



**Arkansas Regional Haze Planning Period II  
State Implementation Plan**

**CHAPTER VII: MONITORING STRATEGY AND OTHER IMPLEMENTATION PLAN  
REQUIREMENTS**

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## **VII. Monitoring Strategy and Other Implementation Plan Requirements**

### **A. Monitoring Strategy**

DEQ's monitoring strategy for Caney Creek and Upper Buffalo relies upon the continued availability of the IMPROVE monitoring network. IMPROVE is a collaborative association of state, tribal, and federal agencies, and international partners. The U.S. Environmental Protection Agency is the primary funding source, with contracting and research support from NPS. The Air Quality Group at the University of California, Davis is the central analytical laboratory, with ion analysis provided by Research Triangle Institute, and carbon analysis provided by Desert Research Institute.

IMPROVE monitors consist of four sampling modules that collect PM<sub>2.5</sub> and PM<sub>10</sub> data for twenty-four hours every three days.<sup>1</sup> Data collected at IMPROVE sites includes specific information on the composition of haze-forming particles. This data is used to calculate visibility impairment and indicate the extent to which the visibility impairment is a result of anthropogenic or natural emissions of air pollutants.<sup>2</sup> A description of each monitor for Arkansas federal Class I areas is provided in Chapter II.

DEQ is committed to continued participation with IMPROVE, including consultation regarding monitoring sites and equipment, if needed.

### **B. Statewide Inventory of Emissions of Pollutants Reasonably Anticipated to Cause or Contribute to Visibility Impairment in any Federal Class I Area**

DEQ will continue to submit annual inventories of pollutants, including those reasonably anticipated to cause or contribute to visibility impairment, in accordance with EPA Air Emissions Reporting Requirements.<sup>3</sup>

### **C. Other Elements Necessary to Access and Report on Visibility**

Data from the IMPROVE monitors is posted to the IMPROVE website <http://vista.cira.colostate.edu/Improve/improve-data/>. This data is accessible to EPA and the public. This fulfills DEQ's annual reporting requirements of visibility monitoring data under 40

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<sup>1</sup> Colorado State IMPROVE Program, <http://vista.cira.colostate.edu/Improve/improve-program/>  
*IMPROVE is a collaborative association of state, tribal, and federal agencies, and international partners. US Environmental Protection Agency is the primary funding source, with contracting and research support from the National Park Service. The Air Quality Group at the University of California, Davis is the central analytical laboratory, with ion analysis provided by Research Triangle Institute, and carbon analysis provided by Desert Research Institute.*

<sup>2</sup> The algorithm used to estimate light extinction for the purposes of the Regional Haze Program and other relevant information can be accessed at the IMPROVE website: <http://vista.cira.colostate.edu/Improve/the-improve-algorithm/>

<sup>3</sup> 40 CFR Part 51 Subpart A

CFR § 51.308(f)(6)(iv).

#### **D. Review, Consultation, & Comments**

DEQ developed a framework document for communication and consultation among DEQ, EPA, states with federal Class I areas impacted by visibility-impairing emissions from Arkansas sources, and tribes. The framework document also contains a log tracking communications with EPA, the FLMs, states, and other stakeholders. This framework document can be found in Appendix D.

##### **1. EPA Review and Action**

In addition to informal conversations during development of the draft SIP, DEQ sent an email to EPA R6 partners on March 1, 2021, to notify them of the availability of the pre-proposal draft SIP and to provide them with the opportunity for early input. Correspondence between DEQ and R6 is included in Appendix D of this SIP.

DEQ plans to submit the final SIP proposal to EPA for review and approval following the public comment period and finalization of any resulting revisions to the draft SIP.

##### **2. Federal Land Manager Review and Consultation**

In accordance with 40 CFR § 51.308(i)(2), DEQ formally consulted with designated FLM staff personnel on this SIP. In addition to informal conversations during development of the SIP, DEQ submitted letters to the FLMs on March 1, 2021, to notify them of the availability of the pre-proposal draft SIP and provide them with the opportunity to discuss the following:

- The FLM's assessment of impairment of visibility in any mandatory federal Class I area; and
- The FLM's recommendations on the development and implementation of strategies to address visibility impairment.

The FLM contact list, notification letters, comments received, and DEQ's written consideration of the comments are included in Appendix D of this SIP.

##### **3. States Consultation**

40 CFR § 51.308(f)(2)(ii) specifies consultation requirements for states that are reasonably anticipated to contribute to visibility impairment of another state's federal Class I areas:

- The State must demonstrate that it has included in its implementation plan all measures agreed to during state-to-state consultations or a regional planning process, or measures that will provide equivalent visibility improvement;
- The State must consider the emission reduction measures identified by other States for their sources as being necessary to make reasonable progress in the mandatory federal Class I area; and

- In any situation in which a State cannot agree with another State on the emission reduction measures necessary to make reasonable progress in a mandatory federal Class I area, the State must describe the actions taken to resolve the disagreement.

Arkansas confers regularly with neighboring states through CenSARA regional haze conference calls. DEQ shares and receives feedback regarding reasonable progress, monitoring efforts, and other strategies relevant to regional haze planning and program implementation. DEQ also consulted with individual states via conference and video calls; these consultations are documented in Appendix D, in the communication log. On March 1, 2021, DEQ submitted a letter to the Illinois EPA, Indiana DEM, Kentucky DEQ, Louisiana DEQ, Missouri DNR, North Carolina DEQ, Oklahoma DEQ, and Texas CEQ, to notify them of the availability of the pre-proposal draft SIP and provide them with the opportunity to discuss and provide feedback. Availability of the pre-proposal draft SIP was also announced on CenSARA planning calls that occurred March 2, 2021, and April 12, 2021, which included state agency partners from Alabama, Georgia, Iowa, Kansas, and Nebraska. Only Texas CEQ submitted comments on the pre-proposal draft SIP. The affected states and federal partners contact list, notification letters, comments received, and DEQ's written consideration of the comments are included in Appendix D of this SIP proposal.

#### 4. Public Review and Comments

DEQ will provide notice of the final SIP proposal and host a public hearing to receive comments on the proposed SIP revision. The notice of the proposal and public hearing will be published in the Arkansas Democrat-Gazette, which is a newspaper in circulation statewide, at least thirty days prior to the public hearing. In addition, this notice will be posted to DEQ's website concurrent with newspaper publication of the public notice. The notice will provide logistical information regarding the public hearing and the length of the public comment period. The public comment period for this SIP revision will be at least thirty days, in accordance with notice requirements under 40 C.F.R. § 51.102.

A copy of this Proposed SIP is available online at <https://www.adeg.state.ar.us/air/planning/sip/regional-haze.aspx>. Both oral and written comments received by DEQ during the public comment period will be posted on the DEQ Regional Haze webpage. Copies of written comments, a summary of DEQ's response to comments, and records from the public hearing will be included in the final SIP proposal package, which will be submitted to EPA for approval.