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Ms. Tricia Jackson
Air Division
Arkansas Department of
Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: Modeling Requirements for New Minor Source Construction Or Modification
Activities for Compliance With National Ambient Air Quality Standards
(NAAQS)

Dear Ms. Jackson:

I am submitting these brief comments on my understanding of a proposal that has been made by some of the stakeholders in the group formed to discuss and develop concepts for National Ambient Air Quality Standards State Implementation Plan (NAAQS SIP) development.

Of course, without having the benefit of the discussions among the members of the stakeholder's group, it is sometimes difficult to appreciate all of the nuances of a proposal. However, there is one proposal regarding the size of the facilities at which monitoring would be required in the event of remodeling, expansion or construction that seems on its face to be objectionable. That is the proposal that, I understand, would raise the minimum amount of emissions required for modeling to be performed from 40 tons/year to 140 tons/year.

As stated on ADEQ's website, one of ADEQ's missions is to ensure that minor source construction or modification activities do not cause or contribute to an exceedance or interfere with the maintenance of the NAAQS. This is to further ensure, according to the website, that people in all areas of the State, not just those locations with monitors, are protected from exposure to pollutant concentrations exceeding the NAAQS.

If ADEQ were to further limit the universe of facilities at which modeling was required as preface to an expansion, modification or other construction activity by increasing the minimum amount of emissions by the facilities at which the requirement for modeling was triggered, the State's air quality would be less well-monitored, the likelihood of deterioration of the State's air quality would increase, and those abovementioned missions of the agency would be made far more difficult.

I strongly urge that the Department reject any proposal to increase the minimum threshold for imposing the modeling requirements for minor source construction or modification activities.

Sincerely,

/s/ Richard H. Mays