UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
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FEB 02 2012

Leonard K. Peters, Secretary
Energy and Environment Cabinet
Office of Secretary
500 Metro Street
12th Floor, Capital Plaza Tower
Frankfort, Kentucky 40601

Dear Mr. Peters:

Thank you for your letter dated December 20, 2011, transmitting a prehearing package regarding the redesignation request for the Kentucky portion of the Louisville-Indiana 1997 $PM_{2.5}$ nonattainment area. This submittal is the subject of an extended public comment period with written comments due and a public hearing held on February 3, 2012. We have completed our review of the prehearing submittal and offer comments included in the enclosure for your review and consideration.

We look forward to continuing to work with you and your staff. If you have any questions, please contact Ms. Lynorae Benjamin, Chief, Regulatory Development Section at (404) 562-9040, or have your staff contact Ms. Twunjala Bradley at (404) 562-9352.

Sincerely,

R. Scott Davis
Chief
Air Planning Branch

Enclosure

The EPA Comments for Prehearing Submittal for Kentucky portion of the Louisville, KY-Indiana PM $_{2.5}$ Redesignation Request and Maintenance Plan

January 31, 2012

I. Recommended Changes:

The following comments are recommended for inclusion in the final state implementation plan (SIP) revision to clearly provide the methodology and rationale for the analyses and conclusions presented.

1. 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.

2. 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.

3. 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.

4. 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.

II. Suggested Clarifications:

The following comments are suggested clarifications that would be helpful to more clearly portray the information presented.

1. 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.

2. 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).