STATEMENT OF CONSIDERATION

RELATING TO SIP REVISION FOR THE LOUISVILLE KENTUCKY COUNTIES OF BULLITT AND JEFFERSON REDESIGNATION TO ATTAINMENT FOR THE ANNUAL 1997 $PM_{2.5}$ STANDARD
Amended After Comments

Energy and Environment Cabinet

Department for Environmental Protection

Division for Air Quality

A public hearing on the State Implementation Plan (SIP) revision for redesignation of Bullitt and Jefferson Counties to attainment for the annual 1997 $PM_{2.5}$ standard was held on February 3, 2012, at 10:00 am. The hearing was held in the Conference Room of the Louisville Metro Air Pollution Control District, 850 Barret Avenue, Louisville, Kentucky. Written and verbal comments were received during the public comment period.

The following individuals from the Kentucky Energy and Environment Cabinet attended the public hearing and drafted responses to comments received during the public review period.

John Gowins, Environmental Control Supervisor* Division for Air Quality

Leslie Eggen, Environmental Technologist III Division for Air Quality

* Agency moderator

Response to Comments for the proposed revision to the State Implementation Plan (SIP) to redesignate Bullitt and Jefferson Counties as attainment for the National Ambient Air Quality Standard (NAAQS) for annual $PM_{2.5}$.

1. **Comment:** The EPA suggests a more detailed discussion in the SIP Narrative on how the 2025 inventory was developed including extrapolation. For completeness, we recommend that the calculations used in the extrapolation procedure be included in the SIP revision. *(R. Scott Davis, U.S. EPA)*

   Response: The Cabinet acknowledges this comment. The descriptions of calculations developing the inventory numbers has been added to the narratives of Chapter 4, Base Year Emission Inventory and Emission Projections, and are included in the spreadsheets of Appendix B regarding pollutant by type and county. Interpolation and extrapolation was used for nonroad and area sources, and spreadsheets have been added to Appendix B of this submittal.

2. **Comment:** All 2008 attainment emissions inventory source categories for the $PM_{2.5}$ precursor pollutants do not appear to be presented in specific detail in Appendix B and the VISTAS report. Emissions inventory specifics for the area, non-road and on-road sources specific to the Kentucky nonattainment counties are recommended.
(R. Scott Davis, U.S. EPA)

Response: The Cabinet acknowledges this comment. The Cabinet has included specific details for all nonroad and area inventories in Appendix B. There are also summary tables for nonroad and area regarding by pollutant type and county.

3. **Comment:** A discussion of the quality assurance procedures used in the development of the 2008 and other future year inventories is not presented. Please provide this information in the final SIP revision.
(R. Scott Davis, U.S. EPA)

Response: The Cabinet acknowledges this comment. The Cabinet added a clarifying statement which explains that this agency has developed and submitted a point source emissions inventory quality assurance project plan (QAPP) which was approved in a letter from EPA dated August 18, 2010 from the Chief of Air Quality Modeling and Transportation Section, R. Scott Davis. This reference was added to Chapter 4, Base Year Emission Inventory Background and to Appendix B.

4. **Comment:** Chapter 2 indicates there is a modeling component required to address the Clean Air Act (CAA) section 107(d)(3)(E)(i) provisions, and that this is discussed in Chapter 3. However, such discussion does not appear to be included in Chapter 3. Please provide this information in the final SIP revision.
(R. Scott Davis, U.S. EPA)

Response: The Cabinet acknowledges this comment. The Cabinet modified the reference in Chapter 2 (i) to reflect that no modeling was required and not considered in the redesignation request.

5. **Comment:** Each requirement listed throughout the narrative is delineated as being one out of a number of requirements for a particular aspect of the submittal (e.g., 1 of 4, 2 of 4, 3 of 4, 4 of 4). Please clarify the requirement numbering system.
(R. Scott Davis, U.S. EPA)

Response: The Cabinet acknowledges this comment. The overall requirements are taken from the U.S. EPA *Procedures for Processing Requests to Redesignate Areas to Attainment*, John Calcagni, September 4, 1992, as stated in Chapter 2.

6. **Comment:** Below the titles of Chapters 3, 4, 5 and 6 are references to sections for the CAA. These references appear to be intended to indicate which section of the CAA the discussion in the chapter addresses. Please review to ensure the references shown are the ones intended. For example:

a. Chapter 4 lists 107(d)(3)(E)(iii), which is the requirement to show permanent and enforceable improvement in air quality. It seems 107(d)(3)(E)(iv) should also be indicated here since

Chapter 4 also addresses elements of that section, such as the attainment inventory, maintenance demonstration, and verification of continued attainment (i.e., parts of the maintenance plan).

b. Listed below the title of Chapter 5 are references to the CAA sections 107(d)(3)(E)(ii), (iv) and (v). However, it appears this chapter only addresses requirements from CAA section 107(d)(3)(E)(v).

c. Listed below the title of Chapter 6 is a reference to the CAA section 107(d)(3)(E)(v). However, the contingency plan is a requirement of section 107(d)(3)(E)(iv) (i.e., it is part of the maintenance plan).
(R. Scott Davis, U.S. EPA)

Response: The Cabinet acknowledges this comment. The narrative has been corrected for each chapter.

7. **Comment:** CART argues that its members will suffer significant air pollution health effects by an erroneous determination of attainment of the PM 2.5 fine particulate standard by use of FRM gravimetric analysis that ignores 'mode shifting' of mobile source emissions to ultra fine particulate mode not detected by the FRM method. The public health risk is underestimated and the data demonstrating attainment is flawed, biased and unreliable.
(Clarence Hixson, Attorney for Coalition for the Advancement of Regional Transportation (CART))

Response: Cabinet acknowledges this comment. The $PM_{2.5}$ monitors used to demonstrate attainment of the standard are Federal Reference Method monitors and comply with U.S. EPA's monitoring requirements.

8. **Comment:** CART argues that its members will suffer significant air pollution health effects because of erroneous adoption and approval of the SIP. The SIP uses erroneous factors based on FRM gravimetric data that ignores PM 2.5 mode shifting to UFP and uses outdated socio-economic data and 2000 vehicle registrations in the travel demand model to generate erroneous emissions predictions in tons per year of PM 2.5. Approval of the SIP would harm CART's interests by approving a plan that ignores rising public health risk from UFP emissions of mobile sources. These sources would actually be lowered by control measures using mass transit projects instead of ineffective emissions control based on FRM gravimetric analysis.
(Clarence Hixson, Attorney for CART)

Response: The Cabinet acknowledges this comment. KIPDA maintains the most complete set of current and available socio-economic data for mobile emissions modeling. APCD, which runs the mobile source emissions model (MOVES) utilizing inputs from KIPDA, maintains fleet data current within 5 years in accordance with EPA requirements. As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40CFR Part 58, *Ambient Air Quality Surveillance*.

9. **Comment:** CART argues that what has caused a transient dip in LMA PM 2.5 emissions is the economic slowdown or recession which has not yet ended. Trends charted from 2008

to 1010 are unreliable indicators of PM 2.5 declines achievable by the SIP and other measures. *(Clarence Hixson, Attorney for CART)*

Response: The Cabinet acknowledges this comment. The Clean Air Act specifies the required time frame utilized to demonstrate attainment. This SIP revision meets that requirement.

10. **Comment:** It is noted that EPA is in the early stages of the process of rulemaking to reduce further the NAAQS for PM 2.5 and could adopt a new standard in five years as low as 10µg/m3 in recognition of the growing understanding of health impacts and public exposure to fine particulate. *(Clarence Hixson, Attorney for CART)*

    Response: The Cabinet acknowledges this comment, however it is outside the scope of this SIP revision.

11. **Comment:** Enforceable reductions that ignore the principal mode of mobile source combustion emissions – UFP do not result in improved air quality. Such enforcement measures mask actual public health impacts and exposure. *(Clarence Hixson, Attorney for CART)*

    Response: The Cabinet acknowledges this comment, however it is outside the scope of this SIP revision.

12. **Comment:** Recently the EPA has promulgated a requirement for near road monitoring evidencing a recognition of the highest concentrations of pollutants at the near roadway areas. Data based on this modeling will require revision of the PM 2.5 NAAQS and re-deployment of the LMA $PM_{2.5}$ network to more accurately reflect actual public exposure. *(Clarence Hixson, Attorney for CART)*

    Response: The Cabinet acknowledges this comment. EPA finalized a rule in 2010 for NO_2 near road monitoring. EPA has developed a phased-in approach to monitor placement and the Louisville area is expected to complete this by 2014. However this near road monitoring does not require $PM_{2.5}$ sampling. Future potential modifications to the $PM_{2.5}$ NAAQS and the $PM_{2.5}$ monitoring network are outside of the scope of this submittal.

13. **Comment:** Population growth, employment, commuting, and VMT information from the 2010 Census and related sources is not available at a sufficiently small level of geography to be able to quantify the impacts of socioeconomic changes. County-level information does indicate that although the region has suffered from the recent economic downturn, there is still growth in socioeconomic attributes and VMT. Regional planning cannot be based on short-term events like the economic downturn. Therefore, growth in travel must be expected once the economy improves. When it does, MVEBs must be large enough to account for future growth in VMT.
    (Clarence Hixson, Attorney for CART)

    Response: The Cabinet acknowledges this comment. See response to comment 8 above, and comment 14 below.

14. **Comment:** There is sufficient uncertainty associated with several variables used in the analysis of regional air quality that establishing motor vehicle emission budgets (MVEBs) for $PM_{2.5}$ and NOx based on 15% margins of safety will be too low. Establishing MVEBs that are too low (i.e. too stringent) will increase the probability that a conformity failure will occur. If this occurs, the metropolitan transportation plan (MTP) and transportation improvement plan (TIP) cannot be updated or amended. This would hinder the progress in implementing transportation projects some of which have the potential to reduce pollutant emissions and presumably improve local air quality. *(Clarence Hixson, Attorney for CART)*

    Response: The Cabinet acknowledges this comment. Input data development for the MOVES 2010 (EPA/FHWA mobile emissions) model are reviewed and approved by local and regional agencies, known as the Interagency Consultation Group. Once established, the MVEB's are unlikely to be exceeded because vehicle engine technology, emission controls, and fuel formulations have historically reduced vehicle emissions, despite increases in vehicle miles traveled (VMT). If input variables for MOVES 2010 require significant updating that might affect conformity with the SIP MVEB's, there is a process for SIP MVEB revision to properly account for these updates.

15. **Comment:** The underdeveloped transit system remains underdeveloped and abandoned as a pollution control method.
    (Clarence Hixson, Attorney for CART)

    Response: The Cabinet acknowledges this comment, however it is outside the scope of this SIP revision.

16. **Comment:** An increasing number of published, peer reviewed studies demonstrate ultrafine particles are more toxic and particulate numbers must be controlled by standards.
    (Clarence Hixson, Attorney for CART)

    Response: The Cabinet acknowledges this comment, however it is outside the scope of this SIP revision.

17. **Comment:** Ultra fine particulate is highly concentrated in main traffic arteries and corridors and people driving down these main roadways are being exposed to very high concentrations of ultra fine particulate. And this particulate is not monitored or measured by the current network and, thus, approving a redesignation with that background would be unreliable and unprotected.
    (Clarence Hixson, Attorney for CART)

    Response: The Cabinet acknowledges this comment. The Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance* and monitor pollutants to demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) established by U.S. EPA for criteria pollutants. To date, U.S. EPA has established NAAQS for six criteria pollutants, including carbon monoxide, lead, nitrogen dioxide, ozone, sulfur dioxide and particle pollution as PM_{10} and $PM_{2.5}$. U.S. EPA has not established a NAAQS for ultra fine particulate matter; therefore, it

is not required to be monitored as part of the Louisville MSA ambient air monitoring network. Additional details about APCD's ambient air monitoring network are included in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.

18. **Comment:** The Wyandotte Park site, the 21-111-0044 site appears to have no co-location monitor for PM2.5 to validate the results. We understand that the Wyandotte Park 2.5 monitor has been subjected to repeated vandalism and that the air pollution control district has applied to EPA to allow it to close the station because of vandalism. And we argue that that data set should not be allowed in the application.
(Clarence Hixson, Attorney for CART)

Response: The Cabinet acknowledges this comment. The collocated $PM_{2.5}$ monitor is located at the Southwick Community Center (21-111-0043). This monitor meets the siting, operation and quality assured requirements specified in 40 CFR Part 58, *Ambient Air Quality Surveillance* as described in the the relevant portions of the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

19. **Comment:** The Watson Lane data site, the 21-111-0051 site is very close to the existing NAAQS limit. It had a annual average of means of 14.83 micrograms per meter, which was close to the limit, that was in the 2010 year.
(Clarence Hixson, Attorney for CART)

Response: The Cabinet acknowledges this comment. We agree that the monitored annual average for 2010 is close to the annual design value of less than or equal to 15.0 $\mu g/m^3$. However, the annual standard is designed to provide an appropriate level of protection from *long-term* exposure to $PM_{2.5}$. This means that the standard is met when the annual design value is less than or equal to 15.0 $\mu g/m^3$, when calculated by averaging the annual means of three consecutive complete years of air quality data (40 CFR Part 50, Appendix N).

20. **Comment:** The application listed Barret Avenue and Cannons Lane monitoring stations but those two stations did not each have three continuous years of monitoring, which was required by the reapplication statutes. If we are to use Barret Avenue and Cannons Lane it would require spacial <sic> variability averaging and we didn't think that the coefficient of variability, the difference in the average means readings would not permit spacial <sic> averaging for those two stations.
(Clarence Hixson, Attorney for CART)

Response: The Cabinet acknowledges this comment. A site's annual design value is calculated by averaging the weighted annual averages from a site over a three (3) year period. The highest site design value in an MSA is generally determined to be the design value for the area, which is then compared to the NAAQS to determine attainment/nonattainment for the area. For the Louisville area's monitoring network, the Walnut Street, Jeffersonville, IN monitoring site sets the current design value for particulate matter. With respect to APCD's Cannons Lane monitoring station, it received approval from U.S. EPA for SLAMS (State and Local Air Monitoring Stations) monitoring on December 22, 2008, and NCore monitoring on October 30, 2009. Data handling procedures are applied on an individual basis at each monitor in the area. APCD's Barret Ave. monitoring site was eliminated on December 31, 2008. The most recent date that U.S.EPA determined that the monitoring network was compliant was on October 20, 2011.

21. Comment: We tried to access data to show accurate particle readings for April 18th of 2011, Thunder Over Louisville day, we were unable to find any on-line accessible data for Jefferson County, Kentucky.
(Clarence Hixson, Attorney for CART)

Response: Continuous $PM_{2.5}$ (year round) and ozone (from March to October) data is uploaded to U.S.EPA's AIR*NOW* (www.airnow.gov) hourly. You may review archived daily data at http://www.epa.gov/airdata/ad_data_daily.html for the Louisville MSA.

22. Comment: Three months in 2008, July, August, and September had monthly averages exceeding the 15 micrograms per cubic meter level. The July of 2008 was 18.1; August, 17.1; and September, 17.6. Four months in 2010, February, 16.3; July, 16; August 16.4; October 17.0. Three months in 2011, January, 15.2; July, 19.7, a very high reading only recently; and August, 16.2.
(Clarence Hixson, Attorney for CART)

Response: The annual standard is designed to provide an appropriate level of protection from long-term exposure to $PM_{2.5}$. The standard is met when the annual design value is less than or equal to 15.0 $\mu g/m^3$ when calculated by averaging the annual means of three consecutive complete years of air quality data, rather than individual monthly averages, per 40 CFR Part 50 Appendix N.

23. Comment: Our observation about the economic recession was echoed by KIPDA in its comments to the Indiana request which said there is sufficient uncertainty associated with several variables used in the analysis of regional air quality that establishing motor vehicle emission budgets for PM2.5 and NOx based on 15 percent margins of safety will be too low.
(Clarence Hixson, Attorney for CART)

Response: The Cabinet acknowledges this comment. Mobile emissions are one of four sectors analyzed for an emissions inventory. The mobile emissions were projected by the MOVES 2010 mobile emissions model to decrease significantly through the maintenance out year of 2025. The concerns expressed by KIPDA relate to emissions limitations that transportation projects will be held to as specified in this document. KIPDA points out that there are significant reductions in the mobile sector, and these tons of reduction could be

provided to the transportation emissions limitations while the area would still have total emissions levels below those that occurred in the attainment year.

24. **Comment:** If you place your monitor 300 meters away from the road, you're not getting an accurate reading of what the real pollutant load is for the users of that roadway be it the cyclist, drivers or pedestrians.
(David Coyte, CART)

Response: Cabinet acknowledges this comment. As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance*. Additional details about APCD's ambient air monitoring network are included in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan,* which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf
and
http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

25. **Comment:** There seems to be a real bias in how these monitors have been placed within the metro area that are keeping the accurate data and the accurate health impacts from being seen, not just for the ultra fine, which is a coming issue, but for the 2.5, which is with us today.
(David Coyte, CART)

Response: As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance* and monitor pollutants for existing National Ambient Air Quality Standards (NAAQS). Additional details about APCD's ambient air monitoring network are included in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan,* which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf
and
http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

26. **Comment:** If redesignation is approved, if the EPA considers this now to be an attainment area, what would the impact be on stage 2 vapor recovery requirements at retail gasoline facilities?
(Jeff Gallic, Thorntons Inc.)

Response: The Cabinet acknowledges this comment. Stage II vapor recovery programs, which are required under Section 182(b)(3) of the Clean Air Act (CAA), 42 U.S.C.

7511a(b)(3), for "moderate" or worse ozone nonattainment areas, would have no impact on the Stage II vapor recovery requirement. However in July of 2011 U.S. EPA issued a notice of proposed rulemaking to address this and to determine widespread use of on board vapor recovery systems. Once this rulemaking is final, it will address the requirement for Stage II vapor recovery systems and the ability to remove them. Stage II is not a control measure for fine particulates.

27. Comment: What would the impact be on the current requirement for reformulated gasoline to be sold in this area?
(Jeff Gallic, Thorntons Inc.)

Response: The Cabinet acknowledges this comment. The use of reformulated gasoline (RFG) was mandated by Congress in the 1990 Clean Air Act amendments. The first phase of the RFG program began in 1995 and the second (current) phase began in 2000. Due to 1-Hour Ozone nonattainment in the Northern Kentucky and Louisville area, Kentucky voluntarily opted into the federal RFG program on January 1, 1995, in accordance with Section 211(k)(6)(A) of the Federal Clean Air Act. This measure was the only way that improvement in the air quality in Northern Kentucky could be achieved without undue economic hardship to the business community. Measures that are in place when an area reaches attainment are required to remain in place afterwards. It may be possible to replace RFG with a different fuel, however past discussions with U.S. EPA headquarters have indicated that the Federal Energy Policy Act of 2005 (FEPA) makes the option of replacing RFG with a boutique fuel very improbable, specifically, the language in FEPA creates three hurdles:

1. U.S. EPA cannot approve the use of a fuel if it would increase the total number of boutique fuels approved in all State Implementation plans;
2. U.S. EPA and the Department of Energy (DOE) in consultation must determine the total number of fuels approved and publish the list including the states in which they are used; and
3. The only way a new fuel can be added to the list is if an existing approved fuel is removed from a State Implementation Plan and the list prepared by EPA and DOE is revised.

RFG is an ozone and air toxic pollutants control measure and not a control measure for fine particulates.

28. Comment: The folks who live in the Cane Run neighborhood are just across the street from that 14-story coal ash landfill. They regularly have dust, which has been shown to have come from the landfill, polluting their homes, their cars, gets inside their houses. Their children are suffering from asthma and other diseases. We just are very concerned about the fact that we feel like that pollution is not being monitored in the way it should be.
(Mary Love, Kentuckians for the Commonwealth)

Response: When NAAQS are reviewed, a scientific assessment of all available peer-reviewed health and environmental effects information is compiled and assembled. It is then reviewed by the Clean Air Scientific Advisory Committee (CASAC) and made available for public review. Based on scientific assessments and taking into account CASAC's recommendations, the U.S.EPA subsequently determines the applicable standard, including whether or not it is appropriate to revise existing standards.

As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance*. Detailed information regarding specific monitoring sites is documented in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

29. Comment: The Mill Creek and Cane Run plants are on the southwest side of Louisville. Mill Creek also has a huge landfill there for coal ash. And the prevailing winds are from the southwest. And we are pretty certain that all that pollution coming from those coal ash landfills is coming all over Louisville and adding to the fact that Louisville has one of the highest asthma rates around.
(Mary Love, Kentuckians for the Commonwealth)

Response: As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance*. Detailed information regarding specific monitoring sites is documented in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

30. Comment: We're not sure at all that there are monitoring stations that are close enough to that pollution to really measure what's coming out particularly for those neighborhoods.
(Mary Love, Kentuckians for the Commonwealth)

Response: As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance*. Detailed information regarding specific monitoring sites is documented in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.

31. Comment: We would like to understand in depth thinking, your methodology behind the placements of the monitors, exactly what was the thought process, why each one of those areas of those spots were placed.
(Meme Sweets Runyun, River Fields, Inc.)

Response: As required, Louisville MSA ambient air monitors are sited, operated, and quality-assured in accordance with 40 CFR Part 58, *Ambient Air Quality Surveillance*. Detailed information regarding specific monitoring sites is documented in the *Indiana Ambient Air Monitoring Network Plan* and the *Kentucky Ambient Air Monitoring Network Plan*, which may be found at www.epa.gov/ttnamti1/files/networkplans/INPlan2010.pdf and http://air.ky.gov/Division%20Reports/2011%20Air%20Quality%20Surveillance%20Network%20Report.pdf.
These plans, which are submitted annually to U.S. EPA following a thirty day public review and public comment period, provide the framework for establishing and maintaining the network of ambient air quality monitors, including a discussion of any proposed network changes.