

Air Quality Screening Protocol: Arkansas Department of Environmental Quality Announce Proposed Update (CLARIFICATION)



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As noted in a post yesterday, the Arkansas Department of Environmental Quality (“ADEQ”) is seeking comments on a new Air Quality Screening Protocol (“Protocol”). ([Click here for link.](#))

The post describes the draft protocol including its format.

I subsequently received correspondence from Mr. William K. (“Will”) Montgomery of ADEQ suggesting a clarification of the post. Mr. Montgomery is the Policy & Planning Branch Manager for the agency’s Office of Air Quality.

Mr. Montgomery’s correspondence states:

I just wanted to clarify a couple of details that look a little ambiguous on your recent blog post on the air quality screening protocol. First, the changes were based on the latest infrastructure state implementation plans (SIP). The type of these SIPs are infrastructure SIPs. The wording of the post is a little unclear and makes it look like we had three separate and distinct SIPs. The National Ambient Air Quality Standards state implementation plan (NAAQS SIP) referred to is actually a state requirement and not a Clean Air Act requirement. The NAAQS SIP served to support measures required to implement the infrastructure SIPs. The infrastructure SIPs and NAAQS SIP were submitted together to EPA as one package.

“ADEQ states that the protocol includes updates based on the latest infrastructure, state implementation plans, and the Clean Air Act National Ambient Air Quality Standards state implementation plan which require demonstrations for:

- Coarse particulate matter
- Nitrogen Oxides

Sulfur dioxide emission increases 100 tons per year or greater”

Second, the “100 tons per year or greater” threshold applies to all three pollutants: Coarse PM, NOx, and SO2; not just SO2.

I appreciate Mr. Montgomery taking the time to provide this input.