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August 3, 2011

Ms. Gwendolyn Keyes Fleming
Regional Administrator
U.S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303



RE: Revision to Recommendations for NO₂ Nonattainment Areas in Kentucky

Dear Ms. Fleming:

In accordance with Section 107 (d)(1)(A) of the Clean Air Act, states must submit to U.S. EPA, within one year following promulgation of a new or revised National Ambient Air Quality Standard, a list of all areas in the state, recommending designations for each as attainment, nonattainment, or unclassifiable with respect to a new or revised standard for a pollutant. On January 11, 2011, Kentucky submitted a recommendation letter to U.S. EPA for the revised nitrogen dioxide (NO₂) standard published in the *Federal Register* on January 22, 2010.

In response, U.S. EPA notified Kentucky in a letter dated June 28, 2011, of the intent to designate the entire state as unclassifiable/attainment using the boundaries of Kentucky as the classified area. The letter emphasized that Kentucky consider the implications to the Prevention of Significant Deterioration permitting program of having the entire state designated as opposed to smaller designated areas, thus allowing for management of air quality deterioration and economic growth.

At the time Kentucky submitted the recommendation letter, we were under the impression that a recommendation for "the rest of the state" would be based on individual counties and not the entire state of Kentucky as one boundary area. This letter is provided to further clarify those areas of the state that should be designated attainment or attainment/unclassifiable are recommended on a county per county boundary.

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The values of the 98th percentiles of the NO₂ monitors in Kentucky are listed in Attachment 1, and the average of the 98th percentile for all monitors is below the standard of 100 parts per billion. Therefore these counties in Kentucky comply with the standard and should be designated as attainment for the NO₂ standard, with the remainder of the counties designated as attainment/unclassifiable as specified in Attachment 2.

Your prompt attention to this letter is appreciated. If you have any questions or comments concerning this matter, please contact Andrea Smith at the Division for Air Quality at (502) 564-3999.

Sincerely yours,

A handwritten signature in black ink, appearing to read "L. K. Peters", written in a cursive style.

Leonard K. Peters
Secretary

Enclosures

cc: Beverly Banister
Scott Davis

Attachment 1: 98th Percentile of the NO₂ Monitors

Year	Site ID	City	County	98th Percentile
2007	21-019-0017	Ashland	Boyd	39.0
2008	21-019-0017	Ashland	Boyd	42.0
2009	21-019-0017	Ashland	Boyd	36.0
	3-year average			39.0
2007	21-037-3002	Highland Heights	Campbell	40.0
2008	21-037-3002	Highland Heights	Campbell	37.0
2009	21-037-3002	Highland Heights	Campbell	31.0
	3-year average			36.0
2007	21-059-0005	Owensboro	Daviess	36.0
2008	21-059-0005	Owensboro	Daviess	35.0
2009	21-059-0005	Owensboro	Daviess	35.0
	3-year average			35.3
2007	21-067-0012	Lexington	Fayette	56.0
2008	21-067-0012	Lexington	Fayette	49.0
2009	21-067-0012	Lexington	Fayette	44.0
	3-year average			49.7
2007	21-111-1021	Louisville	Jefferson	52.0
2008	21-111-1021	Louisville	Jefferson	56.0
2009	21-111-1021	Louisville	Jefferson	51.0
	3-year average			53.0
2007	21-145-1024	Paducah	McCracken	43.0
2008	21-145-1024	Paducah	McCracken	42.0
2009	21-145-1024	Paducah	McCracken	40.0
	3-year average			41.7

Attachment 2: NO2 Recommendations

County	Designation	County	Designation	County	Designation
Adair	Attainment/Unclassifiable	Carroll	Attainment/Unclassifiable	Grant	Attainment/Unclassifiable
Allen	Attainment/Unclassifiable	Carter	Attainment/Unclassifiable	Graves	Attainment/Unclassifiable
Anderson	Attainment/Unclassifiable	Casey	Attainment/Unclassifiable	Grayson	Attainment/Unclassifiable
Ballard	Attainment/Unclassifiable	Christian	Attainment/Unclassifiable	Green	Attainment/Unclassifiable
Barren	Attainment/Unclassifiable	Clark	Attainment/Unclassifiable	Greenup	Attainment/Unclassifiable
Bath	Attainment/Unclassifiable	Clay	Attainment/Unclassifiable	Hancock	Attainment/Unclassifiable
Bell	Attainment/Unclassifiable	Clinton	Attainment/Unclassifiable	Hardin	Attainment/Unclassifiable
Boone	Attainment/Unclassifiable	Crittenden	Attainment/Unclassifiable	Harlan	Attainment/Unclassifiable
Bourbon	Attainment/Unclassifiable	Cumberland	Attainment/Unclassifiable	Harrison	Attainment/Unclassifiable
Boyd	Attainment	Daviess	Attainment	Hart	Attainment/Unclassifiable
Boyle	Attainment/Unclassifiable	Edmonson	Attainment/Unclassifiable	Henderson	Attainment/Unclassifiable
Bracken	Attainment/Unclassifiable	Elliott	Attainment/Unclassifiable	Henry	Attainment/Unclassifiable
Breathitt	Attainment/Unclassifiable	Estill	Attainment/Unclassifiable	Hickman	Attainment/Unclassifiable
Breckinridge	Attainment/Unclassifiable	Fayette	Attainment	Hopkins	Attainment/Unclassifiable
Bullitt	Attainment/Unclassifiable	Fleming	Attainment/Unclassifiable	Jackson	Attainment/Unclassifiable
Butler	Attainment/Unclassifiable	Floyd	Attainment/Unclassifiable	Jefferson	Attainment
Caldwell	Attainment/Unclassifiable	Franklin	Attainment/Unclassifiable	Jessamine	Attainment/Unclassifiable
Calloway	Attainment/Unclassifiable	Fulton	Attainment/Unclassifiable	Johnson	Attainment/Unclassifiable
Campbell	Attainment	Gallatin	Attainment/Unclassifiable	Kenton	Attainment/Unclassifiable
Carlisle	Attainment/Unclassifiable	Garrard	Attainment/Unclassifiable	Knott	Attainment/Unclassifiable

County	Designation	County	Designation	County	Designation
Knox	Attainment/Unclassifiable	Mason	Attainment/Unclassifiable	Robertson	Attainment/Unclassifiable
Larue	Attainment/Unclassifiable	Meade	Attainment/Unclassifiable	Rockcastle	Attainment/Unclassifiable
Laurel	Attainment/Unclassifiable	Menifee	Attainment/Unclassifiable	Rowan	Attainment/Unclassifiable
Lawrence	Attainment/Unclassifiable	Mercer	Attainment/Unclassifiable	Russell	Attainment/Unclassifiable
Lee	Attainment/Unclassifiable	Metcalfe	Attainment/Unclassifiable	Scott	Attainment/Unclassifiable
Leslie	Attainment/Unclassifiable	Monroe	Attainment/Unclassifiable	Shelby	Attainment/Unclassifiable
Letcher	Attainment/Unclassifiable	Montgomery	Attainment/Unclassifiable	Simpson	Attainment/Unclassifiable
Lewis	Attainment/Unclassifiable	Morgan	Attainment/Unclassifiable	Spencer	Attainment/Unclassifiable
Lincoln	Attainment/Unclassifiable	Muhlenberg	Attainment/Unclassifiable	Taylor	Attainment/Unclassifiable
Livingston	Attainment/Unclassifiable	Nelson	Attainment/Unclassifiable	Todd	Attainment/Unclassifiable
Logan	Attainment/Unclassifiable	Nicholas	Attainment/Unclassifiable	Trigg	Attainment/Unclassifiable
Lyon	Attainment/Unclassifiable	Ohio	Attainment/Unclassifiable	Trimble	Attainment/Unclassifiable
McCracken	Attainment	Oldham	Attainment/Unclassifiable	Union	Attainment/Unclassifiable
McCreary	Attainment/Unclassifiable	Owen	Attainment/Unclassifiable	Warren	Attainment/Unclassifiable
McLean	Attainment/Unclassifiable	Owsley	Attainment/Unclassifiable	Washington	Attainment/Unclassifiable
Madison	Attainment/Unclassifiable	Pendleton	Attainment/Unclassifiable	Wayne	Attainment/Unclassifiable
Magoffin	Attainment/Unclassifiable	Perry	Attainment/Unclassifiable	Webster	Attainment/Unclassifiable
Marion	Attainment/Unclassifiable	Pike	Attainment/Unclassifiable	Whitley	Attainment/Unclassifiable
Marshall	Attainment/Unclassifiable	Powell	Attainment/Unclassifiable	Wolfe	Attainment/Unclassifiable
Martin	Attainment/Unclassifiable	Pulaski	Attainment/Unclassifiable	Woodford	Attainment/Unclassifiable