

These are late comments that were submitted to us outside of the comment period for our proposed SIP. These comments are not considered as part of the Administrative Record for our Regional Haze NOx SIP revision proposed on July 8, 2017.

From: [GEORGE WISE](#)  
To: [Treece, Tricia](#)  
Subject: Regional Haze  
Date: Monday, August 14, 2017 8:39:34 PM

---

ADEQ's proposed state plan, if approved by ADEQ and EPA, would replace source-specific nitrogen oxides reductions at Arkansas coal-burning plants with reliance on EPA's NOx trading program (the Cross State Air Pollution Rule or CSAPR, pronounced 'Casper').

Nitrogen oxides contribute to ozone and smog and a host of respiratory, cardiovascular, and other health impacts that harm people. Nitrogen oxides are among the most-harmful air pollutants for public health. They also contribute to visibility impairment or haze. This plan is (1) a pollution trading program that is dangerous to the health Arkansans, (2) an unfair bailout of large polluters that allows even more delay in pollution reductions, and, (3) a plan that could force Arkansans to pay for pollution reductions in other states while continuing to breathe dirtier air in our own

- **ADEQ should reject the trading program for nitrogen oxides (NOx). This program would allow polluters to avoid limits and responsibilities for cleaning up particular plants, and allow them to meet their legal requirements by cleaning up plants in other states.**
- **Replacing source-specific pollution reductions with a trading program would leave Arkansans breathing dirtier air for years.**

The trading program would allow Arkansas's biggest polluters like Entergy and SWEPCO to reduce pollution in other regions or states instead of at their Arkansas coal-burning power plants, which are the state's largest sources of air pollution.

o Even for the plants that install NOx controls, reliance on the trading program alone would allow Entergy and SWEPCO to turn off their pollution controls for much of the year.

- This is akin to paying to install an airbag in your car but then turning it off so it doesn't work for half of the year.

o Source-specific controls—especially for the large coal-burning plants that are Arkansas's biggest polluters—in conjunction with the national trading program, would ensure better protection of air quality in this state.

o Why should Arkansas residents live next to giant coal-burning plants that lack any pollution controls for harmful pollutants like NOx? These Arkansas plants are some of the last remaining coal-burning plants anywhere in the United States that don't have any pollution controls for NOx.

- **ADEQ is essentially proposing to eliminate pollution reduction**

**requirements and safeguards. The NOx controls are for public safety. ADEQ's proposed program will result in dirtier air for Arkansas. Eliminating pollution safeguards will leave Arkansas residents breathing dirtier air and will cause smog in our state's parks for decades.**

- **Replacing source-specific reductions with a trading program would slow progress on reducing haze in the Natural State's national parks and wilderness areas.**

- o Instead of requiring reductions close to parks like the Upper Buffalo Wilderness Area, reliance on the trading program could instead reduce pollution in distant places.
- o The trading program would do nothing to reduce haze caused by Arkansas's power plants in the cooler months of the year (outside the ozone season).
- o ADEQ should take account of the fact that these Ozark parks, and tourism in general, are a key foundation of Arkansas's economy. We won't make our state more prosperous by polluting our best economic assets.

- **Arkansans electric customers will pay for these pollution reductions even if ADEQ approves the trading program, and so Arkansans should benefit.**

- o Entergy and SWEPCO and the other large air polluters will charge their customers for the cost of complying with the NOx trading program. But if ADEQ's proposal is approved, much of the benefit will go out of state
- o ADEQ should ensure that the people who pay for pollution reductions get the benefit of cleaner air.

- **Nitrogen oxides by themselves, and their successor pollutants ozone/smog, cause real harm to people.**

NOx harms people. Nitrogen dioxide is an important air pollutant because it contributes to the formation of photochemical smog, which can have significant impacts on human health

It's also harmful by itself: the main effect of breathing in raised levels of nitrogen dioxide is the increased likelihood of respiratory problems. Nitrogen dioxide inflames the lining of the lungs, and it can reduce immunity to lung infections. This can cause problems such as wheezing, coughing, colds, flu and bronchitis.

Increased levels of nitrogen dioxide can have significant impacts on people with asthma because it can cause more frequent and more intense attacks. Children with asthma and older people with heart disease are most at risk.

Ground-level ozone harms people. Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and airway inflammation. It also can reduce lung function and harm lung tissue. Ozone can worsen bronchitis, emphysema, and asthma, leading to increased medical care.

ADEQ should not approve a program that further delays NOx reduction requirements that are already long overdue.

**• Approval of this trading program is a bailout for Arkansas's biggest air polluters.**

- o For too long, ADEQ has let the state's largest polluters—the Flint Creek, Independence, and White Bluff coal-burning plants—get away with not paying to clean up their pollution.
- o Arkansans want ADEQ to require polluters like Entergy and SWEPCO to clean up our air, water, and land from coal-burning plants, which are our state's largest polluters.
- o This looks like yet another corporate handout by ADEQ to delay pollution reductions at Arkansas's coal-burning power plants. The state plan that ADEQ is still working on was due on December 17, 2007. Under the federal plan that ADEQ is currently suing over, NOx reductions would be required at these coal-burning plants by Spring 2018.

George Wise  
501-831-0014

Sent from my iPhone