



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

June 23, 2011

Cheryl Newton
Director, Air and Radiation Division
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3950

Re: Clarification on Ohio's December 5, 2007 Infrastructure State Implementation Plan (SIP) to address the 1997 fine particulate matter (PM2.5) national ambient air quality standard (NAAQS).

Dear Ms. Newton:

I am writing to clarify how Ohio EPA will interpret and apply the Prevention of Significant Deterioration (PSD) program provisions in the Ohio State Implementation Plan (SIP) in order to satisfy PSD permitting requirements for PM2.5.

In the Infrastructure SIP revision which we submitted on December 5, 2007, we committed to follow the 1997 PM10 Surrogate Policy in place at that time. This policy had been interpreted by U.S. EPA to allow states to satisfy the PSD permitting requirements for PM2.5 by demonstrating compliance with the PM10 requirements. Since we submitted the Infrastructure SIP revision, U.S. EPA has confirmed that the 1997 PM10 Surrogate Policy ended on May 16, 2011.

As a result, Ohio will not consider compliance with the PSD requirements for PM10 to be sufficient to satisfy the applicable PSD permitting requirements for PM2.5. Ohio has the legal authority under its approved PSD program regulations to directly regulate PM2.5 for purposes of meeting the applicable requirements of the PSD program and to effectively enforce all applicable requirements. Ohio has discontinued relying on the 1997 PM10 Surrogate Policy to satisfy the PSD requirements for PM2.5. Since Ohio had previously implemented this as policy, no administrative rule(s) needs to be revised to terminate its use. The Ohio EPA will require that permit applicants directly evaluate

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PM2.5 emissions and control technologies in PSD permit applications. The record for the permitting decision will include an explanation of how the permit conditions satisfy the Best Available Control Technology requirements for PM2.5 and assure that the source will not cause or contribute to a violation of the National Ambient Air Quality Standards for PM2.5.

Sincerely,

A handwritten signature in cursive script that reads "Bob Hodanbosi".

Bob Hodanbosi
Chief, Division of Air Pollution Control
Ohio EPA

