

February 3, 2015

Karl Brooks, Administrator  
USEPA, Region VII  
11201 Renner Boulevard  
Lenexa, KS 66219

RE: State Implementation Plan (SIP) Revision for Attainment Demonstration of the 2008 National Ambient Air Quality Standard (NAAQS) for Lead in Kansas

Dear Mr. Brooks:

This letter certifies that the State of Kansas hereby adopts and issues the attached 2008 Lead NAAQS SIP Revision for Attainment Demonstration, effective February 3, 2015. The Kansas Department of Health and Environment (KDHE), Bureau of Air (BOA) presents this lead standard attainment demonstration for approval by EPA pursuant to the Clean Air Act (CAA) Section 191(a) and to CAA Section 172(c). The air quality control strategies and contingency plans for the Salina Exide Battery Manufacturing Facility nonattainment area project lead emission reductions to meet the federal standard of 0.15 micrograms per cubic meter ( $\mu\text{g}/\text{m}^3$ ) of airborne lead in Saline County by December 2016.

This plan demonstrates attainment of the 2008 Lead NAAQS using air dispersion modeling of a control strategy that includes process and work practice modifications, emission limitations, building enclosure projects, expansion of negative pressure and particle capture ventilation systems, and fugitive dust reduction at the Exide plant site. These methods, including a construction permit, satisfy the mandated elements of CAA Section 172(c) for reasonably available control measures and control technology (RACM/RACT) analysis and reasonable further progress (RFP).

A notice of public hearing with required comment period was published for the Kansas 2008 Lead SIP NAAQS Revision in the July 31, 2014 Kansas Register and local newspapers; posted at KDHE District Offices and the KDHE website; and submitted to EPA Region 7. KDHE received no requests for a public hearing so the tentatively scheduled September 3rd hearing was cancelled after 30-day notification period. One comment was received from Exide Technologies to which KDHE responded as noted in Appendix D.

On August 18, 2014, KDHE issued an Air Emission Source Construction Permit C-12206 requiring Exide to develop a Contingency Measures Compliance Plan that was public noticed, separately, on November 20, 2014. After no hearing requests or comments were received, warranting no public hearing or comment response, KDHE incorporated this compliance plan into the 2008 Lead SIP Revision as Appendix F.

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2008 Lead NAAQS SIP Revision with  
Kansas Attainment Demonstration

Please refer to the attached Kansas plan documents that demonstrate attainment of the 2008 Lead NAAQS, as required by December 2016. KDHE e-mailed an electronic copy in exact duplicate of the enclosed Lead SIP Revision package to EPA Region 7, today.

Should you have questions or require further information, please contact Miles Stotts, KDHE Bureau of Air, Monitoring and Planning section at (785) 296-1615 or [mstotts@kdheks.gov](mailto:mstotts@kdheks.gov).

Sincerely,



Susan Mosier, MD, MBA  
Acting Secretary/State Health Officer

SM:pmg

Enclosure: 2008 Lead NAAQS SIP Revision with  
Kansas Attainment Demonstration

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