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