NAGENOT PROTECTION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

APR 1 1 2013

Mr. Doug Szenher
POA Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: The U.S. Environmental Protection Agency's (EPA) Comments on Proposed Revisions to Regulation 19, Chapter 9 for Greenhouse Gas (GHG) Plantwide Applicability Limits (PAL)

Dear Mr. Szenher:

Thank you for the opportunity to review and comment on proposed revisions to Regulation 19, Chapter 9 for the adoption and implementation of the GHG PAL permitting provisions under the Arkansas Prevention of Significant Deterioration (PSD) program. We understand that these revisions have been proposed to be consistent with federal GHG PSD PAL permitting provisions at 40 Code of Federal Regulations (CFR) 52.21 and that this will be submitted as revisions to the Arkansas State Implementation Plan (SIP).

We note that the new provisions proposed at Regulation 19, Section 19.904(A)(1) include the incorporation by reference date of August 13, 2012. Please be mindful that the Arkansas Department of Environmental Quality is responsible for monitoring 40 CFR 52.21(aa) for changes to the PAL permitting provisions and to initiate rulemaking accordingly pursuant to all applicable SIP revision requirements.

Thank you for initiating this rule revision in a timely manner and providing the Region 6 office opportunity to comment. We offer our assistance during the SIP adoption and submittal process. If you have any questions about the EPA's review of these proposed revisions, please feel free to contact me at (214) 665-6435 or Ms. Adina Wiley at (214) 665-2115. Please let us know how we may be of further assistance.

Sincerely yours,

Jeff Robinson

Chief

Air Permits Section

cc: Mr. Mike Bates

Arkansas Department of Environmental Quality

Ms. Elizabeth Sartain

Arkansas Department of Environmental Quality