



April 26, 2017

Samuel Coleman, P.E., Acting Regional Administrator
U.S. Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Dear Mr. Coleman:

On February 7, 2013, the U.S. Environmental Protection Agency (EPA) promulgated New Source Performance Standards and Emissions Guidelines for Commercial and Industrial Solid Waste Incineration Units. Emissions from existing units (Emissions Guidelines) are addressed under Clean Air Act, sections 111(d) and 129(b).

Unlike the New Source Performance Standards, the Emissions Guidelines are not directly enforceable. Instead they are implemented and enforced through either an EPA-approved state plan or a promulgated federal plan. Alternatively, pursuant to 40 CFR 60.23(b), if no designated facilities exist within a state, a negative declaration may be submitted in lieu of a state plan.

After examining potentially affected facilities, the Arkansas Department of Environmental Quality (ADEQ) determined that no facility designated by the Emissions Guidelines exists in Arkansas. Therefore, the State of Arkansas is hereby submitting a negative declaration certifying that no commercial and industrial solid waste incineration units exist in the state of Arkansas.

In the "Federal Plan Requirements for Commercial and Industrial Solid Waste Incineration units" (Federal Plan), EPA identified several units in a "CISWI Inventory List for Memo CISWI Federal Plan." (81 FR 10956). After careful review, ADEQ has determined that the units identified in that Federal Plan are not subject to the Emissions Guidelines.

Planters Cotton Oil (AFIN: 35-00025) Boiler #3 (SN-72) was removed from service in a permit amendment (1427-AOP-R12) issued February 6, 2014. This unit is still removed from service according to their currently active permit (1427-AOP-R13). On January 24, 2017, ADEQ confirmed with Planters Cotton Oil that in addition to being removed from service, Boiler #3 (SN-72) remains onsite at the facility and is inoperable.¹ As a result, Planters Cotton Oil Boiler #3 (SN-72) is not subject to the Emissions Guidelines.

¹ Communication between ADEQ and Planters Cotton Oil regarding this is included with these comments (Enclosed). Current and past air permits for Planters Cotton Oil can be obtained from the ADEQ Facility and Permit Summary database: <https://www.adeq.state.ar.us/home/pdssql/pds.aspx>

Domtar Industries (AFIN: 41-00002) has three units listed in the CISWI Inventory: Power Boiler 1 (SN-03), Power Boiler 2 (SN-05), and Power Boiler 3 (SN-01). According to Domtar's currently active permit, Power Boiler 1 (SN-03) burns only natural gas and therefore is not subject to the Emissions Guidelines. Power Boiler 2 (SN-05) and Power Boiler 3 (SN-01) no longer burn solid waste, and an administrative amendment to Domtar's Title V permit has been finalized to ensure that the permit reflects this.²

No other units were identified as being subject to the Emissions Guidelines. If you have questions regarding this submittal, please contact Stuart Spencer, the Associate Director of the Office of Air Quality, ADEQ. We look forward to your prompt review of this declaration.

Sincerely,



Becky W. Keogh
Director

² Domtar Operating Permit 0287-AOP-R19.