

K4-09-001-6453-RA

Julie Moody
Control to ADEM

ONIS "TREY" GLENN, III
DIRECTOR

ADEM

Alabama Department of Environmental Management
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BOB RILEY
GOVERNOR

October 26, 2009

U.S. EPA REGION 4
OFFICE OF
REGIONAL ADMINISTRATOR
2009 OCT 29 A 11:46

Mr. A. Stanley Meiburg
Acting Regional Administrator, USEPA Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

Re: Request to Classify Potential Alabama Lead Nonattainment Area to Unclassifiable

Dear Mr. Meiburg:

On September 30, 2009, the Alabama Department of Environmental Management provided EPA input regarding the extent of potential nonattainment areas in Alabama for the new Lead National Ambient Air Quality Standard (NAAQS). This input was based on monitoring data collected from 2005-2008. This monitoring data, along with modeling output, indicated that only a small portion of Pike County, Alabama, does not meet the new lead NAAQS.

After submitting this input, the Department became aware of an area in Florida that had a similar situation to that of Pike County, Alabama (in that there is only one significant lead source contributing to the elevated readings). The regulatory agencies in that area of Florida have requested that EPA designate the area as "unclassifiable." Based on the similarities between the areas in Alabama and Florida, the Department requests that the portion of Pike County, Alabama, in question also be designated as "unclassifiable."

The Department has met with the source in Pike County to discuss possible mitigation measures for achieving compliance with the new lead NAAQS. The source has shown willingness to enclose the processes at the facility to abate lead emissions. This is the same measure to be used by the Florida facility discussed above. This method of reducing lead emissions has proven successful at other similar facilities. If these or similar measures are put into place in Pike County, we feel that ambient lead concentrations in the area will be greatly reduced and the new lead NAAQS can be attained.

Thank you for considering our request for an "unclassifiable" designation for the new lead NAAQS in the portion of Pike County, Alabama, identified in our previous submittal from September 2009. ~~If our request for an "unclassifiable" designation for this area is denied or is proven unfeasible, we request a radius around the source to be designated as nonattainment as submitted by ADEM in September, 2009.~~

Birmingham Branch
110 Vulcan Road
Birmingham, AL 35209-4702
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(205) 941-1603 (Fax)

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2715 Sandlin Road, S.W.
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Mobile Branch
2204 Perimeter Road
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4171 Commanders Drive
Mobile, AL 36615-1421
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Mr. Stanley Meiburg

10/26/2009

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Should you require any additional information, please contact Mr. Ron Gore of my staff at 334-271-7868.

Sincerely,

A handwritten signature in black ink, appearing to read "Onis 'Trey' Glenn, III". The signature is stylized with large, sweeping loops and a prominent initial "O".

Onis "Trey" Glenn, III
Director

OTG/RWG/ghe