



State of Ohio Environmental Protection Agency

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Mary Gade
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd. R-19J
Chicago, Illinois 60604-3507

Re: State Implementation Plan for eight hour ozone in the Cleveland-Akron-Lorain, OH area

Dear Administrator Gade:

I am writing to submit The Ohio Environmental Protection Agency (Ohio EPA) plan for attaining the eight-hour ozone standard in the Cleveland-Akron-Lorain, OH nonattainment area. This area was designated as 'moderate' under provisions contained in the Clean Air Act (CAA), Subpart 2 as interpreted under the implementation rule for eight-hour ozone, which was vacated on December 22, 2006, by the U.S. Court of Appeals for the District of Columbus Circuit court. As encouraged by U.S. EPA, Ohio has moved forward with developing this plan in order to meet general CAA requirements to submit a plan within three years of the effective designation date of June 15, 2004 (69 FR 23858).

This submittal includes an attainment demonstration and identifies the rules deemed necessary to attain the air quality standard by June 15, 2010. This current demonstration is based on air quality modeling using a 2002 base year inventory and a 2002 ozone design value which was heavily influenced by the extreme 2002 ozone season. In conjunction with the other states in the Midwest Regional Planning Organization, additional air quality modeling is ongoing which is based on a 2005 base year inventory and an updated base year design value. This submittal will be updated with this additional technical support when it becomes available.

This package is still undergoing public review. A public hearing on this package is scheduled for July 24, 2007. A follow-up submittal will be forwarded following the completion of this process. In the meantime, we believe that U.S. EPA can begin the review of certain components of this package, such as the rules addressing Architectural and Industrial Maintenance Coatings and Consumer Products as well as the 2002 and 2005 inventories and the demonstration of reasonable further progress.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

A specific component of this submittal that Ohio EPA does not want U.S. EPA to act on is the mobile source conformity budget for this area. The latest network information and planning assumptions will be included in the 2005 based modeling package and the mobile source information contained in that submittal should serve as the basis for the mobile source budgets.

The 15 percent rate of progress (ROP) portion of this package consists of two components. Ohio falls under 'Situation I' in the summary included in the August 15, 2006, memorandum from William Harnett to Regional Air Division Directors detailing the ROP requirements for various area types. The original 15 percent plan for Cleveland-Akron-Lorain, OH area was submitted to U.S. EPA as part of Ohio's response to the post 1990 CAA requirements. This submittal was not acted on by U.S. EPA due to the redesignation of this area to attainment on May 7, 1996 (61 FR 20458). The components of this RFP package have been implemented and U.S. EPA has indicated that it would satisfy the same requirement under the eight-hour implementation rule. Ohio EPA is requesting that the original one-hour 15 percent ROP plan be approved. In addition, the new requirement for 15 percent reductions of VOC and/or NOx from the current base year as part of the eight-hour implementation rule has been included as part of this package and can be acted on.

As required, information documenting both the 2002 and 2005 emissions inventories is included in this package. While the components of these inventories have been previously supplied, the packages had not undergone public review and had not been officially submitted as a state implementation plan (SIP) package. The scheduled public hearing will address both emissions inventories.

The air quality modeling associated with this submittal utilizes a 2002 base year emission inventory and design values indicates, with the proposed additional controls in place, the area would not reach attainment by June 15, 2010. The weight of evidence, though, indicates that air quality trends are on schedule to attain by the required date. The 2004-2006 design value at the worst case monitor in the area indicates that the area has improved to 86 ppb. While this is not final or conclusive, it is strong evidence that the 2002 base year modeling is overly conservative. It is anticipated that the 2005 based air quality modeling analysis will provide more reasonable results. It is still possible that the 2005 based modeling and 2007 air quality data could indicate that additional controls above those already proposed will be necessary to attain the standard. Ohio EPA is still committed to implement reasonable controls necessary to attain the standard.

Ohio EPA is also identifying voluntary diesel emission reduction programs such as truck stop electrification and diesel retrofits. Both programs will be brought into the SIP process. While this work is ongoing and will provide air quality benefits

related to ozone, the process of identification, quantification and verification will take time and will be incorporated into the PM2.5 SIP submittal in April 2008.

I have been encouraged by the cooperation and willingness of our staffs to work together to address this significant milestone. If you have any questions concerning this submittal, please feel free to contact Bob Hodanbosi, Chief of the Division of Air Pollution Control (614) 644-2270.

Sincerely

A handwritten signature in cursive script, appearing to read "Chris Korleski".

Chris Korleski
Director