



MATTHEW G. BEVIN  
GOVERNOR

CHARLES G. SNAVELY  
SECRETARY

## ENERGY AND ENVIRONMENT CABINET

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FRANKFORT, KENTUCKY 40601  
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R. BRUCE SCOTT  
DEPUTY SECRETARY

May 4, 2018

Mr. Trey Glenn  
Regional Administrator  
U.S. EPA, Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8909

RE: Redesignation request for Louisville, KY-IN area (Jefferson and Bullitt counties) for the 2012 PM<sub>2.5</sub> annual NAAQS

Dear Administrator Glenn:

On behalf of the Commonwealth of Kentucky, the Energy and Environment Cabinet (Cabinet) respectfully requests that Environmental Protection Agency (EPA) redesignate Jefferson and Bullitt (partial) counties in Kentucky from “unclassifiable” to “unclassifiable/attainment” for the 2012 annual PM<sub>2.5</sub> standard. On April 7, 2015, EPA designated Jefferson and Bullitt (partial) counties as “unclassifiable” due to insufficient data from the Louisville PM<sub>2.5</sub> monitors.<sup>1</sup> Since then, sufficient quality-assured ambient air monitoring data has been obtained and demonstrates that the area achieves the annual PM<sub>2.5</sub> NAAQS.

On February 8, 2018, the Louisville Metro Air Pollution Control District sent a letter to the Cabinet, requesting a submission to EPA for the Louisville, KY-IN area to be redesignated from “unclassifiable” to “unclassifiable/attainment” for the 2012 PM<sub>2.5</sub> NAAQS (Attachment A). In addition, the Cabinet is providing a copy of the AMP480 report that includes quality-assured 2014 - 2016 PM<sub>2.5</sub> design values for all monitors in the Louisville, KY-IN area. The quality-assured ambient monitoring data demonstrate that all monitors in the Louisville, KY-IN Combined Statistical Area, including the “unclassifiable” areas of Jefferson and Bullitt (partial) counties in Kentucky, meet the 2012 PM<sub>2.5</sub> NAAQS of 12 micrograms per cubic meter (µg/m<sup>3</sup>) (Attachment B).

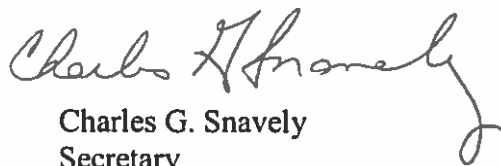
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<sup>1</sup> 80 FR 18537

Mr. Trey Glenn  
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In closing, the Cabinet respectfully requests that Environmental Protection Agency (EPA) redesignate Jefferson and Bullitt (partial) counties in Kentucky from "unclassifiable" to "unclassifiable/attainment" for the 2012 annual PM<sub>2.5</sub> standard. If you or your staff have any questions or comments concerning this matter, please contact Ms. Melissa Duff, Assistant Director, Division for Air Quality, at (502) 782-6597 or [melissa.duff@ky.gov](mailto:melissa.duff@ky.gov).

Sincerely,



Charles G. Snavely  
Secretary

Cc: Beverly Banister, Region 4 US EPA  
Lynorae Benjamin, Region 4 US EPA  
Scott Davis, Region 4 US EPA  
Keith Talley, LMAPCD  
Enclosures

# Attachment A



AIR POLLUTION CONTROL DISTRICT  
LOUISVILLE, KENTUCKY

GREG FISCHER  
MAYOR

KEITH H. TALLEY, SR.  
DIRECTOR

February 8, 2018

Mr. Sean Alteri, Director  
Division for Air Quality  
300 Sower Blvd, 2<sup>nd</sup> Floor  
Frankfort, KY 40601

Dear Mr. Alteri:

The Louisville Metro Air Pollution Control District requests that the Governor's designee submit this letter and attachment to the U.S. EPA in support of a request to redesignate the Louisville KY-IN area from unclassifiable to attainment/unclassifiable for the 2012 PM<sub>2.5</sub> National Ambient Air Quality Standard (NAAQS).

On January 15, 2015, the U.S. EPA initially designated Jefferson County and portions of Bullitt County, Kentucky as nonattainment for the 2012 PM<sub>2.5</sub>NAAQS of 12 µg/m<sup>3</sup>. This designation was based on ambient air quality data collected from 2011-2013 at a monitor in Clark County, Indiana, which showed a violation. 80 FR 2205, 2240; *Louisville, Kentucky-Indiana Area Designations for the 2012 Primary Annual PM<sub>2.5</sub> National Ambient Air Quality Standards Technical Support Document* at 31. U.S. EPA subsequently changed this designation on April 7, 2015, to unclassifiable based on invalid data from 2012-2014 from monitors located in Jefferson County, Kentucky, notwithstanding data which showed the Clark County, IN monitor to be in attainment during that same time period. 80 FR 18535, 18537, 18545.

All monitors in the Louisville KY-IN area now meet the 2012 PM<sub>2.5</sub> NAAQS of 12 µg/m<sup>3</sup>, based on complete, quality-assured data for 2014-2016 submitted to AQS. *See* Attachment 1. On April 28, 2017 the District certified complete, quality-assured PM<sub>2.5</sub> monitoring data for 2016. The attached data, reflecting design values for 2014-2016 for all monitors in the Louisville, KY-IN area from AQS, meets all requirements of 40 CFR Part 58.

The District appreciates your prompt consideration of this request. If you have any further questions or comments, please contact Byron Gary at (502) 574-7253 or [Byron.Gary@LouisvilleKy.gov](mailto:Byron.Gary@LouisvilleKy.gov).

Sincerely,

Keith Talley, Sr.



**Attachment 1**  
**2014-2016 PM<sub>2.5</sub> Design Values**  
**Louisville KY-IN Area**

<b>Site Name</b>	<b>Site ID</b>	<b>State</b>	<b>County</b>	<b>2014-2016 DV<sup>1</sup></b>
<b>Walnut St./Jefferson PFAU</b>	180190006	Indiana	Clark	10.6
<b>Charlestown</b>	180190008	Indiana	Clark	8.7
<b>New Albany Green Valley Elementary</b>	180431004	Indiana	Floyd	9.3
<b>Southwick</b>	211110043	Kentucky	Jefferson	10.4
<b>Watson Lane</b>	211110051	Kentucky	Jefferson	10.3
<b>Cannons Lane</b>	211110067	Kentucky	Jefferson	9.5
<b>Durrent Lane (Near Road)</b>	211110075	Kentucky	Jefferson	10.4

<sup>1</sup> Annual mean averaged over 3 years,  $\mu\text{g}/\text{m}^3$ .

# Attachment B

User ID: SLM

DESIGN VALUE REPORT

Mar. 8, 2018

Report Request ID: 1631685

Report Code: AMP480

GEOGRAPHIC SELECTIONS

Tribal Code	State	County	Site	Parameter	POC	City	AOCR	UAR	CBSA	CSA	EPA Region
18	019	0006									
18	019	0008									
18	043	1004									
21	111	0043									
21	111	0051									
21	111	0067									
21	111	0075									

PROTOCOL SELECTIONS

Parameter Classification	Parameter	Method	Duration
DESIGN VALUE	88101		

SELECTED OPTIONS

Option Type	Option Value
SINGLE EVENT PROCESSING	EXCLUDE REGIONALLY CONCURRED EVENTS
MERGE PDF FILES	YES
AGENCY ROLE	PQAO
USER SITE METADATA	STREET ADDRESS
QUARTERLY DATA IN WORKFILE	NO
WORKFILE DELIMITER	

DATE CRITERIA

Start Date	End Date
2014	2016

APPLICABLE STANDARDS

Standard Description
PM25 24-hour 2012
PM25 Annual 2012

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
PRELIMINARY DESIGN VALUE REPORT

Report Date: Mar. 8, 2018

- Notes:
1. Computed design values are a snapshot of the data at the time the report was run (may not be all data for year).
  2. Some PM<sub>2.5</sub> 24-hour DVs for incomplete data that are marked invalid here may be marked valid in the Official report due to additional analysis.
  3. Annual Values not meeting completeness criteria are marked with an asterisk (\*).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 AIR QUALITY SYSTEM  
 PRELIMINARY DESIGN VALUE REPORT

Report Date: Mar. 8, 2018

Pollutant: Site-Level PM2.5 - Local Conditions (88101) Design Value Year: 2014  
 Standard Units: Micrograms/cubic meter (LC) (105)  
 NAAQS Standard: PM25 24-hour 2012 / PM25 Annual 2012  
 Statistic: Annual Weighted Mean Level: 12  
 Statistic: Annual 98th Percentile Level: 35

State Name: Indiana

Site ID / STREET ADDRESS	2014				2013				2012				24-Hour				Annual		
	Cred. Days	Comp. Qtrtrs	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrtrs	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrtrs	98th Percntl	Wtd. Mean	Certf. Eval	Design Value	Valid Ind.		
18-019-0006 JEFFERSONVILLE PFAU- 719 WALNUT ST	304	3	26.2*	11.9*	Y	351	4	23.1	11.4	Y	328	4	24.1	11.9	Y	24	Y	11.8	N
18-019-0008 12500 St. Rd. 62-Charlestown State Park/ Indiana Armory	115	4	22.3	9.5	Y	121	4	22.5	9.5	Y	119	4	20.5	9.5	Y	22	Y	9.5	Y
18-043-1004 2230 GREEN VALLEY ROAD/GREEN VALLEY ELEMENTARY SCHOOL	119	4	23.5	10.2	Y	117	4	21.2	10.5	Y	120	4	19.7	10.4	Y	21	Y	10.4	Y

- Notes:
1. Computed design values are a snapshot of the data at the time the report was run (may not be all data for year).
  2. Some PM2.5 24-hour DVs for incomplete data that are marked invalid here may be marked valid in the Official report due to additional analysis.
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 AIR QUALITY SYSTEM  
 PRELIMINARY DESIGN VALUE REPORT

Report Date: Mar. 8, 2018

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 Standard Units: Micrograms/cubic meter (LC)(105)  
 NAAQS Standard: PM25 24-hour 2012 / PM25 Annual 2012  
 Statistic: Annual Weighted Mean Level: 12  
 State Name: Indiana

Site ID / STREET ADDRESS	2015				2014				2013										
	Cred. Days	Comp. Qtrrs	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrrs	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrrs	98th Percntl	Wtd. Mean	Certf. Eval	24-Hour Value	Design Valid Ind.	Annual Value	Design Valid Ind.
18-019-0006 JEFFERSONVILLE PFAU- 719 WALNUT ST	359	4	25.8	10.7	Y	304	3	26.2*	11.9*	Y	351	4	23.1	11.4	Y	25	Y	11.4	Y
18-019-0008 12500 St. Rd. 62-Charlestown State Park/ Indiana Armory	109	4	21.7	8.8	Y	115	4	22.3	9.5	Y	121	4	22.5	9.5	Y	22	Y	9.3	Y
18-043-1004 2230 GREEN VALLEY ROAD/GREEN VALLEY ELEMENTARY SCHOOL	121	4	21.5	9.3	Y	119	4	23.5	10.2	Y	117	4	21.2	10.5	Y	22	Y	10.0	Y

- Notes:**
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Pollutant: Site-Level PM2.5 - Local Conditions (88101) Design Value Year: 2016  
 Standard Units: Micrograms/cubic meter (LC) (105) REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.  
 NAAQS Standard: PM25 24-hour 2012 / PM25 Annual 2012

Statistic: Annual Weighted Mean Level: 12  
 Statistic: Annual 98th Percentile Level: 35  
 State Name: Indiana

Site ID / STREET ADDRESS	2016				2015				2014				Annual					
	Cred. Days	Comp. Qtrrs	98th Percntil	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrrs	98th Percntil	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrrs	98th Percntil	Wtd. Mean	Design Value	Valid Ind.		
18-019-0006 JEFFERSONVILLE PFAU- 719 WALNUT ST	363	4	19.8	9.3	Y	359	4	25.8	10.7	Y	304	3	26.2*	11.9*	24	Y	10.6	Y
18-019-0008 12500 St. Rd. 62-Charlestown State Park/ Indiana Armory	116	4	16.3	7.9	Y	109	4	21.7	8.8	Y	115	4	22.3	9.5	20	Y	8.7	Y
18-043-1004 2230 GREEN VALLEY ROAD/GREEN VALLEY ELEMENTARY SCHOOL	121	4	17.1	8.3	Y	121	4	21.5	9.3	Y	119	4	23.5	10.2	21	Y	9.3	Y

- Notes:**
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  2. Some PM2.5 24-hour DVs for incomplete data that are marked invalid here may be marked valid in the Official report due to additional analysis.
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Pollutant: Site-Level PM2.5 - Local Conditions (88101) Design Value Year: 2014  
 Standard Units: Micrograms/cubic meter (LC) (105) REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.  
 NAAQS Standard: PM25 24-hour 2012 / PM25 Annual 2012  
 Statistic: Annual Weighted Mean Level: 12  
 State Name: Kentucky  
 Statistic: Annual 98th Percentile Level: 35

Site ID / STREET ADDRESS	2014				2013				2012				Annual						
	Cred. Days	Comp. Qtrts	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrts	98th Percntl	Wtd. Mean	Certf. Eval	Cred. Days	Comp. Qtrts	98th Percntl	Wtd. Mean	Certf. Eval	Design Value	Valid Ind.		
21-111-0043 37TH & SOUTHERN AVENUE	295	4	24.4	11.2	Y	350	4	24.0	12.3	N	129	1	24.1*	12.3*	M	24	N	11.9	N
21-111-0051 7201 WATSON LN, WATSON LN ELEMENTARY SCH	351	4	26.2	12.2	Y	347	4	23.8	12.5	N	251	3	26.3*	13.3*	M	25	N	12.7	N
21-111-0067 2730 CANNONS LANE, BOWMAN FIELD	345	4	23.9	11.0	Y	349	4	22.5	11.1	N	351	4	23.2	12.3	M	23	Y	11.5	Y
21-111-0075 1517 Durrett Lane	116	4	26.0	12.0	Y	0	0	*	*	*	0	0	*	*	*	26	N	12.0	N

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Pollutant: Site-Level PM2.5 - Local Conditions (88101) Design Value Year: 2015  
 Standard Units: Micrograms/cubic meter (LC) (105)  
 NAAQS Standard: PM25 24-hour 2012 / PM25 Annual 2012  
 Statistic: Annual Weighted Mean Level: 12  
 State Name: Kentucky  
 Statistic: Annual 98th Percentile Level: 35

Site ID / STREET ADDRESS	2015				2014				2013				24-Hour				Annual		
	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Cert'd Eval	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Cert'd Eval	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Cert'd Eval	Design Value	Valid Ind.		
21-111-0043 37TH & SOUTHERN AVENUE	325	4	22.3	10.4	Y	295	4	24.4	11.2	Y	350	4	24.0	12.3	N	24	Y	11.3	Y
21-111-0051 7201 WATSON LN, WATSON LN ELEMENTARY SCH	330	4	22.9	10.4	Y	351	4	26.2	12.2	Y	347	4	23.8	12.5	N	24	Y	11.7	Y
21-111-0067 2730 CANNONS LANE, BOWMAN FIELD	349	4	21.7	9.5	Y	345	4	23.9	11.0	Y	349	4	22.5	11.1	N	23	Y	10.5	Y
21-111-0075 1517 Durrett Lane	115	4	22.1	10.0	Y	116	4	26.0	12.0	Y	0	0	*	*	*	24	N	11.0	N

Notes: 1. Computed design values are a snapshot of the data at the time the report was run (may not be all data for year).  
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 AIR QUALITY SYSTEM  
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	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Certf Eval	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Certf Eval	Cred. Days	Comp. Qtrts	98th Perctil	Wtd. Mean	Certf Eval	Design Value	Valid Ind.		
21-111-0043 37TH & SOUTHERN AVENUE	339	4	19.2	9.5	Y	325	4	22.3	10.4	Y	295	4	24.4	11.2	Y	22	Y	10.4	Y
21-111-0051 7201 WATSON LN, WATSON LN ELEMENTARY SCH	341	4	16.3	8.2	Y	330	4	22.9	10.4	Y	351	4	26.2	12.2	Y	22	Y	10.3	Y
21-111-0067 2730 CANNONS LANE, BOWMAN FIELD	344	4	18.5	8.2	Y	349	4	21.7	9.5	Y	345	4	23.9	11.0	Y	21	Y	9.5	Y
21-111-0075 1517 Durrett Lane	120	4	18.7	9.2	Y	115	4	22.1	10.0	Y	116	4	26.0	12.0	Y	22	Y	10.4	Y

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**CERTIFICATION EVALUATION AND CONCURRENCE FLAG MEANINGS**

FLAG	MEANING
M	The monitoring organization has revised data from this monitor since the most recent certification letter received from the state.
N	The certifying agency has submitted the certification letter and required summary reports, but the certifying agency and/or EPA has determined that issues regarding the quality of the ambient concentration data cannot be resolved due to data completeness, the lack of performed quality assurance checks or the results of uncertainty statistics shown in the AMP255 report or the certification and quality assurance report.
S	The certifying agency has submitted the certification letter and required summary reports. A value of "S" conveys no Regional assessment regarding data quality per se. This flag will remain until the Region provides an "N" or "Y" concurrence flag.
U	Uncertified. The certifying agency did not submit a required certification letter and summary reports for this monitor even though the due date has passed, or the state's certification letter specifically did not apply the certification to this monitor.
X	Certification is not required by 40 CFR 58.15 and no conditions apply to be the basis for assigning another flag value
Y	The certifying agency has submitted a certification letter, and EPA has no unresolved reservations about data quality (after reviewing the letter, the attached summary reports, the amount of quality assurance data submitted to AQS, the quality statistics, and the highest reported concentrations).

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