



STATE OF ARKANSAS

ASA HUTCHINSON

GOVERNOR

September 11, 2015

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

Re: Update to 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 within one year of 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. The existing secondary standard of 0.5 ppm per 3-hour period remained unchanged.

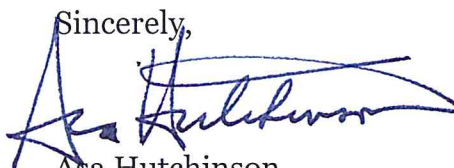
As per the State's letter dated March 22, 2011, all monitored counties in Arkansas are currently attaining the existing primary and secondary SO₂ standards. However, as part of the implementation of the new 1-hour NAAQS, EPA has begun requiring, in addition to monitoring data, the use of dispersion modeling for areas with facilities emitting large quantities of SO₂ as a means of determining compliance with the new standard. Currently, only two counties in Arkansas fall under this requirement: Independence and Jefferson. These counties are subject to this requirement because two facilities operated by Entergy Arkansas, Inc. have sulfur dioxide emissions that are greater than the level that the EPA determined would require review.

Based on the analysis of modeling that was conducted by Environmental Resources Management (ERM) for Entergy Arkansas, Inc. and provided to the Arkansas Department of Environmental Quality for review, both Independence and Jefferson counties will comply with the standard. Copies of ERM's analysis reports, *SO₂ Air Dispersion Modeling Report for White Bluff Steam Electric Station* and *SO₂ Air*

Dispersion Modeling Report for Independence Steam Electric Station, are enclosed for your review.

Consistent with the previous recommendation, it is the State's recommendation that the two counties with existing monitor sites, Pulaski and Union should be designated "attainment". Based on the information contained in the enclosed reports, Independence and Jefferson counties should be designated "unclassifiable/attainment". All other counties in Arkansas should be designated "unclassifiable."

The attached table lists all Arkansas counties and their recommended designations. For further information regarding these recommendations, please contact Stuart Spencer, Chief of the Air Division, 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:

SO₂ Air Dispersion Modeling Report for Independence Steam Electric Station
SO₂ Air Dispersion Modeling Report for White Bluff Steam Electric Station

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

County	Recommended Designation
Arkansas	Unclassifiable
Ashley	Unclassifiable
Baxter	Unclassifiable
Benton	Unclassifiable
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

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

County	Recommended Designation
Independence	Unclassifiable/Attainment
Izard	Unclassifiable
Jackson	Unclassifiable
Jefferson	Unclassifiable/Attainment
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
Monroe	Unclassifiable
Montgomery	Unclassifiable
Nevada	Unclassifiable
Newton	Unclassifiable
Ouachita	Unclassifiable
Perry	Unclassifiable
Phillips	Unclassifiable
Pike	Unclassifiable
Poinsett	Unclassifiable
Polk	Unclassifiable
Pope	Unclassifiable
Prairie	Unclassifiable
Pulaski	Attainment
Randolph	Unclassifiable
St. Francis	Unclassifiable
Saline	Unclassifiable
Scott	Unclassifiable
Searcy	Unclassifiable

Arkansas 1-Hour Sulfur Dioxide (SO₂) Designation Recommendations (cont.)	
County	Recommended Designation
Sebastian	Unclassifiable
Sevier	Unclassifiable
Sharp	Unclassifiable
Stone	Unclassifiable
Union	Attainment
Van Buren	Unclassifiable
Washington	Unclassifiable
White	Unclassifiable
Woodruff	Unclassifiable
Yell	Unclassifiable