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**Mary Fallin**  
*Governor*  
August 17, 2015

Mr. Ron Curry, Regional Administrator  
U.S. Environmental Protection Agency, Region 6  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Subject: Affirmation of Designation Recommendation for 2010 Sulfur Dioxide NAAQS for Noble, Choctaw, and Muskogee Counties in Oklahoma

Dear Administrator Curry:

Oklahoma has evaluated the letter from Acting Assistant Administrator McCabe dated March 20, 2015, which gave an update on the U.S. Environmental Protection Agency's (EPA's) status on implementing the revised primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>) (75 FR 35520, June 22, 2010). Accompanying the letter was the "Updated Guidance for Area Designations for the '2010 Primary Sulfur Dioxide National Ambient Air Quality Standard.'" In the letter, EPA outlined three future rounds of designation actions to comply with the federal consent decree and court order issued in Sierra Club, et al v. Regina McCarthy, Case No. 3:13-cv-03953-SI (N.D. Cal.), and identified areas in Noble, Choctaw, and Muskogee Counties as affected by the first round of designations. Each of these areas contains a source that meets the criteria established in the federal consent decree for inclusion in the first round of designation actions. The letter provided an opportunity to submit an updated recommendation and supporting information for EPA consideration for designation of the affected areas.

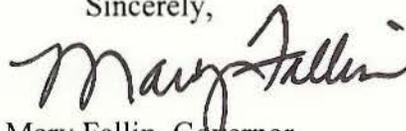
As required by section 107(d)(1)(A) of the federal Clean Air Act (42 U.S.C. § 7407) and on behalf of the State of Oklahoma, I recommended on May 27, 2011, Noble and Choctaw Counties be designated attainment, and Muskogee County be designated unclassifiable for the revised SO<sub>2</sub> standard. Our recommendation for these three counties/areas remains unchanged.

Under separate cover, Oklahoma is submitting an air quality evaluation, performed by the Oklahoma Department of Environmental Quality (DEQ), to support our current recommendation. DEQ's report evaluates certified SO<sub>2</sub> monitoring data, and modeling for contributing SO<sub>2</sub> sources in the three identified areas. Specifically, the evaluation demonstrates

attainment for the areas associated with the two facilities in Noble and Choctaw Counties. The air quality analysis for Muskogee County shows no violation of the 2010 SO<sub>2</sub> NAAQS has been detected at the source-oriented SO<sub>2</sub> monitoring site located approximately 4 kilometers NNW of the facility for the last three years of available certified data. However, modeling for the facility indicates there may be a potential for a NAAQS violation under certain conditions during the period prior to full implementation of the facility's federally-enforceable BART requirements and other planned changes (e.g., in response to Mercury and Air Toxics Standards). The evaluation identified significant uncertainties regarding the effects of available meteorological data on the modeling results. (Modeling did not show any potential violations at receptors located outside Muskogee County.) We believe this information collectively supports a designation of unclassifiable for Muskogee County.

If you desire additional information or have questions concerning this matter, please contact Mr. Eddie Terrill, DEQ's Director of Air Quality, at (405) 702-4100.

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Fallin". The signature is written in a cursive style with a large, prominent "M" and "F".

Mary Fallin, Governor  
State of Oklahoma

cc: Michael Teague, Secretary of Energy and Environment  
Scott Thompson, Executive Director, Department of Environmental Quality  
Eddie Terrill, Director of Air Quality, Department of Environmental Quality