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## Arkansas Department of Energy & Environment - Division of Environmental Quality Non-Criteria Pollutant Control Strategy: Ben Holden, P.E., (GBMc & Associates) Arkansas Environmental Federation Presentation

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Ben Holden, P.E., undertook a presentation at the Arkansas Environmental Federation Air Seminar titled:

*Case Studies in Navigating DEQ's Non-Criteria Pollutant Control Strategy (NCPCS) ("Presentation")*

Ben serves as Air Services Project Manager for GBMc & Associates.

Ben's *Presentation* addressed three topics associated with the Arkansas Department of Energy & Environment – Division of Environmental Quality's ("DEQ") Non-Criteria Pollutant Control Strategy ("NCPCS"). These components included:

- History and NCPCS 101
- NCPCS Case Studies
- Risk Assessment Case Studies

The DEQ NCPCS is a methodology used to review and evaluate non-criteria emissions by facilities seeking Arkansas air permits. The "non-criteria" denomination means that it is not one of the six substances currently classified under the Clean Air Act as "criteria air pollutants." Sections 108 and 109 of the Clean Air Act require that the United States Environmental Protection Agency identify whether a substance should be designated under Section 108 as a "criteria" air pollutant and, if so, a National Ambient Air Quality Standard must be developed pursuant to Section 109 of the Clean Air Act.

DEQ utilizes the NCPCS to ensure that emissions from non-criteria air pollutants do not cause unacceptable off-site acute or chronic human health impacts. It is implemented pursuant to Arkansas regulations rather than the federal Clean Air Act. This is important since any air permit provision resulting from application of the NCPCS alone is state enforceable only.

Ben's *Presentation* first addressed the history of NCPCS noting:

- 1988 – NCPCS established considered synergistic impacts

- 1996 – Revised to use relative toxicities (RTs)
- 2013 – Removed RTs in streamlining effort
- 2015 – Further streamlined NCPCS

By way of background, the *Presentation* states:

1. DEQ Required Application Review – Stationary source cannot cause air pollution
2. State Only – Implemented pursuant Reg. 18 and AR state law
3. DEQ Flexibility – Screening methodology not a regulation or policy
4. Permit Limits – Impacts which pollutants have listed permit limits

The discussion included a slide listing the air pollutants covered by the NCPCS and a flowchart addressing the screening procedures utilized. In addition, the *Presentation* also addressed the refined analysis options:

1. Refined Modeling
2. Revised Emissions
3. Risk Assessment
4. Additional Control
5. Operating Scenarios
6. Ambient Monitoring
7. Permit Emissions Limits
8. Property Line

The three case studies included:

1. Roofing and Asphalt Plant
2. Chemical Plant
3. Lumber Mill

The challenges, solutions, and conclusions were addressed for each case study.

Finally, the risk assessment discussion noted three categories to be addressed:

1. Noncarcinogenic (acute and/or chronic) risk
2. Carcinogenic (typically chronic) risk (if applicable)
3. Environment

Case studies were provided that involved risk assessment issues.

A copy of the slides may be downloaded [here](#).