



STATE OF ARKANSAS

ASA HUTCHINSON
GOVERNOR

January 24, 2017

Mr. Ron Curry
Regional Administrator
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: Submissions of Sulfur Dioxide (SO₂) National Ambient Air Quality
Standard (NAAQS) Area Attainment Designation Recommendation for
Counties in the State of Arkansas.

Dear Mr. Curry:

Section 107(d)(1) of the Federal Clean Air Act requires state governors to recommend attainment status designations after the promulgation of any new or revised NAAQS. On June 2, 2010, the federal Environmental Protection Agency (EPA) promulgated a new primary 1-hour NAAQS for SO₂ at 75 ppb for the 3-year average of the 99th percentiles of the maximum daily values per calendar year.

As reflected in the State's letter dated March 22, 2011, all monitored counties in Arkansas are then and now attaining the existing primary and secondary SO₂ standards. However, as part of the implementation of the new 1-hour SO₂ NAAQS, EPA has begun requiring, in addition to monitoring data, the use of dispersion modeling for areas with facilities emitting SO₂ in quantities greater than the threshold set by the EPA.

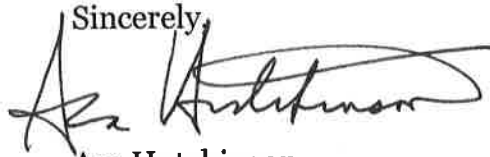
For Round 3, the current round of designations, two counties in Arkansas (Benton and Mississippi) are subject to this requirement because they include facilities with SO₂ emissions greater than the EPA-determined threshold for review. Benton and Mississippi counties are in compliance with the 2010 SO₂ NAAQS based on modeling analyses conducted by or for the Arkansas Department of Environmental Quality (ADEQ). Copies of the two Modeling Reports as well as two complete archives of AERMOD-associated modeling files are enclosed. As a result, Arkansas recommends that the two counties (Benton and Mississippi) be designated "unclassifiable/attainment".

Based on a Round 2 follow-up modeling demonstration involving both Entergy Arkansas Inc.'s Independence Steam Electrical Station and FutureFuel Chemical Company resulting from EPA's June 30, 2016 designation of Independence County as "Unclassifiable" based on "insufficient information", Arkansas also recommends that Independence County be designated "unclassifiable/attainment". A copy of the combined simulation Modeling Report and a complete archive of AERMOD-associated modeling files are enclosed.

In addition, the two counties with existing monitor sites, Pulaski and Union, continue to maintain the standard and should be designated as in "attainment". Jefferson County was already designated as "unclassifiable/attainment" by the EPA in Round 2. All other counties in Arkansas should be designated "unclassifiable."

For further information regarding these recommendations, please contact Stuart Spencer, Associate Director for the Office of Air Quality, Arkansas Department of Environmental Quality, by phone at 501-682-0750 or email at SPENCER@adeq.state.ar.us.

Sincerely,



Asa Hutchinson

attachment: Table of Arkansas County Designation Recommendations

enclosures:

- 1) SO₂ Air Dispersion Modeling Report and a complete archive of AERMOD-associated modeling files for Southwestern Electric Power Company d/b/a Flint Creek Power Plant
- 2) SO₂ Air Dispersion Modeling Report and a complete archive of AERMOD-associated modeling files for Plum Point Services Company, LLC
- 3) SO₂ Air Dispersion Modeling Report and a complete archive of AERMOD-associated modeling files for a combined simulation for Entergy Arkansas Inc.'s Independence Steam Electric Station and FutureFuel Chemical Company

**Arkansas 1-Hour Sulfur Dioxide (SO₂)
Designation Recommendations**

County	Recommended Designation
Arkansas	Unclassifiable
Ashley	Unclassifiable
Baxter	Unclassifiable
Benton	Unclassifiable/Attainment ¹
Boone	Unclassifiable
Bradley	Unclassifiable
Calhoun	Unclassifiable
Carroll	Unclassifiable
Chicot	Unclassifiable
Clark	Unclassifiable
Clay	Unclassifiable
Cleburne	Unclassifiable
Cleveland	Unclassifiable
Columbia	Unclassifiable
Conway	Unclassifiable
Craighead	Unclassifiable
Crawford	Unclassifiable
Crittenden	Unclassifiable
Cross	Unclassifiable
Dallas	Unclassifiable
Desha	Unclassifiable
Drew	Unclassifiable
Faulkner	Unclassifiable
Franklin	Unclassifiable
Fulton	Unclassifiable
Garland	Unclassifiable
Grant	Unclassifiable
Greene	Unclassifiable
Hempstead	Unclassifiable
Hot Spring	Unclassifiable
Howard	Unclassifiable

¹ Current Round 3 recommendation based on enclosed Southwestern Electric Power Company d/b/a Flint Creek Power Plant Modeling Report

**Arkansas 1-Hour Sulfur Dioxide (SO₂)
Designation Recommendations (cont.)**

County	Recommended Designation
Independence	Unclassifiable/Attainment ²
Izard	Unclassifiable
Jackson	Unclassifiable
Jefferson	Unclassifiable/Attainment ³
Johnson	Unclassifiable
Lafayette	Unclassifiable
Lawrence	Unclassifiable
Lee	Unclassifiable
Lincoln	Unclassifiable
Little River	Unclassifiable
Logan	Unclassifiable
Lonoke	Unclassifiable
Madison	Unclassifiable
Marion	Unclassifiable
Miller	Unclassifiable
Mississippi	Unclassifiable/Attainment ⁴
Monroe	Unclassifiable
Montgomery	Unclassifiable
Nevada	Unclassifiable
Newton	Unclassifiable
Ouachita	Unclassifiable
Perry	Unclassifiable
Phillips	Unclassifiable
Pike	Unclassifiable
Poinsett	Unclassifiable
Polk	Unclassifiable
Pope	Unclassifiable
Prairie	Unclassifiable

² Arkansas' recommended change to EPA's Round 2 June 30, 2016 designation

³ Round 2 recommendation and EPA's June 30, 2016 designation

⁴ Current Round 3 recommendation based on enclosed Plum Point Services Company, LLC Modeling Report

**Arkansas 1-Hour Sulfur Dioxide (SO₂)
Designation Recommendations (cont.)**

County	Recommended Designation
Pulaski	Attainment ⁵
Randolph	Unclassifiable
St. Francis	Unclassifiable
Saline	Unclassifiable
Scott	Unclassifiable
Searcy	Unclassifiable
Sebastian	Unclassifiable
Sevier	Unclassifiable
Sharp	Unclassifiable
Stone	Unclassifiable
Union	Attainment ⁵
Van Buren	Unclassifiable
Washington	Unclassifiable
White	Unclassifiable
Woodruff	Unclassifiable
Yell	Unclassifiable

⁵ Based on monitor data