



ARKANSAS  
Department of Environmental Quality

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mailed 5-15-2012*

Certified Return Receipt Number: 91 7199 9991 7030 4899 3210

91 7199 9991 7030 4899 3210

May 14, 2012

Tracy Johnson  
Interim Manager, Arkansas Environmental Support  
425 West Capitol Avenue  
P.O. Box 551  
Little Rock, AR 72203

Re: Arkansas Regional Haze Rule Revision – 5-Factor Analysis

Dear Mr. Johnson:

In accordance with CAA sections 110(a) and 169A, the Air Division of the Arkansas Department of Environmental Quality (ADEQ) is responsible for the development and implementation of a State Implementation Plan (SIP) incorporating the requirements of the federal Regional Haze Rule. ADEQ submitted a Regional Haze SIP on September 23, 2008.

On March 12, 2012, the federal Environmental Protection Agency (EPA) promulgated a Final Rule, Approval and Promulgation of Implementation Plans; Arkansas Regional Haze State Implementation Plan; Interstate Transport State Implementation Plan To Address Pollution Affecting Visibility and Regional Haze – (Federal Register, March 12, 2012), that partially disapproved the Regional Haze SIP. In response to this disapproval, ADEQ has determined that it will take measures to develop appropriate SIP revisions.

As a result, ADEQ will conduct new Best Available Retrofit Technology determinations (BART determinations) for certain facilities identified in the EPA notice. This will require that your company prepare new BART-related analyses. Specifically, ADEQ is requesting that your company submit an analysis of the five factors specified in CAA section 169(A)(g)(2) for the following affected subject to BART unit/units and pollutants:

- White Bluff's Units 1 and 2 SO<sub>2</sub> and NO<sub>x</sub> for both bituminous and sub-bituminous coal firing
- White Bluff's auxiliary boiler
- Lake Catherine Unit 4 NO<sub>x</sub> for natural gas firing
- Lake Catherine Unit 4 SO<sub>2</sub>, NO<sub>x</sub>, and PM for oil firing

Each "5 – Factor Analysis" is to be conducted in accordance with 40 CFR 51, App. Y and the guidance provided by ADEQ. This guidance can be obtained by accessing the BART Analysis folder located on the following ftp site:

<ftp://gis.adeq.state.ar.us/pub/AirPermits/>

The format of your submittal should closely follow the procedures described in App. Y. (Please see the attached BART Engineering Analysis Format and the letter from the U.S. EPA recommending the use of CALPUFF version 5.8, the NO OBS = 0 CALMET and CALPOST version 6.221.) This will assist ADEQ staff responsible for completing the BART determinations. I am requesting that you provide this analysis within two months of your receipt of this letter. Questions regarding the development of this analysis should be directed to Thomas Rheaume, Engineer P.E. Branch Manager at Tel. No.: (501) 682- 0762. Questions regarding air quality modeling should be directed to Mary Pettyjohn, Epidemiologist at Tel No.: (501) 682- 0070. Your immediate attention to this request is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Bates". The signature is fluid and cursive, with the first name "Mike" and last name "Bates" clearly distinguishable.

Mike Bates, Chief – Air Division

Attachment: 2



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Certified Return Receipt Number: 91 7199 9991 7030 4899 3180

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May 14, 2012

Jim W. Cutbirth  
Environmental Affairs Manager  
Georgia Pacific  
100 Paper Mill Road  
Crossett, AR 71635

Re: Arkansas Regional Haze Rule Revision – 5-Factor Analysis

Dear Mr. Cutbirth:

In accordance with CAA sections 110(a) and 169A, the Air Division of the Arkansas Department of Environmental Quality (ADEQ) is responsible for the development and implementation of a State Implementation Plan (SIP) incorporating the requirements of the federal Regional Haze Rule. ADEQ submitted a Regional Haze SIP on September 23, 2008.

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As a result, ADEQ will conduct new Best Available Retrofit Technology determinations (BART determinations) for certain facilities identified in the EPA notice. This will require that your company prepare new BART-related analyses. Specifically, ADEQ is requesting that your company submit an analysis of the five factors specified in CAA section 169(A)(g)(2) for the following affected subject to BART unit/units and pollutants:

- Crossett Power Boilers 6A and 9A were found to be subject-to-BART for SO<sub>2</sub>, NO<sub>x</sub>, and PM

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responsible for completing the BART determinations. I am requesting that you provide this analysis within two months of your receipt of this letter. Questions regarding the development of this analysis should be directed to Thomas Rheaume, Engineer P.E. Branch Manager at Tel. No.: (501) 682- 0762. Questions regarding air quality modeling should be directed to Mary Pettyjohn, Epidemiologist at Tel No.: (501) 682- 0070. Your immediate attention to this request is appreciated.

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Mike Bates, Chief – Air Division

Attachment: 2



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Certified Return Receipt Number: 91 7199 9991 7030 4899 3197

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May 14, 2012

Kris Gaus  
Principal Environmental Specialist  
C/O American Electric Power  
Suite 800  
1201 Elm Street  
Dallas, TX 75270

Re: Arkansas Regional Haze Rule Revision – 5-Factor Analysis

Dear Mr. Gaus:

In accordance with CAA sections 110(a) and 169A, the Air Division of the Arkansas Department of Environmental Quality (ADEQ) is responsible for the development and implementation of a State Implementation Plan (SIP) incorporating the requirements of the federal Regional Haze Rule. ADEQ submitted a Regional Haze SIP on September 23, 2008.

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As a result, ADEQ will conduct new Best Available Retrofit Technology determinations (BART determinations) for certain facilities identified in the EPA notice. This will require that your company prepare new BART-related analyses. Specifically, ADEQ is requesting that your company submit an analysis of the five factors specified in CAA section 169(A)(g)(2) for the following affected subject to BART unit/units and pollutants:

- Flint Creek Unit 1 SO<sub>2</sub> and NO<sub>x</sub>

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Mike Bates, Chief – Air Division

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Certified Return Receipt Number: 91 7199 9991 7030 4899 3203

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May 14, 2012

Stephen Cain  
Senior Environmental Engineer  
Arkansas Electric Cooperative Corporation  
P.O. Box 194208  
Little Rock, AR 72219-4208

Re: Arkansas Regional Haze Rule Revision – 5-Factor Analysis

Dear Mr. Cain:

In accordance with CAA sections 110(a) and 169A, the Air Division of the Arkansas Department of Environmental Quality (ADEQ) is responsible for the development and implementation of a State Implementation Plan (SIP) incorporating the requirements of the federal Regional Haze Rule. ADEQ submitted a Regional Haze SIP on September 23, 2008.

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As a result, ADEQ will conduct new Best Available Retrofit Technology determinations (BART determinations) for certain facilities identified in the EPA notice. This will require that your company prepare new BART-related analyses. Specifically, ADEQ is requesting that your company submit an analysis of the five factors specified in CAA section 169(A)(g)(2) for the following affected subject to BART unit/units and pollutants:

- Bailey Plant Unit 1 SO<sub>2</sub>, NO<sub>x</sub>, and PM
- McClellan Plant Unit 1 SO<sub>2</sub>, NO<sub>x</sub>, and PM

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Mike Bates, Chief – Air Division

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Certified Return Receipt Number: 91 7199 9991 7030 4899 3227

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May 14, 2012

Kelley Crouch  
Group Leader, Environmental & Energy  
Domtar A.W. LLC  
285 Highway 71 South  
Ashdown, AR 71822

Re: Arkansas Regional Haze Rule Revision – 5-Factor Analysis

Dear Ms. Crouch:

In accordance with CAA sections 110(a) and 169A, the Air Division of the Arkansas Department of Environmental Quality (ADEQ) is responsible for the development and implementation of a State Implementation Plan (SIP) incorporating the requirements of the federal Regional Haze Rule. ADEQ submitted a Regional Haze SIP on September 23, 2008.

On March 12, 2012, the federal Environmental Protection Agency (EPA) promulgated a Final Rule, Approval and Promulgation of Implementation Plans; Arkansas Regional Haze State Implementation Plan; Interstate Transport State Implementation Plan To Address Pollution Affecting Visibility and Regional Haze – (Federal Register, March 12, 2012), that partially disapproved the Regional Haze SIP. In response to this disapproval, ADEQ has determined that it will take measures to develop appropriate SIP revisions.

As a result, ADEQ will conduct new Best Available Retrofit Technology determinations (BART determinations) for certain facilities identified in the EPA notice. This will require that your company prepare new BART-related analyses. Specifically, ADEQ is requesting that your company submit an analysis of the five factors specified in CAA section 169(A)(g)(2) for the following affected subject to BART unit/units and pollutants:

- Domtar Ashdown's Power Boiler # 1 SO<sub>2</sub> and NO<sub>x</sub>
- Domtar Ashdown's Power Boiler #2 SO<sub>2</sub>, NO<sub>x</sub>, and PM

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Mike Bates, Chief – Air Division

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