

Comments - Public hearing on ADEQ's proposed state plan for Nitrogen Oxides, August 14, 2017

If the EPA and ADEQ approve Arkansas' State Plan for Nitrogen Oxide, it would replace source-specific Nitrogen Oxide reductions of Arkansas coal-burning plants with reliance on EPA's NOx trading program.

This program is known as "Cross-state Air Pollution Rule" or CSAPR.

We adamantly oppose EPA and ADEQ's approval of the NOx trading program, CSAPR, whereby air and water polluters such as SWEPCO and ENTERGY can reduce pollution in other states instead of their own, old coal-burning power plants in Arkansas, specifically Flint Creek, Independence and White Bluff. So, other states benefit from cleaner air while Arkansans will not gain the health advantages of breathing cleaner air.

1. Using the aforementioned "trading program", (source-specific pollution reduction), from Arkansas coal-fired plants would mean we breathe dirty air for several more years.
2. ADEQ should skip the trading program for NOx since it allows polluters to avoid responsibility for cleaning up specific plants in Arkansas, thus enabling legal requirements to be met by cleaning up plants outside Arkansas.
3. Arkansas coal-burning plants are the state's largest source of air pollution. Source specific controls and pollution limits for Arkansas' biggest air polluters, working with the national trading program, would better assure protection of air quality in Arkansas.
4. WHY are there no pollution controls for NOx at these previously referenced Arkansas plants? These three plants are among the last in the U.S. to not have standards for NOx.
5. The Problems: ADEQ proposes to remove pollution reduction requirements that will result in unhealthy air for Arkansas and continue to cause haze in our State's Parks and federally designated Upper Buffalo Wilderness. Progress for improving Arkansas air quality will be further slowed as it has been since December, 2007 when ADEQ's State Plan was due. The Federal Plan NOx reductions would be required at these Arkansas plants by the Spring of 2018. These NOx reductions are long overdue. Protecting the health of Arkansans through Cleaner Air and Clean Water are primary missions of ADEQ .

Regarding health and most important, it is widely known by the medical and scientific communities that Nitrogen Oxides contributes ozone and many respiratory, cardiovascular and other health issues, causing harm to humans. Specifically, Nitrogen Dioxide causes lung inflammation which reduces one's immunity to infections, wheezing, colds, coughs, flu, bronchitis and exacerbates asthma. Ozone, at the ground level can cause health issues such as chest pain, coughing, throat irritation and decreases lung function by damaging lung tissue – all of which adds medical costs to Arkansas consumers.

Obviously, Arkansas electric customers will pay more for cleaner air and therefore should directly benefit from cleaner air rather than benefits going out of state through the trading program.

Last, Arkansas Tourism could suffer since Arkansas Parks and Tourism in general, are a critical part of the Arkansas economy. ADEQ should consider that approving CSAPR can harm one of Arkansas' best economic assets. Please do not approve this plan. Protect Arkansas citizen's health by supporting cleaner air!

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