



File Code: 2580

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Guy Donaldson
Chief, Air Planning Section (6PD-L)
Environmental Protection Agency
1445 Ross Avenue, Suite 1200
Dallas, TX 75202-0727

Dear Mr. Donaldson

The United States Forest Service (USFS) has reviewed the Environmental Protection Agency's (EPA's) proposed "Approval and Promulgation of Air Quality Implementation Plans; State of Arkansas; Regional Haze State Implementation Plan" (SIP). We agree with EPA's finding that the Arkansas Department of Environmental Quality (ADEQ) must go beyond simply meeting the Uniform Rate of Progress (URP) to conclude that its goals provide for reasonable progress. We do not feel ADEQ fully considered the four statutory factors when evaluating potential controls for all sources or source categories that contribute to visibility impairment as required under 40 CFR 51.308(d)(1)(i)(A).

Our current information indicated that source apportionment modeling by the Central Regional Air Partnership forms the basis for Arkansas's URP determination, and indicates Arkansas's point source emissions of sulfur dioxide (SO₂) are projected to increase between 2002 and 2018, while contributions from surrounding states are projected to decrease. The resultant sulfate particles, the major pollutant contributing to visibility impairment in Arkansas' Class I areas, are also projected to increase, which may lead to unnecessary visibility impairment in Arkansas' Class I areas, Caney Creek and Upper Buffalo. For Class I areas where the State causes or contributes to visibility impairment in a mandatory Class I area, section 51.308(d)(3)(ii) requires that the State must demonstrate that it has included in its implementation plan all measures necessary to obtain its share of the emissions reductions needed to meet the progress goal for the area. We feel an increase in SO₂ emissions from Arkansas point sources does not meet this requirement. For this reason, the USFS cannot support approval of Arkansas' long term strategy as well as the reasonable progress analysis.

Finally, we anticipate that implementation of EPA's proposed Cross State Air Pollution Rule (CSAPR), utilizing a cross state visibility averaging mechanism, could result in actual and unnecessary visibility declines within the Class I areas of the Rule's Western tier states. Our interpretation is that a test must be performed demonstrating that an alternative program does not lead to visibility 'decline' at any Class I area from that obtained through BART. We recommend that EPA only consider the differences in visibility improvement between BART and CSAPR for each Class I area, and not evaluate against a baseline without BART or Transport rule controls. Therefore, we support Arkansas and other Western tier states implementing fully factored BART controls if case-by-case BART determinations provide greater visibility improvement when compared with visibility estimates based on a CSAPR's averaging mechanism.



We appreciate the opportunity to work with EPA and ADEQ in achieving natural visibility conditions at our Wilderness Areas. For further information regarding our comments, please contact Judy Logan of my staff at 501-321-5341.

Sincerely,

/s/ Norman L. Wagoner
NORMAN L. WAGONER
Forest Supervisor

/s/ Judith L. Henry
JUDITH L. HENRY
Forest Supervisor

cc: Ann Acheson
Bret A Anderson
Scott A Copeland
Charles E Sams