



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 15 2019

Ms. Melissa Duff, Director
Kentucky Division for Air Quality
Kentucky Department for
Environmental Protection
300 Sower Boulevard, 2nd Floor
Frankfort, Kentucky 40601-6571

Dear Ms. Duff:

This correspondence is to provide you with the final assessment of the Kentucky Department for Environmental Protection, Division of Air Quality (DAQ) title V program based on the evaluation conducted August 21-22, 2019, by the U.S. Environmental Protection Agency, Region 4.

The purpose of our visit was to evaluate the status and the ability of the DAQ to carry out its duties and responsibilities required to effectively run the title V program and to also determine how our office can best assist the DAQ in meeting this commitment. The program evaluation consisted of a review of title V revenue and expenses, permit issuance, staffing, public participation, and selected permit files. Information was gathered by survey, interviews, and file and document review.

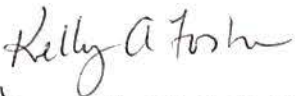
Based on this latest evaluation, the EPA believes that the DAQ is continuing to implement the title V program in accordance with the requirements set forth in 40 CFR part 70. The most notable indicator of your program's effectiveness is the very low backlog with respect to permit issuance. Your staff has reported that the TEMPO database system has been an excellent tool that aids in ensuring management and staff are able to effectively track impending due dates for title V actions, such as renewal permits and synthetic minor permits. The only concern we noted is a high staff turnover rate in the program and the self-reported difficulty in obtaining qualified applicants to fill vacancies. In the past 12 months, the DAQ has experienced a 36% staff turnover rate.

As discussed in the closeout meeting, the EPA remains committed to meeting the DAQ's request for information regarding environmental justice training opportunities and enhanced outreach opportunities. In addition, we will provide the DAQ with additional information on the EPA's Electronic Permitting System (EPS). EPS, an online database system designed to facilitate information exchange between the EPA and permit authorities, will be available to states early next year.

I would like to thank you and your staff for the cooperation and hospitality that was shown throughout this process. If you have any questions or comments regarding this evaluation, please do not hesitate to

contact me at (404) 562-9065 or have your staff contact Randy Terry or Art Hofmeister of my staff at (404) 562-9032 or (404) 562-9115, respectively.

Sincerely,


for
Kenneth L. Mitchell, Ph.D.
Acting Director
Air and Radiation Division