will not have the potential to exceed the H<sub>2</sub>S ambient air concentration limit.  
Part 5 limits sulfur dioxide emissions from new equipment (constructed after July 1, 1972). For liquid fuels the limit is 0.8 lb/MMBTU. The permit will require the use of fuel oil with a maximum sulfur content of 0.5 percent by weight. The new fire pump and emergency generator engines are subject to a limitation in NSPS Subpart IIII of 500 ppm sulfur in the fuel, which is equivalent to 0.05 lb/MMBTU. For the Main Boiler solid fuels, the limit is 1.2 lb/MMBTU. Emissions of 1.2

lb/MMBTU will be determined from Continuous Emissions Monitoring System (CEMS) data. These emission rates are in compliance with the limitations of Subchapter 31.

OAC 252:100-33 (Nitrogen Oxides)

[Applicable]

This subchapter limits new solid fossil fuel-burning equipment with rated heat input greater than or equal to 50 MMBTUH to emissions of 0.7 lb of NO<sub>x</sub> per MMBTU. The permit establishes a NO<sub>x</sub> limitation of 0.46 lb/MMBTU for the Main Boiler (40 CFR Part 76 requirement), which is in compliance with this subchapter. The Emergency Engines are all smaller than the 50 MMBTUH threshold.

OAC 252:100-37 (Volatile Organic Compounds)

[Applicable]

Part 3 requires storage tanks constructed after December 28, 1974, with a capacity of 400 gallons or more and storing a VOC with a vapor pressure greater than 1.5 psia to be equipped with a permanent submerged fill pipe or with an organic vapor recovery system. The storage tanks at the facility are exempt from this part since they store a VOC with a vapor pressure less than 1.5 psia.

Part 3 requires loading facilities with a throughput equal to or less than 40,000 gallons per day to be equipped with a system for submerged filling of tank trucks or trailers if the capacity of the vehicle is greater than 200 gallons. The facility has gasoline loading but it is only used to fill vehicles with tanks less than 200 gallons. Therefore, gasoline loading at the facility is exempt from this part.

Part 5 limits the VOC content of coatings used in coating lines or operations. Any painting operation will involve maintenance coatings of buildings and equipment and emit less than 100 pounds per day of VOCs and so is exempt.

Part 7 requires fuel-burning and refuse-burning equipment to be operated to minimize emissions of VOC. The equipment at this location is subject to this requirement.

Part 7 requires effluent water separators which receive water containing more than 200 gallons per day of any VOC to be equipped with vapor control devices. The oil/water separator located at the facility receives insignificant amounts of oil throughput (<200 gal/day of VOC) and is therefore not subject to this subchapter.

OAC 252:100-42 (Toxic Air Contaminants (TAC))

[Applicable]

This subchapter regulates toxic air contaminants (TAC) that are emitted into the ambient air in areas of concern (AOC). Any work practice, material substitution, or control equipment required by the Department prior to June 11, 2004, to control a TAC, shall be retained, unless a modification is approved by the Director. Since no AOC has been designated there are no specific requirements for this facility at this time.

OAC 252:100-43 (Testing, Monitoring, and Recordkeeping)

[Applicable]

This subchapter provides general requirements for testing, monitoring and recordkeeping and applies to any testing, monitoring or recordkeeping activity conducted at any stationary source. To determine compliance with emissions limitations or standards, the Air Quality Director may require the owner or operator of any source in the state of Oklahoma to install, maintain and operate monitoring equipment or to conduct tests, including stack tests, of the air contaminant source. All required testing must be conducted by methods approved by the Air Quality Director and under the direction of qualified personnel. A notice-of-intent to test and a testing protocol shall be submitted to Air Quality at least 30 days prior to any EPA Reference Method stack tests. Emissions and other data required to demonstrate compliance with any federal or state emission limit or standard, or any requirement set forth in a valid permit shall be recorded, maintained, and submitted as required by this subchapter, an applicable rule, or permit requirement. Data from any

required testing or monitoring not conducted in accordance with the provisions of this subchapter shall be considered invalid. Nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

Each emissions unit must be evaluated for periodic testing in accordance with the Periodic Testing Standardization guidance issued December 1, 2011, on a pollutant by pollutant basis. The frequency of the periodic testing requirement is based on the quantity of emissions an emission unit is permitted to emit. Periodic testing requirements are not required for an emission unit that is subject to an applicable requirement that already requires periodic testing, continuous emission monitoring (CEMS), or predictive emission monitoring (PEMS). The main boiler, HU-Unit-1, has NO<sub>x</sub>, CO, SO<sub>2</sub>, and PM emissions greater than 100 TPY and is equipped with a CEMS. The following table lists the applicable testing for each pollutant required under the guidance.

**Periodic Testing Review**

EUG/EU	Pollutant	TPY	Current Monitoring	Periodic Testing
EUG-1 HU-Unit-1	NO <sub>x</sub>	4,498.85	CEMS	NO
	CO	4,689.81	NO	YES – Every Year
	SO <sub>2</sub>	16,404.1	CEMS	NO
	PM	223.65	NO*	NO*

\* PM testing is conducted periodically in accordance with NESHAP Subpart UUUUU (MATS Rule) which satisfies the periodic testing requirements.

All testing requirements under the guidance as applicable to this facility have been incorporated into the permit.

**The following Oklahoma Air Pollution Control Rules are not applicable to this facility:**

OAC 252:100-11	Alternative Emissions Reduction	not requested
OAC 252:100-15	Mobile Sources	not in source category
OAC 252:100-23	Cotton Gins	not type of emission unit
OAC 252:100-24	Grain Elevators	not in source category
OAC 252:100-35	Carbon Monoxide	not in source category
OAC 252:100-39	Nonattainment Areas	not located in affected county
OAC 252:100-47	Municipal Solid Waste Landfills	not in source category

**SECTION IX. FEDERAL REGULATIONS**

PSD, 40 CFR Part 52

[Not Applicable at this Time]

Potential emissions for NO<sub>x</sub>, CO, PM<sub>10</sub> and SO<sub>2</sub> are greater than the level of significance of 100 TPY for this source category. Any future increase of emissions above significance levels must be evaluated for PSD (100 TPY CO, 40 TPY NO<sub>x</sub>, 40 TPY SO<sub>2</sub>, 40 TPY VOC, 15 TPY PM<sub>10</sub>, 10 TPY PM<sub>2.5</sub>, or 75,000 TPY CO<sub>2e</sub>).

NSPS, 40 CFR Part 60

[Subparts D, Y, and III Are Applicable]

Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators. This subpart affects each fossil-fuel-fired steam generating unit of more than 73 megawatts heat input rate (250

MMBTUH) that commences construction or modification after August 17, 1971. The Main Boiler (HU-Unit1) commenced construction in 1977 and is subject to this subpart. The standards are listed below:

- PM: 0.10 lb/MMBTU  
Opacity: 20% except for one six-minute period per hour of not more than 27% (40 CFR §60.42)
- SO<sub>2</sub>: 1.2 lb/MMBTU for solid fossil fuel (40 CFR §60.43)
- NO<sub>x</sub> 0.7 lb/MMBTU for solid fossil fuel (40 CFR §60.44)

The subpart also requires that each owner or operator install, calibrate, maintain, and operate COMS for measuring the opacity and CEMS for measuring sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide (40 CFR §60.45). Performance test methods and procedures are specified (40 CFR §60.46).

COMS and CEMS were installed to monitor opacity, SO<sub>2</sub>, NO<sub>x</sub> and CO<sub>2</sub>. The CEMS meet the requirements of 40 CFR §§60.45 and 60.46 and 40 CFR Part 75.

Subpart Da, Standards of Performance for Electric Utility Steam Generating Units. This subpart regulates electric generating units capable of combusting more than 250 MMBTUH heat input of fossil fuel for which construction, modification, or reconstruction is commenced after September 18, 1978. The Main Boiler (HU-Unit1) commenced construction prior to 1978.

Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. This subpart regulates any steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBTUH. The Main Boiler was constructed before 1984 and therefore is exempt from the requirements of Subpart Db.

Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. This subpart regulates any steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 100 MMBTU per hour or less, but greater than or equal to 10 MMBTU per hour. The Main Boiler was constructed before 1989, and therefore is exempt from the requirements of Subpart Dc.

Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquid for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978. This subpart regulates storage tanks for petroleum liquids with capacities larger than 40,000 gallons. The No. 2 distillate fuel oil tank (450,000 gallons) is exempt because it was installed after May 19, 1978.

Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after May 18, 1978, and Prior to July 23, 1984. The No. 2 distillate fuel oil tank (450,000 gallons) is exempt because No. 2 through 6 distillate fuel oils are not defined as “petroleum liquid” by this subpart.

Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. Kb regulates hydrocarbon tanks with capacities larger than 40 M<sup>3</sup> (19,813 gallons). All tanks at this site are exempt from Subpart Kb since they were installed before the effective date of the regulation.

Subpart Y, Standards of Performance for Coal Preparation and Processing Plants. This subpart applies to coal preparation plants constructed or modified after October 24, 1974, with capacity greater than 200 tons per day (TPD). Affected sources include thermal dryers, pneumatic coal-cleaning equipment, coal processing and conveying equipment (including breakers and crushers), coal storage systems, and coal transfer and loading systems. All equipment at this facility was constructed after the specified date, and the unit's capacity exceeds 200 TPD. The facility does not have thermal dryers or pneumatic cleaning equipment. The following standard shall be met by the facility:

Opacity from any coal processing and conveying equipment, coal storage systems, and coal transfer and loading systems shall be no greater than 20% opacity (40 CFR §60.254).

The subpart requires that Reference Method 9 be used to demonstrate compliance with the opacity standard. Method 9 testing was performed on March 30, 2011.

Subpart DDDD, Emission Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units. This subpart affects energy recovery units that combust solid waste constructed on or before November 30, 1999. As the facility will not combust solid waste, the requirements of this regulation do not apply.

Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. This subpart affects stationary compression ignition (CI) internal combustion engines (ICE) based on power and displacement ratings, depending on date of construction, beginning with those constructed after July 11, 2005. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. The emergency fire pump engines (P-24A and P-25A) each have a rated power of 600-hp and a model year later than 2009. They have been certified by the manufacturer (Caterpillar) to meet the applicable standards of Subpart IIII: 3.0 g/hp-hr NO<sub>x</sub>, 2.6 g/hp-hr CO, and 0.15 g/hp-hr PM.

Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines (SI-ICE). This subpart establishes emission standards for all new SI engines ordered after June 12, 2006 and all SI engines modified or reconstructed after June 12, 2006. There are no SI-ICE at this facility.

NESHAP, 40 CFR Part 61

[Not Applicable]

There are no emissions of any of the regulated pollutants: arsenic, asbestos, beryllium, benzene, coke oven emissions, mercury, radionuclides or vinyl chloride except for trace amounts of benzene. Subpart J affects process streams which contain more than 10% benzene by weight.

NESHAP, 40 CFR Part 63

[Subparts ZZZZ, DDDDD and UUUUU Applicable]

Subpart ZZZZ, Reciprocating Internal Combustion Engines (RICE). This subpart affects any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions.



A RICE > 500 hp located at a major source is new or reconstructed if construction or reconstruction commenced after December 19, 2002. The 630-hp black start diesel generator (P-22) was originally constructed before December 19, 2002, and is an existing stationary emergency source at a major facility. As such, per §63.6590(b)(3), it is not subject to the requirements of this subpart or Subpart A, including the initial notification requirements. The 600-hp Caterpillar 18HH0-UFAD176-600 emergency engines (P-24A and P-25A) were constructed in 2019, and are new stationary emergency sources at a major facility. As such, per §63.6590(b)(1)(i), they were subject to only the initial notification requirements of §63.6645(f) and must comply with 40 CFR Part 60 Subpart III.

Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process. This regulation was re-promulgated effective December 21, 2012. Any unit subject to another MACT is excluded from Subpart DDDDD. Since the Main Boiler is subject to Subpart UUUUU, it is not subject to Subpart DDDDD.

Subpart UUUUU, National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units. Subpart UUUUU affects coal-fired and oil-fired electric utility steam generating units. Although the new/existing date is May 3, 2011 and the compliance date for existing units is April 16, 2015, the AQD extended the compliance date for WFEC to April 16, 2016 following submittal of a compliance deadline extension request. Coal-fired units are divided into two subcategories, those designed for coal with a heating value above 8,300 BTU/lb, and those designed for “low rank virgin coal.” Subpart UUUUU regulates emissions of mercury (Hg), other “total HAP metals,” HCl, and HF. Existing facilities must either install CEMS measuring these pollutants, conduct quarterly emissions tests, or demonstrate that the unit qualifies as a “Low-emitting EGU.” Emissions limits are specified for filterable PM (0.03 lb/MMBTU or 0.3 lb/MWh), or total non-Hg HAP metals, or individual HAP metals; HCl (0.002 lb/MMBTU or 0.02 lb/MWh) or SO<sub>2</sub>; and mercury (1.2 lb/TBTU or 0.013 lb/GWh). Compliance may be demonstrated by performance testing or certified CEMS results. Regular tune-ups of the burners and combustion controls are required.

Subpart CCCCC, National Emissions Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities. This subpart applies to gasoline storage tanks located at area sources. As this facility is a major source of HAP, this subpart does not apply.

CAM, 40 CFR Part 64

[Applicable]

Compliance Assurance Monitoring (CAM), as published in the Federal Register on October 22, 1997, applies to any pollutant specific emission unit at a major source, that is required to obtain a Title V permit, if it meets all of the following criteria:

- It is subject to an emission limit or standard for an applicable regulated air pollutant
- It uses a control device to achieve compliance with the applicable emission limit or standard
- It has potential emissions, prior to the control device, of the applicable regulated air pollutant of 100 TPY

CAM affects the main boiler for PM. All other ancillary units do not have potential emissions above the 100 TPY threshold. CAM for the Electrostatic Precipitator (ESP) on the main boiler is acceptable as an opacity monitor as specified by NSPS Subpart D. CAM was first specified in Permit No. 97-058-TV, issued on April 2, 2004.

Chemical Accident Prevention Provisions, 40 CFR Part 68 [Not Applicable]  
This facility does not store any regulated substance above the applicable threshold limits. More information on this federal program is available at the web site: <http://www.epa.gov/rmp>.

Acid Rain Program, 40 CFR Part 72 (Permit Requirements) [Applicable]  
Acid Rain Permit No. 2018-0915-ARR4 was issued on January 10, 2020, and remains effective.

Acid Rain Program, 40 CFR Part 73 (SO<sub>2</sub> Requirements) [Applicable]  
SO<sub>2</sub> initial allowances as published in 40 CFR §73.10 are listed in Acid Rain Permit No. 2010-270-ARR2. However, all allowances can be traded, bought, and sold. Therefore, the actual allowances held by an affected unit may change which will not necessitate a revision to the permit.

Acid Rain Program, 40 CFR Part 75 (Monitoring Requirements) [Applicable]  
Certification testing has been completed for the CEM systems required for the Main Boiler (HU-Unit1), and the EPA has issued approval of certification on September 25, 1996 for this unit.

Acid Rain Program, 40 CFR Part 76 (NO<sub>x</sub> Emission Reduction Program) [Applicable]  
40 CFR Part 76 establishes NO<sub>x</sub> emission limitations for coal-fired electric utility units. HU-Unit1 is a dry bottom wall-fired type boiler. The applicable limitation is 0.46 lb/MMBTU (40 CFR §76.6(a)(2)). The facility is in compliance with this part.

Stratospheric Ozone Protection, 40 CFR Part 82 [Subpart A and F Applicable]  
These standards require phase out of Class I & II substances, reductions of emissions of Class I & II substances to the lowest achievable level in all use sectors, and banning use of nonessential products containing ozone-depleting substances (Subparts A & C); control servicing of motor vehicle air conditioners (Subpart B); require Federal agencies to adopt procurement regulations which meet phase out requirements and which maximize the substitution of safe alternatives to Class I and Class II substances (Subpart D); require warning labels on products made with or containing Class I or II substances (Subpart E); maximize the use of recycling and recovery upon disposal (Subpart F); require producers to identify substitutes for ozone-depleting compounds under the Significant New Alternatives Program (Subpart G); and reduce the emissions of halons (Subpart H).

Subpart A identifies ozone-depleting substances and divides them into two classes. Class I controlled substances are divided into seven groups; the chemicals typically used by the manufacturing industry include carbon tetrachloride (Class I, Group IV) and methyl chloroform (Class I, Group V). A complete phase-out of production of Class I substances is required by January 1, 2000 (January 1, 2002, for methyl chloroform). Class II chemicals, which are hydrochlorofluorocarbons (HCFCs), are generally seen as interim substitutes for Class I CFCs. Class II substances consist of 33 HCFCs. A complete phase-out of Class II substances, scheduled in phases starting by 2002, is required by January 1, 2030.

Subpart F requires that any persons servicing, maintaining, or repairing appliances except for motor vehicle air conditioners; persons disposing of appliances, including motor vehicle air conditioners; refrigerant reclaimers, appliance owners, and manufacturers of appliances and recycling and recovery equipment comply with the standards for recycling and emissions reduction. The standard conditions of the permit address the requirements specified at § 82.156 for persons opening appliances for maintenance, service, repair, or disposal; § 82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; § 82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; § 82.166 for recordkeeping; § 82.158 for leak repair requirements;

and § 82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

The standard conditions of the permit address the requirements specified at §82.156 for persons opening appliances for maintenance, service, repair, or disposal; §82.158 for equipment used during the maintenance, service, repair, or disposal of appliances; §82.161 for certification by an approved technician certification program of persons performing maintenance, service, repair, or disposal of appliances; §82.166 for recordkeeping; § 82.158 for leak repair requirements; and §82.166 for refrigerant purchase records for appliances normally containing 50 or more pounds of refrigerant.

Federal NO<sub>x</sub> and SO<sub>2</sub> Trading Programs, 40 CFR Part 97 [Subpart EEEEE is Applicable] Subpart EEEEE, Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Group 2 Trading Program. This subpart establishes various provisions for the CSAPR NO<sub>x</sub> Ozone Season Group 2 Trading Program, under Section 110 of the Clean Air Act and under the Federal Implementation Plan (FIP) codified under 40 CFR § 52.38 to reduce ozone transport across state lines. Under this subpart, the permittee is required to designate an official representative, monitor emissions, keep records, and make reports in accordance with §§ 97.830 through 97.835. The monitoring program must comply with 40 CFR Part 75 or an alternative monitoring program must be requested and approved. CSAPR NO<sub>x</sub> Ozone Season Group 2 allowances are periodically allocated to the facility and at the completion of the allowance transfer deadline for the control period in a given year the permittee is required to hold, in the source's compliance account administered by the EPA Clean Air Markets Division (CAMD), sufficient allowances available for deduction for such control period under § 97.824(a) in an amount not less than the tons of total NO<sub>x</sub> emissions for the control period from all CSAPR NO<sub>x</sub> Ozone Season Group 2 units at the facility. The control period starts on May 1 of a calendar year, except as provided in § 97.806(c)(3), and ends on September 30 of the same year. For the CSAPR NO<sub>x</sub> Ozone Season Group 2 Trading Program, the deadline for obtaining sufficient allowances (allowance transfer deadline) is midnight of March 1 (if March 1 is a business day) or midnight of the first business day after March 1 (if March 1 is not a business day) following the end of the associated control period. Future allowance deductions will be levied as described in § 97.806 if the permittee holds insufficient allowances at the completion of the allowance transfer deadline. The process of establishing an allowance account and requirements for administrating an account are included in § 97.820. The recording of allowance allocations is described in § 97.821. Submission and recording of allowance transfers is described in §§ 97.822 and 97.823. Compliance with ozone season emissions limitations and assurance provisions are described in §§ 97.824 and 97.825. Extra allowances may be banked (see § 97.826) and used in later years. Vintage allowances banked from prior trading programs may be used in later years with certain restrictions after conversion. These allowances do not constitute a property right. No Title V permit revision is required for any allocation, holding, deduction, or transfer of allowances in accordance with this subpart. The facility is subject to the requirements of this subpart. The permit includes the requirement to comply with all applicable requirements of the applicable trading program since the applicable trading program changes over time as EPA addresses compliance with applicable NAAQS and updates its modeling to demonstrate compliance with the CAA Good Neighbor Provision.

## **SECTION X. COMPLIANCE**

The Specific Conditions of this permit contain various testing, monitoring, recordkeeping, and reporting requirements in order to document on-going compliance with emission limits. The

specific method used to document compliance was based on the type of emission unit, the type of process equipment, the specific pollutants emitted, and the amount of permitted emissions taking into account other regulatory requirements that an emission unit may be subject to.

### Inspection

In addition to the permitting requirements, the following periodic inspections were conducted during the previous five (5) year period.

Inspection Type	Date	Summary/Results
Full Inspection	1/27/2015	Failed to conduct a Method 9 Test on the Aux Boiler; Opacity excess emissions from the Aux Boiler
Full Inspection	1/6/2016	No Violations Cited.
Full Inspection	10/21/2016	No Violations Cited.
Full Inspection	11/30/2017	No Violations Cited.
Full Inspection	1/9/2019	No Violations Cited.
Full Inspection	3/24/2020	In Compliance.

### Tier Classification and Public Review

This application has been determined to be a Tier II based on the request for renewal of a Part 70 operating permit.

The permittee has submitted an affidavit that they are not seeking a permit for land use or for any operation upon land owned by others without their knowledge. The affidavit certifies that the applicant owns the real property.

The applicant published the "Notice of Filing a Tier II Application" in the *Hugo News* on February 27, 2018, a daily newspaper in the City of Hugo, Choctaw County. The notice stated that the application is available for public review at the Choctaw County library, Hugo, Oklahoma. A draft of this permit will also be made available for public review for a period of 30 days as stated in another newspaper announcement. This facility is within 50 miles of the Oklahoma borders with Arkansas and Texas; those states will be notified of the draft permit. All Tier II permit drafts are also available for public review in the Air Quality section of the DEQ web page: <https://www.deq.ok.gov/>.

The "proposed" permit will be submitted to EPA for a 45-day review period.

If the Administrator does not object in writing during the 45-day EPA review period, any person that meets the requirements of this subsection may petition the Administrator within 60 days after the expiration of the Administrator's 45-day review period to make such objection. Any such petition shall be based only on objections to the permit that the petitioner raised with reasonable specificity during the public comment period provided for in 27A O.S. § 2-14-302.A.2., unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period. If the Administrator objects to the permit as a result of a petition filed under this subsection, the DEQ shall not issue the permit until EPA's objection has been resolved, except that a petition for review does not stay the effectiveness of a permit or its requirements if the permit was issued after the end of the 45-day review period and prior to an EPA objection. If the DEQ has issued a permit prior to receipt of an EPA objection

under this subsection, the DEQ will modify, terminate, or revoke such permit, and shall do so consistent with the procedures in 40 CFR §§ 70.7(g)(4) or (5)(i) and (ii) except in unusual circumstances. If the DEQ revokes the permit, it may thereafter issue only a revised permit that satisfies EPA's objection. In any case, the source will not be in violation of the requirement to have submitted a timely and complete application.

**Testing**

The facility continues to monitor emissions as required by 40 CFR Part 75 (Acid Rain Program) and conducts annual RATA testing of the equipment for verification. Air Quality observations have shown testing of the continuous emission monitors have been conducted properly. CEMS data is submitted to Headquarters EPA on a quarterly basis as required by the Acid Rain Program.

**Fee Paid**

Title V operating permit renewal fee of \$7,500 was received.

**SECTION XI. SUMMARY**

The facility was constructed as described in the permit application. Ambient air quality standards are not threatened at this site. There are active Air Quality compliance or enforcement issues concerning this facility, but those issues do not affect this permit. Issuance of the renewed operating permit is recommended, contingent on public and EPA review.



**DRAFT/PROPOSED**

**PERMIT TO OPERATE  
AIR POLLUTION CONTROL FACILITY  
SPECIFIC CONDITIONS**

**Western Farmers Electric Cooperative  
Hugo Power Plant**

**Permit No. 2018-0201-TVR2**

The permittee is authorized to operate in conformity with the specifications submitted to Air Quality on February 13, 2018 and subsequent information received since. The Evaluation Memorandum dated June 10, 2021, explains the derivation of applicable permit requirements and estimates of emissions; however, it does not contain operating permit limitations or permit requirements. Continuing operations under this permit constitutes acceptance of, and consent to, the conditions contained herein:

1. Points of emissions and emissions limitations for each point:  
[OAC 252:100-8-6(a) and 40 CFR §60.14(h)]

**EUG 1. Coal-fired Main Boiler**

<b>EU and Point ID#</b>	<b>Make</b>	<b>Heat Capacity (MMBTUH)</b>	<b>Serial #</b>	<b>Installed Date</b>
HU-Unit1, P-1	Babcock & Wilcox	4,600	RB-575	1978

**A. Emission Limitations**

<b>Pollutant</b>	<b>Limitations (lb/hr)</b>	<b>Limitations (TPY)</b>
PM	62.5	223.65
SO <sub>2</sub>	4,591.8	16,404.1
NO <sub>x</sub>	1,872.6	4,498.85
CO	11,977.0	4,689.81
VOC	34.5	86.02

- i. Compliance with the TPY limitations shall be based on a 12-month rolling total, determined monthly. For purposes of compliance demonstration with the NO<sub>x</sub> and SO<sub>2</sub> TPY limitations, 40 CFR 75 calculation and data substitution methodology will be utilized.
- ii. Compliance with the PM, CO, and VOC lb/hr limit is based on a 12-month rolling average, determined monthly.
- iii. Compliance with the SO<sub>2</sub> and NO<sub>x</sub> lb/hr limitations shall be based on a 3-hour rolling average (arithmetic average of three contiguous one-hour periods of boiler operation calculated in accordance with 40 CFR Part 60). NOTE: the lb/hr calculation methodology (NSPS) does not match the TPY methodology (Acid Rain) for NO<sub>x</sub> and SO<sub>2</sub>. Therefore, it is anticipated that there may be compliance periods for which the lb/hr multiplied by the operating hours will not be equal to the reported TPY due to the difference in calculation methodologies.

B. HU-Unit1 shall have the following emission limitations:

[40 CFR §§60.42(a)(1), 43(a)(2), and 44(a)(3)]

Emission Unit	PM lbs/MMBTU	SO <sub>2</sub> lbs/MMBTU	NO <sub>x</sub> lbs/MMBTU	Opacity* %
HU-Unit1	0.1	1.2	0.7	20

\* opacity shall be limited to 20% except for one six minute period per hour of not more than 27%.  
[40 CFR §60.42(a)(2) and 40 CFR §60.8(c)]

i. Emissions limitations do not apply during periods of startup, shutdown, or malfunction. Accordingly, emissions during periods of startup, shutdown, or malfunction are not required to be reported as excess emissions pursuant to OAC 252:100-9 but are required to be reported pursuant to 40 CFR § 60.7(c).

[40 CFR §60.42(a)(2) and 40 CFR §§60.7(c) and 60.8(c)]

C. The Main Boiler, HU-Unit1 is subject to the Acid Rain Program and shall comply with all applicable requirements including the following: [40 CFR Parts 72, 73, 75 and 76]

- i. SO<sub>2</sub> allowances
- ii. Monitoring as required by 40 CFR Part 75
- iii. NO<sub>x</sub> emission limitation of 0.46 lb/MMBTU by 40 CFR Part 76
- iv. Report quarterly emissions to EPA
- v. Conduct RATA tests
- vi. QA/QC plan for operation and maintenance of the CEMS

D. The Main Boiler, HU-Unit 1, may use No. 2 fuel oil with a maximum fuel sulfur content of 0.5% by weight as a startup fuel.

E. Boiler HU-Unit 1 is subject to NSPS Subpart D and shall comply with all applicable requirements. [40 CFR, 60, Subpart D]

- i. §60.40 Applicability and designation of affected facility.
- ii. §60.41 Definitions.
- iii. §60.42 Standard for particulate matter (PM).
- iv. §60.43 Standard for sulfur dioxide (SO<sub>2</sub>).
- v. §60.44 Standard for nitrogen oxides (NO<sub>x</sub>).
- vi. §60.45 Emissions and fuel monitoring.
- vii. §60.46 Test methods and procedures.

F. The permittee shall operate and maintain the continuous monitoring systems for the Main Boiler, HU-Unit 1, using the applicable methods and procedures set forth and shall record the output of the systems. [40 CFR §60.45(a)]

G. The permittee shall comply with the reporting and recordkeeping requirements of 40 CFR §60.45(g).



- H. Compliance with the SO<sub>2</sub> lb/MMBTU emission limits in Specific Condition 1 shall be determined on the basis of the average emission rate for three successive boiler operating hours, a 3-hour rolling average. [40 CFR §60.43]
- I. Compliance with the NO<sub>x</sub> lb/MMBTU emission limits in Specific Condition 1 shall be determined on the basis of the average emission rate for a 3-hour rolling average. [OAC 252:100-33]
- J. Annual emissions from the Main Boiler, HU-Unit 1, shall be determined monthly with compliance based on a 12-month rolling total. Emissions of NO<sub>x</sub> and SO<sub>2</sub> from the Main Boiler, HU-Unit 1, shall be determined from CEMS data. NO<sub>x</sub> and SO<sub>2</sub> TPY will be calculated using 40 CFR Part 75 calculation methodology, including Part 75 data substitution methods. Emissions of CO and VOC shall be determined based on stack testing or AP-42 emissions factor. PM emissions shall be determined based on stack testing or coal ash content, AP-42 emission factors, and ESP control efficiency of PM emissions (99.99%).
- K. Compliance Assurance Monitoring for the Main Boiler, HU-Unit 1, shall be conducted as follows: [40 CFR §§64.1 to 64.10]

Parameter	Indicator No. 1
Indicator	Opacity
Measurement Approach	Opacity shall be monitored using a continuous opacity monitor
Indicator Range	An excursion is defined as an opacity greater than 20% except for one six-minute period per hour not to exceed 27% opacity
Data Representativeness Performance Criteria	The opacity monitoring system shall consist of a continuous opacity monitor which has been certified using the methods and procedures of 40 CFR Part 60, Appendix B, Performance Specification 1.
QA/QC Practices and Criteria	Filter audit conducted at least once annually.
Monitoring Frequency	Opacity is monitored at least once every 15 seconds
Data Collection Procedure	Data are continuously recorded by the opacity monitor DAHS computer
Averaging Period	Six-minute averages

- L. The owner/operator shall comply with all applicable requirements of the NESHAP for Coal and Oil-Fired Electric Utility Steam Generating Units, Subpart UUUUU, for each affected unit, including but not limited to: [40 CFR § 63.9980 to § 63.10042]
  - i. §63.9980 What is the purpose of this subpart?
  - ii. §63.9981 Am I subject to this subpart?
  - iii. §63.9982 What is the affected source of this subpart?
  - iv. §63.9983 Are any fossil fuel-fired electric generating units not subject to this subpart?
  - v. §63.9984 When do I have to comply with this subpart?
  - vi. §63.9985 What is a new EGU?
  - vii. §63.9990 What are the subcategories of EGUs?

- viii. §63.9991 What emission limitations, work practice standards, and operating limits must I meet?
- ix. §63.10000 What are my general requirements for complying with this subpart?
- x. §63.10001 [Reserved]
- xi. §63.10005 What are my initial compliance requirements and by what date must I conduct them?
- xii. §63.10006 When must I conduct subsequent performance tests or tune-ups?
- xiii. §63.10007 What methods and other procedures must I use for the performance tests?
- xiv. §63.10008 [Reserved]
- xv. §63.10009 May I use emissions averaging to comply with this subpart?
- xvi. §63.10010 What are my monitoring, installation, operation, and maintenance requirements?
- xvii. §63.10011 How do I demonstrate initial compliance with the emissions limits and work practice standards?
- xviii. §63.10020 How do I monitor and collect data to demonstrate continuous compliance?
- xix. §63.10021 How do I demonstrate continuous compliance with the emission limitations, operating limits, and work practice standards?
- xx. §63.10022 How do I demonstrate continuous compliance under the emissions averaging provision?
- xxi. §63.10023 How do I establish my PM CPMS operating limit and determine compliance with it?
- xxii. §63.10030 What notifications must I submit and when?
- xxiii. §63.10031 What reports must I submit and when?
- xxiv. §63.10032 What records must I keep?
- xxv. §63.10033 In what form and how long must I keep my records?
- xxvi. §63.10040 What parts of the General Provisions apply to me?
- xxvii. §63.10041 Who implements and enforces this subpart?
- xxviii. §63.10042 What definitions apply to this subpart?

**EUG 3. Coal Handling Activities**

EU ID#	Activities	PM	
		lb/hr	TPY
HU-Coal1	Railcar Unloading-Rotary Dump	0.14	0.62
HU-Coal2	Conveying	0.14	0.62
HU-Coal3	Crushing	0.23	0.99
HU-Coal4	Active Storage Pile-Load in by Conveyor	0.79	3.47
HU-Coal5	Active Storage Pile-Load out under Pile Reclaim	0.01	0.04
HU-Coal6	Inactive Storage Pile-Load in by Conveyor	0.20	0.87

A. The owner or operator shall comply with all applicable NSPS Subpart Y requirements of 40 CFR Part 60 for coal processing equipment which was constructed, reconstructed, or modified after October 24, 1974. [OAC 252:100-2 and 40 CFR §§60.250 to 60.254]

- B. Operations HU-Coal1, HU-Coal2, and HU-Coal3 shall be operated with wet dust suppression systems, per manufacturer specification, with at least 95% control efficiency for PM. [OAC 252:100-8-6(a)]
- C. The permittee shall water coal in HU-Coal4, HU-Coal5, and HU-Coal6, or take other reasonable precautions when needed to control fugitive dust emissions to 20% opacity or less. [OAC 252:100-29]
- D. Compliance monitoring for HU-Coal1, HU-Coal2, and HU-Coal3 shall be conducted as follows: [OAC 252:100-43]

Parameter	Indicator No. 1
Indicator	Visible Emissions
Measurement Approach	Method 22 or Method 9 testing of visible emissions
Indicator Range	An excursion is defined as an opacity greater than 20% except for one six-minute period per hour not to exceed 27% opacity
Data Representativeness Performance Criteria	Any Method 9 testing shall be performed by a Certified Visible Emissions Evaluator
QA/QC Practices and Criteria	Monthly testing of railcar unloading building and discharge points WC-1 and WC-2
Monitoring Frequency	Monthly
Data Collection Procedure	Data are recorded manually
Averaging Period	Six-minute averages for Method 9, fifteen-minute for Method 22

**EUG 4: Ash Handling Activities:** Emissions from the equipment listed below are estimated based on existing equipment items and are insignificant.

EU and Point ID#	Activities	Installed Date
HU-Ash1, P-13	Fly Ash Truck Loading and Unloading	1978
HU-Ash2, P-14	Fly Ash Conveying/Storage	1978
HU-Ash3, P-15	Fly Ash Silo (Load Out)	1978
HU-Ash5, P-17	Bottom Ash Truck Loading and Unloading	2018
HU-Ash6, P-18	Bottom Ash Conveyor Discharge	2018

**EUG 5. Plant Traffic:** Emissions from the equipment listed below are insignificant.

EU and Point ID#	Activities	Installed Date
HU-PT, P-18	Paved and unpaved roads	1978

A. Plant roads shall be watered when necessary to control emissions of fugitive dust.

**EUG 6.** Storage Tanks: The following emissions units are considered insignificant since emissions are less than 5 TPY of any pollutant.

Point and EU ID#	Capacity (gallon)	Material Stored	Installed Date
HU-T, P-19	450,000	Distillate Fuel Oil	1980
HU-T, P-20	2,030	Unleaded Gasoline	1980
HU-T, P-21	12,000	Diesel	1980

**EUG 7.** Emergency Engine:

Point and EU ID#	Capacity (hp)	Make/Model	Installed Date
HU-G, P-22	630	Black Start Diesel Generator	1980

- A. The owner/operator shall comply with all applicable requirements of the NESHAP for Stationary Reciprocating Internal Combustion Engines (RICE), Subpart ZZZZ, for each affected engine, including but not limited to: [40 CFR § 63.6580 to § 63.6675]
- i. § 63.6580 What is the purpose of subpart ZZZZ?
  - ii. § 63.6585 Am I subject to this subpart?
  - iii. § 63.6590 What parts of my plant does this subpart cover?
  - iv. § 63.6595 When do I have to comply with this subpart?
  - v. § 63.6600 What emission limitations and operating limitations must I meet?
  - vi. § 63.6605 What are my general requirements for complying with this subpart?
  - vii. § 63.6610 By what date must I conduct the initial performance tests or other initial compliance demonstrations?
  - viii. § 63.6615 When must I conduct subsequent performance tests?
  - ix. § 63.6620 What performance tests and other procedures must I use?
  - x. § 63.6625 What are my monitoring, installation, operation, and maintenance requirements?
  - xi. § 63.6630 How do I demonstrate initial compliance with the emission limitations and operating limitations?
  - xii. § 63.6635 How do I monitor and collect data to demonstrate continuous compliance?
  - xiii. § 63.6640 How do I demonstrate continuous compliance with the emission limitations and operating limitations?
  - xiv. § 63.6645 What notifications must I submit and when?
  - xv. § 63.6650 What reports must I submit and when?
  - xvi. § 63.6655 What records must I keep?
  - xvii. § 63.6660 In what form and how long must I keep my records?
  - xviii. § 63.6665 What parts of the General Provisions apply to me?
  - xix. § 63.6670 Who implements and enforces this subpart?
  - xx. § 63.6675 What definitions apply to this subpart?

EUG 7A. Emergency Engines Subject to NSPS Subpart IIII

Point and EU ID#	Capacity (hp)	Make/Model	Installed Date
HU-G, P-24A	600	Caterpillar 18HH0-UFAD176-600	2019
HU-G, P-25A	600	Caterpillar 18HH0-UFAD176-600	2019

A. Engines P-24A and P-25A are subject to 40 CFR Part 60, Subpart IIII, and shall comply with all applicable requirements, including but not limited to: [40 CFR §§60.4200 – 4219]

- i. §60.4200(a)(2)(iii) Stationary Compression Ignition (CI) Internal Combustion Engines (ICE) that commence construction after July 1, 2005 and are manufactured after July 1, 2006 as a NFPA fire pump engine are subject to this Subpart. P-24A and P-25A are subject to this Subpart.
- ii. §60.4205(c) Owners and operators of stationary CI ICE that are fire pump engines with a displacement of less than 30 liters per cylinder must comply with the emission standards in Table 4 of this Subpart for all pollutants. The applicable portion of Table 4 is duplicated below:

Model Year	NMHC + NO <sub>x</sub>	CO	PM
2009 and Later	3.0 g/hp-hr	2.6 g/hp-hr	0.15 g/hp-hr

- iii. §60.4206 Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards specified in §60.4205(c) according to manufacturer’s written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.
- iv. §60.4207 Fuel requirements
  - a. §60.4207(a): Beginning October 1, 2007, owners and operators of stationary CI ICE using diesel fuel must use diesel fuel that meets the requirements of 40 CFR §80.510(a).
  - b. §60.4207(b): Beginning October 1, 2010, owners and operators of stationary CI ICE with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR §80.510(b) for nonroad diesel fuel.
- v. §60.4209: Monitoring Requirements
  - a. §60.4209(a) Owners and operators of emergency stationary CI ICE must install a non-resettable hour meter prior to startup of the engine.
- vi. §60.4211: Compliance Requirements
  - a. §60.4211(a) Owners and operators must comply with the emission standards specified in this subpart, operate and maintain the stationary CI ICE and control device (if applicable) to the manufacturer’s written instructions and procedures developed by the owner or operator that are approved by the engine manufacturer. In addition, owners and operators may only change those settings that are permitted by the manufacturer.
  - b. §60.4211(b) The facility must demonstrate compliance with §60.4205(c) according to one of the methods in paragraphs (b)(1) through (5) of this section.

- (1) Purchasing an engine certified according to 40 CFR Part 89 or 40 CFR Part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.
  - (2) Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.
  - (3) Keeping records of engine manufacturer data indicating compliance with the standards.
  - (4) Keeping records of control device vendor data indicating compliance with the standards.
  - (5) Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in §60.4212, as applicable.
- c. §60.4211(e) Emergency stationary ICE may be operated for the purpose of maintenance checks and readiness testing as recommended by Federal, State, or Local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing is limited to 100 hours per year per engine. There is no time limit on the use of emergency stationary ICE in emergency situations. Anyone may petition the Administrator for approval of additional hours. Any operation of emergency stationary CI ICE meeting the standards of §60.4205 but not §60.4204 other than emergency operation and maintenance and testing as permitted in this section is prohibited.
- vii. §60.4214: Notification, Reporting, and Recordkeeping Requirements
    - a. §60.4214(b) Owners or operators of stationary CI ICE that are emergency stationary ICE are not required to submit an initial notification.
  - viii. §60.4218: General Provisions
  - ix. §60.4219: Definitions

**EUG 8.** Mercury Control Additives Silos: Emissions from the equipment listed below are insignificant.

EU and Point ID#	Activities	Installed Date
Silo 1	Additive A	2014
Silo 2	Powdered activated carbon	2014

- 2. Each boiler (HU-Unit1) at the facility shall have a permanent identification plate attached which shows the make, model number, and serial number. [OAC 252:100-8-6(a)]
- 3. No discharge of greater than 20% opacity is allowed except for short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity. [OAC 252:100-25]
- 4. Reasonable precautions shall be taken to minimize or prevent visible fugitive dust from the facility to be discharged beyond the property line in such a manner as to damage or interfere with the use of adjacent properties, or cause ambient air quality standards to be exceeded, or to interfere

with the maintenance of air quality standards. Reasonable precautions shall include, but not be limited to: [OAC 252:100-29]

- A. Use of water or chemicals on roads, stockpiles, material processing and all transfer operations where possible.
  - B. Apply coatings or coverings to substances susceptible to becoming air-borne or wind-borne.
  - C. Cover or wet materials in trucks.
  - D. Plant and maintain vegetation coverings or windbreaks.
  - E. Locate stockpiles so as to provide minimum exposure to high winds and avoid open spaces near neighboring homes and businesses.
  - F. The proper maintenance and operation of loading equipment.
5. The following records shall be maintained on-site to verify insignificant activities. [OAC 252:100-43]
- A. For storage tanks with less than or equal to 10,000 gallons capacity that store volatile organic liquids with a true vapor pressure less than or equal to 1.0 psia at maximum storage temperature: capacity of each storage tank and true vapor pressure of material stored.
  - B. Fuel storage/dispensing equipment: gasoline purchases (monthly and calendar year).
  - C. For activities having the potential to emit no more than 5 TPY (actual) of any criteria pollutant: activity and actual emissions.
6. When monitoring shows PM, SO<sub>2</sub>, or NO<sub>x</sub> emissions, or opacity, in excess of limits listed in the Specific Conditions of this permit, the owner or operator shall comply with the provisions of OAC 252:100-9. [OAC 252:100-9]
- A. In accordance with OAC 252:100-9-7(a)(1)(A), excess emissions with the primary cause of startup or shutdown are not subject to immediate notice requirements. WFEC is not required to submit immediate notices for any excess emissions of the limitations in Specific Condition 1, EUG 1, A if the exceedance is due to a primary cause of startup or shutdown or complies with OAC 252:100-9-7(a)(1)(B) and (C).
  - B. For startup, shutdown, or malfunction events, the emission limits in Specific Condition 1, EUG 1, B do not apply. Therefore, neither the immediate notices required by OAC 252:100-9-7(a) nor the excess emission reports required by OAC 252:100-9-7(b) apply to those startup, shutdown, or malfunction events.
  - C. In accordance with OAC 252:100-9-7(d), WFEC will submit the information required in OAC 252:100-9-7(b) semi-annually for excess emissions of Specific Condition 1, EUG 1, B in accordance with NSPS Subpart D and §§ 60.7(c) and (d) with the Title V Semi-Annual Monitoring and Deviation Reports within 30 days following the end of each six-month reporting period (submitted by May 1 for reporting period of October 2 – April 1 and by October 31 for reporting period of April 2 – October 1 each year). Excess emissions of the limitations in Specific Condition 1, EUG 1, B will be reported semi-annually only.
7. The permittee shall maintain the following records of operations. These records shall be maintained on-site for at least five years after the date of recording and shall be provided to regulatory personnel upon request. [OAC 252:100-8-6 (a)(3)(B)]
- A. CEMS data for the Main Boiler (HU-Unit1) to determine the emissions of SO<sub>2</sub> and NO<sub>x</sub>.

- B. Opacity, PM, SO<sub>2</sub>, and NO<sub>x</sub> emissions to demonstrate compliance by the Main Boiler with 40 CFR Subpart D.
  - C. Sulfur content of fuel oil (each shipment).
  - D. Emission data as required by the Acid Rain Program.
  - E. RATA test results from periodic CEMS certification tests.
  - F. Visible emissions observations for the coal handling activities.
  - G. Hours of operation of the Main Boiler (monthly and 12-month rolling totals).
  - H. Records as required by NSPS Subpart IIII and NESHAP Subpart ZZZZ for Engines P-22, P-24A and P-25A.
  - I. Records as required by NESHAP Subpart UUUUU and DDDDD.
  - J. Records as required by OAC 252:100-8-36.2(c).
  - K. Records as required by 40 CFR Part 97.
8. No later than 30 days after each anniversary date of the issuance of the initial Title V operating permit (April 2, 2004), the permittee shall submit to Air Quality Division of DEQ, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit. No later than 30 days after the end of each semi-annual period starting with the anniversary date of the issuance of the initial Title V permit (submitted by October 31 for the reporting period of April 2 through October 1 and by May 1 for the reporting period of October 2 through April 1 each year), the permittee shall submit to Air Quality Division of DEQ a semi-annual monitoring and deviation report.  
[OAC 252:100-8-6 (c)(5)(A) & (D), OAC 252:100-8-6 (a)(3)(C)]
9. The Permit Shield (Standard Conditions, Section VI) is extended to the following requirements that have been determined to be inapplicable to this facility. [OAC 252:100-8-6(d)(2)]
- A. OAC 252:100-11 Alternative Emissions Reduction
  - B. OAC 252:100-15 Mobile Sources
  - C. OAC 252:100-23 Cotton Gins
  - D. OAC 252:100-24 Grain Elevators
  - E. OAC 252:100-35 Carbon Monoxide
  - F. OAC 252:100-39 Nonattainment Areas
  - G. OAC 252:100-47 Landfills
10. The Main Boiler is subject to the Cross-State Air Pollution Rule (CSAPR) NO<sub>x</sub> Ozone Season Group 2 Trading Program. The permittee shall comply with all applicable CSAPR and associated Trading Program requirements, including but not limited to:  
[40 CFR § 97.801 to § 97.835]
- A. § 97.801 Purpose.
  - B. § 97.802 Definitions.
  - C. § 97.803 Measurements, abbreviations, and acronyms.
  - D. § 97.804 Applicability.
  - E. § 97.805 Retired unit exemption.
  - F. § 97.806 Standard requirements.
  - G. § 97.807 Computation of time.
  - H. § 97.808 Administrative appeal procedures.



- I. § 97.810 State NO<sub>x</sub> Ozone Season Group 2 trading budgets, new unit set-asides, Indian country new unit set-aside, and variability limits.
  - J. § 97.811 Timing requirements for CSAPR NO<sub>x</sub> Ozone Season Group 2 allowance allocations.
  - K. § 97.812 CSAPR NO<sub>x</sub> Ozone Season Group 2 allowance allocations to new units.
  - L. § 97.813 Authorization of designated representative and alternate designated representative.
  - M. § 97.814 Responsibilities of designated representative and alternate designated representative.
  - N. § 97.815 Changing designated representative and alternate designated representative; changes in owners and operators; changes in units at the source.
  - O. § 97.816 Certificate of representation.
  - P. § 97.817 Objections concerning designated representative and alternate designated representative.
  - Q. § 97.818 Delegation by designated representative and alternate designated representative.
  - R. § 97.820 Establishment of compliance accounts, assurance accounts, and general accounts.
  - S. § 97.821 Recordation of CSAPR NO<sub>x</sub> Ozone Season Group 2 allowance allocations and auction results.
  - T. § 97.822 Submission of CSAPR NO<sub>x</sub> Ozone Season Group 2 allowance transfers.
  - U. § 97.823 Recordation of CSAPR NO<sub>x</sub> Ozone Season Group 2 allowance transfers.
  - V. § 97.824 Compliance with CSAPR NO<sub>x</sub> Ozone Season Group 2 emissions limitation.
  - W. § 97.825 Compliance with CSAPR NO<sub>x</sub> Ozone Season Group 2 assurance provisions.
  - X. § 97.826 Banking.
  - Y. § 97.827 Account error.
  - Z. § 97.828 Administrator's action on submissions.
  - AA. § 97.830 General monitoring, recordkeeping, and reporting requirements.
  - BB. § 97.831 Initial monitoring system certification and recertification procedures.
  - CC. § 97.832 Monitoring system out-of-control periods.
  - DD. § 97.833 Notifications concerning monitoring.
  - EE. § 97.834 Recordkeeping and reporting.
  - FF. § 97.835 Petitions for alternatives to monitoring, recordkeeping, or reporting requirements.
11. The permittee shall conduct the following testing as indicated below when operating under representative conditions. Testing shall be conducted using the approved reference methods listed below. [OAC 252:100-8-6 (a)(3)(A) & OAC 252:100-43]
- a. Periodic testing of the listed emissions units for the specified pollutant shall be conducted at least once during the specified frequency starting from the issuance date of this permit:

**Periodic Testing Schedule**

<b>EU</b>	<b>Pollutant</b>	<b>Frequency</b>
EUG-1	CO	Every Calendar Year

- b. The following reference methods specified in 40 CFR Part 60 shall be used unless general accepted alternatives are included in the test notice and protocol:
    - (i) Method 1: Sample and Velocity Traverses for Stationary Sources.
    - (ii) Method 2, 2A, 2C, 2F, 2G, 2H, or equivalent: Determination of Stack Gas Velocity and Volumetric Flow Rate from various equipment.
    - (iii) Method 3: Gas Analysis for Carbon Dioxide, Excess Air, and Dry Molecular Weight.
    - (iv) Method 3A or 3B: Determination of Oxygen and Carbon Dioxide.
    - (v) Method 4: Determination of Moisture in Stack Gases.
    - (vi) Method 10: Determination of Carbon Monoxide Emissions from Stationary Sources
    - (vii) Method 10A/10B: Determination of CO Emissions from Stationary Sources
  - c. Performance testing shall be conducted while the units are operating under representative conditions.
  - d. A protocol describing the testing plan shall be submitted to the Air Quality Division at least 30 days prior to the on-site testing.
  - e. A written report documenting the results of emissions testing shall be submitted within 60 days of completion of on-site testing.
12. This facility is considered an existing Prevention of Significant Deterioration (PSD) facility. As such, the facility is subject to the provisions of OAC 252:100-8-36.2(c) for any project as defined therein. [OAC 252:100-8-36.2(c)]
13. This permit supersedes all previous Air Quality operating permits for the facility except issued Acid Rain Permit. Those permits are now canceled.





**DRAFT/PROPOSED**

SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Western Farmers Electric Cooperative  
Attn: Gerald Butcher, Environmental Supervisor  
P. O. Box 429  
Anadarko, OK 73005

Re: Permit Application No. 2018-0201-TVR2  
Hugo Generating Station (FAC ID 1700)  
Choctaw County, Oklahoma

Dear Mr. Butcher:

Enclosed is the permit authorizing operation of the referenced facility. Please note that this permit is issued subject to standard and specific conditions, which are attached. These conditions must be carefully followed since they define the limits of the permit and will be confirmed by periodic inspections.

Also note that you are required to annually submit an emissions inventory for this facility. An emissions inventory must be completed through DEQ's electronic reporting system by April 1<sup>st</sup> of every year. Any questions concerning the submittal process should be referred to the Emissions Inventory Staff at (405) 702-4100.

Thank you for your cooperation in this matter. If we may be of further service, please contact our office at (405) 702-4100.

Sincerely,

Ryan Buntyn, P.E.  
Existing Source Permits Section  
**AIR QUALITY DIVISION**

Enclosures





# PART 70 PERMIT

AIR QUALITY DIVISION  
STATE OF OKLAHOMA  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
707 NORTH ROBINSON, SUITE 4100  
P.O. BOX 1677  
OKLAHOMA CITY, OKLAHOMA 73101-1677

Permit Number: 2018-0201-TVR2

Western Farmers Electric Cooperative,  
having complied with the requirements of the law, is hereby granted permission to operate  
a coal-fired electric generation plant in Section 21 – T6S – R 19E, Ft. Towson, Choctaw  
County, Oklahoma, subject to standard conditions dated June 21, 2016, and Specific  
Conditions, both attached

This permit shall expire five (5) years from the issuance date below, except as authorized under Section VIII of the Standard Conditions.

\_\_\_\_\_  
Division Director  
Air Quality Division

\_\_\_\_\_  
Date

**MAJOR SOURCE AIR QUALITY PERMIT  
STANDARD CONDITIONS  
(June 21, 2016)**

**SECTION I. DUTY TO COMPLY**

A. This is a permit to operate / construct this specific facility in accordance with the federal Clean Air Act (42 U.S.C. 7401, et al.) and under the authority of the Oklahoma Clean Air Act and the rules promulgated there under. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

B. The issuing Authority for the permit is the Air Quality Division (AQD) of the Oklahoma Department of Environmental Quality (DEQ). The permit does not relieve the holder of the obligation to comply with other applicable federal, state, or local statutes, regulations, rules, or ordinances. [Oklahoma Clean Air Act, 27A O.S. § 2-5-112]

C. The permittee shall comply with all conditions of this permit. Any permit noncompliance shall constitute a violation of the Oklahoma Clean Air Act and shall be grounds for enforcement action, permit termination, revocation and reissuance, or modification, or for denial of a permit renewal application. All terms and conditions are enforceable by the DEQ, by the Environmental Protection Agency (EPA), and by citizens under section 304 of the Federal Clean Air Act (excluding state-only requirements). This permit is valid for operations only at the specific location listed.

[40 C.F.R. §70.6(b), OAC 252:100-8-1.3 and OAC 252:100-8-6(a)(7)(A) and (b)(1)]

D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in assessing penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations. [OAC 252:100-8-6(a)(7)(B)]

**SECTION II. REPORTING OF DEVIATIONS FROM PERMIT TERMS**

A. Any exceedance resulting from an emergency and/or posing an imminent and substantial danger to public health, safety, or the environment shall be reported in accordance with Section XIV (Emergencies). [OAC 252:100-8-6(a)(3)(C)(iii)(I) & (II)]

B. Deviations that result in emissions exceeding those allowed in this permit shall be reported consistent with the requirements of OAC 252:100-9, Excess Emission Reporting Requirements. [OAC 252:100-8-6(a)(3)(C)(iv)]



C. Every written report submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

### **SECTION III. MONITORING, TESTING, RECORDKEEPING & REPORTING**

A. The permittee shall keep records as specified in this permit. These records, including monitoring data and necessary support information, shall be retained on-site or at a nearby field office for a period of at least five years from the date of the monitoring sample, measurement, report, or application, and shall be made available for inspection by regulatory personnel upon request. Support information includes all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Where appropriate, the permit may specify that records may be maintained in computerized form.

[OAC 252:100-8-6 (a)(3)(B)(ii), OAC 252:100-8-6(c)(1), and OAC 252:100-8-6(c)(2)(B)]

B. Records of required monitoring shall include:

- (1) the date, place and time of sampling or measurement;
- (2) the date or dates analyses were performed;
- (3) the company or entity which performed the analyses;
- (4) the analytical techniques or methods used;
- (5) the results of such analyses; and
- (6) the operating conditions existing at the time of sampling or measurement.

[OAC 252:100-8-6(a)(3)(B)(i)]

C. No later than 30 days after each six (6) month period, after the date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to AQD a report of the results of any required monitoring. All instances of deviations from permit requirements since the previous report shall be clearly identified in the report. Submission of these periodic reports will satisfy any reporting requirement of Paragraph E below that is duplicative of the periodic reports, if so noted on the submitted report.

[OAC 252:100-8-6(a)(3)(C)(i) and (ii)]

D. If any testing shows emissions in excess of limitations specified in this permit, the owner or operator shall comply with the provisions of Section II (Reporting Of Deviations From Permit Terms) of these standard conditions.

[OAC 252:100-8-6(a)(3)(C)(iii)]

E. In addition to any monitoring, recordkeeping or reporting requirement specified in this permit, monitoring and reporting may be required under the provisions of OAC 252:100-43, Testing, Monitoring, and Recordkeeping, or as required by any provision of the Federal Clean Air Act or Oklahoma Clean Air Act.

[OAC 252:100-43]



F. Any Annual Certification of Compliance, Semi Annual Monitoring and Deviation Report, Excess Emission Report, and Annual Emission Inventory submitted in accordance with this permit shall be certified by a responsible official. This certification shall be signed by a responsible official, and shall contain the following language: “I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.”

[OAC 252:100-8-5(f), OAC 252:100-8-6(a)(3)(C)(iv), OAC 252:100-8-6(c)(1), OAC 252:100-9-7(e), and OAC 252:100-5-2.1(f)]

G. Any owner or operator subject to the provisions of New Source Performance Standards (“NSPS”) under 40 CFR Part 60 or National Emission Standards for Hazardous Air Pollutants (“NESHAPs”) under 40 CFR Parts 61 and 63 shall maintain a file of all measurements and other information required by the applicable general provisions and subpart(s). These records shall be maintained in a permanent file suitable for inspection, shall be retained for a period of at least five years as required by Paragraph A of this Section, and shall include records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, any malfunction of the air pollution control equipment; and any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 C.F.R. §§60.7 and 63.10, 40 CFR Parts 61, Subpart A, and OAC 252:100, Appendix Q]

H. The permittee of a facility that is operating subject to a schedule of compliance shall submit to the DEQ a progress report at least semi-annually. The progress reports shall contain dates for achieving the activities, milestones or compliance required in the schedule of compliance and the dates when such activities, milestones or compliance was achieved. The progress reports shall also contain an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted. [OAC 252:100-8-6(c)(4)]

I. All testing must be conducted under the direction of qualified personnel by methods approved by the Division Director. All tests shall be made and the results calculated in accordance with standard test procedures. The use of alternative test procedures must be approved by EPA. When a portable analyzer is used to measure emissions it shall be setup, calibrated, and operated in accordance with the manufacturer’s instructions and in accordance with a protocol meeting the requirements of the “AQD Portable Analyzer Guidance” document or an equivalent method approved by Air Quality.

[OAC 252:100-8-6(a)(3)(A)(iv), and OAC 252:100-43]

J. The reporting of total particulate matter emissions as required in Part 7 of OAC 252:100-8 (Permits for Part 70 Sources), OAC 252:100-19 (Control of Emission of Particulate Matter), and OAC 252:100-5 (Emission Inventory), shall be conducted in accordance with applicable testing or calculation procedures, modified to include back-half condensables, for the concentration of particulate matter less than 10 microns in diameter (PM<sub>10</sub>). NSPS may allow reporting of only particulate matter emissions caught in the filter (obtained using Reference Method 5).

K. The permittee shall submit to the AQD a copy of all reports submitted to the EPA as required by 40 C.F.R. Part 60, 61, and 63, for all equipment constructed or operated under this permit subject to such standards. [OAC 252:100-8-6(c)(1) and OAC 252:100, Appendix Q]

**SECTION IV. COMPLIANCE CERTIFICATIONS**

A. No later than 30 days after each anniversary date of the issuance of the original Part 70 operating permit or alternative date as specifically identified in a subsequent Part 70 operating permit, the permittee shall submit to the AQD, with a copy to the US EPA, Region 6, a certification of compliance with the terms and conditions of this permit and of any other applicable requirements which have become effective since the issuance of this permit.

[OAC 252:100-8-6(c)(5)(A), and (D)]

B. The compliance certification shall describe the operating permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the methods used for determining compliance, currently and over the reporting period. The compliance certification shall also include such other facts as the permitting authority may require to determine the compliance status of the source.

[OAC 252:100-8-6(c)(5)(C)(i)-(v)]

C. The compliance certification shall contain a certification by a responsible official as to the results of the required monitoring. This certification shall be signed by a responsible official, and shall contain the following language: "I certify, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

[OAC 252:100-8-5(f) and OAC 252:100-8-6(c)(1)]

D. Any facility reporting noncompliance shall submit a schedule of compliance for emissions units or stationary sources that are not in compliance with all applicable requirements. This schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with any applicable requirements for which the emissions unit or stationary source is in noncompliance. This compliance schedule shall resemble and be at least as stringent as that contained in any judicial consent decree or administrative order to which the emissions unit or stationary source is subject. Any such schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based, except that a compliance plan shall not be required for any noncompliance condition which is corrected within 24 hours of discovery.

[OAC 252:100-8-5(e)(8)(B) and OAC 252:100-8-6(c)(3)]

**SECTION V. REQUIREMENTS THAT BECOME APPLICABLE DURING THE PERMIT TERM**

The permittee shall comply with any additional requirements that become effective during the permit term and that are applicable to the facility. Compliance with all new requirements shall be certified in the next annual certification.

[OAC 252:100-8-6(c)(6)]

**SECTION VI. PERMIT SHIELD**

A. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC 252:100-8) shall be deemed compliance with the applicable requirements identified and included in this permit. [OAC 252:100-8-6(d)(1)]

B. Those requirements that are applicable are listed in the Standard Conditions and the Specific Conditions of this permit. Those requirements that the applicant requested be determined as not applicable are summarized in the Specific Conditions of this permit. [OAC 252:100-8-6(d)(2)]

**SECTION VII. ANNUAL EMISSIONS INVENTORY & FEE PAYMENT**

The permittee shall file with the AQD an annual emission inventory and shall pay annual fees based on emissions inventories. The methods used to calculate emissions for inventory purposes shall be based on the best available information accepted by AQD.

[OAC 252:100-5-2.1, OAC 252:100-5-2.2, and OAC 252:100-8-6(a)(8)]

**SECTION VIII. TERM OF PERMIT**

A. Unless specified otherwise, the term of an operating permit shall be five years from the date of issuance. [OAC 252:100-8-6(a)(2)(A)]

B. A source's right to operate shall terminate upon the expiration of its permit unless a timely and complete renewal application has been submitted at least 180 days before the date of expiration. [OAC 252:100-8-7.1(d)(1)]

C. A duly issued construction permit or authorization to construct or modify will terminate and become null and void (unless extended as provided in OAC 252:100-8-1.4(b)) if the construction is not commenced within 18 months after the date the permit or authorization was issued, or if work is suspended for more than 18 months after it is commenced. [OAC 252:100-8-1.4(a)]

D. The recipient of a construction permit shall apply for a permit to operate (or modified operating permit) within 180 days following the first day of operation. [OAC 252:100-8-4(b)(5)]

**SECTION IX. SEVERABILITY**

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[OAC 252:100-8-6 (a)(6)]

**SECTION X. PROPERTY RIGHTS**

- A. This permit does not convey any property rights of any sort, or any exclusive privilege.  
[OAC 252:100-8-6(a)(7)(D)]
- B. This permit shall not be considered in any manner affecting the title of the premises upon which the equipment is located and does not release the permittee from any liability for damage to persons or property caused by or resulting from the maintenance or operation of the equipment for which the permit is issued.  
[OAC 252:100-8-6(c)(6)]

**SECTION XI. DUTY TO PROVIDE INFORMATION**

- A. The permittee shall furnish to the DEQ, upon receipt of a written request and within sixty (60) days of the request unless the DEQ specifies another time period, any information that the DEQ may request to determine whether cause exists for modifying, reopening, revoking, reissuing, terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the DEQ copies of records required to be kept by the permit.  
[OAC 252:100-8-6(a)(7)(E)]
- B. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 27A O.S. § 2-5-105(18). Confidential information shall be clearly labeled as such and shall be separable from the main body of the document such as in an attachment.  
[OAC 252:100-8-6(a)(7)(E)]
- C. Notification to the AQD of the sale or transfer of ownership of this facility is required and shall be made in writing within thirty (30) days after such sale or transfer.  
[Oklahoma Clean Air Act, 27A O.S. § 2-5-112(G)]

**SECTION XII. REOPENING, MODIFICATION & REVOCATION**

- A. The permit may be modified, revoked, reopened and reissued, or terminated for cause. Except as provided for minor permit modifications, the filing of a request by the permittee for a permit modification, revocation and reissuance, termination, notification of planned changes, or anticipated noncompliance does not stay any permit condition.  
[OAC 252:100-8-6(a)(7)(C) and OAC 252:100-8-7.2(b)]
- B. The DEQ will reopen and revise or revoke this permit prior to the expiration date in the following circumstances: [OAC 252:100-8-7.3 and OAC 252:100-8-7.4(a)(2)]
- (1) Additional requirements under the Clean Air Act become applicable to a major source category three or more years prior to the expiration date of this permit. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.
  - (2) The DEQ or the EPA determines that this permit contains a material mistake or that the permit must be revised or revoked to assure compliance with the applicable requirements.

- (3) The DEQ or the EPA determines that inaccurate information was used in establishing the emission standards, limitations, or other conditions of this permit. The DEQ may revoke and not reissue this permit if it determines that the permittee has submitted false or misleading information to the DEQ.
- (4) DEQ determines that the permit should be amended under the discretionary reopening provisions of OAC 252:100-8-7.3(b).

C. The permit may be reopened for cause by EPA, pursuant to the provisions of OAC 100-8-7.3(d). [OAC 100-8-7.3(d)]

D. The permittee shall notify AQD before making changes other than those described in Section XVIII (Operational Flexibility), those qualifying for administrative permit amendments, or those defined as an Insignificant Activity (Section XVI) or Trivial Activity (Section XVII). The notification should include any changes which may alter the status of a “grandfathered source,” as defined under AQD rules. Such changes may require a permit modification.

[OAC 252:100-8-7.2(b) and OAC 252:100-5-1.1]

E. Activities that will result in air emissions that exceed the trivial/insignificant levels and that are not specifically approved by this permit are prohibited. [OAC 252:100-8-6(c)(6)]

### **SECTION XIII. INSPECTION & ENTRY**

A. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized regulatory officials to perform the following (subject to the permittee's right to seek confidential treatment pursuant to 27A O.S. Supp. 1998, § 2-5-105(17) for confidential information submitted to or obtained by the DEQ under this section):

- (1) enter upon the permittee's premises during reasonable/normal working hours where a source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- (2) have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- (3) inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- (4) as authorized by the Oklahoma Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit.

[OAC 252:100-8-6(c)(2)]

**SECTION XIV. EMERGENCIES**

A. Any exceedance resulting from an emergency shall be reported to AQD promptly but no later than 4:30 p.m. on the next working day after the permittee first becomes aware of the exceedance. This notice shall contain a description of the emergency, the probable cause of the exceedance, any steps taken to mitigate emissions, and corrective actions taken.

[OAC 252:100-8-6 (a)(3)(C)(iii)(I) and (IV)]

B. Any exceedance that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to AQD as soon as is practicable; but under no circumstance shall notification be more than 24 hours after the exceedance. [OAC 252:100-8-6(a)(3)(C)(iii)(II)]

C. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. [OAC 252:100-8-2]

D. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that: [OAC 252:100-8-6 (e)(2)]

- (1) an emergency occurred and the permittee can identify the cause or causes of the emergency;
- (2) the permitted facility was at the time being properly operated;
- (3) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit.

E. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency shall have the burden of proof. [OAC 252:100-8-6(e)(3)]

F. Every written report or document submitted under this section shall be certified as required by Section III (Monitoring, Testing, Recordkeeping & Reporting), Paragraph F.

[OAC 252:100-8-6(a)(3)(C)(iv)]

**SECTION XV. RISK MANAGEMENT PLAN**

The permittee, if subject to the provision of Section 112(r) of the Clean Air Act, shall develop and register with the appropriate agency a risk management plan by June 20, 1999, or the applicable effective date. [OAC 252:100-8-6(a)(4)]

**SECTION XVI. INSIGNIFICANT ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate individual emissions units that are either on the list in Appendix I to OAC Title 252, Chapter 100, or whose actual calendar year emissions do not exceed any of the limits below. Any activity to which a State or Federal applicable requirement applies is not insignificant even if it meets the criteria below or is included on the insignificant activities list.

- (1) 5 tons per year of any one criteria pollutant.
- (2) 2 tons per year for any one hazardous air pollutant (HAP) or 5 tons per year for an aggregate of two or more HAP's, or 20 percent of any threshold less than 10 tons per year for single HAP that the EPA may establish by rule.

[OAC 252:100-8-2 and OAC 252:100, Appendix I]

**SECTION XVII. TRIVIAL ACTIVITIES**

Except as otherwise prohibited or limited by this permit, the permittee is hereby authorized to operate any individual or combination of air emissions units that are considered inconsequential and are on the list in Appendix J. Any activity to which a State or Federal applicable requirement applies is not trivial even if included on the trivial activities list.

[OAC 252:100-8-2 and OAC 252:100, Appendix J]

**SECTION XVIII. OPERATIONAL FLEXIBILITY**

A. A facility may implement any operating scenario allowed for in its Part 70 permit without the need for any permit revision or any notification to the DEQ (unless specified otherwise in the permit). When an operating scenario is changed, the permittee shall record in a log at the facility the scenario under which it is operating. [OAC 252:100-8-6(a)(10) and (f)(1)]

B. The permittee may make changes within the facility that:

- (1) result in no net emissions increases,
- (2) are not modifications under any provision of Title I of the federal Clean Air Act, and
- (3) do not cause any hourly or annual permitted emission rate of any existing emissions unit to be exceeded;

provided that the facility provides the EPA and the DEQ with written notification as required below in advance of the proposed changes, which shall be a minimum of seven (7) days, or twenty four (24) hours for emergencies as defined in OAC 252:100-8-6 (e). The permittee, the DEQ, and the EPA shall attach each such notice to their copy of the permit. For each such change, the written notification required above shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield provided by this permit does not apply to any change made pursuant to this paragraph. [OAC 252:100-8-6(f)(2)]

**SECTION XIX. OTHER APPLICABLE & STATE-ONLY REQUIREMENTS**

A. The following applicable requirements and state-only requirements apply to the facility unless elsewhere covered by a more restrictive requirement:

- (1) Open burning of refuse and other combustible material is prohibited except as authorized in the specific examples and under the conditions listed in the Open Burning Subchapter.  
[OAC 252:100-13]
- (2) No particulate emissions from any fuel-burning equipment with a rated heat input of 10 MMBTUH or less shall exceed 0.6 lb/MMBTU.  
[OAC 252:100-19]
- (3) For all emissions units not subject to an opacity limit promulgated under 40 C.F.R., Part 60, NSPS, no discharge of greater than 20% opacity is allowed except for:  
[OAC 252:100-25]
  - (a) Short-term occurrences which consist of not more than one six-minute period in any consecutive 60 minutes, not to exceed three such periods in any consecutive 24 hours. In no case shall the average of any six-minute period exceed 60% opacity;
  - (b) Smoke resulting from fires covered by the exceptions outlined in OAC 252:100-13-7;
  - (c) An emission, where the presence of uncombined water is the only reason for failure to meet the requirements of OAC 252:100-25-3(a); or
  - (d) Smoke generated due to a malfunction in a facility, when the source of the fuel producing the smoke is not under the direct and immediate control of the facility and the immediate constriction of the fuel flow at the facility would produce a hazard to life and/or property.
- (4) No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.  
[OAC 252:100-29]
- (5) No sulfur oxide emissions from new gas-fired fuel-burning equipment shall exceed 0.2 lb/MMBTU. No existing source shall exceed the listed ambient air standards for sulfur dioxide.  
[OAC 252:100-31]
- (6) Volatile Organic Compound (VOC) storage tanks built after December 28, 1974, and with a capacity of 400 gallons or more storing a liquid with a vapor pressure of 1.5 psia or greater under actual conditions shall be equipped with a permanent submerged fill pipe or with a vapor-recovery system.  
[OAC 252:100-37-15(b)]
- (7) All fuel-burning equipment shall at all times be properly operated and maintained in a manner that will minimize emissions of VOCs.  
[OAC 252:100-37-36]



**SECTION XX. STRATOSPHERIC OZONE PROTECTION**

A. The permittee shall comply with the following standards for production and consumption of ozone-depleting substances: [40 CFR 82, Subpart A]

- (1) Persons producing, importing, or placing an order for production or importation of certain class I and class II substances, HCFC-22, or HCFC-141b shall be subject to the requirements of §82.4;
- (2) Producers, importers, exporters, purchasers, and persons who transform or destroy certain class I and class II substances, HCFC-22, or HCFC-141b are subject to the recordkeeping requirements at §82.13; and
- (3) Class I substances (listed at Appendix A to Subpart A) include certain CFCs, Halons, HBFCs, carbon tetrachloride, trichloroethane (methyl chloroform), and bromomethane (Methyl Bromide). Class II substances (listed at Appendix B to Subpart A) include HCFCs.

B. If the permittee performs a service on motor (fleet) vehicles when this service involves an ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all applicable requirements. Note: The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant. [40 CFR 82, Subpart B]

C. The permittee shall comply with the following standards for recycling and emissions reduction except as provided for MVACs in Subpart B: [40 CFR 82, Subpart F]

- (1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to § 82.156;
- (2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to § 82.158;
- (3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to § 82.161;
- (4) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record-keeping requirements pursuant to § 82.166;
- (5) Persons owning commercial or industrial process refrigeration equipment must comply with leak repair requirements pursuant to § 82.158; and
- (6) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to § 82.166.

**SECTION XXI. TITLE V APPROVAL LANGUAGE**

A. DEQ wishes to reduce the time and work associated with permit review and, wherever it is not inconsistent with Federal requirements, to provide for incorporation of requirements established through construction permitting into the Source's Title V permit without causing redundant review. Requirements from construction permits may be incorporated into the Title V permit through the administrative amendment process set forth in OAC 252:100-8-7.2(a) only if the following procedures are followed:

- (1) The construction permit goes out for a 30-day public notice and comment using the procedures set forth in 40 C.F.R. § 70.7(h)(1). This public notice shall include notice to the public that this permit is subject to EPA review, EPA objection, and petition to EPA, as provided by 40 C.F.R. § 70.8; that the requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process; that the public will not receive another opportunity to provide comments when the requirements are incorporated into the Title V permit; and that EPA review, EPA objection, and petitions to EPA will not be available to the public when requirements from the construction permit are incorporated into the Title V permit.
- (2) A copy of the construction permit application is sent to EPA, as provided by 40 CFR § 70.8(a)(1).
- (3) A copy of the draft construction permit is sent to any affected State, as provided by 40 C.F.R. § 70.8(b).
- (4) A copy of the proposed construction permit is sent to EPA for a 45-day review period as provided by 40 C.F.R. § 70.8(a) and (c).
- (5) The DEQ complies with 40 C.F.R. § 70.8(c) upon the written receipt within the 45-day comment period of any EPA objection to the construction permit. The DEQ shall not issue the permit until EPA's objections are resolved to the satisfaction of EPA.
- (6) The DEQ complies with 40 C.F.R. § 70.8(d).
- (7) A copy of the final construction permit is sent to EPA as provided by 40 CFR § 70.8(a).
- (8) The DEQ shall not issue the proposed construction permit until any affected State and EPA have had an opportunity to review the proposed permit, as provided by these permit conditions.
- (9) Any requirements of the construction permit may be reopened for cause after incorporation into the Title V permit by the administrative amendment process, by DEQ as provided in OAC 252:100-8-7.3(a), (b), and (c), and by EPA as provided in 40 C.F.R. § 70.7(f) and (g).
- (10) The DEQ shall not issue the administrative permit amendment if performance tests fail to demonstrate that the source is operating in substantial compliance with all permit requirements.

B. To the extent that these conditions are not followed, the Title V permit must go through the Title V review process.

**SECTION XXII. CREDIBLE EVIDENCE**

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any provision of the Oklahoma implementation plan, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[OAC 252:100-43-6]





SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Texas Commission On Environmental Quality  
Operating Permits Division (MC 163)  
P.O. Box 13087  
Austin, TX 78711-3087

Re: Permit Application No. **2018-0201-TV2**  
Western Farmers Electric Cooperative  
Hugo Power Plant (FAC ID 1700)  
SE/4 Section 21, T6S, R19E, Choctaw County, Oklahoma

Dear Sir / Madame:

The subject facility has requested a Title V operating permit renewal. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma - Texas border, a copy of the draft permit will be provided to you upon request. A copy of the draft permit is also on the Air Quality section of the DEQ web page at [www.deq.ok.gov](http://www.deq.ok.gov).

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

*Phillip Fielder*

Phillip Fielder, P.E.,  
Chief Engineer  
**AIR QUALITY DIVISION**





SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Arkansas Department of Environmental Quality  
Attn: Ms. Teresa Marks  
P.O. Box 8913  
5301 Northshore Drive,  
N Little Rock, AR 72219-8913

Re: Permit Application No. **2018-0201-TV2**  
Western Farmers Electric Cooperative  
Hugo Power Plant (FAC ID 1700)  
SE/4 Section 21, T6S, R19E, Choctaw County, Oklahoma

Dear Sir / Madame:

The subject facility has requested a Title V operating permit renewal. Air Quality Division has completed the initial review of the application and prepared a draft permit for public review. Since this facility is within 50 miles of the Oklahoma - Arkansas border, a copy of the draft permit will be provided to you upon request. A copy of the draft permit is also on the Air Quality section of the DEQ web page at [www.deq.ok.gov](http://www.deq.ok.gov).

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me or the permit writer at (405) 702-4100.

Sincerely,

*Phillip Fielder*

Phillip Fielder, P.E.,  
Chief Engineer  
**AIR QUALITY DIVISION**





SCOTT A. THOMPSON  
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

KEVIN STITT  
Governor

Western Farmers Electric Cooperative  
Attn: Gerald Butcher, Environmental Supervisor  
P. O. Box 429  
Anadarko, OK 73005

Re: Permit Application No. **2018-0201-TVR2**  
Western Farmers Electric Cooperative  
Hugo Power Plant (FAC ID 1700)  
SE/4 Section 21, T6S, R19E, Choctaw County, Oklahoma

Dear Mr. Butcher:

Air Quality Division has completed the initial review of your permit application referenced above. This application has been determined to be a **Tier II**. In accordance with 27A O.S. § 2-14-302 and OAC 252:004-7-13(c) the enclosed draft permit is now ready for public review. The requirements for public review include the following steps which you must accomplish:

1. Publish at least one legal notice (one day) in at least one newspaper of general circulation within the county where the facility is located. (Instructions enclosed)
2. Provide for public review (for a period of 30 days following the date of the newspaper announcement) a copy of this draft permit on the DEQ website and access to the application through the DEQ website.
3. Send to AQD a copy of the proof of publication notice from Item #1 above together with any additional comments or requested changes which you may have on the draft permit.

Thank you for your cooperation. If you have any questions, please refer to the permit number above and contact me at (405) 702-4100 or the permit writer, Ryan Buntyn, at (405) 702-4213.

Sincerely,

A handwritten signature in black ink that reads "Phillip Fielder". The signature is written in a cursive, slightly slanted style.

Phillip Fielder, P.E., Chief Engineer  
**AIR QUALITY DIVISION**

Enclosures







**Department of Environmental Quality (DEQ)**  
**Air Quality Division (AQD)**  
**Acronym List**  
**4-15-21**

<b>ACFM</b>	Actual Cubic Feet per Minute	<b>GHG</b>	Greenhouse Gases
<b>AD</b>	Applicability Determination	<b>GR</b>	Grain(s) (gr)
<b>AFRC</b>	Air-to-Fuel Ratio Controller	<b>H<sub>2</sub>CO</b>	Formaldehyde
<b>API</b>	American Petroleum Institute	<b>H<sub>2</sub>S</b>	Hydrogen Sulfide
<b>ASTM</b>	American Society for Testing and Materials	<b>HAP</b>	Hazardous Air Pollutants
		<b>HC</b>	Hydrocarbon
<b>BACT</b>	Best Available Control Technology	<b>HCFC</b>	Hydrochlorofluorocarbon
<b>BAE</b>	Baseline Actual Emissions	<b>HFR</b>	Horizontal Fixed Roof
<b>BHP</b>	Brake Horsepower (bhp)	<b>HON</b>	Hazardous Organic NESHAP
<b>BTU</b>	British thermal unit (Btu)	<b>HP</b>	Horsepower (hp)
		<b>HR</b>	Hour (hr)
<b>C&amp;E</b>	Compliance and Enforcement	<b>I&amp;M</b>	Inspection and Maintenance
<b>CAA</b>	Clean Air Act	<b>IBR</b>	Incorporation by Reference
<b>CAM</b>	Compliance Assurance Monitoring	<b>ICE</b>	Internal Combustion Engine
<b>CAS</b>	Chemical Abstract Service		
<b>CAAA</b>	Clean Air Act Amendments	<b>LAER</b>	Lowest Achievable Emission Rate
<b>CC</b>	Catalytic Converter	<b>LB</b>	Pound(s) [Mass] (lb, lbs, lbm)
<b>CCR</b>	Continuous Catalyst Regeneration	<b>LB/HR</b>	Pound(s) per Hour (lb/hr)
<b>CD</b>	Consent Decree	<b>LDAR</b>	Leak Detection and Repair
<b>CEM</b>	Continuous Emission Monitor	<b>LNG</b>	Liquefied Natural Gas
<b>CFC</b>	Chlorofluorocarbon	<b>LT</b>	Long Ton(s) (metric)
<b>CFR</b>	Code of Federal Regulations		
<b>CI</b>	Compression Ignition	<b>M</b>	Thousand (Roman Numeral)
<b>CNG</b>	Compressed Natural Gas	<b>MAAC</b>	Maximum Acceptable Ambient Concentration
<b>CO</b>	Carbon Monoxide or Consent Order	<b>MACT</b>	Maximum Achievable Control Technology
<b>COA</b>	Capable of Accommodating	<b>MM</b>	Prefix used for Million (Thousand-Thousand)
<b>COM</b>	Continuous Opacity Monitor	<b>MMBTU</b>	Million British Thermal Units (MMBtu)
<b>D</b>	Day	<b>MMBTUH</b>	Million British Thermal Units per Hour (MMBtu/hr)
<b>DEF</b>	Diesel Exhaust Fluid	<b>MMSCF</b>	Million Standard Cubic Feet (MMscf)
<b>DG</b>	Demand Growth	<b>MMSCFD</b>	Million Standard Cubic Feet per Day
<b>DSCF</b>	Dry Standard (At Standard Conditions) Cubic Foot (Feet)	<b>MSDS</b>	Material Safety Data Sheet
		<b>MWC</b>	Municipal Waste Combustor
<b>EGU</b>	Electric Generating Unit	<b>MWe</b>	Megawatt Electrical
<b>EI</b>	Emissions Inventory		
<b>EPA</b>	Environmental Protection Agency	<b>NA</b>	Nonattainment
<b>ESP</b>	Electrostatic Precipitator	<b>NAAQS</b>	National Ambient Air Quality Standards
<b>EUG</b>	Emissions Unit Group	<b>NAICS</b>	North American Industry Classification System
<b>EUSGU</b>	Electric Utility Steam Generating Unit	<b>NESHAP</b>	National Emission Standards for Hazardous Air Pollutants
<b>FCE</b>	Full Compliance Evaluation		
<b>FCCU</b>	Fluid Catalytic Cracking Unit	<b>NH<sub>3</sub></b>	Ammonia
<b>FIP</b>	Federal Implementation Plan	<b>NMHC</b>	Non-methane Hydrocarbon
<b>FR</b>	Federal Register	<b>NGL</b>	Natural Gas Liquids
<b>GACT</b>	Generally Achievable Control Technology	<b>NO<sub>2</sub></b>	Nitrogen Dioxide
<b>GAL</b>	Gallon (gal)	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>GDF</b>	Gasoline Dispensing Facility	<b>NOI</b>	Notice of Intent
<b>GEP</b>	Good Engineering Practice	<b>NSCR</b>	Non-Selective Catalytic Reduction

<b>NSPS</b>	New Source Performance Standards	<b>SNCR</b>	Selective Non-Catalytic Reduction
<b>NSR</b>	New Source Review	<b>SO<sub>2</sub></b>	Sulfur Dioxide
		<b>SO<sub>x</sub></b>	Sulfur Oxides
		<b>SOP</b>	Standard Operating Procedure
<b>O<sub>3</sub></b>	Ozone	<b>SRU</b>	Sulfur Recovery Unit
<b>O&amp;G</b>	Oil and Gas	<b>T</b>	Tons
<b>O&amp;M</b>	Operation and Maintenance	<b>TAC</b>	Toxic Air Contaminant
<b>O&amp;NG</b>	Oil and Natural Gas	<b>THC</b>	Total Hydrocarbons
<b>OAC</b>	Oklahoma Administrative Code	<b>TPY</b>	Tons per Year
<b>OC</b>	Oxidation Catalyst	<b>TRS</b>	Total Reduced Sulfur
		<b>TSP</b>	Total Suspended Particulates
<b>PAH</b>	Polycyclic Aromatic Hydrocarbons	<b>TV</b>	Title V of the Federal Clean Air Act
<b>PAE</b>	Projected Actual Emissions		
<b>PAL</b>	Plant-wide Applicability Limit	<b>µg/m<sup>3</sup></b>	Micrograms per Cubic Meter
<b>Pb</b>	Lead	<b>US EPA</b>	U. S. Environmental Protection Agency
<b>PBR</b>	Permit by Rule		
<b>PCB</b>	Polychlorinated Biphenyls	<b>VFR</b>	Vertical Fixed Roof
<b>PCE</b>	Partial Compliance Evaluation	<b>VMT</b>	Vehicle Miles Traveled
<b>PEA</b>	Portable Emissions Analyzer	<b>VOC</b>	Volatile Organic Compound
<b>PFAS</b>	Per- and Polyfluoroalkyl Substance	<b>VOL</b>	Volatile Organic Liquid
<b>PM</b>	Particulate Matter	<b>VRT</b>	Vapor Recovery Tower
<b>PM<sub>2.5</sub></b>	Particulate Matter with an Aerodynamic Diameter <= 2.5 Micrometers	<b>VRU</b>	Vapor Recovery Unit
<b>PM<sub>10</sub></b>	Particulate Matter with an Aerodynamic Diameter <= 10 Micrometers	<b>YR</b>	Year
<b>POM</b>	Particulate Organic Matter or Polycyclic Organic Matter	<b>2SLB</b>	2-Stroke Lean Burn
<b>ppb</b>	Parts per Billion	<b>4SLB</b>	4-Stroke Lean Burn
<b>ppm</b>	Parts per Million	<b>4SRB</b>	4-Stroke Rich Burn
<b>ppmv</b>	Parts per Million Volume		
<b>ppmvd</b>	Parts per Million Dry Volume		
<b>PSD</b>	Prevention of Significant Deterioration		
<b>psi</b>	Pounds per Square Inch		
<b>psia</b>	Pounds per Square Inch Absolute		
<b>psig</b>	Pounds per Square Inch Gage		
<b>RACT</b>	Reasonably Available Control Technology		
<b>RATA</b>	Relative Accuracy Test Audit		
<b>RAP</b>	Regulated Air Pollutant		
<b>RFG</b>	Refinery Fuel Gas		
<b>RICE</b>	Reciprocating Internal Combustion Engine		
<b>RO</b>	Responsible Official		
<b>ROAT</b>	Regional Office at Tulsa		
<b>RVP</b>	Reid Vapor Pressure		
<b>SCC</b>	Source Classification Code		
<b>SCF</b>	Standard Cubic Foot		
<b>SCFD</b>	Standard Cubic Feet per Day		
<b>SCFM</b>	Standard Cubic Feet per Minute		
<b>SCR</b>	Selective Catalytic Reduction		
<b>SER</b>	Significant Emission Rate		
<b>SI</b>	Spark Ignition		
<b>SIC</b>	Standard Industrial Classification		
<b>SIP</b>	State Implementation Plan		

**NOTICE OF DRAFT PERMIT  
TIER II or TIER III AIR QUALITY PERMIT APPLICATION**

**APPLICANT RESPONSIBILITIES**

Permit applicants are required to give public notice that a Tier II or Tier III draft permit has been prepared by DEQ. The notice must be published in one newspaper local to the site or facility. Upon publication, a signed affidavit of publication must be obtained from the newspaper and sent to AQD. Note that if either the applicant or the public requests a public meeting, this must be arranged through the Customer Services Division of the DEQ.

**REQUIRED CONTENT** (27A O.S. § 2-14-302 and OAC 252:4-7-13(c))

1. A statement that a Tier II or Tier III draft permit has been prepared by DEQ;
2. Name and address of the applicant;
3. Name, address, driving directions, legal description and county of the site or facility;
4. The type of permit or permit action being sought;
5. A description of activities to be regulated, including an estimate of emissions from the facility;
6. Location(s) where the application and draft permit may be reviewed (a location in the county where the site/facility is located must be included);
7. Name, address, and telephone number of the applicant and DEQ contacts;
8. Any additional information required by DEQ rules or deemed relevant by applicant;
9. A 30-day opportunity to request a formal public meeting on the draft permit.

**SAMPLE NOTICE on page 2.**

**SAMPLE NOTICE** (*Italicized print is to be filled in by the applicant.*):

**DEQ NOTICE OF TIER ...II or III... DRAFT PERMIT**

**A Tier ...II or III... application for an air quality ...type of permit or permit action being sought (e.g., Construction Permit for a Major Facility)... has been filed with the Oklahoma Department of Environmental Quality (DEQ) by applicant, ...name and address.**

**The applicant requests approval to ...brief description of purpose of application... at the ...site/facility name ... [proposed to be] located at ...physical address (if any), driving directions, and legal description including county....**

**In response to the application, DEQ has prepared a draft permit [modification] (Permit Number: ...xx-xxx-x...), which may be reviewed at ...locations (one must be in the county where the site/facility is located)... or at the Air Quality Division's main office (see address below). The draft permit is also available for review in the Air Quality Section of DEQ's Web Page: <http://www.deq.ok.gov/>**

**This draft permit would authorize the facility to emit the following regulated pollutants: (list each pollutant and amounts in tons per year (TPY))**

**The public comment period ends 30 days after the date of publication of this notice. Any person may submit written comments concerning the draft permit to the Air Quality Division contact listed below. [Modifications only, add: Only those issues relevant to the proposed modification(s) are open for comment.] A public meeting on the draft permit [modification] may also be requested in writing at the same address. Note that all public meetings are to be arranged and conducted by DEQ/CSD staff.**

**In addition to the public comment opportunity offered under this notice, this draft permit is subject to U.S. Environmental Protection Agency (EPA) review, EPA objection, and petition to EPA, as provided by 40 CFR § 70.8. [For Construction Permits, add: The requirements of the construction permit will be incorporated into the Title V permit through the administrative amendment process. Therefore, no additional opportunity to provide comments or EPA review, EPA objection, and petitions to EPA will be available to the public when requirements from the construction permit are incorporated into the Title V permit.]**

**If the Administrator (EPA) does not object to the proposed permit, the public has 60 days following the Administrator's 45 day review period to petition the Administrator to make such an objection as provided in 40 CFR 70.8(d) and in OAC 252:100-8-8(j). Information on all permit actions and applicable review time lines is available in the Air Quality section of the DEQ Web page: <http://www.deq.ok.gov/>.**

**For additional information, contact ...names, addresses and telephone numbers of contact persons for the applicant, or contact DEQ at: Chief Engineer, Permits & Engineering Group, Air Quality Division, 707 N. Robinson, Suite 4100, P.O. Box 1677, Oklahoma City, OK, 73101-1677. Phone No. (405) 702-4100.**