



October 27, 2017

Tim Allen, Meteorologist / Modeler  
U.S. Fish and Wildlife Service  
National Wildlife Refuge System  
Branch of Air Quality  
7333 W Jefferson Ave., Suite 375  
Lakewood, CO 80235-2017

RE: Arkansas Regional Haze State Implementation Plan

Dear Mr. Allen:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NO<sub>x</sub> requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

This notification is intended to provide your agency with an opportunity for a sixty-day consultation period on this SIP revision in accordance with 40 C.F.R. § 51.308(i). This consultation will give you the opportunity to discuss—by conference call, in person, and/or in writing—your assessment of the impact of the proposed revisions on Class I areas impacted by Arkansas sources.

Notice of the public hearing and public comment period will be published in the Arkansas Democrat Gazette and posted to the ADEQ Regional Haze webpage (<https://www.adeq.state.ar.us/air/planning/sip/regional-haze.aspx>) providing, at minimum, a thirty-day public comment period.

A pre-proposal copy of the SIP revision and the draft notice of public hearing have been included with this letter. Should changes be made to the SIP revision prior to proposal, we will send an updated draft. We expect that any such changes would not impact the control strategy included in the SIP and the resulting visibility improvements expected at Class I areas.

Written comments should be mailed to Tricia Treece, Office of Air Quality, Arkansas Department of Environmental Quality, 5301 Northshore Drive, North Little Rock, AR 72118. Electronic comments should be sent to: [treecep@adeq.state.ar.us](mailto:treecep@adeq.state.ar.us).

Should you have any questions, please contact Will Montgomery at 501-692-0885 (montgomery@adeq.state.ar.us) or Tricia Treece at 501-682-0055 (treecep@adeq.state.ar.us).

Sincerely,



Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures



October 27, 2017

Cherie Hamilton, Forest Supervisor  
U.S. Forest Service  
Ozark/St. Francis: Upper Buffalo Wilderness Area  
605 West Main Street  
Russellville, AR 72801

RE: Arkansas Regional Haze State Implementation Plan

Dear Forest Supervisor Hamilton:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NO<sub>x</sub> requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

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Sincerely,



Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures



October 27, 2017

Pat Brewer  
Regulatory, Policy, Smoke Management  
NPS Air Resources Division  
P.O. Box 25287  
Denver, CO 80225-0287

RE: Arkansas Regional Haze State Implementation Plan

Dear Ms. Brewer:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NO<sub>x</sub> requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

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Sincerely,



Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures



October 27, 2017

Sherri Schwenke  
U.S. Forest Service  
Mark Twain Forest: Hercules Glade Wilderness Area  
401 Fairgrounds Road  
Rolla, MO 65401

RE: Arkansas Regional Haze State Implementation Plan

Dear Ms. Schwenke:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NO<sub>x</sub> requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

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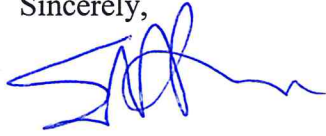
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Sincerely,



Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures



October 27, 2017

Norm Wagoner, Forest Supervisor  
U.S. Forest Service  
Ouachita: Caney Creek Wilderness Area  
P.O. Box 1270  
Hot Springs, AR 71902

RE: Arkansas Regional Haze State Implementation Plan

Dear Forest Supervisor Wagoner:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NOx requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

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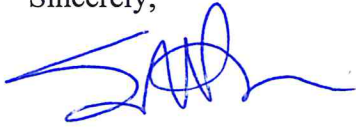
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Sincerely,



Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures



October 27, 2017

Kyra Moore  
Air Pollution Control Program Director  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, Missouri 65102

RE: Arkansas Regional Haze State Implementation Plan

Dear Director Moore:

This letter serves to notify you that ADEQ has prepared a revision to the Arkansas Regional Haze State Implementation Plan (SIP) to address all remaining disapproved portions of the SIP with the exception of NO<sub>x</sub> requirements for electric generating units which were addressed in our July 8, 2017 proposal and BART requirements for Domtar Ashdown Mill.

This notification is intended to provide your agency with an opportunity for consultation on this SIP revision in accordance with 40 CFR § 51.308(d)(3)(i). This consultation will give you the opportunity to discuss—by conference call, in person, and/or in writing—your assessment of the impact of the proposed revisions on reasonable progress in Class I areas in your state.

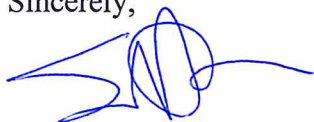
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Should you have any questions, please contact Will Montgomery at 501-692-0885 ([montgomery@adeq.state.ar.us](mailto:montgomery@adeq.state.ar.us)) or Tricia Treece at 501-682-0055 ([treecep@adeq.state.ar.us](mailto:treecep@adeq.state.ar.us)).

Sincerely,

A handwritten signature in blue ink, appearing to be 'Stuart Spencer', with a stylized, looped design.

Stuart Spencer  
Associate Director  
Office of Air Quality

Enclosures

**From:** [Montgomery, William](#)  
**To:** [kyra.moore@dnr.mo.gov](mailto:kyra.moore@dnr.mo.gov); [Wilbur, Emily \(emily.wilbur@dnr.mo.gov\)](mailto:Wilbur, Emily (emily.wilbur@dnr.mo.gov)); [Tim.Allen@fws.gov](mailto:Tim.Allen@fws.gov); [cehamilton@fs.fed.us](mailto:cehamilton@fs.fed.us); [patricia.f.brewer@nps.gov](mailto:patricia.f.brewer@nps.gov); [nwagone@fs.fed.us](mailto:nwagone@fs.fed.us); [sschwenke@fs.fed.us](mailto:sschwenke@fs.fed.us); [Logan, Judy -FS \(jlogan@fs.fed.us\)](mailto:Logan, Judy -FS (jlogan@fs.fed.us))  
**Cc:** [Spencer, Stuart](#); [Treece, Tricia](#)  
**Subject:** FLM and State Consultation: AR Regional Haze SIP Proposal Comment Period Extension  
**Date:** Friday, January 12, 2018 1:39:58 PM  
**Attachments:** [SIP Hearing 1-10-18.docx](#)

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This is to inform you that ADEQ has extended the public comment period on the Arkansas Regional Haze State Implementation Plan to February 2, 2018. The public hearing will remain on January 19, 2018 as previously scheduled.

As before, written comments should be mailed to Tricia Treece, Office of Air Quality, Arkansas Department of Environmental Quality, 5301 Northshore Drive, North Little Rock, AR 72118. Electronic comments should be sent to: [treecep@adeq.state.ar.us](mailto:treecep@adeq.state.ar.us).

Thanks,

William K. Montgomery  
Policy & Planning Branch Manager  
Office of Air Quality  
Arkansas Department of Environmental Quality  
Ph. # (501) 682-0885  
E-mail: [Montgomery@adeq.state.ar.us](mailto:Montgomery@adeq.state.ar.us)

**From:** [Logan, Judy -FS](#)  
**To:** [Treece, Tricia](#)  
**Cc:** [Anderson, Bret A -FS](#); [Sams, Charles E -FS](#)  
**Subject:** RE: Comments for SIP  
**Date:** Wednesday, January 24, 2018 11:22:33 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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The number to call is 888-844-9904, 2103767#

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**From:** Treece, Tricia [<mailto:treecep@adeq.state.ar.us>]  
**Sent:** Wednesday, January 24, 2018 10:07 AM  
**To:** Logan, Judy -FS <[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)>  
**Cc:** Anderson, Bret A -FS <[baanderson02@fs.fed.us](mailto:baanderson02@fs.fed.us)>; Sams, Charles E -FS <[csams@fs.fed.us](mailto:csams@fs.fed.us)>  
**Subject:** RE: Comments for SIP

Sounds good.

---

**From:** Logan, Judy -FS [<mailto:jlogan@fs.fed.us>]  
**Sent:** Wednesday, January 24, 2018 10:06 AM  
**To:** Treece, Tricia  
**Cc:** Anderson, Bret A -FS; Sams, Charles E -FS  
**Subject:** RE: Comments for SIP

Hi Tricia,

We would like a call at 1:00 today. I will give you the number as soon as they tell me which line to use. Thanks!

---

**From:** Treece, Tricia [<mailto:treecep@adeq.state.ar.us>]  
**Sent:** Wednesday, January 24, 2018 7:55 AM  
**To:** Logan, Judy -FS <[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)>  
**Subject:** RE: Comments for SIP

I am available today any time after 10 am and before 3. I am available tomorrow any time after 9:30 and before 2.

Would a particular time within those availability windows work for you?

---

**From:** Logan, Judy -FS [<mailto:jlogan@fs.fed.us>]  
**Sent:** Tuesday, January 23, 2018 8:53 AM  
**To:** Treece, Tricia  
**Subject:** RE: Comments for SIP

No problem, sorry you were sick. Let me know when you are available again

and we will set up another call. -Judy

---

**From:** Treece, Tricia [<mailto:treecep@adeq.state.ar.us>]

**Sent:** Monday, January 22, 2018 10:34 AM

**To:** Logan, Judy -FS <[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)>

**Cc:** Cole, Steve N -FS <[sncole@fs.fed.us](mailto:sncole@fs.fed.us)>; Wagoner, Norman -FS <[nwagoner@fs.fed.us](mailto:nwagoner@fs.fed.us)>

**Subject:** Re: Comments for SIP

Ok. Sorry. I had forgotten to let you know that I was sick and would not be available for our 9:00 call.

---

**From:** Logan, Judy -FS <[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)>

**Sent:** Monday, January 22, 2018 9:57:19 AM

**To:** Treece, Tricia

**Cc:** Cole, Steve N -FS; Wagoner, Norman -FS

**Subject:** Comments for SIP

Hi Tricia,

The Forest Service had planned to make comments on the AR SIP but due to the furlough that may not be possible. -Judy



**Judith Logan**  
**Air Resource Specialist**

**Forest Service**  
**Ouachita National Forest**

p: 501-321-5341

f: 501-321-5353

[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)

100 Reserve Street  
Hot Springs, AR 71901

[www.fs.fed.us](http://www.fs.fed.us)



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**From:** Treece, Tricia  
**To:** ["Logan, Judy -FS"](#)  
**Cc:** ["Sams, Charles E -FS"](#); ["Anderson, Bret A -FS"](#); [Spencer, Stuart](#); [Montgomery, William](#)  
**Subject:** RE: SOx SIP  
**Date:** Friday, December 01, 2017 2:00:00 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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Judy,

I just wanted to give you a heads up that we will likely be extending the public comment period and pushing back the public hearing in response to comments we have received. If this is the case, we will publish an additional public notice regarding the extensions. If we are pushing the public hearing date back, this could provide for more time for consultation on the SIP revision with the federal land managers.

---

**From:** Treece, Tricia  
**Sent:** Friday, December 01, 2017 8:14 AM  
**To:** 'Logan, Judy -FS'  
**Cc:** Sams, Charles E -FS; Anderson, Bret A -FS; Spencer, Stuart; Montgomery, William  
**Subject:** RE: SOx SIP

I will check with management. We did send it to Norm Wagoner, Forest Supervisor of the Ouachita National Forest on October 27, 2017.

---

**From:** Logan, Judy -FS [<mailto:jlogan@fs.fed.us>]  
**Sent:** Friday, December 01, 2017 8:05 AM  
**To:** Treece, Tricia  
**Cc:** Sams, Charles E -FS; Anderson, Bret A -FS; Spencer, Stuart; Montgomery, William  
**Subject:** RE: SOx SIP

Will this extend our comment period?

---

**From:** Treece, Tricia [<mailto:treecep@adeq.state.ar.us>]  
**Sent:** Friday, December 01, 2017 7:22 AM  
**To:** Logan, Judy -FS <[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)>  
**Cc:** Sams, Charles E -FS <[csams@fs.fed.us](mailto:csams@fs.fed.us)>; Anderson, Bret A -FS <[baanderson02@fs.fed.us](mailto:baanderson02@fs.fed.us)>; Spencer, Stuart <[SPENCER@adeq.state.ar.us](mailto:SPENCER@adeq.state.ar.us)>; Montgomery, William <[Montgomery@adeq.state.ar.us](mailto:Montgomery@adeq.state.ar.us)>  
**Subject:** RE: SOx SIP

Sure. I sent it to the same group of folks as last time, but maybe the NOx SIP was forwarded to you before because I don't see your name on my distribution list. I apologize for not getting you access to this sooner.

Here is a direct link to the SIP: <https://www.adeq.state.ar.us/air/planning/sip/pdfs/regional-haze/public-review-package.pdf>

We have also posted Excel files for spreadsheets included in the Appendices to

<https://www.adeg.state.ar.us/air/planning/sip/regional-haze.aspx>.

Please let me know if you have any questions or would like to set up a meeting with us to discuss your thoughts on the SIP revision.

---

**From:** Logan, Judy -FS [<mailto:jlogan@fs.fed.us>]  
**Sent:** Thursday, November 30, 2017 6:06 PM  
**To:** Treece, Tricia  
**Cc:** Sams, Charles E -FS; Anderson, Bret A -FS  
**Subject:** SOx SIP

Tricia, do you have a copy of the SOx SIP or a link to the document so we can review. I heard rumors that this was in the works and your website says it should be under review by the FLMs now but I don't have a copy. Thanks!



**Judith Logan**  
**Air Resource Specialist**  
**Forest Service**  
**Ouachita National Forest**

p: 501-321-5341

f: 501-321-5353

[jlogan@fs.fed.us](mailto:jlogan@fs.fed.us)

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United States  
Department of  
Agriculture

Forest  
Service

Ouachita National Forest

P. O. Box 1270  
Hot Springs, AR 71902  
501-321-5202  
Fax: 501-321-5353

**File Code:** 2580  
**Date:** February 2, 2018

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

Dear Ms. Treece:

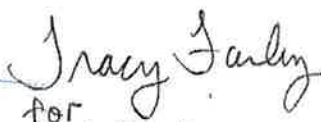
We appreciate the opportunity to review and comment on the State Implementation Plan (SIP) prepared by the Arkansas Department of Environmental Quality (ADEQ). As federal land managers of class 1 airsheds (Upper Buffalo Wilderness and Caney Creek Wilderness) in the state of Arkansas we are very concerned and interested in the air quality of these airsheds.

We are providing these comments to ADEQ, and ask that they be placed in the official public record. We look forward to your response as per section 40 CFR §51.308 (i)(3) and are willing to work with ADEQ staff to address any of the issues discussed in this letter. We request that in order to minimize the class I airshed impacts the state abide by BART guidance.

Again, we appreciate the opportunity to work with ADEQ and compliment you on your hard work and dedication to improve our nation's air quality values and visibility. Our air specialists have additional information and would be happy to discuss in a face-to-face meeting in the future.

Sincerely,

  
Norman L. Wagoner  
Forest Supervisor

  
for  
Cherie Hamilton  
Forest Supervisor



Caring for the Land and Serving People

Printed on Recycled Paper



cc:

Mark McCorkle  
Environmental Programs Manager  
ADEQ  
5301 Northshore Drive  
North Little Rock, AR 72118-5317

Guy Donaldson, Chief  
Air Planning Section  
U.S. EPA Region 6, 6PD-L  
1445 Ross Avenue, Suite 1200  
Dallas TX 75202-2733

Eric Snyder  
Air Planning Section  
US EPA Region 6, 6PD-L  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Tim Allen  
USFWS

## RESPONSE TO COMMENTS RECEIVED FROM FEDERAL LAND MANAGERS AND AFFECTED STATES DURING CONSULTATION PERIOD

The Regional Haze Rule requires consultation between states and Federal Land Managers (FLMs) on state implementation plan development (SIP). Specifically, the State must provide the FLMs of Class I areas impacted by Arkansas sources with the opportunity for consultation no less than sixty days prior to a public hearing on a proposed regional haze state implementation plan. This consultation must include the opportunity for the affected FLMs to discuss their:

- (i) Assessment of impairment of visibility in any Class I area; and
- (ii) Recommendations on the development and implementation of strategies to address visibility impairment.

The State must include in the SIP a description of how the State addressed any comments provided by the FLMs and procedures for continuing consultation with FLMs and other states on the implementation of the visibility protection program.

On October 27, 2017, the Arkansas Department of Environmental Quality (ADEQ or “the Department”) submitted letters to notify the FLMs and Missouri Department of Natural Resources of the proposed SIP revision and offer the opportunity to discuss their assessment of the impact of the proposed SIP revision on Class I areas affected by Arkansas sources. Missouri Department of Natural Resources had no comments. ADEQ participated in phone calls with United States Fish and Wildlife Service (FWS) and United States Forest Service (FS) air quality specialists to answer questions about the proposed SIP. The FS forest supervisors representing the Ouachita National Forest and Ozark-St. Francis National Forest submitted comments to ADEQ during the consultation period. ADEQ has summarized each comment and provided a description of how each comment will be addressed below.

### **Comment 1:**

The FS provided a letter noting their appreciation for the opportunity to review and comment on the State Implementation Plan. The FS expressed their concern and interest in the air quality in the Upper Buffalo Wilderness and Caney Creek Wilderness air sheds. The FS requested that, in order to minimize class I airshed impacts, the state abide by BART guidance. The FS managers further state their appreciation for the opportunity to work with ADEQ and complimented the Department on our dedication to improve our nation's air quality values and visibility.

### **Response 1:**

ADEQ acknowledges and appreciates the comments by the FS and looks forward to continuing to work with the FLMs as partners in protecting visibility at Arkansas's Class I areas. ADEQ also appreciates the discussion between FLM air quality specialists and our staff on the proposed plan. In developing the proposed plan, ADEQ worked within the framework of the Regional Haze Rule and EPA's guidance on the first planning period. In finalizing the SIP, ADEQ will

clarify language to more clearly demonstrate that all BART determinations are consistent with guidance and federal regulations for planning period 1.