



State of Ohio Environmental Protection Agency

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October 3, 2007

Anna Garcia  
Acting Executive Director  
Ozone Transport Commission  
Hall of the States  
444 North Capitol Street, Suite 638  
Washington, DC 20001

Dear Ms. Garcia:

The purpose of this letter is to respond to your letter dated July 30, 2007, letter and the MANE-VU States' initial request for a course of action by states outside of the MANE-VU region toward assuming reasonable progress at your Class I areas (i.e., the MANE-VU "ask").

I would like to first express my thanks to the MANE-VU States and their representatives for traveling to Chicago on August 6 for the initial consultation meeting. This was a productive meeting and sets the stage for further constructive dialogue.

At the August 6 meeting, the following action items were identified:

1. Define next steps for multi-pollutant approach to reduce regional haze, PM 2.5, and ozone.
2. Discuss crafting a national "ask" among interested MANE-VU and MRPO states regarding national action on EGUs, including potential multi-pollutant control levels for a possible CAIR Phase III with emission rates and output-based options.
3. Pursue discussions on options for reducing SO<sub>2</sub> (and NO<sub>x</sub>) emissions from ICI boilers, including:
  - Reconvening the MANE-VU/MRPO ICI boiler workgroup to re-examine the workgroup's January 2007 straw proposal;
  - Developing a process for sharing information on SO<sub>2</sub> RACT for ICI boilers, and examining potential SO<sub>2</sub> control measures;
  - Contacting NACAA regarding expansion of the Boiler MACT model rule work to address SO<sub>2</sub> and NO<sub>x</sub>; and
  - Discuss crafting a revised national "ask" among interested MANE-VU and MRPO states regarding needs for national action on ICI boilers.

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

4. Discuss crafting a national “ask” regarding low sulfur fuel for all off-road sources, and share information on biodiesel.
5. Gather information on pending federal controls for locomotives and commercial marine vessels.
6. Continue to share emissions data and modeling analyses, and continue dialogue between MANE-VU and MRPO states regarding SIP submittals. (Note, clarification of the MANE-VU “ask” is still needed.)
7. Develop list of controls for units that will be scrubbed, not just MANE-VU’s list of 167 stacks.

The above elements provide a significant starting point for our consultation activities. In addition, I suggest the following actions be initiated in order to move the process forward:

- Establish a clear understanding of the MANE-VU “ask” by agreeing on base emissions inventories and control assumptions;
- Draft language on a national “ask” based on the multi-pollutant needs of the states, including potential controls for EGUs and ICI boilers; and
- Reconvene the MANE-VU/MRPO ICI boiler workgroup (with participation by the Southeastern States and USEPA) to re-examine and refine the workgroup’s January 2007 straw proposal.

It appears that, based on our review of the Round 5 Midwest RPO modeling for 2018 and U.S. EPA modeling for 2015, reasonable further progress is essentially meeting or exceeding reasonable further progress interim goals in each of the MANE-VU Class I areas. Is this not correct? It is apparent that significant regional emission reduction programs are achieving health and interim visibility goals across the majority of the eastern United States. With the current goals achieved, the focus should be on the development of the next tier of cost-effective controls, looking at the need for reductions to achieve the revised ambient air quality standards and considering a future regional haze interim milestone date (e.g., 2005). CAIR phase 3, ICI controls and regional programs for fuels, etc. should be the focus for making continued progress towards the 2064 ultimate regional haze goals.

Ms. Anna Garcia  
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Finally, I believe it is premature to respond to the MANE-VU "ask" for additional reductions in SO<sub>2</sub> emissions from EGU and non-EGU sources. The work and discussion noted above are needed before an accurate estimate of future air quality in MANE-VU can be completed. While I am unable to commit to any particular course of action at this time, I am looking forward to further discussions which consider our mutual air quality interests.

Sincerely,

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

Robert Hodanbosi, Chief  
Division of Air Pollution Control