



**ENERGY AND ENVIRONMENT CABINET  
OFFICE OF THE SECRETARY**

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September 16, 2015

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

RE: Submission of additional information for Kentucky's recommendations relating to the 2010 1-hour SO<sub>2</sub> NAAQS

Dear Ms. McTeer Toney:

In accordance with Section 107(d)(1)(A) of the Clean Air Act (CAA), states must submit to U.S. EPA (EPA), within one year following promulgation of a new or revised National Ambient Air Quality Standard (NAAQS), a list of all areas in the state, recommending designations for each as attainment, nonattainment, or unclassifiable. In a letter dated March 28, 2011, I was informed that the proposed designation recommendations for Kentucky were due June 3, 2011, for the 1-hour NAAQS for sulfur dioxide (SO<sub>2</sub>) published in the Federal Register June 22, 2010 (75 FR 35520). On June 2, 2011, I provided EPA with recommended designations for all areas of the state relative to the revised SO<sub>2</sub> NAAQS.

In a letter dated March 20, 2015, Acting Assistant Administrator Janet McCabe updated Commissioner Bruce Scott on the status of U.S. EPA's progress in implementing the primary NAAQS for SO<sub>2</sub>. The letter detailed the agreement between EPA, the Sierra Club, and the Natural Resources Defense Council that was accepted as an enforceable order by the U.S. District Court for the Northern District of California. The court's order and the agreement direct EPA to complete designations in three additional rounds, with the first round due by July 2, 2016.

In the first additional round of area designations, EPA will designate two groups of areas: (1) areas that have newly monitored violations of the 2010 SO<sub>2</sub> NAAQS, and 2) areas that

contain any stationary source that according to the EPA's Air Markets Database either emitted more than 16,000 tons of SO<sub>2</sub> or emitted more than 2,600 tons of SO<sub>2</sub> and had an emission rate of at least 0.45 lbs SO<sub>2</sub>/mmbtu in 2012 and that has not been announced for retirement (as of March 2, 2015). The purpose of this letter is to submit updated area designation recommendations and supporting information no later than the September 18, 2015 deadline, as established in the court order.

As stated in its March 20, 2015 letter, EPA identified two electric generating sources as meeting the criteria established in the court order, DB Wilson Generating Station located in Ohio County and John S. Cooper Power Station located in Pulaski County. As requested by Kentucky's Division for Air Quality, the identified sources provided significant, technical information to characterize the air quality in the areas surrounding their sources.

In a memorandum dated March 20, 2015, from Stephen D. Page to the Regional Air Division Directors ("Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide NAAQS"), the EPA recommended that states use five factors in making designation recommendations: 1) ambient air quality data or dispersion modeling, 2) emissions and emissions-related data, 3) meteorology, 4) geography/topography, and 5) jurisdictional boundaries. Kentucky used these factors as well as the EPA's guidance on the use of source modeling as outlined in the SO<sub>2</sub> NAAQS Designations Modeling Technical Assistance Document (Modeling TAD).

In summary, the following modeled results of the areas' concentrations of SO<sub>2</sub>, which included the recommended factors set forth by the March 20, 2015 memorandum, indicate that the identified facilities are in compliance with the 1-hour SO<sub>2</sub> NAAQS:

<b>Facility</b>	<b>Location</b>	<b>Averaging Period</b>	<b>NAAQS (µg/m<sup>3</sup>)</b>	<b>Maximum Impact (µg/m<sup>3</sup>)</b>
D. B. Wilson Generating Station	Ohio County, KY	1-Hour	196	<b>186.5</b>
John S. Cooper Power Station	Pulaski County, KY	1-Hour	196	<b>173.1</b>

As a result of the information provided above and accompanying this submittal, Kentucky finds that the two facilities located within Ohio and Pulaski Counties are in

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compliance with the 2010 SO<sub>2</sub> NAAQS. Further, Kentucky recommends that the EPA designate these areas as attainment. Kentucky is including additional information regarding the compliance demonstration (copies of the modeling files and reports) to further support our recommendations. Modeling files and reports for both facilities are also available for download at the following URL:

<ftp://eec121321R2:5rdxCFT^7ygv@ftp.cot.ky.gov/EECDAQ121321/eecdaqJM/KYSO2DEMO>

Pursuant to 40 CFR 51.1204, the Division for Air Quality will establish federally-enforceable emission limitations through the source's title V permits, respectively, to ensure compliance with the 2010 SO<sub>2</sub> NAAQS. We look forward to continued dialogue with you and your staff as we work together to implement the 2010 SO<sub>2</sub> NAAQS. If you should have any questions or need additional information regarding the designations for the 2010 SO<sub>2</sub> NAAQS, please do not hesitate to contact me or Mr. Sean Alteri, Director for the Division for Air Quality at (502) 564-3999.

Sincerely yours,



Leonard K. Peters  
Secretary

LKP/mrw/bac