



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

APR 14 2014

Ms. Susan Hedman
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Revision to Ohio's State Implementation Plan (SIP) for Regional Haze – BART Compliance Date for P.H. Glatfelter

Dear Administrator Hedman:

On March 11, 2011, Ohio EPA submitted our Regional Haze SIP to U.S. EPA. Ohio's SIP was subsequently approved on July 2, 2012 (77 FR 39177). Ohio's SIP included the applicability of Best Available Retrofit Technology (BART) to Ohio's only BART source, P.H. Glatfelter. Ohio's submittal included a compliance date for BART emission reductions of December 31, 2014. This compliance date was aligned with P.H. Glatfelter's expected compliance date for the Industrial Boiler Maximum Achievable Control Technology (MACT) requirements promulgated by U.S. EPA in March of 2011 and allowed for achievement of BART well before the compliance date required by U.S. EPA's BART regulations. Under U.S. EPA's regulations (40 CFR 51.308(3)(1)(iv)), BART is to be implemented "as expeditiously as practicable, but in no event later than 5 years after approval of the implementation plan revision." This date is July 2, 2017.

On February 6, 2014, Ohio EPA received a request (Appendix A) from P.H. Glatfelter to extend the original compliance date to January 31, 2017. This request is discussed in detail in the attached letter and is based upon the litigation, revision and new compliance date associated with the Industrial Boiler MACT (as extended by Ohio EPA). As noted above, the original compliance date was designed so that these dates aligned and allowed for P.H. Glatfelter to select and implement a control strategy that would address both the MACT and BART without unnecessarily burdening them with additional planning, design, time, recourse and money constraints. Because the newly requested compliance date still meets U.S. EPA's regulatory compliance date deadlines for BART, Ohio EPA is in agreement with this extension. We ask that U.S. EPA revise Section 8.5 (page 26) of Ohio's original approved SIP submittal as follows:

1. Extend the compliance date from December 31, 2014 to January 31, 2017.

2. Revise the requirement that P.H. Glatfelter submit an application for modification of the federally enforceable permit (that will include a compliance plan outlining, at a minimum, the specific, selected control technologies and methods of compliance) from December 31, 2013 to requiring the submittal provide for sufficient time for Ohio EPA to include these requirements, along with any appropriate monitoring, recordkeeping, and reporting requirements, in the federally enforceable permit by no later than January 31, 2017.
3. Revise the requirement that a continuous emission monitoring system (CEMS) to be installed prior to January 31, 2017 rather than December 31, 2014.

Ohio EPA held a public hearing on March 25, 2014 and accepted written comments through that date. The Federal Land Managers were consulted and included in the public comment process. Appendix B contains the public notice and results of this public comment period and hearing.

This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is available at <http://www.epa.ohio.gov/dapc/SIP/haze.aspx>.

If you have any questions concerning this submittal, please feel free to contact Jennifer Van Vlerah of the Division of Air Pollution Control at 614-644-3696 or jennifer.vanvlerah@epa.ohio.gov.

Sincerely,



Craig W. Butler
Director

Enclosures

cc: Bob Hodanbosi, Ohio EPA, DAPC
John Summerhays, U.S. EPA