

BEFORE THE ARKANSAS POLLUTION CONTROL AND ECOLOGY COMMISSION

IN THE MATTER OF AMENDMENTS TO)
REGULATION NO. 19, REGULATIONS OF THE) DOCKET NO. 08-008-R
ARKANSAS PLAN OF IMPLEMENTATION)
FOR AIR POLLUTION CONTROL)

RESPONSIVE SUMMARY FOR
REGULATION NO. 19, REGULATIONS OF THE ARKANSAS PLAN OF
IMPLEMENTATION FOR AIR POLLUTION CONTROL

Pursuant to A.C.A. § 8-4-202(d)(4)(C) and Regulation No. 8, Section 3.6.2(2), a responsive summary groups public comments into similar categories and explains why the Arkansas Pollution Control and Ecology Commission (“Commission”) accepts or rejects the rationale for each category or comment.

Comment 1 – “Arkansas’ SIP Needs to Avoid Compliance Schedule Conflict with EPA”. “Arkansas’ SIP Needs to Avoid Requiring Investments Prior to Final EPA Approval”. The commenter requests changes be made in Reg. 19.1504(B) to match an EPA guidance and in 11.4.1.2 of the Regional Haze State Implementation Plan.

Response 1 – ADEQ thanks the commenter for these comments; however, this section and language were not proposed for change in this rulemaking and therefore is beyond the scope of this rulemaking. ADEQ will consider these comments for possible future revisions.

Comment 2 – Commenters provided positive comments regarding the proposed changes to permitting thresholds. Commenters also expressed positive sentiments that these changes will result in Arkansas being more competitive in attracting new industries and will allow existing industries to better respond to changing market conditions.

Response 2 – ADEQ staff appreciate and acknowledge these supportive comments.

Comment 3 – “The new registration requirement is a state requirement, and need not be in the SIP. Accordingly, to the extent that registration is maintained, the requirement should only be included in Regulation 18.” The commenter is concerned that if the Registration requirement stays in the SIP, sources that are not required to have a permit would be subject to federal enforcement actions. “In order to transition from the old permitting thresholds to the new permitting thresholds, and to enable registration sources to obtain synthetic minor source permits, Section 19.417 should be revised...” Language to accomplish this was provided.

Response 3 – On consideration of the comments, the Department agrees with the commenters that the inclusion of the proposed Registration provision in APC&EC Regulation 19 is duplicative and unnecessary. The provision is being retained within Regulation 18 with revisions based on submitted comments. Proposed Reg. 19.417 has been revised to delete proposed subparagraphs (A) – (E); the remaining subparagraphs (F) and (G) will be designated as (A) and (B). The final language renames the subsection and also corrects typographical errors and cross reference citations. The final language is as follows:

“(A) Sources currently holding permits issued pursuant to Regulation 19 but whose emissions are below the permitting thresholds of 19.401, and above the registration thresholds of Reg. 18.315 may elect to continue to operate under their existing Regulation 19 permit or they may submit a registration under Reg. 18.315 and request their Regulation 19 permit to be terminated. The Regulation 19 permit shall remain in effect until terminated. If a source takes no action, the Regulation 19 permit shall remain in effect.

(B) A source otherwise subject to registration under Reg. 18.315 may elect to instead operate under a permit issued in accordance with Reg. 19.402.”

Comment 4 – **Under 19.417, would sources have to re-register every time they make a modification?**

Response 4 – The registration provision has been deleted from Regulation 19 making this comment moot.

Comment 5 – **“There needs to be a total allowable emissions from Insignificant Activities. A13 has to at least say that the limits apply to all A13 activities combined. Also Insignificant Activity emissions needs to be listed in the permit, not necessarily in specific conditions but at least as emissions that counted toward fees and applicability as Title V thresholds.”**

Response 5 – ADEQ thanks the commenter for these comments; however, this section and language were not proposed for change in this rulemaking and therefore is beyond the scope of this rulemaking. It should be noted, however, that A13 already contains wording that addresses a portion of this comment (“These emission limits apply to the sum of all activities listed under this group.”). Additionally, emissions from insignificant activities should not be counted when calculating permit fees.

Comment 6 – **“General Permits in 19.411 – only the general permit and not the individual applications (NOI’s) should be subject to notice.”**

Response 6 – ADEQ thanks the commenter for these comments; however, this section and language were not proposed for change in this rulemaking and therefore is beyond the scope of this rulemaking. Consequently, no change was made based on this comment.

Comment 7 – **Delete “Administrator” and “EPA” from Reg. 19.411.**

Response 7 – These terms are not found in Reg. 19.411 of the proposed changes to Regulation 19.

Comment 8 – “19.416 needs additional numbering. There should be 3 distinct sections with sub sections. Also a similar section(s) should be included in Regulation 18.”

Response 8 – Reg. 19.416 was proposed with three distinct sections with subsections and Regulation 18 already has a section with similar language (Reg. 18.314). No change was made based on this comment.

Comment 9 – All references to outside regulations, laws and other texts should include an effective date of the referenced text at the time the affected portion of the regulation was effective. This excludes references to Arkansas Code or other Arkansas Pollution Control and Ecology Commission regulations.

Response 9 – ADEQ agrees. Following is a listing of affected sections and associated dates that have been added. The dates that will be added are the dates that that portion of the regulation was effective. Only references to the Code of Federal Regulations and the Clean Air Act citations are listed below. ADEQ feels there is no need to provide dates for references to Arkansas law or other Arkansas regulations.

Reg. 19.103(A) – “...7401 et seq., as of July 1, 1997,...”
“...Parts 61 and 63) as of July 1, 1997.”

Chapter 2 definition of Federally regulated air pollutant (4) – “...Clean Air Act, 42 U.S.C. §§ 7401, et seq. as amended as of July 1, 1997.”

Chapter 2 definition of PM₁₀ – “...CFR Part 53 as of December 8, 1984.”

Chapter 2 definition of PM₁₀ emissions – “...Part 51, Appendix M as of December 8, 1984...”

Chapter 2 definition of Potential to emit – “...7401 et seq. as of February 15, 1999.”

Chapter 2 definition of Volatile organic compounds (2) – “...Appendix A, as of July 1, 1997, ...”

Reg. 19.407(C)(3)(c) – “...Clean Air Act as amended as of February 15, 1999;”

Reg. 19.504 – “...(kk) are incorporated into this chapter by reference as of September 12, 1986.”

Reg. 19.702 – “... 40 CFR Part 60, Appendix A as of August 30, 1992.”

Reg. 19.703(A) – “...40 CFR Part 60 Appendix B as of August 30, 1992, and quality assurance procedures in 40 CFR Part 60 Appendix F as of August 30, 1992, and other...” “...51 Appendix P as of August 30, 1992, or in 40 CFR Part 60 as of August 30, 1992, shall...”

Reg. 19.703(B) – “...CFR Part 51, Appendix P, Section 4.0 (Minimum Data Requirements) as of August 30, 1992,...”

Reg. 19.803(B) – “...(40 CFR Part 60 Appendix A, as of May 25, 1979)...”

Reg. 19.804(B) – “...40 CFR 60.8 as of January 28, 1983.”

Reg. 19.903(B) – “...in 40 CFR 52.21(b) [PSD] and 40 CFR 51.301 [Protection of Visibility] as of November 29, 2005,...” “...and 40 CFR 51.301 as of November 29, 2005, shall apply.”

Reg. 19.904(B) – “...40 CFR 51.166(f)(1)(iii) as of November 29, 2005, shall be...”

Reg. 19.904(C) – “...40 CFR 52.21(o) as of November 29, 2005, the following...”

Reg. 19.904(C)(2) – “...40 CFR 52.21(q) as of November 29, 2005.”

Reg. 19.904(D) – “...40 CFR 52.21(p)(1) as of November 29, 2005...”

Reg. 19 Appendix A Group B Item 44 – “...pursuant to Section 112(r) of the Act as of July 1, 1997,...”

Comment 10 – Format numbers in accordance with the Regulation Formatting and Drafting Guidelines. (Example: There are twelve (12) months in a year.) Numbers that refer to other regulations, laws or dates, etc., do not need to be changed. These changes should include where noted in the following comments.

Response 10 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this or similar comments. In a future rulemaking, the numbers may be formatted in a consistent manner.

Comment 11 – Table of Contents Reg. 19.403, Table of Contents Reg. 19.1310, Reg. 19.402, Reg. 19.403, Reg. 19.404(C), Reg. 19.405(C), Reg. 19.406(A), Reg. 19.406(B)(1), Reg. 19.406(B)(3), Reg. 19.406(B)(4), Reg. 19.417(C), Reg. 19.1310, and Appendix A, Group B Footnote 2 – Add “or” between “owner” and “operator’s” and delete the “/”.

Response 11 – The “/” is intended to indicate an alternative. Therefore, ADEQ is of the opinion that the request revision is unnecessary.

Comment 12 – Reg. 19.101 – State what “A.C.A.” stands for here or in Chapter 2.

Response 12 – ADEQ agrees. A.C.A stands for Arkansas Code Annotated. Reg.19.101 will be revised to read “...Arkansas Water and Air Pollution Control Act, Arkansas Code Annotated (A.C.A) §§ 8-4-201 et seq...”.

Comment 13 – Reg. 19.103(A) – State what “U.S.C.” stands for here or in Chapter 2.

Response 13 – ADEQ agrees. U.S.C. stands for United States Code. Reg. 19.103(A) will be revised to read “...Act, 42 United States Code (U.S.C.) §§...”

Comment 14 – Reg. 19.103(A) – State what “CFR” stands for here or in Chapter 2.

Response 14 – ADEQ agrees. CFR stands for Code of Federal Regulations. Reg. 19.103(A) will be revised to read “... (40 [Code of Federal Regulations CFR]...”

Comment 15 – Reg. 19.103(A) and Reg. 19.304 – Change all “C.F.R.” to “CFR”.

Response 15 – ADEQ agrees with this comment and the change will be made.

Comment 16 – Chapter 2 – In the definition of “12-month period” spell out twelve and put 12 in parentheses.

Response 16 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 17 – Chapter 2 – In the definition of “Federal Clean Air Act”, add “or ‘the Act’”.

Response 17 – ADEQ agrees with this comment and the change will be made.

Comment 18 – Chapter 2 – In the definition of “Federally regulated air pollutant” the subsection outlining should be letters, not numbers.

Response 18 – ADEQ agrees with this comment and the change will be made.

Comment 19 – Chapter 2 – In the definition of “Hazardous Air Pollutant”, add “or ‘HAP’”.

Response 19 – ADEQ agrees with this comment and the change will be made.

Comment 20 – Chapter 2 – In the definition of “Modification” the subsection outlining should be letters, not numbers, after the lettering should be numbering.

Response 20 – ADEQ agrees with this comment and the change will be made.

Comment 21 – Chapter 2 – In the definition of “Modification”, item 3, remove the section symbol and replace it with “Reg.”.

Response 21 – ADEQ agrees with this comment and the change will be made.

Comment 22 – Chapter 2 – In the definition of “Responsible official” the subsection outlining should be letters, not numbers.

Response 22 – ADEQ agrees with this comment and the change will be made. After the outline lettering, outline numbering will follow.

Comment 23 – Chapter 2 – In the definition of “Responsible official”, item (1)(a) spell out two hundred fifty and put 250 in parentheses.

Response 23 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 24 – Chapter 2 – In the definition of “Responsible official”, item (1)(a) specify that “dollars” is United States Dollars.

Response 24 – ADEQ agrees with this comment and the change will be made.

Comment 25 – Chapter 2 – In the definition of “Volatile organic compound”, the subsection outlining should be letters, not numbers, after the lettering should be numbering.

Response 25 – ADEQ agrees with this comment and the change will be made.

Comment 26 – Chapter 2 – In the definition of “Volatile organic compound”, “VOC” should be bold.

Response 26 – ADEQ agrees with this comment and the change will be made.

Comment 27 – Chapter 2 – Make sure all definitions especially with abbreviations of the words being defined are formatted the same see “Volatile organic compounds”.

Response 27 – ADEQ agrees with this comment. The formatting should be “Volatile organic compounds” or “VOC”.

Comment 28 – Reg. 19.401 – Spell out all numbers and place the numeric in parentheses.

Response 28 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 29 – Reg. 19.405(B)(4) – Spell out all numbers and place the numeric in parentheses.

Response 29 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 30 – Reg. 19.406(B)(2) – Spell out all numbers and place the numeric in parentheses.

Response 30 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 31 – Reg. 19.407(A)(1)(e) – Change “facilities” to “facility’s”.

Response 31 – ADEQ agrees with this comment and the change will be made.

Comment 32 – Reg. 19.407(B)(2) – Add “or she” after “he”.

Response 32 – ADEQ agrees with this comment and the change will be made twice.

Comment 33 – Reg. 19.407(C)(2)(b) – Capitalize “pollutant” and “time”.

Response 33 – ADEQ agrees with this comment and the change will be made.

Comment 34 – Reg. 19.407(C)(3)(c) – Clarify what “BACT” is.

Response 34 – ADEQ agrees. BACT stands for Best Available Control Technology. Reg. 19.407(C)(3)(c) will be revised to read “...pursuant to Best Available Control Technology (BACT),...”

Comment 35 – Reg. 19.409 – Spell out all numbers and place the numeric in parentheses.

Response 35 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 36 – Reg. 19.410(B) – Spell out all numbers and place the numeric in parentheses.

Response 36 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 37 – Reg. 19.412(A) – Capitalize “appendix”.

Response 37 – ADEQ agrees with this comment and the change will be made.

Comment 38 – Reg. 19.412(B) – Delete “US”, leaving “EPA”.

Response 38 – ADEQ agrees with this comment and the change will be made.

Comment 39 – Reg. 19.415 – Spell out all numbers and place the numeric in parentheses.

Response 39 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 40 – Reg. 19.416(A), Reg. 19.416(A)(3), Reg. 19.416(A)(4), Reg. 19.416(B), Reg. 19.416(B)(1), Reg. 19.416(B)(7), Reg. 19.416(C), Reg. 19.416(C)(1), Reg. 19.416(C)(4), – Delete “and/or” and place “or” between “owner” and “operator”.

Response 40 – ADEQ agrees that clarification is needed as to the applicability of this new provision. To clarify the applicability the phrase “owner and/or operator” throughout Reg. 19.416 will be deleted and replaced with “permittee”.

Comment 41 – Reg. 19.416(A)(1) – Spell out all numbers and place the numeric in parentheses.

Response 41 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 42 – **Reg. 19.416(B)(1) – Spell out all numbers and place the numeric in parentheses.**

Response 42 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 43 – **Reg. 19.416(B)(6) – Spell out all numbers and place the numeric in parentheses.**

Response 43 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 44 – **Reg. 19.416(C)(1) – Spell out all numbers and place the numeric in parentheses.**

Response 44 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 45 – **Reg. 19.417(A)(1) through Reg.19.417(A)(7) – Spell out all numbers and place the numeric in parentheses.**

Response 45 – The registration provision has been deleted from Regulation 19 making this comment moot.

Comment 46 – **Reg. 19.417(E) – Spell out two hundred and place the numeric in parentheses.**

Response 46 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 47 – **Reg. 19.417(E) – Capitalize “chapter”.**

Response 47 – The registration provision has been deleted from Regulation 19 making this comment moot.

Comment 48 – **Reg. 19.417(E) – Specify that Regulation 9 is the Arkansas Pollution Control and Ecology Commission’s, Regulation 9, Fee Regulation.**

Response 48 – The registration provision has been deleted from Regulation 19 making this comment moot.

Comment 49 – Reg. 19.417(F) – Add a comma between “action” and “the”.

Response 49 – ADEQ agrees with this comment and the change will be made.

Comment 50 – Reg. 19.503(A) – Add a comma after “1972”.

Response 50 – ADEQ agrees with this comment and the change will be made.

Comment 51 – Reg. 19.503(A)(1) – Spell out all numbers and place the numeric in parentheses for those that are not already.

Response 51 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 52 – Reg. 19.503(B) – Add a comma after “1972”.

Response 52 – ADEQ agrees with this comment and the change will be made.

Comment 53 – Reg. 19.503(B)(1) – Spell out all numbers and place the numeric in parentheses for those that are not already.

Response 53 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 54 – Reg. 19.503(B)(2) – Spell out all numbers and place the numeric in parentheses.

Response 54 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 55 – Reg. 19.601 – Clarify what “NSPS” is either here or in Chapter 2.

Response 55 – ADEQ agrees. NSPS stands for New Source Performance Standards. Reg. 19.601 will be revised to read “...(such as New Source Performance Standards [NSPS] regulations).”

Comment 56 – Reg. 19.601 – Spell out all numbers and place the numeric in parentheses.

Response 56 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 57 – **Reg. 19.704** – **Spell out all numbers and place the numeric in parentheses.**

Response 57 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 58 – **Reg. 19.705(C)** – **Spell out all numbers and place the numeric in parentheses.**

Response 58 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 59 – **Reg. 19.705(D)** – **Add e-mail address of the certifying official to the list of information that certification shall include.**

Response 59 – ADEQ agrees that the change (or addition) of an e-mail address would qualify as an Administrative Permit Amendment; however, no change in the regulatory wording is necessary due to the existing phrase “or provides a similar administrative change in the source.” Therefore, no changes are made to the final regulation based on this comment.

Comment 60 – **Reg. 19.803(A)** – **Define “AFIN” here or in Chapter 2.**

Response 60 – ADEQ agrees. AFIN stands for Arkansas Facility Identification Number. Reg. 19.803(A) will be revised to read “...Company (Arkansas Facility Identification Number [AFIN])...”

Comment 61 – **Reg. 19.803(A)(1)** – **Spell out all numbers and place the numeric in parentheses.**

Response 61 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 62 – **Reg. 19.803(A)(1)** – **Clarify what “H₂SO₄” means.**

Response 62 – ADEQ agrees. H₂SO₄ means sulfuric acid. Reg. 19.803(A)(1) will be revised to read “...lb sulfuric acid (H₂SO₄)...”

Comment 63 – **Reg. 19.804(C)** – **Spell out all numbers and place the numeric in parentheses except CFR references and dates.**

Response 63 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 64 – Reg. 19.804(C) – Define “ppm” here or in Chapter 2.

Response 64 – ADEQ agrees. “ppm” stands for parts per million. Reg. 19.804(C) will be revised to read “...TRS Concentration (parts per million [ppm])...”

Comment 65 – Reg. 19.804(C) – Define “g” and “kg” here or in Chapter 2.

Response 65 – ADEQ agrees. “g” stands for gram and “kg” stands for kilogram . Reg. 19.804(C) will be revised to read “...0.0168 grams (g)/kilogram (kg)...”

Comment 66 – Reg. 19.804(C) – Clarify what “H₂S” means.

Response 66 – ADEQ agrees. H₂S means hydrogen sulfide. Reg. 19.804(C) will be revised to read “...measured as hydrogen sulfide (H₂S)...”

Comment 67 – Reg. 19.901 – Clarify what “PSD” means.

Response 67 – Upon further review, ADEQ believes the meaning of PSD is apparent from the language used in Reg. 19.901 so there will be no change as a result of this comment.

Comment 68 – Reg. 19.902 – Clarify what a “Class I federal area” is here or in Chapter 2.

Response 68 – Class I federal area is defined in the Clean Air Act so it will not be defined in this regulation.

Comment 69 – Reg. 19.903(B) – Capitalize “chapter” (twice).

Response 69 – ADEQ agrees with this comment and the change will be made.

Comment 70 – Reg. 19.903(B) – Specify that Chapter 2 means Chapter 2 of Regulation 19 or “this regulation”.

Response 70 – ADEQ agrees with this comment and the change will be made. Reg. 19.903(B) will be revised to say “...Chapter 2 of Regulation 19...” twice.

Comment 71 – Reg. 19.904(A) – Remove “this section” and replace it with “Reg. 19.904”.

Response 71 – ADEQ agrees with this comment and the change will be made.

Comment 72 – Reg. 19.904(C) – For clarification, add “40 CFR 52.1(o)” between “as” and “subparagraphs”.

Response 72 – ADEQ appreciates this comment however, a review of previous rulemaking that involved changing the formatting of Regulation 19 revealed that an editorial error was previously made in regard to the numbering of the subparagraphs of this section during the reformatting. The proper citation of the subparagraphs shall be changed from “... subparagraphs (4), (5),(6), and (7)]...” to “...Reg. 19.904(C)(1),(2),(3) and (4)]...” to be consistent and accurate as this rule was originally enacted.

Comment 73 – **Reg. 19.1003 – Capitalize “chapter”.**

Response 73 – ADEQ agrees with this comment and the change will be made twice.

Comment 74 – **Reg. 19.1003 – Specify that Chapter 2 means Chapter 2 of Regulation 19 or “this regulation” twice.**

Response 74 – ADEQ agrees with this comment and the change will be made. Reg. 19.1003 will be revised to say “...Chapter 2 of Regulation 19...”

Comment 75 – **Reg. 19.1003 – In the “Gasoline” definition, define “kPa” here or in Chapter 2.**

Response 75 – ADEQ agrees. “kPa” means kilopascal. Reg. 19.1003 will be revised to read “...27.6 kilopascals (kPa)...”

Comment 76 – **Reg. 19.1003 – In the “Gasoline” definition, define “psi” here or in Chapter 2.**

Response 76 – ADEQ agrees. “psi” means pounds per square inch. Reg. 19.1003 will be revised to read “... (4 pounds per square inch [psi])...”

Comment 77 – **Reg. 19.1003 – In the “New Source Standard of Performance” definition, add “(NSPS)”.**

Response 77 – ADEQ agrees with this comment and the change will be made.

Comment 78 – **Reg. 19.1003 – In the “Vapor control system” definition, spell out all numbers and place the numeric in parentheses.**

Response 78 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 79 – **Reg. 19.1004(A)(2) – Capitalize “chapter”.**

Response 79 – ADEQ agrees with this comment and the change will be made.

Comment 80 – **Reg. 19.1004(A)(2) – Delete “&” and replace it with “and” (twice).**

Response 80 – ADEQ agrees with this comment and the change will be made.

Comment 81 – Reg. 19.1004(A)(2) – Add a comma after “July 1, 1979”.

Response 81 – ADEQ agrees with this comment and the change will be made.

Comment 82 – Reg. 19.1004(D)(1) – Correct the indent formatting to match Reg. 19.1004(D)(2).

Response 82 – ADEQ agrees with this comment and the change will be made.

Comment 83 – Reg. 19.1004(E)(1)(a) – Delete “&” and replace it with “and”(twice).

Response 83 – ADEQ agrees with this comment and the change will be made.

Comment 84 – Reg. 19.1004(E)(1)(b) – Delete “&” and replace it with “and” (four times).

Response 84 – ADEQ agrees with this comment and the change will be made.

Comment 85 – Reg. 19.1004(E)(1)(b) – Add a space between “July” and “1”.

Response 85 – ADEQ agrees with this comment and the change will be made.

Comment 86 – Reg. 19.1004(F)(1) – Capitalize “chapter”.

Response 86 – ADEQ agrees with this comment and the change will be made.

Comment 87 – Reg. 19.1004(F)(3) – Correct the citation from “Reg. 9.1005(D) **subsection**” to “Reg. 19.1005(D)”.

Response 87 – ADEQ agrees with this comment and the change will be made.

Comment 88 – Reg. 19.1004(F)(3)(a) – Add “or her” after “his”.

Response 88 – ADEQ agrees with this comment and the change will be made.

Comment 89 – Reg. 19.1004(F)(5) – Spell out all numbers and place the numeric in parentheses except references to regulations.

Response 89 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 90 – Reg. 19.1004(F)(5) – Define “cm” here or in Chapter 2.

Response 90 – ADEQ agrees. “cm” means centimeter. Reg. 19.1004(F)(5) will be revised to read “... centimeter (cm)...”

Comment 91 – Reg. 19.1004(G)(2) – Remove “paragraph 1” and replace it with “Reg. 19.1004(G)(1)”.

Response 91 – ADEQ agrees with this comment and the change will be made.

Comment 92 – Reg. 19.1005(B)(1) – Define “psia” here or in Chapter 2.

Response 92 – ADEQ agrees. “psia” means pounds-force per square inch absolute. Reg. 19.1005(B)(1) will be revised to read “...kilopascals (1.52 pounds-force per square inch absolute (psia)...”

Comment 93 – Reg. 19.1005(B)(1)(b) – Remove “(a) above” and replace it with “Reg. 19.1005(B)(1)(a)”.

Response 93 – ADEQ agrees with this comment and the change will be made.

Comment 94– Reg. 19.1005(B)(2) – Remove “(1)(b)&(c) of this section” and replace it with “Reg. 19.1005(B)(1)(b) and (c)”.

Response 94 – ADEQ agrees with this comment and the change will be made.

Comment 95 – Reg. 19.1005(C) – Spell out all numbers and place the numeric in parentheses.

Response 95 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 96 – Reg. 19.1005(C) – Define “degrees C” and “°F” here or in Chapter 2 or spell out what the C and °F stand for.

Response 96 – ADEQ agrees. “Degrees C” and “°F” mean degrees Celsius and degrees Fahrenheit. Reg. 19.1005(C) will be revised to read “...15 degrees Celsius (°C) (59 degrees Fahrenheit [°F]).”

Comment 97 – Reg. 19.1005(D)(1)(b) – Spell out all numbers and place the numeric in parentheses.

Response 97 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 98 – Reg. 19.1005(D)(1)(b) – Define “in. of H₂O” here or in Chapter 2.

Response 98 – ADEQ agrees. “in. of H₂O” means inches of water. Reg. 19.1005(D)(1)(b) will be revised to read “inches of water (in. of H₂O).”

Comment 99 – Reg. 19.1005(D)(1)(b) – Delete “this chapter” and replace it with “Reg. 19.1005(D)(1)(a)”.

Response 99 – ADEQ agrees with this comment and the change will be made. Reg. 19.1005(D)(1)(b) will be revised to read “...during the testing required in “Reg. 19.1005(D)(1)(a);...”

Comment 100– Reg. 19.1005(D)(1)(c) – Spell out all numbers and place the numeric in parentheses except those that refer to regulations.

Response 100 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 101 – Reg. 19.1005(D)(1)(c) – Delete “this chapter” and replace it with “Reg. 19.1005(D)(1)(b)”.

Response 101 – ADEQ agrees with this comment and the change will be made. Reg. 19.1005(D)(1)(c) will be revised to read “...not meet the criteria of Reg. 19.1005(D)(1)(b).”

Comment 102 – Reg. 19.1005(D)(2)(a)(i) – Spell out all numbers and place the numeric in parentheses.

Response 102 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 103 – Reg. 19.1005(D)(2)(a)(ii) – Spell out all numbers and place the numeric in parentheses except those that refer to regulations.

Response 103 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 104 – Reg. 19.1005(D)(2)(b) – Spell out all numbers and place the numeric in parentheses except those that refer to regulations.

Response 104 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 105 – Reg. 19.1005(E)(1)(a) – Define “kg”, “l”, “lb” and “gal” here or in Chapter 2.

Response 105 – ADEQ agrees. “kg” was defined earlier (see Comment 65). “l”, “lb” and “gal” mean liter, pound and gallon respectively. Reg. 19.1005(E)(1)(a) will be revised to read “0.52 kg/liter (l) 4.3 pounds per gallon [lb/gal]...”

Comment 106 – Reg. 19.1005(E)(1)(a) – Spell out all numbers and place the numeric in parentheses.

Response 106 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 107 – Reg. 19.1005(E)(1)(b) – Spell out all numbers and place the numeric in parentheses.

Response 107 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 108 – Reg. 19.1005(E)(1)(c) – Spell out all numbers and place the numeric in parentheses.

Response 108 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 109 – Reg. 19.1005(E)(1)(d) – Spell out all numbers and place the numeric in parentheses.

Response 109 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 110 – Reg. 19.1005(E)(3)(b) – Spell out all numbers and place the numeric in parentheses.

Response 110 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 111 – Reg. 19.1005(E)(3)(b) – Delete “volatile organic compounds” and the parentheses around “VOC”. This has already been defined in Chapter 2.

Response 111 – ADEQ agrees with this comment and the change will be made.

Comment 112 – Reg. 19.1005(E)(4) – Delete “&” and replace it with “and”.

Response 112 – ADEQ agrees with this comment and the change will be made.

Comment 113 – Reg. 19.1005(F)(2)(a) – Spell out all numbers and place the numeric in parentheses.

Response 113 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 114 – Reg. 19.1005(F)(2)(a) – Define “bbls” here or in Chapter 2.

Response 114 – ADEQ agrees. “bbls” means barrels. Reg. 19.1005(F)(2)(a) will be revised to read “...(10,000 barrels [bbls])...”

Comment 115 – Chapter 11 – Specify that Regulation 26 is Arkansas Pollution Control and Ecology Commission’s, Regulation 26, Regulations of the Arkansas Operating Air Permit Program.

Response 115 – ADEQ agrees with this comment and the change will be made. Chapter 11 of Regulation 19 will read as follows: “Facilities subject to Arkansas Pollution Control and Ecology Commission’s, Regulation 26, Regulations of the Arkansas Operating Air Permit Program, Regulation 26 (Regulation 26) shall be required to have their permit applications processed in accordance with the procedures contained in Regulation 26 which are hereby incorporated by reference.”

Comment 116 – Reg. 19.1301 – Delete “volatile organic compounds” and the parentheses around “VOC”. This has already been defined in Chapter 2.

Response 116 – ADEQ agrees with this comment and the change will be made.

Comment 117 – Reg. 19.1303(G)(2) – Spell out all numbers and place the numeric in parentheses.

Response 117 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 118 – Reg. 19.1303(G)(2) – Add “or her” after “his”.

Response 118 – ADEQ agrees with this comment and the change will be made.

Comment 119 – Reg. 19.1303(G)(3) – Spell out all numbers and place the numeric in parentheses.

Response 119 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 120 – **Reg. 19.1303(Q)** – **Spell out all numbers and place the numeric in parentheses.**

Response 120 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 121 – **Reg. 19.1303(Q)** – **Explain the abbreviation “ppm” here or in the definitions.**

Response 121 – ADEQ agrees. “ppm” was defined earlier. See Comment 64.

Comment 122 – **Reg. 19.1304(B)** – **Spell out all numbers and place the numeric in parentheses.**

Response 122 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 123 – **Reg. 19.1304(D)** – **Spell out all numbers and place the numeric in parentheses.**

Response 123 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 124 – **Reg. 19.1304(E)** – **Spell out all numbers and place the numeric in parentheses.**

Response 124 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 125 – **Reg. 19.1308(A)(2)** – **Spell out all numbers and place the numeric in parentheses.**

Response 125 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 126 – Reg. 19.1308(D) – Spell out all numbers and place the numeric in parentheses.

Response 126– There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 127 – Reg. 19.1309(C) – Spell out all numbers and place the numeric in parentheses.

Response 127 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 128 – Reg. 19.1310(D) – Spell out all numbers and place the numeric in parentheses.

Response 128 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 129 – Reg. 19.1311(A)(1) – Spell out all numbers and place the numeric in parentheses.

Response 129 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 130 – Reg. 19.1311(A)(2) – Spell out all numbers and place the numeric in parentheses.

Response 130 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 131 – Reg. 19.1312(B) – Spell out all numbers and place the numeric in parentheses.

Response 131 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 132 – Reg. 19.1312(B)(1) through Reg. 19.1312 (B)(3) – Spell out all numbers and place the numeric in parentheses.

Response 132 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 133 – **Reg. 19.1402** – **Spell out all numbers and place the numeric in parentheses except dates.**

Response 133 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 134 – **Reg. 19.1403(A)** – **Spell out all numbers and place the numeric in parentheses except dates and references to regulations.**

Response 134 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 135 – **Reg. 19.1404(A)** – **Delete “paragraph (B) of this section” and replace it with “Reg. 19.1404(B)”.**

Response 135 – ADEQ agrees with this comment and the change will be made.

Comment 136 – **Reg. 19.1404(A)** – **Spell out all numbers and place the numeric in parentheses except dates and references to regulations.**

Response 136 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 137 – **Reg. 19.1404(B)** – **Delete “paragraph (A) of this section” and replace it with “Reg. 19.1404(A)”.**

Response 137 – ADEQ agrees with this comment and the change will be made.

Comment 138 – **Reg. 19.1404(B)** – **Spell out all numbers and place the numeric in parentheses except dates and references to regulations.**

Response 138 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 139 – **Reg. 19.1404(B)** – **Delete “paragraph (E) of this section” and replace it with “Reg. 19.1404(E)”.**

Response 139 – ADEQ agrees with this comment and the change will be made.

Comment 140 – Reg. 19.1404(C) – Delete “paragraph (B) of this section” and replace it with “Reg. 19.1404(B)”.

Response 140 – ADEQ agrees with this comment and the change will be made.

Comment 141 – Reg. 19.1404(D) – Delete “paragraph (A) of this section” and replace it with “Reg. 19.1404(A)”.

Response 141 – ADEQ agrees with this comment and the change will be made.

Comment 142 – Reg. 19.1404(D)(1) – Spell out all numbers and place the numeric in parentheses except references to regulations.

Response 142 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 143 – Reg. 19.1404(D)(2) – Delete “paragraph (B) of this section” and replace it with “Reg.19.1404(B)”.

Response 143 – ADEQ agrees with this comment and the change will be made.

Comment 144 – Reg. 19.1404(D)(3) – Delete “paragraph (D)(2) of this section” and replace it with “Reg. 19.1404(D)(2)”.

Response 144 – ADEQ agrees with this comment and the change will be made.

Comment 145 – Reg. 19.1404(D)(4) – Delete “paragraph (D)(2) of this section” and replace it with “Reg. 19.1404(D)(2)”.

Response 145 – ADEQ agrees with this comment and the change will be made.

Comment 146 – Reg. 19.1404(D)(4)(a) – Delete “paragraphs (D)(2) and (3) of this section” and replace it with “Reg. 19.1404(D)(2) and (3)”.

Response 146 – ADEQ agrees with this comment and the change will be made.

Comment 147 – Reg. 19.1404(D)(4)(b) – Delete “paragraph (D)(4)(a) of this section” and replace it with “Reg. 19.1404(D)(4)(a)”.

Response 147 – ADEQ agrees with this comment and the change will be made.

Comment 148 – Reg. 19.1404(D)(4)(d) – Add “19.1404” between “Reg.” and “(D)(4)(a)” and delete “paragraph”.

Response 148 – ADEQ agrees with this comment and the change will be made. Additionally “of this section” will be deleted.

Comment 149 – Reg. 19.1404(E) – Delete “paragraph (B) of this section” and replace it with “Reg. 19.1404(B)”.

Response 149 – ADEQ agrees with this comment and the change will be made.

Comment 150 – Reg. 19.1404(E) – Spell out all numbers and place the numeric in parentheses except references to regulations.

Response 150 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 151 – Reg. 19.1501 – Use a lowercase ‘c’ for “chapter”.

Response 151 – ADEQ agrees with this comment and the change will be made.

Comment 152 – Reg. 19.1502 – Use a lowercase ‘c’ for “chapter”.

Response 152 – ADEQ agrees with this comment and the change will be made.

Comment 153 – Reg. 19.1503 – Define “MMbtu” here or in Chapter 2, unless defined in 40 CFR 51.301 as incorporated by reference.

Response 153 – ADEQ agrees. “MMbtu” means Million British Thermal Units. Reg. 19.1503 will be revised to read “[million British thermal units (MMbtu)/hour...”

Comment 154 – Reg. 19.1503 Number 3. – Add a comma after “Packaging”.

Response 154 – ADEQ agrees with this comment and the change will be made.

Comment 155 – Reg. 19.1503 Number 3. – Add a period after “LLC”.

Response 155 – ADEQ agrees with this comment and the change will be made.

Comment 156 – Reg. 19.1504(A) – Add a period after “E” in “Carl E Bailey”.

Response 156 – ADEQ agrees with this comment and the change will be made.

Comment 157 – Reg. 19.1504 – There are two (A)s. Correct the outline.

Response 157 – ADEQ agrees with this comment and the change will be made.

Comment 158 – Reg. 19.1504(A)(first) – Move the period before “Ashdown” to immediately after “Inc.”.

Response 158 – ADEQ agrees that the comma is misplaced and will be moved to immediately after “Industries”.

Comment 159 – Reg. 19.1504(A)(second) – Spell out all numbers and place the numeric in parentheses.

Response 159 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 160 – Reg. 19.1505(A)(1) – Spell out all numbers and place the numeric in parentheses.

Response 160 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 161 – Reg. 19.1505(A)(2) – Spell out all numbers and place the numeric in parentheses.

Response 161 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 162 – Reg. 19.1505(B) – Add a period after “E”.

Response 162 – ADEQ agrees with this comment and the change will be made.

Comment 163 – Reg. 19.1505(B) – Spell out all numbers and place the numeric in parentheses.

Response 163 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 164 – Reg. 19.1505(C) – Spell out all numbers and place the numeric in parentheses except those that refer to regulations or source numbers.

Response 164 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 165 – Reg. 19.1505(D)(1) – Spell out all numbers and place the numeric in parentheses.

Response 165 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 166 – Reg. 19.1505(D)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.

Response 166 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 167 – Reg. 19.1505(D)(2) – Spell out all numbers and place the numeric in parentheses.

Response 167 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 168 – Reg. 19.1505(D)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.

Response 168 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 169 – Reg. 19.1505(D)(3) – Spell out all numbers and place the numeric in parentheses.

Response 169 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 170 – Reg. 19.1505(E)(1) – Spell out all numbers and place the numeric in parentheses.

Response 170 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 171 – Reg. 19.1505(E)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.

Response 171 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 172 – Reg. 19.1505(E)(2) – Spell out all numbers and place the numeric in parentheses.

Response 172 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 173 – Reg. 19.1505(E)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.

Response 173 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 174 – Reg. 19.1505(E)(3) – Spell out all numbers and place the numeric in parentheses.

Response 174 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 175 – Reg. 19.1505(F)(1) – Spell out all numbers and place the numeric in parentheses.

Response 175 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 176 – for Reg. 19.1505(F)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.

Response 176 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 177 – Reg. 19.1505(F)(2) – Spell out all numbers and place the numeric in parentheses.

Response 177 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 178 – Reg. 19.1505(F)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.

Response 178 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 179 – Reg. 19.1505(F)(2) – Format the “x” in “NO_x” to be subscript.

Response 179 – ADEQ agrees with this comment and the change will be made.

Comment 180 – Reg. 19.1505(F)(3) – Add the date this chapter was initially effective (i.e. “...emission limit as of October 15, 2007, satisfies the BART...”).

Response 180 – ADEQ agrees with this comment and the change will be made.

Comment 181 – Reg. 19.1505(G)(1) – Spell out all numbers and place the numeric in parentheses.

Response 181 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 182 – Reg. 19.1505(G)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.

Response 182 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 183 – Reg. 19.1505(G)(2) – Spell out all numbers and place the numeric in parentheses.

Response 183 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 184 – Reg. 19.1505(G)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.

Response 184 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 185 – Reg. 19.1505(G)(2) – Format the “x” in “NO_x” to be subscript.

Response 185 – ADEQ agrees with this comment and the change will be made.

Comment 186 – Reg. 19.1505(G)(3) – Add the date this chapter was initially effective (i.e. “...emission limit as of October 15, 2007, satisfies the BART...”).

Response 186 – ADEQ agrees with this comment and the change will be made.

Comment 187 – Reg. 19.1505(H) – Format the “x” in “NO_x” to be subscript.

Response 187 – ADEQ agrees with this comment and the change will be made.

Comment 188– **Reg. 19.1505(I)(1) – Spell out all numbers and place the numeric in parentheses.**

Response 188 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 189 – **Reg. 19.1505(I)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.**

Response 189 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 190 – **Reg. 19.1505(I)(2) – Spell out all numbers and place the numeric in parentheses.**

Response 190 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 191 – **Reg. 19.1505(I)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.**

Response 191 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 192 – **Reg. 19.1505(I)(2) – Format the “x” in “NO_x” to be subscript.**

Response 192 – ADEQ agrees with this comment and the change will be made.

Comment 193 – **Reg. 19.1505(I)(3) – Add the date this chapter was initially effective (i.e. “...emission limit as of October 15, 2007, satisfies the BART...”).**

Response 193 – ADEQ agrees with this comment and the change will be made.

Comment 194 – **Reg. 19.1505(J)(1) – Spell out all numbers and place the numeric in parentheses.**

Response 194 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 195 – **Reg. 19.1505(J)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.**

Response 195 – ADEQ agrees with this comment and the change will be made and the parentheses around SO₂ will also be deleted.

Comment 196 – Reg. 19.1505(J)(2) – **Spell out all numbers and place the numeric in parentheses.**

Response 196- There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 197 – Reg. 19.1505(J)(2) – **The abbreviation “NOx” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.**

Response 197 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 198 – Reg. 19.1505(J)(2) – **Format the “x” in “NOx” to be subscript.**

Response 198 – ADEQ agrees with this comment and the change will be made.

Comment 199 – Reg. 19.1505(J)(3) – **Add the date this chapter was initially effective (i.e. “...emission limit as of October 15, 2007, satisfies the BART...”).**

Response 199 – ADEQ agrees with this comment and the change will be made.

Comment 200 – Reg. 19.1505(K) – **Format the “x” in “NOx” to be subscript.**

Response 200 – ADEQ agrees with this comment and the change will be made.

Comment 201 – Reg. 19.1505(L) – **Spell out all numbers and place the numeric in parentheses except those that refer to regulations or source numbers.**

Response 201 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 202 – Reg. 19.1505(M)(1) – **Spell out all numbers and place the numeric in parentheses.**

Response 202 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 203 – Reg. 19.1505(M)(1) – **The abbreviation “NOx” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.**

Response 203 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 204 – Reg. 19.1505(J)(2) – Reg. 19.1505(M)(1) – Make the “x” in “NO_x” subscript.

Response 204 – ADEQ agrees with this comment and the change will be made.

Comment 205 – Reg. 19.1505(M)(2) – Add the date this chapter was initially effective (i.e. “...emission limit as of October 15, 2007, satisfies the BART...”).

Response 205 – ADEQ agrees with this comment and the change will be made.

Comment 206 – Reg. 19.1505(N)(1) – Spell out all numbers and place the numeric in parentheses.

Response 206 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 207 – Reg. 19.1505(N)(1) – The abbreviation “SO₂” has already been explained in Reg. 19.1505(A)(1). Delete “sulfur dioxide”.

Response 207 – ADEQ agrees with this comment and the change will be made the parentheses around SO₂ will also be deleted.

Comment 208 – Reg. 19.1505(N)(2) – Spell out all numbers and place the numeric in parentheses.

Response 208 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 209 – Reg. 19.1505(N)(2) – The abbreviation “NO_x” has already been explained in Reg. 19.1505(A)(1). Delete “nitrogen oxides”.

Response 209 – ADEQ agrees with this comment and the change will be made and the parentheses around NO_x will also be deleted.

Comment 210 – Reg. 19.1505(N)(2) – Format the “x” in “NO_x” to be subscript.

Response 210 – ADEQ agrees with this comment and the change will be made.

Comment 211 – Reg. 19.1505(N)(3) - Define “PM_{2.5}” here or in Chapter 2, unless this is defined in the definitions which were incorporated by reference.

Response 211 – ADEQ agrees with this comment. PM_{2.5} will be defined in Chapter 2 of Regulation 19 as “PM_{2.5}’ means particulate matter with an aerodynamic diameter less than or equal to a nominal two and one-half (2.5) micrometers.”

Comment 212 – Reg. 19.1505(N)(3) – **Spell out all numbers and place the numeric in parentheses.**

Response 212 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 213 – Reg. 19.1506 – **Delete “19.15005” and replace it with “Reg. 19.1505”.**

Response 213 – ADEQ agrees with this comment and the change will be made.

Comment 214 – Reg. 19.1507 – **Specify that Regulation 26 is the Arkansas Pollution Control and Ecology Commission’s, Regulation 26, Regulations of the Arkansas Operating Air Permit Program.**

Response 214 – ADEQ agrees with this comment and this comment was addressed earlier in Comment 115. No change was made as a result of this comment.

Comment 215 – **The page numbering for Appendix A is different between Regulation 18 and Regulation 19. Use a consistent page numbering system.**

Response 215 – ADEQ agrees with this comment and the change will be made in Regulation 19. Page numbering will follow the following scheme A-1.

Comment 216 – **Appendix A – Define “NSPS” here or in Chapter 2.**

Response 216 – ADEQ agrees with this comment and this comment was addressed earlier in Comment 55. No change was made as a result of this comment.

Comment 217 – **Appendix A – Define “NESHAP” here or in Chapter 2.**

Response 217 – ADEQ agrees with this comment and the change will be made as follows “...(such as NSPS, National Emission Standard for Hazardous Air Pollutants [NESHAP]...”

Comment 218 – **Appendix A – Define “MACT” here or in Chapter 2.**

Response 218 – ADEQ agrees with this comment and the change will be made as follows “...(such as NSPS, National Emission Standards for Hazardous Air Pollutants [NESHAP], Maximum Achievable Control Technology [MACT])...”

Comment 219 – Appendix A, Group A 1. – Spell out all numbers and place the numeric in parentheses.

Response 219 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 220 – Appendix A, Group A 1. – Define “BTU” here or in Chapter 2.

Response 220 – ADEQ agrees. “Million BTU” is used in the text. “MMbtu” was defined earlier. See Comment 153. Appendix A, Group A 1. will read as follows “...less than 10 MMbtu per hour...”

Comment 221 – Appendix A, Group A 2. – Spell out all numbers and place the numeric in parentheses.

Response 221 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 222 – Appendix A, Group A 3. – Spell out all numbers and place the numeric in parentheses.

Response 222 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 223 – Appendix A, Group A 5. – Spell out all numbers and place the numeric in parentheses.

Response 223 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 224 – Appendix A, Group A 6. – Add a hyphen between “non” and “commercial”.

Response 224 – ADEQ agrees with this comment and the change will be made.

Comment 225 – Appendix A, Group A 7. – Spell out all numbers and place the numeric in parentheses.

Response 225 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 226 – Appendix A, Group A 8. – Spell out all numbers and place the numeric in parentheses.

Response 226 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 227 – Appendix A, Group A 9. – Spell out all numbers and place the numeric in parentheses.

Response 227 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 228 – Appendix A, Group A 10. – Spell out all numbers and place the numeric in parentheses.

Response 228 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 229 – Appendix A, Group A 11. – Spell out all numbers and place the numeric in parentheses.

Response 229 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 230 – Appendix A, Group A 12. – Spell out all numbers and place the numeric in parentheses.

Response 230 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.

Comment 231 – Appendix A, Group A 13. – Spell out all numbers and place the numeric in parentheses.

Response 231 – There is no guidance on the proper formatting of numbers in the ADEQ’s and Arkansas Pollution Control and Ecology Commission’s Regulation Formatting and Drafting Guidelines. Therefore, no changes will be made based on this comment.


Comment 232 – Appendix A, Group B 14. – Change “sources” to “source’s”.

Response 232 – ADEQ agrees with this comment and the change will be made.

Comment 233 – Appendix A, Group B 75. – Define “IC” here or in Chapter 2.

Response 233 – The change will be made as follows “...including internal combustion engines...” Since IC is not used as an abbreviation in any other place in this regulation, there is no need to abbreviate it.

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