Appendix F

Public Participation Documentation

and

Statement of Consideration

STATEMENT OF CONSIDERATION

RELATING TO SIP REVISION FOR THE ASHLAND AREA COUNTIES OF BOYD AND A PORTION OF LAWRENCE COUNTY, KENTUCKY, REDESIGNATION TO ATTAINMENT FOR THE ANNUAL $PM_{2.5}$ 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 Boyd County and a portion of Lawrence County to attainment for the annual $PM_{2.5}$ standard was scheduled for 6 p.m., December 22, 2011. The public hearing was cancelled after this agency received no requests by December 15th to conduct the hearing. Written comments were received during the public comment period.

The following individuals from the Kentucky Environmental and Public Protection Cabinet drafted responses to comments received during the public review period.

John Gowins, Environmental Control Supervisor Division for Air Quality

Susan Weaver, Internal Policy Analyst III Division for Air Quality

Response to Comments for the proposed revision to the State Implementation Plan (SIP) to redesignate Boyd County and a portion of Lawrence County as attainment for the National Ambient Air Quality Standard (NAAQS) for annual $PM_{2.5}$.

1. **Comment:** The Visibility Improvement State and Tribal Association of the Southeast (VISTAS) 2005 referenced under the Demonstration section appears to be a typo. It is our understanding that VISTAS did not develop a 2005 emissions inventory. Please confirm.
   (R. Scott Davis, U.S. EPA)

   Response: The Cabinet acknowledges this comment. The reference to the 2005 VISTAS inventory has been deleted from Chapter 4, Base Year Emissions Inventory, and all inventory details have been clarified in the background and demonstration.

2. **Comment:** The first paragraph (page 32) of the State Implementation Plan (SIP) narrative appears to imply a connection between VISTAS' projection growth and control files discussed in Appendix D in a VISTAS report that was used to develop the 2009 and 2018 inventories, and the 2015 and 2022 projection inventories used in this redesignation SIP. However, this is not the case, since interpolation was used to develop the 2015 inventory from the VISTAS data and extrapolation was used to develop the 2022 inventory.
(R. Scott Davis, U.S. EPA)

   Response: The Cabinet acknowledges this comment. The Cabinet added description of the interpolation calculation used for 2015 and 2022 to the inventory narration of Chapter 4, Emission Inventory Demonstration. The nonroad and area emissions inventory spreadsheets have been added to Appendix B.

3. **Comment:** It is not clear how extrapolation was used to develop the 2022 inventory. Can you provide detail on how extrapolation was used to develop 2022 inventory?
(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 narrative of Chapter 4, 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.

4. **Comment:** It is not clear how interpolation was used to develop the 2015 inventory for stationary and mobile sources. It is not clear if the on-road and mobile source inventories for 2009 and 2018 were developed using the MOVES model. Please explain.
(R. Scott Davis, U.S. EPA)

   Response: The Cabinet acknowledges this comment. The Cabinet added a clarifying statement that MOVES was used for all mobile numbers. It is further discussed on page A-2 of Appendix C in the KYOVA document that all mobile inventory years were developed using MOVES. Kentucky used our own KyEIS numbers for stationary sources and extrapolated to 2015 and 2022. Chapter 4, Emission Projections, Background and Demonstration, for the KYOVA and KYTC Travel Demand Model, were updated to reflect these clarifications.

5. **Comment:** All 2008 attainment emissions inventory source categories for the PM2.5 precursor pollutants are not 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 must be presented.
(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.

6. **Comment:** The SIP does not discuss the quality control procedure with respect to the inventory development. Please explain what quality control measures were used with respect to the inventory.
(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.

7. **Comment:** Chapter 2 indicates there is a modeling component required to address Clean Air Act (CAA) section 107(d)(3)(E)(i) and that this is discussed in Chapter 3. However, such discussion does not appear to be included in Chapter 3 and would be helpful. The ambient monitoring data may be sufficient without modeling.
(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.

8. **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 what the source of the requirements numbering is.
(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.

9. **Comment:** Below the titles of Chapter 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, part 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 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.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 22, 2011

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

Dear Mr. Peters:

Thank you for your letter dated November 9, 2011, transmitting a prehearing package regarding the Redesignation Request of the Huntington Ashland Nonattainment Area. These rules were the subject of a public hearing held December 15, 2011, with written comments due by the close of business on December 22, 2011. We have completed our review of the prehearing submittal and offer suggested clarifications in the enclosure.

1. The Visibility Improvement State and Tribal Association of the Southeast (VISTAS) 2005 referenced on page 21 under the Demonstration section appears to be a typo. It is our understanding that VISTAS did not develop a 2005 emissions inventory. Please confirm.

2. The first paragraph (page 32) of the State Implementation Plan (SIP) Narrative appears to imply a connection between the VISTAS' projection growth and control files discussed in Appendix D in a VISTAS report that was used to develop the 2009 and 2018 inventories and the 2015 and 2022 projection inventories used in this redesignation SIP. However, this is not the case, since interpolation was used to develop the 2015 inventory from the VISTAS data and extrapolation was used to develop the 2022 inventory.

3. It is not clear how extrapolation was used to develop the 2022 inventory. Can you provide detail on how extrapolation was used to develop 2022 inventory?

4. It is not clear how interpolation was used to develop the 2015 inventory for stationary and mobile sources. It is not clear if the on-road and mobile source inventories for 2009 and 2018 were developed using the MOVES model. Please explain.

5. All 2008 attainment emissions inventory source categories for the PM2.5 precursor pollutants are not 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 must be presented.

6. The SIP does not discuss the quality control procedure with respect to the inventory development. Please explain what quality control measures were used with respect to the inventory.

7. Chapter 2 indicates there is a modeling component required to address Clean Air Act (CAA) section 107(d)(3)(E)(i) and that this is discussed in Chapter 3. However, such discussion does not appear to be included in Chapter 3 and would be helpful. The ambient monitoring data may be sufficient without modeling.

8. 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 what the source of the requirements numbering is.

9. 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 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 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).

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 Mr. Zuri Farngalo at (404) 562-9152.

Sincerely,

Stanley J. Krivo for

R. Scott Davis
Chief
Air Planning Branch

KENTUCKY DIVISION FOR AIR QUALITY
NOTICE OF PUBLIC HEARING
TO REVISE KENTUCKY'S STATE IMPLEMENTATION PLAN

The Kentucky Energy and Environment Cabinet will conduct a public hearing on December 22, 2011, at 10:00 a.m. (ET) in the Conference Room of the Ashland-Boyd County Health Department, 2916 Holt Street, Ashland, Kentucky. This hearing is being held to receive comments on a proposed State Implementation Plan (SIP) revision to redesignate the Kentucky portion of the Huntington-Ashland, Ohio-Kentucky-Indiana area from nonattainment to attainment for the 1997 annual $PM_{2.5}$ National Ambient Air Quality Standard to address sections 107 and 175A of the Clean Air Act (CAA). This revision, when approved by the U.S. EPA, will redesignate the counties of Boyd and a portion of Lawrence to attainment, and document that the ambient monitoring data for annual $PM_{2.5}$ indicates attainment of the standard.

This hearing is open to the public and all interested persons will be given the opportunity to present testimony. The hearing will be held, if requested, at the date, time and place given above. It is not necessary that the hearing be held or attended in order for persons to comment on the proposed submittal to EPA. To assure that all comments are accurately recorded, the Division requests that oral comments presented at the hearing also be provided in written form, if possible. To be considered part of the hearing record, comments must be received by the close of the hearing. Comments should be sent to the contact person. If no request for a public hearing is received, the hearing will be cancelled, and notice of the cancellation will be posted at the website listed below. Request for a public hearing must be received no later than December 15, 2011 while all comments must be submitted no later than December 22, 2011.

The full text of the proposed SIP revision is available for public inspection and copying during regular business hours (8:00 a.m. to 4:30 p.m.) at the locations listed below. Any individual requiring copies may submit a request to the Division for Air Quality in writing, by telephone, or by fax. Requests for copies should be directed to the contact person. In addition, an electronic version of the proposed SIP revision document and relevant attachments can be downloaded from the Division for Air Quality's website at:
http://air.ky.gov/Pages/PublicNoticesandHearings.aspx.

The hearing facility is accessible to people with disabilities. An interpreter or other auxiliary aid or service will be provided upon request. Please direct these requests to the contact person.

CONTACT PERSON: Susan Weaver, Internal Policy Analyst III, Division for Air Quality, 200 Fair Oaks Lane, Frankfort, Kentucky 40601. Phone (502) 564-3999; Fax (502) 564-4666; E-mail susan.weaver@ky.gov.

The Environmental and Public Protection Cabinet does not discriminate on the basis of race, color, national origin, sex, age, religion, or disability and provides, upon request, reasonable accommodation including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in all services, programs, and activities.

Ashland Regional Office
1550 Wolohan Drive, Suite 1
Ashland, KY 41102-8942

Bowling Green Regional Office
1508 Westen Avenue
Bowling Green, KY 42104-3356

Florence Regional Office
8020 Veterans Mem Dr, Suite 110
Florence, KY 41042

Frankfort Regional Office
200 Fair Oaks, 3rd Floor
Frankfort, KY 40601-1758

Hazard Regional Office
233 Birch Street, Suite 2
Hazard, KY 41701-2179

London Regional Office
875 S Main Street
London, KY 40741

Owensboro Regional Office
3032 Alvey Park Dr W, Suite 700
Owensboro, KY 42303-2191

Paducah Regional Office
130 Eagle Nest Drive
Paducah, KY 42003-0823

Boyd County Clerk
2800 Louisa St #106
Catlettsburg, KY 41129

Lawrence County Clerk
122 South Main Cross Street
Louisa, KY 41230

page that calls for a boycott of TLC because of the series, which it calls "an attempt to make America accept Islam without showing the truth about what Islam is all about."

Mike Mosallam, a television producer from Dearborn, didn't have to cast a wide net when he sought participants from within his close-knit community. One cast member is his cousin, another is an old schoolmate. Still, the contrasts he highlights make for interesting, even educational television.

Nawal Aoude, for instance, wears the traditional hijab, or headscarf, and does not touch a man other than her husband. She's outspoken and funny, dispelling any image of submissiveness the hijab may represent to outsiders.

curity benefits or programs, call the Ashland office to speak to a representative in the office on the first floor of the Carl D. Perkins Federal Building on Greenup Avenue in Ashland. You also may call (866) 269-3993.

BERNARD O'NAN is district manager for the Ashland Social Security office.

dinner, sign up at counter.

Thursday: Lunch: salad potluck.

Flatwoods

Events this week at the Flatwoods Senior Citizens Center on Reed Street. The center is open from 9 a.m. to 2 p.m. Monday, Wednesday and Friday. Telephone: (606) 494-2362.

Today: 9 a.m. — Coffee and doughnuts. 10 a.m. — Health department. 11:15 a.m. — Lunch.

Wednesday: 9 a.m. — Coffee and doughnuts. 10 a.m. — Bible study. 11:15 a.m. — Lunch — gold for cash.

Friday: 9 a.m. — Coffee and doughnuts. 10 a.m. — Bingo; 11:15 a.m. — Lunch.

Nov. 21: 9 a.m. — Coffee and doughnuts. 10 a.m. — Rita Spence; 11:15 a.m. — Lunch.

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Hazard Regional Office
233 Birch Street, Suite 2
Hazard, KY 41701-2179

Boyd County Clerk
2800 Louisa St. #106
Catlettsburg, KY 41129

Florence Regional Office
8020 Veterans Mem Dr., Suite 110
Florence, KY 41042

Owensboro Regional Office
3032 Alvey Park Dr. W., Suite 700
Owensboro, KY 42303-2191

Bowling Green Regional Office
1508 Western Avenue
Bowling Green, KY 42104-3356

London Regional Office
875 S. Main Street
London, KY 40741

Lawrence County Clerk
122 South Main Cross Street
Louisa, KY 41230

Frankfort Regional Office
200 Fair Oaks, 3rd Floor
Frankfort, KY 40601-1758

Paducah Regional Office
130 Eagle Nest Drive
Paducah, KY 42003-0823

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