

Background

WFEC is a generation and transmission cooperative that provides electric service to 21 member cooperatives, located primarily in Oklahoma and New Mexico, with some service areas extending into parts of Texas and Kansas. Through these cooperatives, WFEC provides service to nearly 717,000 customers through 340,000 meters. As an electric cooperative, WFEC operates on a not-for-profit basis and is Oklahoma's largest locally owned power supply system. WFEC's Hugo Generating Station is an approximately 446 MW coal-fired power station located near Hugo, Oklahoma, comprising one coal steam unit. WFEC is a member of the 14-state Southwest Power Pool ("SPP") integrated market, which serves more than 17.5 million people throughout the midwestern United States.

Item 1: Technology to Implement the Standard is Not Available

WFEC HU-UNIT1 complies with the current 0.030 lb/MMBtu fPM standard by conducting periodic stack testing. The stack testing is conducted at maximum achievable load conditions and does not reflect the full range of operational variability of the unit and control device. WFEC has no basis for determining how operational variability may impact compliance with the revised standard. WFEC requires additional time as allowed by the extension to assess the impact of operational variability on its ability to achieve continuous compliance with the revised limitation.

Achieving compliance with the Final Rule's requirements by 2027 is infeasible and impossible due to several challenges related to the availability of technology, including: (1) the lack of existing control technology capable of achieving the Final Rule's fPM emissions standard on a continuous basis, and (2) the inability of existing PM CEMS to measure fPM emissions at the level required by the Final Rule.

1. The Necessary Control Technology Is Not Available

There is no data to support a conclusion that HU-UNIT1 will be capable of meeting the 0.010 lb/MMBtu limit continuously across all operating conditions, as is required by the Final Rule. HU-UNIT1 employs state-of-the-art electrostatic precipitators ("ESPs") to comply with the current MATS standards, with compliance demonstrated through fPM stack testing conducted under prescribed "representative testing conditions."¹ While WFEC is proud to have demonstrated compliance with the current standard, this does not necessarily support a conclusion that HU-UNIT1 can achieve compliance with the revised standard, which must be demonstrated to be continuous across all operating conditions. The current compliance testing conditions do not include data across a unit's entire load range, since stack testing is conducted at maximum achievable load and excludes startups, shutdowns, maintenance, and malfunction events. Under EPA's Final Rule, the PM CEMS would capture fPM emissions during all operating conditions. EGUs' operational limitations could hinder the ability of some coal-fired EGUs to continuously comply with the fPM standard. Key factors include the following:

- *Peak conditions.* HU-UNIT1 will likely have difficulty continuously meeting the 0.010 lb/MMBtu limit during peak load conditions when maintenance and cleaning of the electrostatic precipitators ("ESPs") are minimized due to SPP's dispatch scheduling. Due to the changing SPP load requirements and grid conditions in the past two years, SPP has issued more resource advisories which has required HU-UNIT1 to operate at a higher capacity factor than in previous

¹ See EPA, *Memorandum re Issuance of the Clean Air Act National Stack Testing Guidance*, 14-17 (Apr. 27, 2009), https://www.epa.gov/sites/default/files/2013-09/documents/stacktesting_1.pdf (excluding start up, shutdown, malfunction, and other non-representative operating conditions).