REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE PARTIAL LOGAN COUNTY, OH ANNUAL LEAD NONATTAINMENT AREA

Logan County,
Ohio

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Division of Air Pollution Control

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CHAPTER ONE

Introduction

The Clean Air Act (CAA), as amended, requires each State with areas failing to meet the annual lead National Ambient Air Quality Standards (NAAQS) to develop State Implementation Plans (SIPs) to expeditiously attain and maintain the standards. The United States Environmental Protection Agency (U.S. EPA) revised the NAAQS for lead on November 12, 2008 (73 FR 66964). It replaced the existing annual lead standard of 1.5 micrograms per cubic meter ($\mu g/m^3$) with a lower annual standard set at 0.15 $\mu g/m^3$. The new lead standard is measured as a rolling three-month average (not to be exceeded) of the monthly mean concentrations, which is evaluated over a three-year period.

On November 22, 2010, U.S. EPA promulgated the initial lead nonattainment areas designations for the lead standard, which became effective on December 31, 2010. Section 191 of the CAA Amendments require states with lead nonattainment areas to submit a plan within eighteen months of the effective date of the designations (November 22, 2008) detailing how the lead standard will be attained by December 31, 2015. However, for this area, Ohio attained the standard prior to the date this attainment demonstration was required (June 30, 2012); therefore, the requirement to submit an attainment demonstration is waived. Ohio EPA submitted a clean data request to U.S. EPA on May 14, 2012 and a revised request on April 19, 2013 so that U.S. EPA could formally acknowledge attainment of the area. Regardless of any clean data determination by U.S. EPA, states must still submit redesignation requests and maintenance plans in order for any area to officially be redesignated back to attainment. This submittal satisfies that requirement.

Section 107(d)(3)(E) of the CAA allows states to request nonattainment areas to be redesignated to attainment provided certain criteria are met. The following are the criteria that must be met in order for an area to be redesignated from nonattainment to attainment:

i) A determination that the area has attained the lead standard.
ii) An approved State Implementation Plan (SIP) for the area under Section 110(k).
iii) A determination that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting

from implementation of the SIP and other federal requirements.

iv) A fully approved maintenance plan under Section 175(A).

v) A determination that all Section 110 and Part D requirements have been met.

This document addresses each of these requirements, and provides additional information to support continued compliance with the annual lead standard.

Geographical Description and Background

The current partial Logan County nonattainment area is located in just west of central Ohio and includes a portion of the city of Bellefontaine and an area surrounding the violating monitor located near the facility Daido[1]. This area is shown in Figure 1 under Chapter Three.

Daido was a producer of bearing sleeves for the automotive industry. In June of 2009, the Daido facility permanently shutdown all lead operations.

This document is intended to support Ohio's request that the partial Logan County nonattainment area be redesignated from nonattainment to attainment for the annual lead standard.

Status of Air Quality

Lead complete quality-assured ambient air quality monitoring data for the most recent three (3) years, 2010 through 2012, demonstrate that the air quality has met the NAAQS for the annual lead standard in this nonattainment area. The NAAQS attainment, accompanied by decreases in emission levels discussed in Chapter Four, supports a redesignation to attainment for the partial Logan County area based on the requirements in Section 107(d)(3)(E) of the CAA as amended.

[1] This area includes sections 27, 28, 33 and 34 of Lake Township

CHAPTER TWO

Requirements for Redesignation

U.S. EPA has published detailed guidance in a document entitled *Procedures for Processing Requests to Redesignate Areas to Attainment* (redesignation guidance), issued September 4, 1992, to Regional Air Directors. The redesignation request and maintenance plan are based on the redesignation guidance, supplemented with additional guidance received from staff of U.S. EPA Region 5.

Below is a summary of each redesignation criterion as it applies to the partial Logan County area.

i.) Attainment of the standard (CAA Section 107(d)(3)(E)(i))

There are two components involved in making this demonstration. The first component relies on ambient air quality data. The data that are used to demonstrate attainment should be the product of ambient monitoring that is representative of the area of highest concentration. The data should be collected and quality-assured in accordance with 40 CFR 58 and recorded in the Air Quality System (AQS) in order for it to be available to the public for review.

The second component relies upon supplemental U.S. EPA-approved air quality modeling. While no modeling is required for redesignating nonattainment areas, the redesignation guidance states it is "generally necessary" for lead redesignations in order to evaluate comprehensively sources' impacts and to determine the areas of expected high concentrations based upon current conditions. Because the only source of lead emissions in the nonattainment area was Daido, and Daido has since been permanently shutdown, this modeling is not necessary.

ii.) Permanent and enforceable improvement in air quality (CAA Section 107(d)(3)(E)(iii))

The state must be able to reasonably attribute the improvement in air quality to emission reductions which are permanent and enforceable. The state should estimate the percent reduction achieved from federal measures as well as control measures that have been adopted and implemented by the state.

It was not necessary for Ohio to adopt or implement control measures for this nonattainment area because the only source of lead emissions, Daido, permanently shutdown.

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Chapters Four and Five discuss this requirement in more detail.

iii.) Section 110 and Part D requirements (CAA Section 107(d)(3)(E)(v))
For purposes of redesignation, a state must meet all requirements of Section 110 and Part D that were applicable prior to submittal of the complete redesignation request.

Subpart 1 of Part D consists of general requirements applicable to all areas which are designated nonattainment based on a violation of the NAAQS. Subpart 5 of Part D consists of more specific requirements applicable to lead.

i.) Section 110(a) requirements
Section 110(a) of Title I of the CAA contains the general requirements for a SIP. Section 110(a)(2) provides that the implementation plan submitted by a state must have been adopted by the state after reasonable public notice and hearing, and that, among other things, it must include enforceable emission limitations and other control measures, means or techniques necessary to meet the requirements of the CAA; provide for establishment and operation of appropriate devices, methods, systems and procedures necessary to monitor ambient air quality; provide for implementation of a source permit program to regulate the modification and construction of any stationary source within the areas covered by the plan; include provisions for the implementation of Part C, prevention of significant deterioration (PSD) and Part D, NSR permit programs; include criteria for stationary source emission control measures, monitoring, and reporting; include provisions for air quality modeling; and provide for public and local agency participation in planning and emission control rule development. In Ohio's October 12, 2011 infrastructure SIP submission, Ohio verified that the State fulfills the requirements of Section 110(a)(2) of the Act.

Section 110(a)(2)(D) also requires State plans to prohibit emissions from within the State which contribute significantly to nonattainment or maintenance areas in any other State, or which interfere with programs under Part C to prevent significant deterioration of air quality or to achieve reasonable progress toward the national visibility goal for Federal class I areas (national parks and wilderness areas). In order to assist States in addressing their obligations regarding regionally transported pollution, Ohio EPA has adopted and implemented the various major

programs related to the interstate transport of pollution. OAC Chapters 3745-16 (Stack Height Requirements), 3745-103 (Acid Rain Permits and Compliance), 3745-14 (Nitrogen Oxides – Budget Trading Program), and 3745-109 (Clean Air Interstate Rule) all address Congressional and U.S.EPA concerns over the transport of emissions of regulated pollutants beyond our State borders. Ohio has also responded to requests by the States of Indiana and West Virginia to implement revisions to OAC Chapter 3745-18 (Hamilton County and Jefferson County) to alleviate modeled violations due, in part, to sources in Ohio. Additionally, all new major sources and major modifications in the state are subject to PSD and NNSR program to help achieve the lead standard.

Based upon U.S. EPA's "Guidance on SIP Elements Required Under Sections 110(a)(1) and (2) for the 2008 Lead (Pb) National Ambient Air Quality Standards (NAAQS)" (draft as of 6/17/11), the physical properties of lead prevent lead emissions from experiencing the same travel or formation phenomena as PM2.5 or ozone. Lead concentrations sharply decrease with the distance from a lead source. Only large sources in close proximity to state boundaries could contribute significantly to nonattainment in, or interfere with maintenance by, any other state.

This nonattainment area is not in close proximity to Ohio's border and the only source of lead emissions, Daido, is now permanently shutdown. Therefore, lead sources in this area do not contribute significantly to nonattainment, or interfere with maintenance, of the NAAQS in another state, or interfere with measures required to prevent significant deterioration of air quality.

ii.) Section 172(c) requirements

This Section contains general requirements for nonattainment plans. The requirements for reasonable further progress, identification of certain emissions increases, and other measures needed for attainment will not apply for redesignations because they only have meaning for areas not attaining the standard. The requirements for an emission inventory will be satisfied by the inventory requirements of the maintenance plan. Chapters Four and Five discuss this requirement in more detail.

iii.) Conformity

The state must work with U.S. EPA to show that its SIP provisions are consistent with the Section 176(c)(4) conformity requirements. The redesignation request should include conformity procedures, if the state already has these procedures in place. If a state does not have conformity procedures in place at the time that it submits a redesignation request, the state must commit to follow U.S. EPA's conformity regulation upon issuance, as applicable. Furthermore, in U.S. EPA's final rule it was stated that In light of the elimination of lead additives from gasoline, transportation conformity does not apply to the lead NAAQS [73 FR 67043].

iv.) Maintenance plans (CAA Section 107(d)(3)(E)(iv))

Section 107(d)(3)(E) stipulates that for an area to be redesignated, U.S. EPA must fully approve a maintenance plan that meets the requirements of Section 175(A). The maintenance plan will constitute a SIP revision and must provide for maintenance of the relevant NAAQS in the area for at least 10 years after redesignation. Section 175(A) further states that the plan shall contain such additional measures, if any, as may be necessary to ensure such maintenance.

In addition, the maintenance plan shall contain such contingency measures as the Administrator deems necessary to ensure prompt correction of any violation of the NAAQS. At a minimum, the contingency measures must include a requirement that the state will implement all measures contained in the nonattainment SIP prior to redesignation.

States seeking redesignation of a nonattainment area should consider the following provisions:

a) attainment inventory;
b) maintenance demonstration;
c) monitoring network;
d) verification of continued attainment; and
e) contingency plan.

Chapter Six discusses this requirement in more detail.

CHAPTER THREE

LEAD MONITORING

CAA Section 107(d)(3)(E)(i)

Requirement 1 of 4

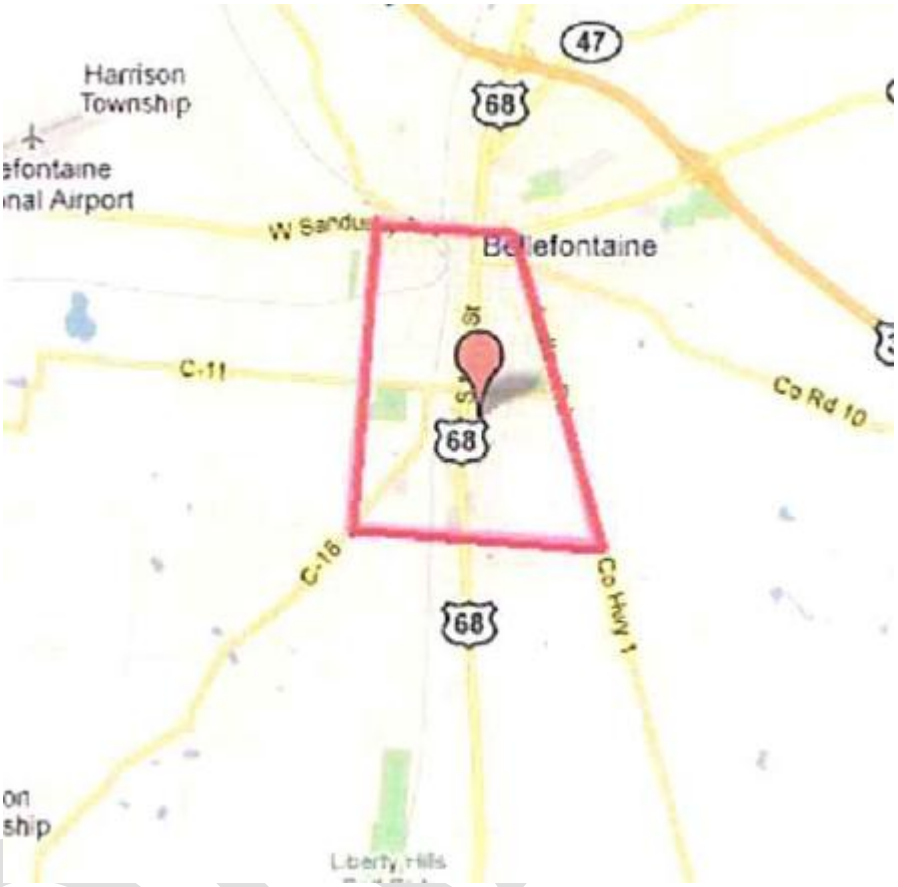
A demonstration that the NAAQS for annual lead, as published in 40 CFR 50.12, has been attained.

Background

There is one monitor measuring lead concentrations in this nonattainment area. The monitor is operated by Ohio EPA Division of Air Pollution Control, Northwest District Office. A listing of the design values from 2010 through 2012 are shown in Table 1. The location of the monitoring site for this nonattainment area is shown on Figure 1.

Demonstration

Figure 1 - Map of the partial Logan County, OH- nonattainment area and monitor location



Requirement 2 of 4

Ambient monitoring data quality assured in accordance with 40 CFR 58.10, recorded in the U.S. EPA air quality system (AQS) database, and available for public view.

Demonstration

Ohio EPA has quality assured all data shown in Appendix A in accordance with 40 CFR 58.10 and all other federal requirements. Ohio EPA has recorded the data in the AQS database and, therefore, the data are available to the public.

Requirement 3 of 4

In accordance with 40 CFR Part 50, Appendix R, the lead NAAQS is met at a monitoring site when the identified design value is valid and less than or equal to 0.15 µg/m^3. A lead design value that meets the NAAQS (*i.e.* , 0.15 µg/m^3 or less), is considered valid if it encompasses 36 consecutive valid 3-month site means (specifically for a 3-year calendar period and the two previous months).

For sites that begin monitoring lead after this rule is effective but before January 15, 2010, lead design values that meets the NAAQS will be considered valid if it encompasses at least 34 consecutive valid 3-month means (specifically encompassing only the 3-year calendar period). This is the case for this monitoring site as demonstrated, and discussed in detail, in Ohio EPA's April 19, 2013 clean data request.

Background

Table 1 shows the monitoring data for the 3-year calendar period of 2010-2012 that were retrieved from the U.S. EPA AQS. Also included are monitoring data collected and analyzed to date for the 2013 year.

Demonstration

Table 1 - Monitoring data for the partial Logan County, OH Area for 2010 – 2012

Site Location City	3-month period (unless noted)	Three-month rolling average (ug/m^3)			
		2010	2011	2012	2013
39-091-0006 Richard Ave. – Daido Facility Bellefontaine	Jan Only	0.005	0.004	0.004	0.003
	Feb Only	0.004	0.003	0.003	0.002
	Jan -Mar	0.006	0.003	0.003	0.002
	Feb-Apr	0.006	0.003	0.003	0.002
	Mar-May	0.005	0.003	0.003	0.002
	Apr-Jun	0.004	0.003	0.003	
	May-July	0.003	0.003	0.004	
	Jun-Aug	0.003	0.003	0.003	
	July-Sept	0.004	0.003	0.003	
	Aug-Oct	0.004	0.005	0.003	
	Sept-Nov	0.004	0.005	0.003	
	Oct-Dec	0.004	0.004	0.003	

Sites with one or more months of a composite analysis missing in any three-month period.

Source: U.S. EPA Air Quality System (AQS); http://www.epa.gov/ttn/airs/airsaqs/index.htm

A design value is considered valid only when minimum data-completeness requirements are met.

There is incomplete data for the 3-month means for January to March 2012 and February to April 2012 periods. Data for these periods did not meet the 75% capture criteria because only three of five samples were collected in both February and March of 2012. In each case, the missed

samples resulted in data capture of less than 75%, for the 3-month mean periods but greater than 50% of the required monthly collections. Therefore, Ohio EPA performed a conservative substation analysis in accordance with 40 CFR Part 50, Appendix R, Section (4)(c)(ii)(B) showing passing design values for these periods. This analysis was detailed in Ohio EPA's April 19, 2013 clean data request.

The design values calculated for the partial Logan County area demonstrate that the annual lead NAAQS has been attained. The area's design values have remained consistently low since the permanent shutdown of the Daido facility.

Requirement 4 of 4

A commitment that once redesignated, the state will continue to operate an appropriate monitoring network to verify the maintenance of the attainment status.

Demonstration

Ohio EPA commits to continue monitoring lead levels at this site indicated in Figure 1 and Table 1. Ohio EPA will consult with U.S. EPA Region 5 prior to making changes to the existing monitoring network, should changes become necessary in the future. Ohio EPA will continue to quality assure the monitoring data to meet the requirements of 40 CFR Part 58 and all other federal requirements. Ohio EPA will enter all data into AQS on a timely basis in accordance with federal guidelines.

CHAPTER FOUR

EMISSION INVENTORY

CAA Section 107(d)(3)(E)(iii)

U.S. EPA's redesignation guidance requires the submittal of a comprehensive inventory of lead emissions representative of the year when the area achieves attainment of the annual lead air quality standard. Ohio also must demonstrate that the improvement in air quality between the year that violations occurred and the year that attainment was achieved is based on permanent and enforceable emission reductions. Other emission inventory related requirements include a projection of the emission inventory to a year at least 10 years following redesignation; a demonstration that the projected level of emissions is sufficient to maintain the annual lead standard; and a commitment to provide future updates of the inventory to enable tracking of emission levels during the 10-year maintenance period.

The comprehensive inventory includes emissions of lead from point sources. Ohio does not have area, mobile, non-road, or marine/air/rail sources of lead emissions that contribute to nonattainment. The only point source of emissions in this nonattainment area was the Daido facility.

Requirement 1 of 5

A comprehensive emission inventory of lead sources completed for the base year.

Background

The point source data are taken from U.S. EPA National Emissions Inventory (NEI) reporting program. The period coincides with nonattainment air quality in the partial Logan County nonattainment area.

Demonstration

The 2005 NEI is used as the base year for the purpose of this submittal and was submitted to U.S. EPA with Ohio's lead nonattainment area recommendations submitted on October 5, 2009. The detailed lead emission inventory information for the partial Logan County area is provided in Table 2 under Requirement Three of this Chapter.

Requirement 2 of 5

A projection of the emission inventory to a year at least 10 years following redesignation.

Demonstration

Ohio EPA prepared a comprehensive future year inventory for the partial Logan County area. See Requirement 3 of 5 under Requirement Three of this Chapter.

Requirement 3 of 5

A demonstration that the projected level of emissions is sufficient to maintain the lead standard.

Background

In consultation with U.S. EPA, Ohio EPA selected the year 2025 as the maintenance year for this redesignation request. This document contains projected emissions inventories for 2015 and 2025.

Maintenance is demonstrated when the future-year (2025) projected emission totals are below (or at in the case of zero emissions) the 2010 attainment year totals.

Demonstration

Table 2 – Partial Logan County, OH Lead Emission Inventory Totals for Base Year 2005, Attainment Year 2010, and Projected 2015 and 2025 (tpy)

Source	2005 Base	2010 Attainment	2015 Interim	2025 Maintenance	Safety Margin
Daido	0.0035	0	0	0	0
TOTAL	0.0035	0	0	0	0

As shown in the table above (Table 2), lead emissions in the nonattainment area are projected to decrease to zero tpy by 2025 due to the permanent shutdown of Daido in June 2009.

Furthermore, the 2008 NEI[2] shows that lead emissions for the *entire* Logan County are very low, at 0.003 tpy. Daido is also not identified in the 2008 NEI as a lead emissions source.

Requirement 4 of 5

A demonstration that improvement in air quality between the year violations occurred and the year attainment was achieved is based on permanent and enforceable emission reductions and not on temporary adverse economic

[2] https://www.google.com/fusiontables/DataSource?docid=16gJi7ePu_IX_2Hyu46sp7sFdu4cOP9_Zb3x3Zks#rows:id=1

conditions or unusually favorable meteorology.

Background

Ambient air quality data from all monitoring sites indicate that air quality met the NAAQS for lead in 2010-2012. U.S. EPA's redesignation guidance (p 9) states: "A state may generally demonstrate maintenance of the NAAQS by either showing that future emissions of a pollutant or its precursors will not exceed the level of the attainment inventory, or by modeling to show that the future mix of sources and emissions rates will not cause a violation of the NAAQS."

Demonstration

Due to the permanent shutdown of Daido in June of 2009, emissions of lead in the area have been zero since the attainment year. Daido is identified in Ohio EPA's records as permanently shutdown, and therefore, operations could not resume without Daido being considered a new source and subject to new source review provisions. No additional sources of lead are expected in the future. In the event a future source of lead may install in the area in the future, all relevant requirements at that time would be required, including new source review permitting. This ensures maintenance of the lead standard into the future.

Requirement 5 of 5

Provisions for future annual updates of the inventory to enable tracking of the emission levels, including an annual emission statement from major sources.

Demonstration

In Ohio, major point sources in all counties are required to submit air emissions information annually, in accordance with U.S. EPA's Consolidated Emissions Reporting Rule (CERR). Ohio EPA prepares a new periodic inventory for all lead sources every three years. This lead inventories will be prepared for future years as necessary to comply with the inventory reporting requirements established in the CFR. Emissions information will be compared to the 2005 base year and the 2025 projected maintenance year inventory to assess emission trends, as necessary, and to assure continued compliance with the annual lead standard.

CHAPTER FIVE

CONTROL MEASURES AND REGULATIONS

CAA Section107 (d)(3)(E)(ii), 107(d)(3)(iv), and 107(d)(3)(E)(v)

Requirement 1 of 6

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to implement RACM and RACT.

Background

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to submit a SIP providing for implementation of all reasonably available control measures (RACM) as expeditiously as practicable (including such reductions in emissions from existing sources in the area as may be obtained through the adoption, at a minimum, of reasonable available control technology (RACT)).

U.S. EPA's final rule stated it is appropriate to set a threshold for RACT analysis at 0.5 tpy.

Demonstration

The Daido facility emissions never exceeded the threshold of 0.5 tpy, necessitating a RACT analysis. In addition, Daido permanently shutdown prior to when any RACT analysis would have been required.

Requirement 2 of 6

Section 172(c)(2) of the 1990 CAA Amendments requires attainment demonstration SIPs for nonattainment areas to show reasonable further progress (RFP).

Background

U.S. EPA's final rule expected that RFP for lead nonattainment areas should be met by strict adherence to an ambitious compliance schedule which should periodically yield significant emissions reductions, and to the extent appropriate, linear progress.

Demonstration

Because Daido permanently shutdown in June of 2009, RFP has been met.

Requirement 3 of 6

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions.

Background

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions in the area, including the requirement for periodic revisions as determined necessary. 40 CFR 51.1008 requires such inventory to be submitted within three years of designation and requires a baseline emission inventory for calendar year 2002 or other suitable year to be used for attainment planning.

Demonstration

The 2005 comprehensive inventory was submitted to U.S. EPA with Ohio's lead recommended designations document submitted on October 5, 2009. Emissions for this area were taken from U.S. EPA's NEI.

Ohio also updates its inventory in accordance with U.S. EPA's CERR rule (i.e. emissions statements). Ohio EPA submitted its emissions statement SIP on March 18, 1994 which was approved by U.S. EPA on October 13, 1995 (59 FR 51863). As discussed in Chapter 4 (Requirement 4), Ohio EPA submits, and commits to submit, emission inventories (statements) every three years.

Requirement 4 of 6

Evidence that control measures required in past lead SIP revisions have been fully implemented.

Demonstration

There are no past control measures required in Ohio's SIP for this area.

Requirement 5 of 6

Acceptable provisions to provide for new source review.

Background

Ohio has a longstanding and fully implemented New Source Review (NSR) program. This is addressed in OAC Chapter 3745-31[3]. The Chapter includes provisions for the Prevention of Significant Deterioration (PSD) permitting program in OAC rules 3745-31-01 to 3745-31-20. Ohio's PSD program was conditionally approved on October 10, 2001 (66 FR 51570) and received final

3 http://www.epa.ohio.gov/dapc/regs/3745_31.aspx

approval on January 22, 2003 (68FR 2909) by U.S. EPA as part of the SIP.

Demonstration

Any facility that is not listed in the 2005 emission inventory, or for the closing of which credit was taken in demonstrating attainment, will not be allowed to construct, reopen, modify, or reconstruct without meeting all applicable NSR requirements. Once the area is redesignated, Ohio EPA will implement NSR through the PSD program.

Requirement 6 of 6

Assure that all existing control measures will remain in effect after redesignation unless the State demonstrates through modeling that the standard can be maintained without one or more control measures.

Demonstration

Ohio commits to maintaining the existing control measures after redesignation.

Ohio, through Ohio EPA's Legal office, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, it intends to continue enforcing all rules that relate to the emission of lead in the partial Logan County area.

CHAPTER SIX

CONTINGENCY MEASURES

CAA Section 107(d)(3)(E)(v)

Requirement 1 of 4

A commitment to submit a revised plan eight years after redesignation.

Demonstration

Ohio hereby commits to review its maintenance plan eight years after redesignation, as required by Section 175(A) of the CAA.

Requirement 2 of 4

A commitment to expeditiously enact and implement additional contingency control measures in response to exceeding specified predetermined levels (triggers) or in the event that future violations of the ambient standard occur.

Demonstration

Ohio hereby commits to adopt and expeditiously implement necessary corrective actions in the following circumstances:

Warning Level Response:

A warning level response shall be prompted whenever a lead 3-month rolling average concentration of 0.135 µg/m^3 occurs within the maintenance area. A warning level response will consist of a study to determine whether the lead value indicates a trend toward higher lead values. The study will evaluate whether the trend, if any, is likely to continue and, if so, the control measures necessary to reverse the trend taking into consideration ease and timing for implementation as well as economic and social considerations. Implementation of necessary controls in response to a warning level response trigger will take place as expeditiously as possible, but in no event later than 12 months from the conclusion of the most recent calendar year.

Should it be determined through the warning level study that action is necessary to reverse the noted trend, the procedures for control selection and implementation outlined under “action level response” shall be followed.

Action Level Response:

An action level response shall be prompted whenever a two-year average of the 3-month rolling average concentration of 0.143 µg/m^3 or greater occurs within the maintenance area. A violation of the standard (any 3-month rolling average over a 36-month

rolling average period (3-calendar years plus the preceding 2 months) exceeds 0.15 µg/m^3) shall also prompt an action level response. In the event that the action level is triggered and is not found to be due to an exceptional event, malfunction, or noncompliance with a permit condition or rule requirement, Ohio EPA in conjunction with the entity(ies) believed to be responsible for the exceedance will evaluate additional control measures needed to assure future attainment of the NAAQS for annual lead. In this case, measures that can be implemented in a short time will be selected in order to be in place within 18 months from the close of the calendar year that prompted the action level. Ohio EPA will also consider the timing of an action level trigger and determine if additional, significant new regulations not currently included as part of the maintenance provisions will be implemented in a timely manner and will constitute our response.

Control Measure Selection and Implementation

Adoption of any additional control measures is subject to the necessary administrative and legal process. This process will include publication of notices, an opportunity for public hearing, and other measures required by Ohio law for rulemaking or permitting.

If a new measure/control is already promulgated and scheduled to be implemented at the federal or State level, and that measure/control is determined to be sufficient to address the upward trend in air quality, additional local measures may be unnecessary. Furthermore, Ohio will submit to U.S. EPA an analysis to demonstrate the proposed measures are adequate to return the area to attainment.

Requirement 3 of 4

A list of potential contingency measures that would be implemented in such an event.

Demonstration

Contingency measures to be considered will be based on an analysis of the suspected cause of the elevated lead levels from the entity(ies) suspected to be contributing to the elevated levels. Measures may include improvements in existing control devices, addition of secondary control devices or improvements in housekeeping and maintenance, among other measures. It is not possible to fully develop an appropriate list of contingency measures until the cause of the elevated levels is known. Any contingency measures implemented will require a compliance plan and expeditious compliance timeline from the entity(ies) involved.

No contingency measure shall be implemented without providing the opportunity for full public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be fully evaluated.

Requirement 4 of 4

A list of lead sources potentially subject to future additional control requirements.

Demonstration

Ohio EPA does not expect any future lead sources in this area. As discussed elsewhere in this document, any new source planning to locate in this area would be a point source that would be subject to the new source review program.

CHAPTER SEVEN

PUBLIC PARTICIPATION

Ohio published notification for a public hearing and solicitation for public comment concerning the draft redesignation petition and maintenance plan in the widely distributed county publications on _____.

The public hearing to receive comments on the redesignation request was held on _____, at the _____, Ohio. The public comment period closed on _____. Appendix B includes a copy of the public notice, and the transcript from the public hearing.

CHAPTER EIGHT

CONCLUSIONS

The partial Logan County annual lead nonattainment area has attained the 2008 annual NAAQS for lead and complied with the applicable provisions of the 1990 Amendments to the CAA regarding redesignations of lead nonattainment areas. Documentation to that effect is contained herein. Ohio EPA has prepared a redesignation request and maintenance plan that meet the requirements of Section 110 (a)(1) of the 1990 CAA.

Based on this presentation, the partial Logan County annual lead nonattainment area meets the requirements for redesignation under the CAA and U.S. EPA guidance. Ohio has performed an analysis that shows the air quality improvements are due to permanent and enforceable measures. Furthermore, because the only source of lead emissions in this area has permanently shutdown, Ohio can ensure continued compliance (maintenance) with the standard with an increasing margin of safety.

The State of Ohio hereby requests that the partial Logan County annual lead nonattainment area be redesignated to attainment simultaneously with U.S. EPA approval of the maintenance plan provisions contained herein.

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