



Steven L. Beshear  
Governor

**Energy and Environment Cabinet**  
**Department for Environmental Protection**

Leonard K. Peters  
Secretary

Division for Air Quality  
200 Fair Oaks Lane, 1st Floor  
Frankfort, Kentucky 40601-1403  
air.ky.gov

February 26, 2015

Ms. Heather McTeer Toney  
Regional Administrator  
US EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth St, SW  
Atlanta, Georgia 30303-8960

Dear Ms. McTeer Toney:

The Kentucky Division for Air Quality greatly appreciates EPA's consideration of the most recent quality-assured, certified data to properly designate areas prior to the effective date established in the final rule, *Air Quality Designations for the 2012 Primary Annual Fine Particle (PM<sub>2.5</sub>) National Ambient Air Quality Standards (NAAQS)*, published in the *Federal Register* on January 15, 2015. In the final rule, EPA indicates that fine particulate (PM<sub>2.5</sub>) nonattainment areas will become effective April 15, 2015 (90 days after the *Federal Register* publication). However, EPA also requests states to submit complete, quality-assured, certified 2014 data by February 27, 2015, to properly designate areas for the 2012 PM<sub>2.5</sub> NAAQS.

On February 5, 2014, the Division submitted 2014 PM<sub>2.5</sub> ambient air monitoring data to EPA for certification. As shown in the Table 1, the most current monitoring data for all Kentucky counties indicate that the areas are attaining the annual fine particulate National Ambient Air Quality Standard. Additionally, Indiana and Ohio have certified and submitted ambient air monitoring data for PM<sub>2.5</sub> for their adjacent areas in their respective, adjoining states. The 2012-2014 PM<sub>2.5</sub> ambient air monitoring data for both Indiana and Ohio demonstrates that the 2012-2014 design values in the affected areas are below the 2012 standard (also provided in Table 1).

**Table 1: 2012-2014 Monitored Values**

<u>Kentucky</u>	<u>Monitor ID</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>3-Yr Design Value</u>
Campbell	210373002	9.7	9.6	9.7	9.6
<u>Indiana</u>		<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>3-Yr Design Value</u>
Clark	180190008	9.5	9.5	9.5	9.5
Clark	180190006	11.9	11.4	11.9	11.8
Floyd	180431004	10.4	10.5	10.2	10.4
<u>Ohio</u>		<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>3-Yr Design Value</u>
Butler	390170003	11.2	11.1	11.3	11.2
Butler	390170016	10.8	10.7	10.7	10.7
Butler	390170019	11.4	11.0	11.2	11.2
Hamilton	390610006	10.3	10.1	10.3	10.2
Hamilton	390610010	10.6	10.5	10.4	10.5
Hamilton	390610014	12.1	11.6	11.3	11.7
Hamilton	390610040	10.5	10.6	10.4	10.5
Hamilton	390610042	11.7	11.5	11.2	11.5

In the January 15, 2015 *Federal Register*, EPA revises 40 CFR 81.318 to designate areas as moderate nonattainment for Boone, Campbell and Kenton counties in northern Kentucky, as well as Bullitt and Jefferson counties in the Louisville area, for the 2012 PM<sub>2.5</sub> NAAQS. Consistent with EPA's process to evaluate complete, quality-assured, certified 2014 ambient air monitoring data, the Division requests that the following counties be removed from the list of nonattainment areas and be designated as attainment/unclassifiable, based on the 2012-2014 design values for PM<sub>2.5</sub> ambient air monitoring data: Boone, Bullitt, Campbell, Jefferson and Kenton Counties.

If you have any questions regarding this matter, please feel free to contact me, or Ms. Melissa Duff, Program Planning and Administration Branch Manager for the Division, at (502) 564-3999.

Sincerely,



Sean Alteri  
Director

Enclosure



Steven L. Beshear  
Governor

**Energy and Environment Cabinet  
Department for Environmental Protection**

Leonard K. Peters  
Secretary

Division for Air Quality  
200 Fair Oaks Lane, 1<sup>st</sup> Floor  
Frankfort, Kentucky 40601-1403  
air.ky.gov

February 5, 2015

Beverly Banister, Director  
Air, Pesticides and Toxics Management Division  
U.S. Environmental Protection Agency, Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

Dear Ms. Banister:

The Kentucky Division for Air Quality is respectfully submitting 2014 intermittent and continuous PM<sub>2.5</sub> ambient air monitoring data for certification. The data, for which certification is requested, is listed on the following attached AQS-generated reports:

- AMP600: intermittent PM<sub>2.5</sub> data obtained from FRM-type samplers (parameter code 88101)
- AMP450: continuous PM<sub>2.5</sub> data obtained from a FEM BAM monitor, granted an exclusion from NAAQS comparisons (parameter code 88101, POC 3)

I hereby certify that the ambient concentration data and the quality assurance data are completely submitted to AQS. I also certify that, to the best of my knowledge, the ambient air concentration data are accurate, taking into account the quality assurance findings.

If there are any questions or concerns, please contact Ms. Jennifer Miller, Environmental Scientist with our Technical Services Branch, at (502) 564-3999, extension 4050.

Sincerely,

Sean Alteri,  
Director

SA/jfm  
Enclosures

Ms. Beverly Banister

February 5, 2015

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c: Darren Palmer, USEPA Region 4

Daniel Garver, USEPA Region 4

Keith Goff, USEPA Region 4

User ID: FNX

CERTIFICATION EVALUATION AND CONCURRENCE

Report Request ID: 1293412

Report Code: AMP600

Feb. 5, 2015

GEOGRAPHIC SELECTIONS											
Tribal Code	State	County	Site	Parameter	POC	City	AQCR	UAR	CBSA	CSA	EPA Region

21

PROTOCOL SELECTIONS			
Parameter Classification	Parameter	Method	Duration

CRITERIA 88101

AGENCY SELECTIONS
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Kentucky Division For Air Quality

SELECTED OPTIONS	
Option Type	Option Value

MERGE PDF FILES

YES

AGENCY ROLE

CERTIFYING

DATE CRITERIA	
Start Date	End Date

2014

2014

# Data Evaluation and Concurrence Report Summary

Feb. 5, 2015

**Certification Year:** 2014

**Certifying Agency (CA):** Kentucky Division For Air Quality (0584)

**Pollutants in Report:**

<u>Parameter Name</u>	<u>Code</u>	<u>Monitors Evaluated</u>	<u>Monitors Recommended for Concurrence by AQS</u>	<u>Monitors NOT Recommended for Concurrence by AQS</u>
PM2.5 - Local Conditions	88101	18	18	0

**PQAOs in Report:**

<u>PQAO Name</u>	<u>PQAO Code</u>	<u>TSA Date</u>
Kentucky Division For Air Quality	0584	06/19/12

**Summary of 'N' flags for all pollutants:**

<u>Parameter</u>	<u>AQS Recommended</u>	<u>Cert. Agency Recommended</u>	<u>Reason for AQS Recommendation</u>
<u>PQAO Code</u>	<u>AQS Site-ID</u>	<u>POC</u>	<u>Flag</u>

**Signature of Monitoring Organization Representative:** Sean Altus

# Data Evaluation and Concurrence Report for Gaseous Pollutants

# Data Evaluation and Concurrence Report for Particulate Matter

**Certifying Year:** 2014

**Certifying Agency:** Kentucky Division For Air Quality (0584)

**Parameter:** PM2.5 - Local Conditions (88101)

**PQAO Name:** Kentucky Division For Air Quality (0584)

**Quality Assurance Project Plan Approval Date:** 04/21/2011

### Collocation Summary

Method	# Sites	# Sites Req	# Sites Collocated	% Collocated	CV Est	CV UB	Criteria Met?
118	9	1	2	100	3.46	3.81	Y
145	10	2	2	100	8.48	9.34	Y

### PEP Summary

# Methods	# Audited Methods	# PEP Required	# PEP Submitted	% Complete	Bias	Criteria Met?
2	0	8	3	37.5	-5.15	Y

### Monitors Summaries

AQS Site ID	POC	Method	Monitor Type	Routine Data (ug/m3)					Flow Rate Audit		Collocation		PEP PQAO Crit. Met	QAPP Appr.	Concurrence Flag				
				Mean	Min	Max	Exceed. Count	Outlier Count	% Complete	Bias	% Complete	% CV			% Complete	PQAO Crit. Met	AQS Rec Flag	CA Rec Flag	EPA Rec Flag
21-013-0002	1	118	SPM	9.00	2.7	22.6	0	0	100	-1.39	100			Y	Y	Y	Y	Y	S
21-019-0017	1	118	SLAMS	9.34	2.6	25.9	0	0	98	-0.52	100			Y	Y	Y	Y	Y	S
21-037-3002	1	145	SLAMS	9.63	2.5	25.6	0	0	96	+0.18	100			Y	Y	Y	Y	Y	S
21-043-0500	1	145	SLAMS	7.99	2.3	23.6	0	0	94	-0.50	100			Y	Y	Y	Y	Y	S
21-047-0006	1	145	SLAMS	10.11	2.4	27.2	0	0	87	-0.13	100			Y	Y	Y	Y	Y	S
21-059-0005	1	145	SLAMS	11.05	2.0	30.6	0	0	100	-0.59	100			Y	Y	Y	Y	Y	S
21-067-0012	1	145	SLAMS	9.48	2.3	23.7	0	0	95	-0.10	100			Y	Y	Y	Y	Y	S
21-093-0006	1	145	SLAMS	10.36	1.7	27.4	0	0	94	+0.38	100	11.23	100	Y	Y	Y	Y	Y	S
21-093-0006	2	145	SLAMS	9.50	1.7	22.0	0	0	100	+0.36	100			Y	Y	Y	Y	Y	S
21-101-0014	1	145	SLAMS	10.85	1.9	27.3	0	0	96	+0.50	100			Y	Y	Y	Y	Y	S
21-145-1024	1	145	SLAMS	10.43	2.0	24.9	0	0	97	+0.91	100			Y	Y	Y	Y	Y	S
21-151-0003	1	118	SLAMS	8.52	2.6	22.4	0	0	90	-1.09	100			Y	Y	Y	Y	Y	S
21-193-0003	1	118	SPM	8.40	2.1	16.5	0	0	96	-0.81	100			Y	Y	Y	Y	Y	S
21-195-0002	1	118	SLAMS	8.56	2.3	24.5	0	0	97	+0.45	100	3.87	100	Y	Y	Y	Y	Y	S
21-195-0002	2	118	SLAMS	8.11	2.2	18.7	0	0	100	-0.25	100			Y	Y	Y	Y	Y	S
21-199-0003	1	145	SPM	9.27	2.1	28.3	0	0	100	-0.69	100			Y	Y	Y	Y	Y	S
21-227-0009	1	145	SLAMS	9.42	2.8	25.1	0	0	97	-0.16	100	7.94	100	Y	Y	Y	Y	Y	S
21-227-0009	2	118	SLAMS	8.79	1.7	19.6	0	0	93	+0.10	100			Y	Y	Y	Y	Y	S

## Data Concurrence and Evaluation Report for Lead



User ID: FNX

QUICKLOOK CRITERIA PARAMETERS

Report Request ID: 1293413

Report Code: AMP450

Feb. 5, 2015

GEOGRAPHIC SELECTIONS

Tribal Code	State	County	Site	Parameter	POC	City	AQCR	UAR	CBSA	CSA	EPA Region
	21	195	0002	88101	3						

PROTOCOL SELECTIONS

Parameter Classification	Parameter	Method	Duration
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QUICK LOOK

SELECTED OPTIONS

Option Type	Option Value
WORKFILE DELIMITER	,
MERGE PDF FILES	YES
EVENTS PROCESSING	EXCLUDE REGIONALLY CONCURRED EVENTS
AGENCY ROLE	PQAO

SORT ORDER

Order	Column
1	PARAMETER_CODE
2	STATE_CODE
3	COUNTY_CODE
4	SITE_ID
5	POC
6	DATES
7	EDT_ID

DATE CRITERIA

Start Date	End Date
2014	2014

APPLICABLE STANDARDS

Standard Description
CO 1-hour 1971
CO 8-hour 1971
Lead 3-Month 2009
Lead 3-Month PM10 Surrogate 2009
NO2 1-hour
NO2 Annual 1971
Ozone 1-hour Daily 2005
Ozone 8-Hour 2008
PM10 24-hour 2006
PM25 24-hour 2013
PM25 Annual 2013
SO2 1-hour 2010
SO2 24-hour 1971
SO2 3-hour 1971
SO2 Annual 1971

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
QUICK LOOK REPORT (AMP450)

Feb. 5, 2015

EXCEPTIONAL DATA TYPES

EDT	DESCRIPTION
0	NO EVENTS
1	EVENTS EXCLUDED
2	EVENTS INCLUDED
5	EVENTS WITH CONCURRENCE EXCLUDED

Note: The \* indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 AIR QUALITY SYSTEM  
 QUICK LOOK REPORT (AMP450)

Feb. 5, 2015

PM2.5 - Local Conditions (88101)

Kentucky

Micrograms/cubic meter (LC) (105)

24-HOUR

SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	NUM	1ST	2ND	3RD	4TH	98TH	WTD	CERT	EDT
								DAYS	MAX	MAX	MAX	MAX	PERCENTILE	ARITH	and	
													VALUE	MEAN	EVAL	
21-195-0002	3	0584	Pikeville	Pike	KYTC DISTRICT OFFICE, 109 LORAIN STREET	2014	170	195	36.6	28.5	28.4	25.2	25.2	9.35*	S	0

Note: The \* indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
QUICK LOOK REPORT (AMP450)  
Lead (TSP) LC

Feb. 5, 2015

Note: These reported values do not reflect the combination of 14129 and 85129 and validation substitution tests utilized for Design Value Calculations

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
QUICK LOOK REPORT (AMP450 END)

Feb. 5, 2015

METHODS USED IN THIS REPORT

PARAMETER	METHOD CODE	COLLECTION METHOD	ANALYSIS METHOD
88101	170	Met One BAM-1020 Mass Monitor w/VSCC	Beta Attenuation

Note: The \* indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
QUICK LOOK REPORT (AMP450 END)

Feb. 5, 2015

PQAOS USED IN THIS REPORT

PQAO	AGENCY DESCRIPTION
0584	Kentucky Division For Air Quality

Note: The \* indicates that the mean does not satisfy summary criteria.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
AIR QUALITY SYSTEM  
QUICK LOOK REPORT (AMP450 END)

Feb. 5, 2015

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).

Note: The \* indicates that the mean does not satisfy summary criteria.