



STATE OF ARKANSAS
ASA HUTCHINSON
GOVERNOR

November 1, 2022

Dr. Earthea Nance, Regional Administrator
U.S. EPA Region VI
1201 Elm St, Ste 500
Dallas, TX 75270

Submitted via SPeCS for SIPs

**Re: Arkansas State Implementation Plan (SIP) Revision in Response to
EPA's Startup, Shutdown, Malfunction SIP Call**

Dear Dr. Nance:

The State of Arkansas hereby respectfully submits to the United States Environmental Protection Agency (EPA) revisions to the Arkansas State Implementation Plan (SIP) and requests approval of the SIP revision as submitted.

On June 12, 2015, the EPA finalized a rule that identified two regulatory portions of Arkansas's SIP (Rule 19.602 and Rule 19.1004(H)) as deficient because they would bar the EPA and citizens from enforcing against Clean Air Act violations during periods of start-up, shutdown, and malfunction ("2015 SSM SIP call," 80 FR 33840). The deficiency regarding Rule 19.1004(H) was addressed when the Arkansas Pollution Control and Ecology Commission (APC&EC) adopted proposed changes to Rule 19.1004(H) on January 28, 2022, and these provisions became effective on May 6, 2022. DEQ submitted the related SIP revision to the EPA for approval through the State Planning Electronic Collaboration System (SPeCS) on June 26, 2022, requesting that the EPA remove Rule 19.1004(H) from the SIP.

This SIP submittal addresses Rule 19.602, which is subject to the EPA's 2015 SSM SIP call.

The SIP package accompanying this letter is summarized as follows:

- SIP Narrative
- Legal Authority to Adopt and Implement the Plan
- Procedural Requirements, including evidence of public notice
- Compilation of public comments and state responses

This SIP package is being submitted electronically through the SPeCS for SIPs web-based system in accordance with 40 CFR § 51.103(a). Should questions arise, please contact Tricia Treece, the DEQ Deputy Associate Director of the Office of Air Quality, at (501) 682-0055, or by email at treecep@adeq.state.ar.us.

Thank you for your consideration of Arkansas's submission.

Sincerely,



Asa Hutchinson,

Enclosures