



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

JUL 16 2009

Certified Mail

Mr. Bharat Mathur
Acting Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: State Implementation Plan revision for the fine particulate (PM_{2.5}) NAAQS
for the State of Ohio

Dear Mr. Mathur:

I am writing to submit the Ohio Environmental Protection Agency (Ohio EPA) plan for attaining and maintaining the annual fine particulate (PM_{2.5}) NAAQS in all of Ohio's nonattainment areas. The nonattainment areas for the 1997 PM_{2.5} NAAQS were designated as such in the January 5, 2005 Federal Register [70 FR 944], effective April 5, 2005.

This submittal includes a demonstration of attainment of the air quality standards by April, 2010. This current demonstration is based on air quality modeling using a 2005 base year emission inventory and "weight-of-evidence" evaluations.

This package will undergo public review, and a follow-up submittal will be forwarded following the completion of that process. In the meantime, we believe that U.S. EPA can review the components of this package.

The air quality modeling associated with this submittal, which includes all the proposed additional controls in place (i.e., "on-the-books" controls), indicates that only Cuyahoga County in the Cleveland area possibly will not reach attainment by April, 2010. However, the air quality modeling does not provide a complete picture of future air quality. Ohio EPA believes the proper approach to demonstrate attainment in the whole State (including the highest reading monitor in Cuyahoga County) should be a multifaceted strategy based upon weight-of-evidence evaluations.

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

Bharat Mathur

Re: State Implementation Plan revision for the fine particulate (PM_{2.5}) NAAQS for the
State of Ohio

Page 2

In general, the components for the attainment demonstration strategy for PM_{2.5} are implementation of national, State, and local controls. National controls and certain State rules are considered "on-the-books" controls and are already accounted for in the results of the technical analysis performed by the Midwest Regional Planning Organization (LADCO). Additional emission reductions due to local control strategies have not been incorporated into LADCO's analysis. Among the local control strategies are mobile source controls, enforcement efforts, and plant closures and changes in operations that will help reduce the PM_{2.5} levels, especially in Cuyahoga County.

Over the next two years, several mobile diesel reduction projects will take place in all of Ohio's nonattainment areas. Ohio's Diesel Emission Reduction Grant Program (DERG), conceived in Ohio's budget bill H.B. 66, earmarked \$19.8 million over the biennium to reduce diesel emissions. The DERG program is available for all public and private diesel engine fleets that will operate in Ohio's nonattainment areas at least 65% of the time. The first round of grants is expected to be awarded by July, 2008.

U.S. EPA has identified violations at the Mittal Steel plant located in Cuyahoga County, a few miles from the high reading monitor (St. Tikhon monitor). The violations centered mostly on increases in production that occurred without proper New Source Review (and the associated permitting and additional control of emissions). The increase in production capacity also increased emissions of PM and SO₂. U.S. EPA's current schedule is to have agreement with the company regarding injunctive relief by the end of this year (2008) and to have the Consent Decree finalized in 2009. U.S. EPA has stated that they expect to see significant PM_{2.5} reductions as a result of the injunctive relief.

As part of its plan to improve its profitability, Ford Motor Company has decided to shut down its Cleveland Casting Plant (CCP). The plant will phase out its operations until it completely shuts down at the end of 2010. The CCP is located approximately 8.5 miles away from the highest PM_{2.5} reading monitor (St. Tikhon monitor). The production ramp down leading to the shutdown of CCP in 2010 will result in substantial particulate emissions reductions.

Ohio EPA believes that after looking at the emissions reductions that will occur as a result of federal and State rules, other local control measures, trends in ambient monitoring data, as well as the air quality modeling, the weight-of-evidence allows us to conclude that Ohio will be able to attain and maintain the PM_{2.5} NAAQS throughout the State by April, 2010.

Bharat Mathur

Re: State Implementation Plan revision for the fine particulate (PM_{2.5}) NAAQS for the
State of Ohio

Page 3

I have been encouraged by the cooperation and willingness of our staffs to work together to address Ohio's PM_{2.5} nonattainment problems. If you have any questions concerning this submittal, please feel free to contact Bob Hodanbosi, Chief of the Division of Air Pollution Control at (614) 644-2270.

Sincerely



Chris Korleski
Director

c: Cheryl L. Newton, USEPA, Region 5
Bob Hodanbosi, DAPC
Jim Orlemann, DAPC
Richard Nemeth, Cleveland DAQ
Howard R. Maier, NOACA
Carolina Prado, DAPC

Enclosures