



Division of Air Pollution Control

Response to Comments

Revised Redesignation Request and Maintenance Plan

For the 1997 8-Hour Ozone Standard for the Steubenville-Weirton Area

Agency Contact for this Package

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Ohio EPA held a public hearing in Columbus, OH on March 4, 2013, regarding the revised Maintenance Plan for the former Steubenville-Weirton Ozone Nonattainment Area. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on March 4, 2013. Ohio EPA reviewed and considered all comments received during the public comment period.

By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

The name of the commenter follows the comment in parentheses.

Comment 1: This 2013 update is based upon a 2006 original document. The narrative introduction should explain why the document is being updated (e.g., inter alia, to update the on-road (highway) emission estimates and Motor Vehicle Emission Budgets (MVEBs) using the most recent EPA approved software, MOVES). The narrative could benefit from general polishing and refreshing, including discussion of fundamental points raised below. (**William Durham- West Virginia Division of Air Quality**)

Response 1: Ohio EPA will be adding a footnote to the title page explaining the purpose of the revision. Ohio EPA included updates to the narrative throughout this document to reflect the changes regarding the use of the new MOVES model. Where necessary, based on comments below, Ohio EPA has incorporated additional clarification.

Comment 2: Any discussions related to the West Virginia MVEB's and Safety Margins should clearly reference the most recent EPA approved WV 1997 8-hour ozone budgets [see 76, Federal Register 56975, September 15, 2011; Weirton area summarized on page 56978; file attached in PDF]. Such discussions should clearly state that nothing in the Ohio proposal will change any of the EPA approved WV MVEB's or Safety Margins. **(William Durham- West Virginia Division of Air Quality)**

Response 2: Ohio EPA has updated Table 7, the MVEBs, using those budgets established for the WV portion of this area in the September 15, 2011 Federal Register. The footnote has also been clarified to describe the basis of West Virginia's MVEBs. Subsequent tables and narrative have also been updated to reflect this change.

Comment 3: For example, though the title of Table 7 refers to Jefferson County (OH) MVEBs, the table also displays values for Brooke and Hancock (WV), which are incorrect and could mislead readers into thinking that the WV MVEBs have been, or are being, changed. This is absolutely NOT the case. **(William Durham- West Virginia Division of Air Quality)**

Response 3: Please see response to comment 2

Comment 4: The same concern applies to Table 9, which displays WV on-road emission estimates, then shows 15% increases as the resulting MVEBs (via asterisk-referenced text). Again, while the on-road emission estimates may be correct as now calculated using MOVES, the 2009 Interim and 2018 Maintenance values that have been flagged with asterisks are NOT the EPA approved MVEBs. The text should clearly state that the displayed values are shown ONLY for informational purposes and the EPA approved MVEBs should be shown in the document (this could be done in the narrative itself, in a separate table, or as a footnote). **(William Durham- West Virginia Division of Air Quality)**

Response 4: Please see response to comment 2

Comment 5: Table 10 & Table 12 should then be revised to show the correct WV values and resultant total safety margins.

The EPA approved values for WV total emissions [based upon augmented MOBILE6.2 on-road (highway) emission estimates,

NOT MOVES; see 76 FR at 56978, Table 8 - portion labeled Revised Total Emissions in the Revised Maintenance Plan (Tons/Day)] are:

	2004	2009	2018	
VOC:	13.5	13.4	13.4	tons per summer day
NOx:	18.2	18.0	17.9	tons per summer day (William Durham- West Virginia Division of Air Quality)

Response 5: Please see response to comment 2

Comment 6: We suggest that a more comprehensive explanation of “safety margin” would help clarify its meaning.

The Transportation Conformity Rule (40 CFR 93.101) defines *Safety margin* as:

“[t]he amount by which the total projected emissions from all sources of a given pollutant are less than the total emissions that would satisfy the applicable requirement for reasonable further progress, attainment, or maintenance” (emphasis added).

To assure maintenance, the 2009 total emission estimates AND the 2018 total emission estimates, respectively, must be less than the 2004 maintenance plan base year total emissions (for a given pollutant/precursor). Thus, in the context of this maintenance plan, there are actually four safety margins:

2009 NOx; 2009 VOC; 2018 NOx; and 2018 VOC.

(Arguably, one could say there are a total of eight safety margins for the entire former nonattainment area, because the Ohio and West Virginia respective SIPs establish separate MVEBs for each state, with distinct resulting safety margins). These safety margins are calculated by subtracting the 2009 total emissions (for a given pollutant) and the 2018 total emissions (for a given pollutant), respectively, from the 2004 attainment year total emissions (for a given pollutant). We may refer to the results for a given pollutant/precursor as the *2009 safety margin* and the *2018 safety margin*, respectively. Portions of the original safety margins may be reallocated to the MVEBs as long as adequate margins remain to ensure maintenance.

It is important to consider that transportation planning organizations typically develop a twenty year Long Range Transportation Plan

(LRTP) while the initial air quality maintenance plan only lasts for ten years. Under the conformity rule, the last year of the LRTP must be tested against the MVEBs established for the last year of the maintenance plan. Therefore, future transportation conformity determinations will not only be made for the specific years contained in the maintenance plans but also for horizon years contained in the LRTP, which now may extend to the year 2040. That is, the future expected highway emissions, including growth, in 2040 will be compared against the 2018 MVEBs. Therefore, reallocation of appropriate portions of the safety margins into the respective MVEBs helps to assure future positive transportation conformity determinations while preserving good air quality. **(William Durham- West Virginia Division of Air Quality)**

Response 6: Ohio EPA has added additional clarification where necessary to explain the origin of West Virginia's safety margin. Beyond that, Ohio EPA is not updating additional language in this originally approved submittal. The purpose of this submittal is to revise the previously approved safety margin.

Comment 7: We concur with Ohio EPA, that there are adequate remaining safety margins to assure maintenance for the 1997 8-hour ozone standard. **(William Durham- West Virginia Division of Air Quality)**

Response 7: Thank you.