



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

AUG 11 2015

Ms. Susan Hedman
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Redesignation Request and Maintenance Plan for the Ohio Portion of the Campbell-Clermont KY-OH 2010 Sulfur Dioxide National Ambient Air Quality Standard Nonattainment Area

Dear Administrator Hedman:

On August 15, 2013, U.S. EPA published (78 FR 47191) the initial sulfur dioxide (SO₂) nonattainment area designations for the 1-hour SO₂ national ambient air quality standard (NAAQS) across the country (effective October 4, 2013). Four areas of Ohio were designated nonattainment. I am writing to formally request a redesignation to attainment of the Ohio portion (Pierce Township) of the Campbell-Clermont KY-OH nonattainment area. The enclosed submittal combines the redesignation request and the required maintenance plan for this area.

Monitoring of existing air quality indicates that the 2010 NAAQS for SO₂ has been attained throughout this area based on 2012-2014 air quality data. The nonattainment area was comprised of one significant source of SO₂ emissions, the Walter C. Beckjord power plant. The Walter C. Beckjord facility permanently ceased operations as of September 1, 2014 and since that time SO₂ air monitoring data has shown a significant decline. Ohio's analyses indicate that Walter C. Beckjord emissions were the cause of nonattainment, and that with the permanent shutdown of this facility maintenance of the NAAQS will be ensured indefinitely into the future even when taking into consideration other sources of SO₂ emissions within the vicinity of the nonattainment borders.

In accordance with U.S. EPA's March 20, 2015 memorandum entitled "Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard", Ohio EPA is requesting this area be redesignated to "attainment" and not "unclassifiable" or "unclassifiable/attainment." Ohio EPA has provided more than sufficient evidence that violations are not occurring in the area since the shutdown of Walter C. Beckjord, no other significant sources exist in the within the area boundary

that may contribute to a violation, and that emission sources outside of the boundary will not contribute to monitored or modeled violations in the area.

Ohio EPA notified the public of the draft and the opportunity to provide comments on March 12, 2015. The public hearing for this package was held on April 16, 2015 in Cincinnati, Ohio. Included in this submittal are comments received, testimony that was provided, and Ohio EPA's response to those comments.

This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is available at <http://www.epa.ohio.gov/dapc/SIP/so2.aspx> under the heading "Redesignations and Maintenance Plans."

If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Craig Butler
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosure