



**Electric Cooperatives
of Arkansas**

Clean Air Act Regional Haze

Background: Congress established Clean Air Act authority for EPA to set best available retrofit technology requirements with the goal of achieving natural visibility conditions in the nation's Class I areas (National Parks, Wilderness areas and national memorial parks meeting certain definitions) by 2064, with states having the primary role in determining their 'glide-path'. Phase I of this program has largely been implemented, and compliance is due by 2018. In recent years, EPA has become much more prescriptive in forcing states to impose high cost, low benefit pollution controls to drive a standard based on aesthetics rather than human health and the environment.

Impact on Cooperatives: EPA has largely demanded that states impose selective catalytic reduction technology to control NOx emissions. This technology can cost hundreds of millions per unit. EPA has started planning for Phase II and has proposed a guidance document for states that continues to erode state authority over their programs.

Electric Cooperatives of Arkansas Position. EPA should revise the proposed EPA guidance and oversight to put the decision making back in the hands of the states and to allow them the time and discretion to cost-effectively manage their program towards a goal that is still 48 years away. A good first step is to extend the 2028 planning and compliance cycle by at least 3 years, which gives states and the regulated community added time to meet the next round of limits. Many states and industry groups have provided specific remedies in comments on the proposed guidance that clarifies where EPA has overstepped their authority and how it can be fixed.

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