




Arkansas Electric Cooperative Corporation

Your Touchstone Energy Cooperative 

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August 14, 2017

Via Electronic Submission to: treecep@adeq.state.ar.us

Ms. Tricia Treece
Office of Air Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: Arkansas Electric Cooperative Corporation's Comments on the Proposed "Revisions to the Arkansas State Implementation Plan – Regional Haze SIP Revision for 2008-2018 Planning Period" dated July 2017

Dear Ms. Treece:

Arkansas Electric Cooperative Corporation (AECC) submits these comments on the referenced proposed revisions to the regional haze state implementation plan (SIP) by the Arkansas Department of Environmental Quality (ADEQ). We appreciate the opportunity to provide comment on the potential implications of the proposed plan on our operations and member-owners. AECC hereby incorporates by reference the comments submitted by the Energy and Environmental Alliance of Arkansas.

AECC supports the finalization of the SIP revision as proposed. AECC agrees with ADEQ's decision that compliance with the Cross-State Air Pollution Rule (CSAPR) is better than source-specific NO_x controls to meet the best available control technology requirements of the federal Regional Haze Rule (RHR). This provides flexibility to achieve visibility goals set by the RHR. Additionally, AECC agrees that reasonable progress goals are not necessary for the first planning period and supports ADEQ's position that no new NO_x emission controls are required beyond CSAPR for achieving reasonable progress.

Sincerely,

A handwritten signature in black ink that reads "Stephen Cain".

Stephen Cain
Manager – Environmental Compliance