

VIA EMAIL (airaction@epa.gov)

March 28, 2025

Honorable Lee Zeldin
Office of the Administrator (1101A)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
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**SUBJECT: PRESIDENTIAL EXEMPTION: NESHAP FOR COAL- AND OIL-FIRED ELECTRIC STEAM
GENERATING UNITS (40 C.F.R. Part 63, SUBPART UUUUU)
HUGO GENERATING STATION, HU-UNIT1
WESTERN FARMERS ELECTRIC COOPERATIVE
PERMIT NUMBER: 2018-0201-TVR2
SECTION 21 T6S, R19E, CHOCTAW COUNTY, OK**

Dear Administrator Zeldin:

Western Farmers Electric Cooperative ("WFEC") respectfully requests the United States Environmental Protection Agency ("EPA") grant WFEC Hugo Generating Station's HU-UNIT1 ("HU-UNIT1") a two-year exemption from compliance with the 0.010 lb/MMBtu filterable Particulate Matter (fPM) emission limitation in Table 2 of the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for coal- and oil-fired electric utility steam generating units ("EGUs") — i.e., the Mercury and Air Toxics Standards ("MATS") ("Final Rule"), 89 Fed. Reg. 38,508 (May 7, 2024), codified at 40 C.F.R. Part 63, Subpart UUUUU. Compliance with the revised standard may only be met through installation and certification of a particulate matter continuous emissions monitoring system ("PM CEMS") based on a continuous 30-boiler operating day rolling average on or after July 6, 2027. It is WFEC's understanding that the two-year exemption from the 0.010 lb/MMBtu fPM emission limitation will also delay the requirement in 40 C.F.R. § 63.10000(c)(1)(iv)(B) to install and certify the PM CEMS and the requirement in 40 C.F.R. § 63.10007(c) to demonstrate continuous compliance with the applicable filterable PM emission standard through the use of a PM CEMS on or after July 8, 2027.

In order to grant this two-year extension request, EPA has asked affected sources to provide a justification to support this request, including:

1. An explanation why the technology to implement the standard is not available, and
2. An explanation why an extension is in the national security interests of the United States.

The following sections provide the justification for this extension request.

Proudly serving the following members in Oklahoma and New Mexico:

Alfalfa Electric Cooperative • Altus Air Force Base • Canadian Valley Electric Cooperative • Central Valley Electric Cooperative •
Choctaw Electric Cooperative • Cimarron Electric Cooperative • CKenergy Electric Cooperative • Cotton Electric Cooperative •
East Central Oklahoma Electric Cooperative • Farmers' Electric Cooperative • Harmon Electric Association • Kay Electric Cooperative •
Kiamichi Electric Cooperative • Lea County Electric Cooperative • Northfork Electric Cooperative • Northwestern Electric Cooperative •
Oklahoma Electric Cooperative • Red River Valley Rural Electric Association • Roosevelt County Electric Cooperative •
Rural Electric Cooperative • Southeastern Electric Cooperative • Southwest Rural Electric Association