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VIA HAND DELIVERY and by
E-Mail to treecep@adeq.state.ar.us.

Ms. Tricia Treece
Office of Air Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Re: Revisions to the Arkansas State Implementation Plan: Regional Haze
SIP Revision for 2008-2018 Planning Period, July 2017 Public
Review Draft ("2017 RHR NOx SIP Revision")

Dear Ms. Treece:

This firm represents the Arkansas Affordable Energy Coalition ("AAEC"). The AAEC is a coalition that includes electric consumers, and associations of electric consumers, that purchase power from electric utilities that own and operate electric power plants located in the State of Arkansas that are subject to the Best Available Retrofit Technology ("BART") provisions of the Regional Haze Rule. For example, much of the electric power purchased by the Arkansas steel mills of AAEC members Nucor Corporation and Nucor-Yamato Steel Company is generated by the Independence, White Bluff, and Flint Creek power plants.

AAEC's membership also includes Arkansas Electric Energy Consumers, Inc., whose members are large, industrial customers of Entergy Arkansas, Inc., which co-owns and operates the White Bluff and Independence power plants. AAEC's members also include providers of goods and services to power plants, in particular coal-fired power plants, including those affected by the Regional Haze Rule. In addition, AAEC members with facilities located in Arkansas may be subject to regulation under other provisions of the Regional Haze Rule, including the Reasonable Progress provisions of the Rule.

AAEC supports the Department's 2017 RHR NO_x SIP Revision, including the Department's determination that the source-specific NO_x BART determinations in the Department's 2008 Regional Haze Rule State Implementation Plan and the NO_x limits in U.S. EPA's September 27, 2016 Regional Haze and Interstate Visibility Federal Implementation Plan (81 F.R. 66332), should be replaced with compliance with the Cross State Air Pollution Rule ("CSAPR") trading rule as an alternative to BART for the Arkansas sources that are subject-to-BART for NO_x. AAEC also supports the Department's determination that no additional controls for NO_x are needed for Arkansas sources beyond the requirements of CSAPR in order to achieve the reasonable progress provisions of the Regional Haze Rule for the implementation period ending in 2018.

AAEC notes that significant progress has been made in reducing light extinction from point sources at the two Arkansas Class I areas, and that Arkansas is well on its way to meeting its Clean Air Act visibility improvement goal in 2064, still almost 50 years away. AAEC supports continued progress in achieving that goal at Arkansas Class I areas based on common sense approaches by the State over the next four and a half decades. AAEC appreciates the opportunity to submit comments on the Department's proposed 2017 RHR NO_x SIP Revision. Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Mark Walters', with a stylized, flowing script.

Mark Walters