COMMONWEALTH OF KENTUCKY
OFFICE OF THE GOVERNOR

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December 7, 2007

Mr. James I. Palmer, Jr.
U. S. EPA, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303

Dear Mr. Palmer:

On June 15, 2007, you notified my office that proposed boundary designations under the new Particulate Matter ($PM_{2.5}$) 24-Hour Standard were due December 18, 2007.

I am especially concerned with EPA's ultimate decision on designating nonattainment areas under this 24-hour fine particulate standard. As clearly outlined in Kentucky's enclosed documentation, in many instances, individual monitors, in close proximity to others, are showing values slightly greater than the revised standard, which is indicative of a more localized impact. In those instances it would appear more appropriate to narrow the field of focus in order to control emissions which are actually contributing to the violation. With the upcoming anticipated regional emission reductions associated with the Clean Air Interstate Rules, which EPA's technical analysis has shown to contribute to declining PM2.5 levels, it would appear that this more narrow focus would allow for localized emission reductions.

Section 107 of the Clean Air Act requires governors of states, including Kentucky, to designate areas within their respective states as either attaining or not attaining the National Ambient Air Quality Standards. In order to comply with those provisions in the Act, I am submitting the following designation recommendations for Kentucky counties under the $PM_{2.5}$ 24-Hour standard. Pending the acceptance of the exceptional data exclusions submitted previously by the Louisville Metro Air Pollution Control District, Kentucky's position is that no counties in Kentucky should be designated nonattainment under the new 24 -hour fine particulate standard. Supporting documentation, based on EPA's guidance criteria, is enclosed.

If you have any questions or comments concerning this matter, please contact John S. Lyons at the Division for Air Quality at (502) 573-3382.

Sincerely,

Ernie Fletcher

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