



## Arkansas Environmental Federation

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February 22, 2017

Ms. Tricia Treece  
Arkansas Department of Environmental Quality  
5301Northshore Drive  
North Little Rock, AR 72118

RE: Comments on Revisions to the Arkansas State Implementation Plan (SIP) National Ambient Air Quality Standards (NAAQS) Infrastructure SIPs and NAAQS SIP Per Ark. Code Ann. Sec. 8-4-318 (January 2017) (Proposed Revisions) and related dockets: In the Matter of Amendments to Regulation No. 18, Arkansas Air Pollution Code Docket No. 14-009-R; In the Matter of Amendments to Regulation No. 19, Regulations of Arkansas Plan of Implementation for Pollution Control Docket No. 14-010-R, and In the Matter of Amendments to Regulation No. 26, Regulations of Arkansas Operating Permit Program Docket No. 14-011-R

Dear Ms. Treece:

On behalf of the Arkansas Environmental Federation (AEF), please consider these public comments to the above described Proposed Infrastructure SIP and NAAQS SIP proposed by the Arkansas Department of Environmental Quality (ADEQ). The AEF is a non-profit association with over 200 members, primarily Arkansas businesses and industries that manufacture products, provide services, and employ skilled workers in Arkansas while also insuring that their operations comply with all federal and state environmental, safety and health regulations. As such, the AEF and its members have an ongoing interest in the adoption and implementation of the NAAQS in accordance with the requirement of state and federal law and regulations and sound scientific and engineering practices.

The AEF has been an active stakeholder in the process of providing comments to ADEQ's revisions to Regulations 18, 19 and 26, which are supporting documents to this Proposed Infrastructure SIP and NAAQS SIP, and have also been involved in the process of ADEQ's development of these Proposed SIP Revisions. The AEF previously submitted its "Comments of the Arkansas Environmental Federation on Proposed Revisions to Arkansas Pollution Control and Ecology Commission Regulation Nos. 18, 19 and 26," at APC&EC Docket Nos. 14-009-R, 14-010-R, and 14-011-R, and incorporate those comments herein as if set out word for word.

This proposed NAAQS SIP revision seeks to establish a NAAQS evaluation for minor new source review permitting actions for emissions of certain pollutants. This evaluation is substantially set out in ADEQ's document, Proposed Revisions, at Sec. 4.2.2 Pollutant-Specific Minor NSR NAAQS Evaluation Requirements. The evaluation has been developed over the last two years by ADEQ with public input from various stakeholders during this process. It is the AEF's understanding that this evaluation is in keeping with ADEQ's duties under Act 1302 of 2013, codified at A.C.A. Secs. 8-4-317 and 8-4-318.

It is also the AEF's understanding that the evaluation only concerns minor NSR permitting actions for PM10, SO2 and NOx emissions. See Proposed Revisions at Secs. 4.2.2.1 PM10 NAAQS Evaluation Requirements, 4.2.2.2 SO2 NAAQS Evaluation Requirements, and 4.2.2.3 NO2 NAAQS Evaluation Requirements. ADEQ has proposed that air dispersion modeling or an approved alternative demonstration method will be required from new and existing stationary sources for minor NSR permitting actions with net emissions increases of such pollutants of 100 tons per year (tpy) or greater.

The AEF appreciates the ADEQ's tremendous effort expended in developing this first-of-its-kind NAAQS SIP for the State of Arkansas. Arkansas is one of only a few states that attains the NAAQS for every pollutant. The ADEQ's work on the NAAQS SIP will ensure that Arkansas' existing clean air resources will be preserved and maintained in harmony with economic growth.

Respectfully submitted,

*Charles M Miller*

Charles M. Miller  
Executive Director