



Division of Air Pollution Control

Ohio's 1-hr Sulfur Dioxide 2010 Revised Standard Area Designation Recommendation

Agency Contact for this Package

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Ohio EPA held a public hearing in Parma Heights, OH on May 17, Steubenville, OH on May 18, and Pomeroy, OH on May 19, 2011 regarding the 1-hour sulfur dioxide national ambient air quality standard designation recommendations. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on May 19, 2011. 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.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General/Overall Concerns

Comment 1: The St. Clair Twp Area Chamber of Commerce would like to go on record as opposing the Ohio EPA's designation for Columbiana County as a Nonattainment Area. To be blunt, the testing that was done was not and is not reflective of the true picture for Columbiana County. We would ask that you specifically look at the following issues; 1) There was only (1) monitoring station for ALL of Columbiana County. Columbiana County is a large county, over 530 square miles. The monitor was placed in one corner of the county located directly between 2 coal fire power plants. We believe that the only way to get a true picture of the entire counties SO₂ levels is by having other monitor's place in and around the county. By labeling the entire county using only 1 data source is questionable. 1) The data, we understand, was gathered from before First Energy had installed their multi-billion dollar scrubbers. Again, one (1) source using data that would not be able to be reproduced today. We understand the Ohio EPA's concern for sulfur dioxide levels. However, at a time when the economy is struggling, industry in particular, we would ask that you reconsider that decision or at least require up to date

data that was gathered in such a manner that does not punish the entire county. (Lori Cline, Executive Director, St. Clair Twp Area Chamber of Commerce)

As a local health official with a strong background in the environmental health sciences, I fully understand the connection between air quality, a safe environment and a healthy population and would have expected a more thorough investigation of sulfur dioxide in our whole community prior to it being designated as nonattainment. Therefore, I am fundamentally opposed to the county wide sulfur dioxide nonattainment designation of Columbiana County. It is my understanding that this determination was based on only a few sampling points in a limited area inside the City of East Liverpool where the river valley geography isolates environmental factors from the rest of the county. Therefore, in a county of 532 square miles, of which the City of East Liverpool represents less than 1% (4.3sq. mi.), a few localized sampling points are statistically insufficient to make a countywide determination of this magnitude. Thank you for your consideration in removing Columbiana County from the sulfur dioxide nonattainment list due to insufficient data collected from an isolated area that lacks geographical and statistical significance. (Wesley J Vins)

Obviously, the county is concerned about the wealth and the health of our citizens in the county and that is a concern of ours. However, we wondered what methodology was used in determining and blanketing the entire county with the results that you came up with for the nonattainment area. We understand that there was some testing done on the southern end of the county, and we did receive that 2010 revised sulfur dioxide report and we have reviewed that. However, the biggest concern for Columbiana County being an Appalachian county along the river how is that methodology determined if you blanketed the entire county? Obviously, the health and welfare of our county is important to us, but also the economic growth and development and the fears that would be in place in our county with our concerns of these reports. It is a very big concern to Columbiana County. So with that, we do not agree with the designation that's been placed on Columbiana County for those reasons. (Penny Traina)

I live in East Liverpool, Ohio just up over the hill from the east end area where the test was taken. It's also my concern that the testing devices that were set down in the valley were set in one small area of the county and in turn the whole county was

blanketed with the same. And I am assuming that would have had been taken for the whole county as what was taken down in that area. And we have nothing against clean air, clean water. We've worked on that for years trying to clean up especially the water in our county. We are trying to get some businesses in the county, but with this designation it will do nothing but make people leary of coming into our county and they will end up in North Carolina and South Carolina, someplace else and not come to our county. That is my concern. (Jim Hoppel)

The Citizen Advisory on Sulfur Dioxide Nonattainment Areas, dated May 6, 2011, was provided to me on today's date by Columbiana County Engineer Bert Dawson. The Columbiana County Port Authority is responsible for large scale economic development projects in Columbiana County. We believe the proposed nonattainment designation for the county contained in the Citizens Advisory would ruin any chance to develop projects involving very large investments that would benefit not only our area but the region and nation as well. We are involved with such projects because of our location and access to transportation systems that allow Ohio to serve the US and world markets. The Port Authority also has serious concerns about the methodology used to determine the nonattainment designation for Columbiana County. We were advised that the designation results from a single measuring device located near WTI in East Liverpool and that the new 75 parts per billion US-EPA standard was only slightly exceeded by a 90 parts per billion reading. How can all of Columbiana County come under a nonattainment designation under this methodology? We further understand that OEPA has acknowledged that a majority of the measured emissions in East Liverpool were likely migratory in nature, originating outside of Columbiana County. In short, the Port Authority protests in the strongest terms possible the proposed nonattainment designation for Columbiana County. (Tracy Drake, Columbiana County Port Authority)

First. Columbiana County is the 14th largest geographic area of the 88 counties in the state of Ohio. Columbiana County has 532 square miles, 18 townships. If you go to Alliance, it's over 30 miles to the Alliance area where we may anticipate having economic development. We've got water and sewer in that area. We're almost 15 to 20 miles from northern Columbiana County in the Salem-Columbiana area, which has been a traditional industrial area in Columbiana County. And we're on the outskirts of the Youngstown metropolitan area, which is

Boardman and that area, which there's a lot of things happening there. It's been mentioned that we had an economic summit held by the Salem group and everyone's trying to work hard and get jobs here.

First. This monitor location inaccurately -- the one that was in Columbiana County, which I don't know this as fact but I'm assuming it was one that was already there to monitor WTI and it was just used in the study. That may or may not be correct but that's what I'm assuming. But the monitoring location inaccurately reflects the SO2 conditions in the vast majority of Columbiana County. In fact, in the study it shows over 50 percent of Columbiana County is forest, and how could that represent that. To impact that point I brought, number one, this is a Columbiana County map, the current Columbiana County map prepared in my office. This star represents the location of the WTI monitor. It references Alliance, which is here. It references Mahoning County, which is here. The Minerva area which is the site of a lot of the industrial development in the Minerva area is clear down here, almost 20 miles away. You can see this is the site here where the star is. This site here impacts the 532 square miles of Columbiana County.

Second. The EPA document indicates that nearly 99 percent of the SO2 recorded at this location is migratory and flows from other adjacent areas, specifically power plants in Jefferson County. And although the report doesn't mention it, we do have a large coal plant right north of us in Pennsylvania. It would seem, therefore, unless these SO2 sources are mitigated there's very little Columbiana County can do to change the SO2 monitoring results at the WTI location. In other words, unless something happens to these places there's isn't -- there's nothing we can do in Columbiana County. It's totally out of our jurisdiction, totally out of our control. The records that I have seen indicate that WTI as the county's largest SO2 producer is in current compliance with their standing. And I don't want to get into the WTI argument, that isn't the reason we're here, but you people are already regulating WTI, so either it meets or doesn't meet that. And your report of what's going into Columbiana County, a very, very small part of this is produced by WTI. The majority is coming from Sammis. The data used to make this determination as shown in the Ohio EPA document indicates that the SO2 at the monitoring station has been declining significantly over the last three years. If you look in your document, the '08, '09 and then '10 figures, the numbers were

already coming down. And '10 is significantly lower than '08 or '09. This is no doubt due to previous actions taken at these power plants. I'd like to point out that the Sammis plant recently completed and brought on-line complete new scrubbers, and when it was distributed I realized the immensity of what they did, which were built at a cost of nearly \$2 billion for those scrubbers. It would seem logical that a plan would determine what effect this equipment has had on the SO2 produced before Columbiana County or even Jefferson, before these determinations were finalized. In other words, we just spent \$2 billion to knock SO2 down and yet in the study we're using figures that were generated in '08. It makes no sense, whatsoever. As Mr. Tracy Drake of the Columbiana County Port Authority has written his submission to this board to the EPA, Columbiana County has struggled to keep and re-acquire our industrial base. This has been a daunting task. I can tell you, I have personally worked on it for over two decades. Any unnecessary regulations -- and as Jim was saying, we already realize regulation has a purpose and it has a meaning. But to have unnecessary regulations, which I deal with personally with all the time, we need to have a balance of what is unneeded regulation which will impact our quality of life. I would hope that including Columbiana County in the list of those designated nonattainment was not done to meet some minimum goal. In other words, I'm afraid and I hope that isn't true, but is EPA saying, well, we've got to come up with something to satisfy the Feds so we'll throw Columbiana County in there even though the data isn't good. I'm hoping that isn't being done. I know how the Federal Highway Department works. If the Federal EPA works anything like it, that could happen. I would ask that the people that actually made this decision, which I know isn't you folks, but that they re-evaluate this decision. Someone somewhere actually made that decision and it was probably one or two that made that decision, and I hope that these comments get to those people that actually were the decision-makers. Governor Kasich has said many times in the last few weeks we must adopt a common sense approach in government if we are to pull out of this mess that we're currently in Ohio and as a nation. There are a number of us, including the commissioners, Tracy Drake, myself, the people that are at this summit, a lot of government leaders -- alot of people devote a lot of time, planning commissions, communities, working to bring employment back to Columbiana County. There are a number of us who work daily tom develop employment opportunities for our county and the State of Ohio. It is extremely frustrating to deal with a regulation, much of which is somewhat unnecessary. A

person in my position deals with this daily. I respectfully request that the Ohio EPA re-visit the decision to designate Columbiana County as a nonattainment county and join with us in making the state a place of opportunity that it once was. And just to echo Jim and Penny's comments. I think our main concern is the fact that one monitoring point which is at the extreme corner of the county may influence whether we can get a plant in the Alliance area, the Minerva area, the Boardman area, East Palestine area. And if you see the -- well, I just saw an analysis of the last census. If you look at the age group of zero to about 21 and see the number of people there and the people that that represents and then you look at that from about 22 to about 40, there is a huge gap in that curve. Those are people that have left Columbiana County, have left the State of Ohio. Have left because there's no jobs, there is no employment. I talked to one of the girls at the EPA the other day and we just had a nice discussion. She was a nice lady and listened to a lot of my malarkey, which you guys are doing and taking it pretty good. I said to her, I said, where are you from? She said Delaware, Delaware County, outside of Columbus. I know Delaware. I know the county engineer. He is a friend of mine. I said, no, I mean where are you from originally? She said, oh, down the river in West Virginia down in Marietta. I said, oh, there weren't any jobs so you went to school, left that area and went to Columbus to get a job. Is that right? She said, yeah. And I said, well, that's exactly what's happened to us. I've got three grandchildren, Jim's got a couple, Penny's got a couple. These gentlemen have family. I went to the prom the other night. I want to go to our kids' prom. I don't want to have to go to North Carolina to see the grandkids. That's where we're coming from, and I encourage you to at least take a look at this and crank the new numbers of what's happened in your calculations. One thing I learned being in government for over forty years, there's a way of doing anything you want to do. You've just got to figure out how to do it. (Bert Dawson)

Response 1:

Thank you for your comments concerning Ohio's recommended nonattainment area designations. U.S. EPA promulgated the revised 1-hr SO₂ standard in June 2010. On March 24, 2011, U.S. EPA issued guidance for State's regarding how to make their recommendations ("Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards"). Much of this guidance is based upon requirements contained in U.S. EPA's final regulation promulgating the new standard (75 FR 35520). In the guidance and final rule, U.S. EPA states monitoring data from the 2008 to 2010 should be used. When comparing an

area's air quality with a standard, 3-years of the most recent data are required. This is the 2008 to 2010 period and referred to as the "design value" for the area. Columbiana County's design value for this period is 90 ppb compared to the standard of 75 ppb. This is valid data that was quality assured and certified in accordance with federal requirements. After Ohio EPA makes our recommendation U.S. EPA will review the recommendation and provide their own recommendation back to Ohio. We will be given an opportunity to comment on U.S. EPA's recommendation before U.S. EPA makes a final determination on which counties will be nonattainment for this revised standard in June 2012. At that time U.S. EPA typically gives each State an opportunity to update any recommendation made with the latest 3-year air quality data, if it is available at that time. If appropriate, Ohio EPA will revise its recommendation to U.S. EPA at that time based on 2009 to 2011 data.

For Columbiana County, Ohio EPA's recommendation is based on ambient air quality data from the only monitor located in this county (East Liverpool monitor). U.S. EPA's guidance states that "consistent with our approach under other NAAQS, we expect to consider the county line as the starting point for determining SO₂ nonattainment boundaries." U.S. EPA then looks for States to consider several factors in determining the final boundaries. U.S. EPA states that many of these factors may be addressed by performing dispersion modeling of sources of SO₂ in the area, specifically within 50 kilometers of the monitor. Final recommendations should include the area with the violating monitor "as well as any adjacent areas (e.g., counties or portions thereof) that contain emissions sources contributing to the violation." Jefferson County is one such area this is recommended for nonattainment. Not only because this county also contains a violating monitor, but because this county's emission sources likely contribute to violations in Columbiana County. Dispersion modeling on this scale would take significant time and resources. Because U.S. EPA's guidance was issued so close to Ohio's required deadline for making recommendations, performing meaningful dispersion modeling was not an option. In light of the comments received during this comment period, Ohio EPA has re-evaluated our recommendation and will be recommending partial nonattainment areas for several counties, including Columbiana County.

As mentioned above, U.S. EPA will be making final recommendations for nonattainment areas in June of 2012. We urge the commentors to participate by submitting comments on U.S. EPA's recommendation. In addition, over the next several years, Ohio EPA will be required to implement programs to bring

these nonattainment areas into compliance with the revised standard. During that process, Ohio EPA will prepare plans for public notice and public comment. We urge the commenters to continue to participate by submitting comments on Ohio future plans for achieving attainment.

Comment 2:

Mr. Spencer stated "I don't have any comments. I would like to make this observation" (in reference to the comments by Ms. Traina, Mr. Hoppel, and Mr. Dawson).

I was struck by the similarity in the arguments that these people are making. I heard those 25, maybe 30 years ago. Similar. I mean, I'm agreeing with them but I'm saying that's what struck me is that the same concerns that I heard at least 25 years ago they're voicing today. It just struck me that similarity of concern raised then. Now, we're talking about a different issue. As Dawson said, this is not -- we're not here to talk about WTI. But I can tell you, you could substitute those names then with Wargo, Trainer, and almost identical concerns raised then are being raised now. Legitimately, I might add, in both instances. That just struck me as being as -- I guess if you're lucky enough to mature to an age where you can reflect back to incidents that have occurred years ago and you're able to compare those two is what I've done. I had no intention of making any comments today but I did notice that similarity between the concerns then, as I say legitimate, to the concerns today. Legitimate but they're almost identical. (Alonzo Spencer)

Response 2:

Thank you for your observation.

Comment 3:

I am here to voice my opinion on the potential nonattainment designation offered by the Ohio EPA. Also, I wanted to say that I have been in contact with Representative Lou Gentile, who represents this area, Jefferson-Belmont County. Also, Representative Gentile said he is not able to be in attendance today because he is voting on the floor of the Ohio House of Representatives at this moment that's in session, but he does share our concerns, certainly, at how we got here and also what this designation could potentially mean. I don't know if anyone spoke before but I want to give a little history, a little bit of where we've been and where we are and where we're headed. As we know, the Ohio Valley here along the river for generations, for over 100 years, was the economic -- what I call the carburetor of the economic engine of this country. We produced the steel, the energy, the chemicals, the products that made the United States of America. That probably could

be attributed to winning wars, both notably the Second World War and others. Today we find ourselves crippled economically. Our steel mills are idle. The Koreans are making our cars, the Chinese are building half of everything else, and the Japanese and other Asian countries are involved in our cameras, our electronics and in other computer items that we can think of. When we're looking for an opportunity to reinvent our economy here in the Ohio Valley, when we turn the corner or maybe see some light at the end of tunnel of our industrial parks along the river in our supply chain opportunities, when we're trying to put people back to work, we are greeted with the potential nonattainment designation, which in my opinion is like putting a big red "X" over Columbiana, Jefferson and Belmont Counties in terms of economic development. Because people who look to build and expand businesses who would fall under possible air regulation or water regulation would, of course, address the entity of the Ohio EPA. And, of course, the nonattainment designation creates an obstacle to job creation. Although it's certainly not appropriate to blame the Ohio EPA or the Federal U.S. EPA in terms of job creation because they have a job to do, they have rules to follow, and I respect that; however, we stand here today because the rules changed having nothing to do with us, having nothing to do with Wheeling-Pittsburgh Steel, having nothing to do with countless other businesses along the river. It had to do with a bureaucracy that determined by rule to change the rule. Not by a vote of the people, not by the voice of the people, not by our federal congressional members or the Senate or confirmed by the Supreme Court as every other law has to be done, but by a rule brought about for whatever reason. The history of this goes this way: In 2010 the U.S. EPA changed the rule of parts per billion from 150 parts per billion to 75 parts per billion. Basically cut it in half. The other thing that was very interesting about this is we changed the rule from a 24-hour attainment period to a one-hour attainment period. I think it's fair to say that the rules have been made a lot tougher. Not an incremental change, not a reasonable change. However, a serious and dramatic change. Now, it wasn't officially done as I mentioned and nor is this officially done. This is an open hearing process and as it says right there, the public interest. And I represent approximately 325,000 people of Eastern Ohio and those 325,000 people ask me every day, how can I go to work, how can my kids stay in the area. We sit inside of an educational facility that does exactly that, trains people to go to work. Trains people to go back to work. Trains people to change careers and go into another work. It helps people go

from maybe a high school education to a career, a technical -- a gateway by virtue of its name, a gateway of education into a higher attainment. The goal: Make more money, have a better life, raise a family, live in the community. While at the same time the rules are changed on us where we can't. What you gentlemen probably remember in growing up and raising your families the folks that worked at the mill or the mine, worked at Cardinal, worked as Sammis, worked at probably a few others I'm not thinking of at the moment. But they were good jobs, decent jobs, the kind you could raise a family on. Today, we look at our valley and we have a distribution center, we have some retail, we have some other places that challenges those living-wage jobs as we would call them. But we have to fight the fight here. And this has been coming for a while and it's not going to end today. But we have a year to fight that fight to raise our voice. Today, I will begin to do exactly what should be done, which is to have a more vocal voice at the federal level, because it starts at the federal level. The good people in Ohio are following the rules that they have been given, but they have been changed on us. Let's go back and look at a few little things. The Sammis Power Plant is probably arguably the most significant environmental impact in this region. The Sammis Power Plant in 2008 contributed over 102,000 tons of SO₂ to the sky, to our environment. In 2010, two years later, it contributed less than 13,000 tons. For the general public, one-tenth, one-tenth of its past contribution to SO₂. Steubenville Works of Wheeling-Pittsburgh Steel, 70 tons of SO₂ to the environment. I would submit to the public that today it contributes zero because it's not operating, nothing. Maybe I'll give it one. I think it's fair to say it's probably negligible at best. A couple of years ago in '08, WTI -- you probably all remember that one -- better known as Heritage today, contributes all of about three-and-a-half tons of SO₂. Three-and-a-half tons. Now, as we look at the monitoring we have to question, is it a fair and reasonable scientific monitoring system. Well, most of this is based on one monitoring site in East Liverpool, Ohio. The other two monitoring sites, one in Mingo I believe on Logan Avenue, the other one in Southern Malaga, Shadyside, the border there give or take a little bit, and we have to wonder in '08, even in '10, the power plant in Shadyside would be idle in the near future. I don't know the tonnage off of that but I would say if Sammis contributed 100,000 tons, I would say the Burger plant in Shadyside probably had a significant tonnage also. I would say that's fair. But in the near future, once again, zero because they're going to close it. It will be idle. 150 people out of work. The tax base for Shadyside destroyed. The school district likely to

close. Shadyside's finances, decimated, because the power plant will no longer exist. Now, hopefully in the future we can do something with it. But a significant tonnage of SO₂ reduced to zero. So I would suspect our attainment in the future would be more likely because we just eliminated a serious environmental contributor. Now, when you go to the Columbiana monitor, which is what much of this is based on, the parts per billion was 111 in '08. In 2007 it was 47. That's about half. That's a fair number, half. Half of what it was two years ago. Somehow I think in the world of science there's a correlation between the Sammis plant and the Columbiana monitoring station. I'm just guessing. But that's a significant reduction in parts per billion in two years, which just so happens to correspond to the Sammis correlation. I'm a reasonable guy but I'm a fairly educated guy too, and I think that those things come together to make sense together. So what's this mean in the long run? So, okay, we get the scarlet letter stuck to our jersey in terms of nonattainment for three counties in Ohio. The other fact that has to exist that there's seven counties in Ohio that are nonattainment. We're just talking about three. And the Ohio EPA, unfortunately, is only talking about three, but there's seven. We're not going to talk about the other four for whatever reason. Apparently they didn't, whatever. But we're just talking three out of seven. What's this mean for us? So let's just assume that General Motors wants to build a plant in our new Horizons Industrial Park. What a great opportunity. A terrific opportunity. And they talk about all the possibilities and all the impact this would have. And I think you gentlemen would agree, most of us would agree, that's a great thing, except one small problem. We would not be able to site that plant in our county or in any of those three counties because of nonattainment. Meaning, we would have to eliminate other SO₂ providers within the county or counties before we could add a facility that would create SO₂. So you've got to reduce one before you add one. Well, what's that mean? That means we increase the cost, that means we increase the regulation, and we do what has occurred in the power-making business over the last twenty years since that summer day when we passed the Clean Air Amendment, which was, we increase the cost of production. And we know what happens when we increase cost: We reduce competitiveness. So that means we would have to take an alternative form. That means we in Ohio in these three counties would lose the opportunity to create jobs that might create SO₂ because we would be prohibited from adding before we subtract from the SO₂. So, if we close another power plant in Eastern Ohio we've got to cut the tax base, put

people out of work. Maybe we'd have an opportunity. But the point is it makes us less competitive in Eastern Ohio to create jobs. Now, the fight only begins today with the public hearing because we in Eastern Ohio, in Ohio, need to raise our voices at a better level. But I think, hopefully, our current administration under the Kasich administration has what they call CSI. I think this is a perfectly good opportunity to utilize CSI. Some of us may think of CSI as a very catchy, fun, interesting program on television. It's really an initiative under the State of Ohio which is called the common sense initiative. Now, common sense would lead us to believe -- we've all ridden up and down the river. You folks will leave here and I assume go back to Columbus and you'll probably go down 7 and -- take a right on Route 7 and on the way down there and you will see common sense. When you drive down through there you will see the Steubenville Works and Wheeling-Pittsburgh Steel is idle. You will see Mingo Junction's BOF is idle. You will see that Martins Ferry and Rayland are shadows of themselves from years gone by. You will see the Cardinal plant producing power today. Ironically, that power nine times out of ten goes to Western Pennsylvania and parts of New York. It doesn't necessarily come here to Ohio. But what you will see, and I think it's common sense, you will see the coke battery that follows into West Virginia producing enormous amounts of material for industry. And you will see the Ergon facility, which is an oil refinery, across the river in West Virginia. I don't think it's too far to imagine that the State of West Virginia is having a significant impact on the air quality of Ohio. And I don't want to blame West Virginia for everything, but I think common sense would tell us that when we're idle in Ohio but West Virginia is working in regards to the coke battery in the Ergon facility, which is an oil refinery, and we're pleased and grateful those economic opportunities are there and jobs are there because many Ohioans work there, that's great. But when we put the scarlet letter on us economically in Ohio, we have to at least suggest that West Virginia is contributing to the problem. Because anybody who's ever been in the valley knows it's one valley, both states, and they contribute to that pool of air. So I do know through my conversations with the EPA over the years and most recently today that West Virginia is not in the jurisdiction of the Ohio EPA. Common sense, too. However, I don't recall West Virginia having an attainment problem. I don't believe they have any EPA hearings for the State of West Virginia any time in the near future. I'm not advised of any. I looked. I didn't notice any. I didn't see any. I'm still opened for education on the issue. But the point being is that our partners and our

neighbors in West Virginia are contributing to this issue. Common sense tells us that. Anything else would not be accurate. But we are being punished for it. And that, my friends, is not fair. Because we have been blamed on and on and on in the past for other things from West Virginia. But we have until I believe the end of 2011 and possibly into 2012 to correct this problem to ask for some common sense and some relief from this designation. Because as we struggle, I struggle, other members of the representation, our mayors, our economic development directors, our port authority folks, our Jefferson County leadership, to get us out of this economic trouble, this puts us another two steps behind before we ever get a half a step forward. I will be working with Governor Kasich. I will be working with Congressman Bill Johnson. I'll be working with our federal legislators, Sherrod Brown and Rob Portman, to impress upon the U.S. EPA that not only is this unfair because it's not all of our problem, it's our neighbor's problem. But, number two, changing the rules arbitrarily without the will of the people is not acceptable and we'll fight this every day from here on out. I appreciate the opportunity to express my opinion and share some of the facts. I'll be back and join you in another public meeting with more facts and hopefully letters of support from the entities I've talked about, and I appreciate the opportunity to say so. (Ohio State Senator Jason Wilson)

Response 3:

Thank you for your comments concerning the nonattainment area designation. Ohio EPA understands your concerns regarding the economic struggles within this area and the concern for the possibility of future nonattainment designation that would require emission offsetting for new or modified facilities. As mentioned in our Response 2, we urge our commentors to watch over the next couple years and continue to participate at both the state and federal level. In light of the comments received during this comment period, Ohio EPA has re-evaluated our recommendation and will be recommending partial nonattainment areas for several counties, including Columbiana, Jefferson and Belmont Counties.

Comment 4:

I guess, you know, mainly I came here to ask questions. But for the record I would like to state that I'm Mary Beth Lohse. I live here in Meigs County. I thank you, the EPA, for the work that they're doing on this. I think it's about time that the air pollution problems in this part of the state are recognized. You know, looking at the material that was provided, it looks like, you know, the biggest source of the problems are Kyger Creek and the Gavin Power Plant; and I would hope that any remediation costs would be borne by those power plants.

(Mary Beth Lohse and John Lohse)

Response 4:

Thank you for your comment regarding the Meigs County nonattainment designation. Meigs County is being recommended as a nonattainment county of for the 1-hour SO₂ National Ambient Air Quality Standard based principally on 2008 to 2010 air quality data. SO₂ is a pulmonary irritant and contributes to respiratory illness, alterations in pulmonary defenses, and aggravation of existing cardiovascular disease. After Ohio EPA makes our recommendation U.S. EPA will review the recommendation and provide their own recommendation back to Ohio. We will be given an opportunity to comment on U.S. EPA's recommendation before U.S. EPA makes a final determination on which counties will be nonattainment for this revised standard in June 2012. At that time U.S. EPA typically gives each State an opportunity to update any recommendation made with the latest 3-year air quality data, if it is available at that time. If appropriate, Ohio EPA will revise its recommendation to U.S. EPA at that time based on 2009 to 2011 data.

The Clean Air Act requires Ohio EPA to submit recommendations for area designation in addition to controlling emissions in nonattainment areas to bring the area into compliance with the respective standard. As part of the next steps under the new SO₂ standard, Ohio EPA will prepare implementation plans to bring areas into attainment. Ohio EPA will perform various analysis, including modeling, to determine the sources that impact the monitored violations and what controls or programs are necessary to bring the area into attainment by the attainment date. We urge our commentors to watch over the next couple years and continue to participate at both the state and federal level.

Comment 5:

On April 14, 2011, Ohio EPA issued a draft of Ohio's designation recommendations for the revised 1-hour SO₂ standard. The draft report recommends that: 1) seven areas be designated nonattainment; 2) thirty-six counties be designated attainment; and 3) the rest of the state be designated unclassifiable. Prior to submitting Ohio's formal recommendations, due to U.S. EPA by June 3, 2011, Ohio EPA has solicited comments on the above recommendations.

The following are comments of the Ohio Utility Group and its specified member companies:

Buckeye Power, Inc.

Columbus Southern Power Company (a unit of AEP)

The Dayton Power and Light Company

Duke Energy Ohio

FirstEnergy

Ohio Power Company (a unit of AEP)
Ohio Valley Electric Corporation
hereinafter, "the Utilities."

The Utilities support Ohio EPA's nonattainment recommendations based on ambient air quality monitoring data indicating a violation of the revised SO₂ standard. In the preamble to the revised National Ambient Air Quality Standard ("NAAQS") for SO₂ EPA recognized that it would not be realistic or appropriate for the states to complete modeling for all significant sources of SO₂ before the designation recommendations are to be submitted to EPA on June 3, 2011. A complete and accurate modeling analysis will require a thorough understanding of the revised AERMOD model and U.S. EPA's "Modeling Guidance for SO₂ NAAQS Designations." Furthermore, EPA expects states to submit a modeling and analysis protocol that details the methodology and model inputs *before* commencement of the modeling exercise.¹ As such, the Utilities support Ohio EPA's decision to refrain from conducting additional modeling as part of the recommendation process and, based on information that is currently available, submit that the nonattainment recommendations are proper.

The Utilities also support Ohio EPA's attainment recommendations. In the SO₂ Modeling Guidance, EPA explained that an area may be designated "attainment" if it has no monitored violations and it "supported by information clearly demonstrating that there are no violations of the SO₂ NAAQS inside the area boundary."² Ohio EPA has satisfied this standard for each of the 36 counties recommended as an attainment area.

The information submitted in Ohio EPA's report confirms that, for each county recommended as an attainment area, there are no violating monitors (or monitoring is not required), and the county does not have any sources that emit more than 100 tpy of SO₂ violations within any of the recommended attainment areas. Therefore, Ohio EPA's attainment recommendations are justified and no additional modeling in those 36 counties is necessary. (Born, representing the Ohio Utilities Group)

Response 5: Thank you for your support of both the recommended attainment and nonattainment designations.

Comment 6: ArcelorMittal Cleveland Inc. (ArcelorMittal) appreciates the opportunity to comment on Ohio EPA's proposed area designation recommendations for the sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). ArcelorMittal

is a fully-integrated iron and steel mill located in the industrial valley of Cuyahoga County that employs more than 1,525 workers. ArcelorMittal Cleveland has also participated actively in the Northeast Ohio Area-wide Coordinating Agency (NOACA) air quality task force, which studies the effect of nonattainment designations on economic development and planning in Cuyahoga County and Northeast Ohio.

ArcelorMittal Cleveland is deeply concerned over Ohio EPA's proposal to designate Cuyahoga County as nonattainment for SO₂. The nonattainment designation is based on the results of a single monitor (located at E.14th and Orange Avenue) that suggests the SO₂ NAAQS of 75 ppb has been exceeded by 1 ppb (the three-year average design value for this monitor is identified as 76 ppb). The data for this monitor is of questionable reliability, as the only individual year demonstrating an exceedence of the SO₂ NAAQS is also a year in which the monitor failed to collect complete data for 2 out of 4 quarters. See OHIO ENVIRONMENTAL PROTECTION AGENCY, OHIO'S 2010 REVISED SULFUR DIOXIDE NATIONAL AMBIENT AIR QUALITY STANDARD RECOMMENDED DESIGNATIONS AND NONATTAINMENT BOUNDARIES at 12 (hereinafter "Ohio EPA SO₂ Report"). Incomplete data are inherently less reliable than complete data and extra care must be taken to ensure that using incomplete data do not compromise the conclusions drawn from the results. Three other monitors with complete data for the three-year design period demonstrate that Cuyahoga County is in attainment, and these three monitors are more than sufficient to meet the minimum monitor requirements established by federal regulations. These factors justify excluding the incomplete data and relying on the complete data to conclude that Cuyahoga County is monitoring attainment with the SO₂ NAAQS.

Ohio EPA is also required to consider other factors when designating Cuyahoga County. For instance, nonattainment designations can be justified if sources in a county are contributing to nonattainment in other areas. After considering wind direction and source contributions, Ohio EPA has determined that Cuyahoga County is not contributing to the monitored exceedences at the Lake County monitors. See Ohio EPA SO₂ Report at 56. Since Ohio EPA has not completed its air dispersion modeling for SO₂, Ohio EPA must designate Cuyahoga County as "unclassifiable" for now, but the data do not support a nonattainment designation for SO₂.

Ohio EPA may alternatively consider a nonattainment area that is narrowly drawn around the nonattaining monitors and the

coal-fired power plants along the lakeshore. These three plants emit over 80% of the SO₂ emissions in Northeast Ohio and only the monitors in close proximity to these sources indicate nonattainment with the one-hour SO₂ standard. ArcelorMittal and the other manufacturers in the Cuyahoga Valley should not suffer the burden of a nonattainment designation when the monitors closest to this area indicate attainment with the standard. Moreover, these attaining monitors are in between the Cuyahoga Valley and the monitors indicating nonattainment that are closer to the lakeshore power plants leaving no doubt that the manufacturing corridor in the Cuyahoga Valley is not contributing to the nonattainment levels at these monitors. These special circumstances support a nonattainment boundary narrowly drawn along the lakeshore to focus on those areas and sources contributing SO₂ to the nonattaining monitors.

The economic and regulatory consequences of a nonattainment area designation can be significant. Cuyahoga County cannot afford to let questionable monitoring results add another obstacle to its economic recovery. A study by the National Economic Research Associates (NERA) predicted 14,000 jobs (approximately 9%) would be lost in Greater Cincinnati due to its ozone nonattainment designation from 1995-2000. Greater Cincinnati actually lost 35,000 manufacturing jobs (over 20%) during this nonattainment era, and the economic uncertainty associated with the nonattainment designation contributed to this decline according to testimony presented to the U.S. Senate Subcommittee on Clean Air, Climate Change and Nuclear Safety by Michael Fisher, President of the Greater Cincinnati Chamber of Commerce (April 1, 2004). In these difficult economic times, Ohio EPA has an obligation to ensure that it is relying only on the best and most complete monitor data and that it is narrowly tailoring the remedy to fit only the area containing sources contributing to nonattainment.

I. Cuyahoga County Should Be Designated "Unclassifiable" until SO₂ Modeling Is Complete

A. It Is Inappropriate to Designate Cuyahoga County as Nonattainment Based on Monitoring Data with a Data Capture Rate below 75 Percent

The only monitor indicated nonattainment in Cuyahoga County is Monitor 390350060, located at the corner of E.14th Street and Orange Avenue near downtown Cleveland. During 2008 and

2010, this monitor registered SO₂ levels at or below the 75 ppb SO₂ NAAQS. Only in 2009 did the monitor indicate an exceedence at 83 ppb. According to Appendix A of the Ohio EPA SO₂ Report, this monitor had complete data for only 2 of 4 quarters in 2009. During these quarters, the monitor collected less than 75 percent of the available data. In the absence of complete data, Ohio EPA is required to follow the procedures in 40 CFR Part 50, Appendix T to determine if another technique may be used to qualify the data. One such technique is to use the highest recorded level to fill the data gaps, which will artificially inflate monitoring results. Since this monitor is just one ppb over the standard, any artificially conservative factor would turn this monitor from attainment to nonattainment. The public record made available for comment does not indicate how this incomplete data for 2009 was deemed appropriate for use in determining nonattainment. ArcelorMittal respectfully requests that EPA make available the methods used to qualify the incomplete data from this monitor for 2009 and provide an additional opportunity for public review and comment if it intends to continue using the data from this monitor.

B. Ohio EPA Should Rely on the Three Monitors with Reliable Data to Determine Attainment Status

Reliance on a single monitor demonstrating nonattainment by 1 ppb is particularly problematic considering the number of available monitors in Cuyahoga County. 40 CFR Part 58, Appendix D requires a minimum of only three monitors in each core based statistical area (CBSA). The relevant CBSA encompasses several counties beyond Cuyahoga County, making the three monitors present within its borders more than sufficient to satisfy the requirements of Appendix D. Ohio EPA does not need the incomplete data from the monitor at E.14th and Orange to designate Cuyahoga County for ambient SO₂, therefore, the agency does not need to go to extraordinary lengths to try and qualify the incomplete data for use. Ohio EPA should not allow this data to be used because it is clear that the conservative assumptions required to qualify incomplete data and fill the data gaps are the sole reason the monitor exceeds the standard. Cuyahoga County can be designated unclassifiable pending the SO₂ modeling data by relying on the three monitors in the county with four full quarters of complete data for all three years used in the design value calculation.

II. Alternatively, Ohio EPA May Use Its Discretion to Concentrate the Nonattainment Area around the Monitors Demonstrating Nonattainment and Designate the Remainder of the Area as Unclassifiable

U.S. EPA has provided states with discretion in setting the boundaries of its nonattainment areas. In addition to monitoring data, Ohio EPA may consider emission-related data, meteorology, geography, and jurisdictional boundaries to designate only a portion of a county as nonattainment. Ohio EPA is not required to follow the jurisdictional boundaries of a county when the data support a different outcome. See Memorandum from Stephen D. Page, Director, Office of Air Quality Planning and Standards, to Regional Air Division Directors, Regions I-X, re: Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards at 5 (Mar. 24, 2011); see also STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY, DIVISION OF AIR POLLUTION CONTROL, OHIO'S 2008 LEAD STANDARD RECOMMENDED DESIGNATIONS AND NONATTAINMENT BOUNDARIES at 1, 19-48 (Oct. 5, 2010) (designating only partial counties as nonattainment) subsequently approved by U.S. EPA at 75 Fed. Reg. 71043, 71043 (Nov. 22, 2010). Ohio EPA has already determined that the southern counties that are part of the Northeast Ohio metropolitan statistical area can be excluded from the nonattainment designation. A close look at the data indicates that the proper nonattainment boundary can be moved further north than Ohio EPA is currently proposing by looking past the county jurisdictional boundaries.

For Lorain, Cuyahoga and Lake Counties along the Lake Erie lakeshore, the three coal-fired utility plants are by far the most significant SO₂ sources in the area. The monitors that exceed the 75 ppb standard are those closest to the lakeshore and those that are primarily influenced by these coal-fired utilities. Ohio EPA acknowledged in its SO₂ Report that the Cuyahoga County lakeshore utility plant has the highest SO₂ emissions in the county, double the emissions of the next highest emitter and more than 6 times the emission of ArcelorMittal's Cleveland Plant. Also, the complying monitors are all south and southeast of the violating monitor and are located closer to the Cuyahoga Valley manufacturing sources, including the ArcelorMittal Cleveland facility. Ohio EPA recognized that the single monitor exceedence in Cuyahoga County indicates "a more localized issue," as "monitors to the south and southeast of the violating monitors are significantly below the standard." Ohio EPA SO₂ Report at 11-12. The highest area

monitor in Lake County is primarily influenced by the Eastlake power plant and Ohio EPA has determined that the power plant in Lorain County is contributing to nonattainment at downwind monitors. Thus, the data support a nonattainment boundary that encompasses the three primary power plants along Lake Erie and the nonattainment monitors they influence. The boundary should be north of the Cuyahoga Valley manufacturers and the attainment monitors that prove these sources are not contributing to the nonattainment monitors that are farther away.

This approach to boundary setting helps Ohio's economy and its jobs. Manufacturers competing in a global market have a hard time absorbing local cost burdens that are not shared by their competitors. This is why nonattainment designations have historically had a devastating impact on manufacturing jobs. In Northeast Ohio, manufacturing jobs have been hit hard and the economic recovery has been slow. The last thing we need is a new obstacle to job growth in our region. To preserve jobs and promote economic recovery, Ohio EPA must propose the narrowest nonattainment boundaries that the data can justify. For the reasons outlined above, that boundary should not encompass ArcelorMittal's Cleveland facility and the other manufacturers in the Cuyahoga Valley. (Stan Rihtar, Manager ArcelorMittal)

Response 6: Thank you for your comments concerning the nonattainment area designation for Cleveland. Upon further review of Appendix T, Ohio EPA is recommending Cuyahoga County be designated as unclassifiable. Please refer to page 67 of the document for Ohio EPA's rationale.

Comment 7: These comments are submitted on behalf of the Sierra Club and the Natural Resources Defense Council (NRDC) and their members in Ohio. EPA promulgated a new National Ambient Air Quality Standard (NAAQS) for sulfur oxides expressed as a 1 - hour standard. This new standard was necessary to protect public health from the serious health threats posed by short - term exposure to sulfur compounds. The health data relied upon by EPA overwhelmingly indicated that increased asthma attacks and hospital visits are attributable to spikes in short term sulfur compound concentrations in the air. The first step in addressing these health threats is to designate areas of the state as either attaining or not attaining the standard. Those areas that are not attaining the standard get increased scrutiny under the Clean Air Act which, in turn, provides more certain progress toward clean air for Ohio's residents. EPA's

final rule calls for all areas to attain the new 1-hr standard by no later than 2017.

Ohio EPA proposes to designate seven Ohio counties nonattainment for the 1 - hour SO₂ standard based on available monitoring data. Sierra Club and NRDC are glad to see that Ohio EPA has made some effort to follow the applicable legal guidelines. In particular, Ohio EPA took the right approach to designate counties with violating monitors nonattainment, and to look outside county boundaries for sources that are most likely responsible for violations. Ohio EPA's proposed designation of Meigs County and the portion of Gallia county that incorporates the Kyger Creek and James Gavin power plants as nonattainment, as well as the proposed designation of Morgan county and the portion of Washington county that incorporates the Muskingum River power plant as nonattainment, are both examples of Ohio EPA's approach to look outside county boundaries to ensure the real cause of violations is incorporated within the nonattainment boundary. This effort is also striking evidence that in Ohio, 1-hr SO₂ violations are largely caused by coal-fired power plants. (Holly Bressett, Sierra Club)

Response 7: Thank you for your support regarding Ohio EPA's recommendation that partial townships in Gallia and Washington County be designated as nonattainment for the 1-hr SO₂ nonattainment area designations.

Comment 8: Ohio EPA Should Utilize Modeling To Determine Whether Individual SO₂ Sources Are Leading To 1-Hour SO₂ NAAQS Violations

Despite Ohio EPA's efforts to capture large polluters in its proposed nonattainment areas, Sierra Club and NRDC are concerned that Ohio EPA has limited its analysis to the existing monitors and has chosen not to use atmospheric modeling as a supplement to the available monitoring data. Ohio EPA's failure to consider modeling data ignores the fact that SO₂ impacts are localized and are expected to be highest around sulfur emitting facilities. Existing monitors only detect the highest sulfur dioxide concentrations in rare instances where they just happen to be located in the plume of a nearby facility. In Ohio, large sources of SO₂ are being ignored in the initial designation process because they are not located upwind of a nearby monitor.

In the Federal Register notice for the final 1 - hour SO₂ NAAQS, EPA notes that a "hybrid analytic approach" is necessary for designating nonattainment areas and assessing compliance with the 1 - hour standard. This approach uses both modeling and monitoring, together, with modeling being the primary method of determining SO₂ concentrations. While EPA acknowledged that the initial nonattainment designations from states may need to rely primarily on monitoring, EPA specifically noted that final designations would

require modeling. Moreover, SIP development will require modeling. Currently Ohio EPA proposes modeling at a much later date as part of infrastructure SIP development in 2013. This approach is unacceptable not only from an air quality and public health perspective, but also from a SIP planning perspective. The NAAQS must be achieved as "expeditiously as possible," but no later than August, 2017.

Ohio EPA's proposal to wait until 2013 to conduct a modeling analysis for major sources of sulfur dioxide unnecessarily delays an analysis that is critical to properly designating nonattainment areas. The longer the state waits to conduct the modeling, the longer citizens of Ohio are exposed to dangerous air pollution. Furthermore, the power plants that are by far the largest source of SO₂ in Ohio may need to install modern pollution controls and/or change to cleaner fuels to bring areas into attainment. If Ohio EPA continues with its plan to wait until 2013 to submit modeling as part of an infrastructure SIP, power plant operators won't have a clear sense of what technology upgrades or fuel changes are needed until June 2014 when EPA acts on the state's submission. The pollution controls take many years of advanced planning to procure and install. Similarly, a fuel switch requires boiler modifications, as well as new infrastructure and fuel contracts. Leaving just 3 years between the time EPA acts on Ohio EPA's infrastructure SIP and the 2017 attainment date is not nearly enough time to bring Ohio into attainment if these changes are needed. Therefore, Ohio EPA should act immediately to begin the process of modeling Ohio's largest sources of sulfur dioxide in order to institute the appropriate SIP measures as quickly as possible. (Holly Bressett, Sierra Club)

Response 8: Ohio EPA is acting immediately to perform the additional modeling for the June 2013 Infrastructure SIP. This will be significant, recourse intensive work and Ohio EPA anticipates the work necessary to complete this project is on the scale of years. Ohio EPA does not view this as "waiting" until 2013. During this process Ohio EPA will be working with the regulated community to prepare for the necessary strategies needed to achieve the standard by 2017. Utilities located in Ohio are well aware of the types of controls and upgrades that will be necessitated in the future not only to address the SO₂ standard, but also the upcoming Transport Rule and Utility MACT. It is not necessary to wait for USEPA to act on Ohio's suggested control strategy in order for Ohio EPA to implement that strategy. Often, implementation occurs before USEPA takes final action.

Comment 9: Ohio EPA Should Consider Several Additional Counties for Initial Nonattainment Designation

Ohio is home to several coal-fired power plants, many of which operate without modern pollution controls, emitting hundreds of thousands of tons of SO₂ annually. Ohio EPA's proposed nonattainment areas are, without exception, impacted by pollution from these coal-fired power plants. The impact of these plants is also apparent in areas of Ohio not currently proposed for nonattainment designation. For example, the Beckjord coal-fired power plant, located in Clermont county, emitted approximately 41,900 tons of SO₂ in 2009. Beckjord's total emissions are much greater than other coal-fired plants that Ohio EPA found are contributing to nonattainment (See Cuyahoga county's Lakeshore Plant (4582 TPY)), but Clermont county does not have an air quality monitor. Given the very clear link between coal-fired power plants and nonattainment areas in other parts of Ohio, Ohio EPA should model the impacts of all coal-fired power plants not already within a proposed nonattainment area, including Beckjord, as part of its initial area designations. Modeling the impacts of the coal-fired power plants that are not located near existing monitors is not the cumbersome task that EPA alludes to in the preamble to the final rule. Ohio EPA lists approximately 600 sources in its SO₂ Emissions Inventory in Appendix C. Instead of hiding behind a long list of SO₂ sources in Ohio, Ohio EPA can easily complete modeling for the list of 10 coal-fired power plants below in light of the overwhelming evidence that coal-fired power plants are causing violations of the 1-hr standard in other parts of Ohio. This relatively simple step must be taken quickly to protect air quality and provide as much time as possible to regulated industry to reduce emissions as needed to attain the 1-hr standard.

Plant	Owner	County	Size (MW)	TPY (2009)	SO ₂
Ashtabula	First Energy	Ashtabula	256	4,955	
Avon Lake	Orion Power	Lorain	760	42,000	
Bay Shore	First Energy	Lucas	640	7,800	
Conesville	Columbus Southern Pwr.	Coshocton	1900	26,000	
J.M. Stuart	Dayton Power & Light	Adams	2440	64,000	
Kille	Dayton Power & Light	Adams	661	1,973	
Miami Fort	Duke Energy	Hamilton	1250	25,000	
Niles	Orion Power	Trumbull	260	4,300	
Walter Beckjord	Duke Energy	Clermont	1220	41,900	
W.H. Zimmer	Duke Energy	Clermont	1426	14,280	

(Holly Bressett, Sierra Club)

Response 9:

Ohio EPA does not view the modeling necessitated for the above plants as a quick and easy project. It is important that any modeling conducted follows an appropriate protocol and includes sources contained in Appendix C. This is not Ohio EPA hiding behind a list of SO₂ sources. USEPA has acknowledged in their final rule and guidance that a collection of smaller sources may also be important to consider when addressing this standard. Ohio EPA also wishes to point out that the attainment date for meeting the standard remains at 2017 regardless of whether an area is initially designated as nonattainment or later modeled and shows nonattainment. In actuality, under USEPA's final rule, Ohio's plan for attainment (e.g., control strategy) but be developed sooner for areas designated as unclassifiable compared to those designated as attainment. Infrastructure SIPs are due in June 2013 while nonattainment area SIPs are due 18 months after designations are effective (~ Dec 2013). Ohio EPA will be working diligently to perform the work necessary to meet these deadlines and progress towards attainment as expeditiously as practicable.

Comment 10:

Ohio EPA's Proposal to Designate "Attainment" Areas is Arbitrary

EPA's preamble to the final 1-hr SO₂ standard and its subsequent guidance are clear that attainment designations require the support of monitoring AND modeling data. Ohio EPA currently proposes 36 counties for attainment where it has neither monitor nor modeling data. Ohio EPA bases its decision to designate these areas attainment on the fact that large sources of SO₂ do not reside in those counties. This analysis completely ignores the well-known fact that pollution crosses county boundaries, so while the source may not reside in the county, a source just over the county line may create a nonattainment area that straddles the county line. This point is well illustrated in the case of Meigs and Morgan counties, both of which have violating monitors exclusively due to emissions from out-of-county sources. Ohio EPA's approach is not only contrary to EPA's stated approach to attainment area designations, but its logic runs contrary to its own experience in various parts of the state. Ohio EPA should at least designate these areas unclassifiable until additional modeling is done.

As the June deadline for initial area designations approaches, Ohio EPA should begin a rigorous modeling program to model the impacts of the largest sources of SO₂ pollution in Ohio, including several coal-fired power plants not already captured in Ohio EPA's proposed nonattainment areas. This modeling is essential to the expeditious attainment of the 1-hr standard that is designed to protect public health. In advance of Ohio EPA's June submission to EPA, Ohio EPA should change all of its proposed "attainment" designations to "unclassifiable" because the proposed attainment designations are wholly unsupported. (Holly Bressett, Sierra Club)

Response 10:

Ohio EPA's recommendation that these areas be designated as attainment is based on a lack of large sources, and more specifically, a lack of a collection of smaller sources, that could cause or contribute to nonattainment in these areas. Ohio EPA intends to retain this recommendation and will await USEPA's review. In the meantime, Ohio EPA will continue working on the modeling necessary for the June 2013 Infrastructure SIP focusing on areas with a higher probability for impacts.