



J. Kevin Stitt
Office of the Governor
State of Oklahoma

April 22, 2020

Ken McQueen, Regional Administrator (ORA)
U.S. Environmental Protection Agency, Region 6
1201 Elm St., Suite 500
Dallas, TX 75270

SUBJECT: Designation Recommendation for Round 4 of the 2010 Primary SO₂ NAAQS

Dear Administrator McQueen:

On June 2, 2010, the U.S. Environmental Protection Agency (EPA) revised the primary sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) to 75 parts per billion (ppb) (75 Fed. Reg. 35520, June 22, 2010). After promulgation of a new or revised NAAQS, each governor or tribal leader has an opportunity to recommend air quality designations, including the appropriate boundaries, to the EPA. By court order,¹ the 2010 SO₂ NAAQS designations have occurred in rounds. For Rounds 1, 2, and 3, EPA designated all areas in Oklahoma as attainment/unclassifiable for the 2010 SO₂ NAAQS except for three areas: Garfield, Mayes, and Muskogee counties. In Round 4, EPA will be designating all remaining areas that have not yet been designated for the 2010 SO₂ NAAQS. With this letter, the State of Oklahoma is hereby submitting its Round 4 2010 SO₂ NAAQS designation recommendations for the remaining three undesignated counties in Oklahoma.

The three undesignated counties are associated with the following four SO₂ sources:

- Georgia-Pacific – Muskogee Mill (Muskogee County)
- GRDA – Chouteau Coal Fired Complex (Mayes County)
- OG&E – Muskogee Generating Station (Muskogee County)
- Oxbow Calcining – Kremlin (Garfield County)

The OG&E–Muskogee Generating Station was originally included in Round 2 of the SO₂ designations based on its emissions. The State of Oklahoma recommended an unclassifiable designation for the area on May 27, 2011, and again on August 17, 2015. However, EPA received an extension to the designation deadline and has not published a final designation.

¹ *Sierra Club, et al v. Regina McCarthy*, Case No. 3:13-cv-03953-SI (N.D. Cal. 2015).



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For Round 4, the Oklahoma Department of Environmental Quality (DEQ) followed EPA's "SO₂ NAAQS Designation Source-Oriented Monitoring Technical Assistance Document" in selecting monitor placement for three ambient air quality SO₂ monitors to address the remaining four sources. EPA approved the monitor site location for both OG&E-Muskogee Generating Station and Georgia-Pacific-Muskogee Mill on November 8, 2016. EPA approved DEQ's selected monitor site location for Oxbow Calcining-Kremlin on November 21, 2016. EPA approved the GRDA-Chouteau Coal Fired Complex monitoring site location on December 6, 2016. These monitors were all considered State or Local Air Monitoring Systems. The three monitors were operational by January 1, 2017 and were operated in accordance with the regulatory requirements of 40 C.F.R. Part 58 for three years.

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 recommend that each of the remaining three counties in Oklahoma be designated attainment/unclassifiable for the revised primary SO₂ NAAQS.

The attainment/unclassifiable recommendation is based on an evaluation performed by the DEQ of certified ambient air quality monitoring data from 2017 through 2019 for the three areas, as specified by the final "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)" (80 Fed. Reg. 51052, August 21, 2015). The DEQ-operated SO₂ regulatory monitors in the three areas described above have design values that are less than the 2010 SO₂ NAAQS of 75 ppb. The 2019 design values calculated from the 2017 through 2019 data for the Garfield County (Kremlin), Mayes County (Pryor), and Muskogee County (Fort Gibson) monitoring sites are respectively 47 ppb, 22 ppb, and 30 ppb. Attached is a summary of the 2017-2019 ambient air quality monitoring data from these three monitors to support this conclusion.

If you desire additional information, or you have any questions concerning this matter, please contact Eddie Terrill, Director, Air Quality Division, DEQ, at 405-702-4100.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Stitt".

J. Kevin Stitt
Governor of Oklahoma

cc: Ken Wagner, Secretary of Energy and Environment
Scott Thompson, Executive Director, DEQ
Eddie Terrill, Director, Air Quality Division, DEQ
Guy Donaldson, Chief, State Planning & Implementation Branch, EPA Region 6
Michael Feldman, Chief, Regional Haze & SO₂ Section, EPA Region 6
Carrie Paige, Infrastructure & Ozone Section, EPA Region 6



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Oklahoma's Designation Recommendation for Round 4 of the 2010 Primary SO₂ NAAQS

2017 through 2019 Data Summary

Site	2017*	2018*	2019*	Design Value**
Kremlin AQS #40-047-0555 Garfield County	54.0	43.0	45.0	47.0
Pryor AQS #40-097-0188 Mayes County	25.0	25.0	16.0	22.0
Fort Gibson AQS #40-101-0170 Muskogee County	52.0	31.0	7.0	30.0

*99th% in ppb

**3 year average of 99th%