



STATE OF ARKANSAS

ASA HUTCHINSON

GOVERNOR

December 10, 2015

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

Re: Crittenden County Ozone Redesignation Request and Maintenance Plan

Dear Mr. Curry:

On behalf of the State of Arkansas and the Arkansas Department of Environmental Quality (ADEQ), I am writing to respectfully request a redesignation to attainment for Crittenden County, Arkansas, part of the Memphis, TN-MS-AR Metropolitan Statistical Area (MSA), for the 2008 ozone National Ambient Air Quality Standard (NAAQS.)

Ozone monitoring data for the period of 2012 through 2014 show that Crittenden County has attained and continues to attain the 2008 eight-hour ozone NAAQS. In addition, all other regulatory monitors in the tri-state Memphis, TN-MS-AR nonattainment area have also attained the 2008 eight-hour ozone NAAQS during the same period. Monitoring data for 2014 have undergone quality assurance and have been certified and submitted to EPA's Air Quality System (AQS) database. This meets the requirements of the Clean Air Act § 107(d)(3)(E)(i).

Measured reductions in ozone in and around Crittenden County, Arkansas, are largely attributable to reductions from emission sources of volatile organic compounds (VOCs) and nitrogen oxides (NO_x), which are precursors in the formation of ground-level ozone. The majority of these reductions have been realized from federal measures related to mobile sources and electrical power generation. In addition, continuing new emissions control programs will help to ensure a further decrease in emissions throughout the area in the future. Emissions projections indicate that current controls, and existing state and federal air quality rules will be sufficient to maintain the NAAQS in the area for the duration of the maintenance plan period.

The package accompanying this letter consists of one hard copy and one electronic copy (on disk), summarized as follows:

Crittenden County Redesignation Request and Maintenance Plan
Emissions Inventory for Crittenden County – Base Year 2011
Emissions Projections Methodology
On-road Mobile Input and Output Files
Memorandum of Agreement for Memphis, TN-MS-AR MSA
Complete Record of the Public Hearing and Comment Period

A redesignation to “attainment” would be of key interest to economic developers and transportation planners not only in Crittenden County and the Delta, but also to the State in general. Once the request is approved by EPA, Arkansas will be in full attainment of all criteria pollutant standards for the entire state. An attainment designation will not only demonstrate that Arkansas’s air quality has continued to improve over the last several years, it also will clear the way in making Arkansas more competitive in attracting business opportunities.

Thank you for your consideration of Arkansas’s request for redesignation. I urge you to act as promptly and as expeditiously as possible in formalizing through a federal determination what has already been borne out through monitoring results—that Crittenden County has attained the 2008 ozone standard.

I hereby certify that all documents submitted to the Regional Office in electronic form are exact duplicates of the hard copy documents. Should any questions arise, please contact Becky Keogh, ADEQ Director, at (501) 682-0959.

Sincerely,

A handwritten signature in black ink, appearing to read "Asa Hutchinson", written over a horizontal line.

Asa Hutchinson,
Governor of the State of Arkansas

Enclosures