

REDESIGNATION REQUEST AND  
MAINTENANCE PLAN FOR  
THE CINCINNATI-HAMILTON, OH-KY-IN  
8- HOUR OZONE  
NONATTAINMENT AREA

Butler, Clermont, Clinton, Hamilton,  
and Warren Counties, Ohio

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# REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE CINCINNATI-HAMILTON, OHIO OZONE NONATTAINMENT AREA

Butler, Clermont, Clinton, Hamilton, and Warren Counties, Ohio

## CHAPTER ONE

### Introduction

The Clean Air Act (CAA) requires areas failing to meet the National Ambient Air Quality Standard (NAAQS) for ozone to develop State Implementation Plans (SIP's) to expeditiously attain and maintain the standard. In 1997, the United States Environmental Protection Agency (U.S. EPA) revised the air quality standard for ozone replacing the 1979 one-hour standard with an eight-hour ozone standard set at 0.08 parts per million (ppm). The standard was challenged legally and upheld by the U.S. Supreme Court in February of 2001.

On April 30, 2004, U.S. EPA designated 134 nonattainment areas for the eight-hour ozone standard. 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 eight-hour ozone 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.

### Background

The current Cincinnati-Hamilton nonattainment area includes the following Counties: Butler, Clermont, Clinton, Hamilton, and Warren in Ohio; Dearborn (partial nonattainment of Lawrenceburg Township only) in Indiana; and Boone, Campbell, and Kenton in Kentucky.

As part of the 1990 CAA Amendments re-evaluation, the following Counties within the Cincinnati-Hamilton area were designated as moderate

nonattainment for the one-hour ozone standard pursuant to the CAA and, therefore, were subject to nonattainment area rulemakings: Butler, Clermont, Hamilton, and Warren Counties in Ohio and Boone, Campbell and Kenton Counties in Kentucky. The Ohio portion of the Cincinnati-Hamilton area was redesignated to attainment on June 19, 2000 (65 FR 37879). Clinton County, Ohio was designated as a transitional nonattainment area. Clinton County was redesignated to attainment on March 21, 1996 (61 FR 11560). A maintenance plan was approved at those times.

As a result of the 2004 ozone designations, U.S. EPA designated the Cincinnati-Hamilton area basic nonattainment for the eight-hour standard, and Ohio EPA was required to develop a plan to reduce volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) emissions to meet the federal eight-hour air quality standard for ozone by June 2009.

This document is intended to support Ohio's request that the Ohio portions of the Cincinnati-Hamilton area be redesignated from nonattainment to attainment for the eight-hour ozone standard. In addition, the States of Kentucky and Indiana also intend to submit requests for their respective portions of the Cincinnati-Hamilton area. The Cincinnati-Hamilton area has recorded three (3) years of complete quality-assured ambient air quality monitoring data for the years 2007 – 2009 demonstrating attainment of the eight-hour ozone standard.

#### Geographical Description

The Cincinnati-Hamilton eight-hour ozone nonattainment area is located in southwest Ohio and includes the following Counties of: Butler, Clermont, Clinton, Hamilton, and Warren in Ohio; Dearborn (partial nonattainment of Lawrenceburg Township only) in Indiana; and Boone, Campbell, and Kenton in Kentucky. This area is shown in Figure 1 under Chapter Three.

#### Status of Air Quality

Ozone monitoring data for the most recent three (3) years, 2007 through 2009, demonstrate that the air quality has met the NAAQS for ozone in this basic nonattainment area. The NAAQS attainment, accompanied by decreases in emission levels discussed in Chapter Four, supports a redesignation to attainment for the Cincinnati-Hamilton area based on the requirements in Section 107(d)(3)(E) of the CAA.

## 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 V.

Below is a summary of each redesignation criterion as it applies to the Cincinnati-Hamilton area.

i.) Attainment of the standard

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. The supplemental modeling is not required for ozone nonattainment areas seeking redesignation; however, in Appendix C and Appendix D the most recent modeling results showing future attainment and maintenance are provided. Chapter Three discusses this requirement in more detail and provides the attainment demonstration.

ii.) SIP approval

The SIP for the area must be fully approved under Section 110(k) and must satisfy all the requirements that apply to the area. Ohio's SIP was approved on May 9, 1994 (59FR23799) and March 23, 1995 (60FR15235) and includes the Cincinnati-Hamilton area. Chapter Five discusses this requirement in more detail.

iii.) Permanent and enforceable improvement in air quality

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.

The Ohio Counties portion of the Cincinnati-Hamilton area was designated moderate nonattainment for ozone as part of the 1990 CAA Amendments re-evaluation. As a result, Ohio has adopted and implemented control measures for these Counties in that area beyond the federal measures and the initial 1979/1981 Statewide rules. In addition, Ohio EPA has adopted several rules recently that will have an impact Statewide on ozone emissions in the future:

- Portable Fuel Containers requirements
- Architectural and Industrial Maintenance (AIM) Coatings rules
- Consumer Products rules
- Clean Air Interstate Rule (CAIR)
- NO<sub>x</sub> Sip Call Rules

Chapters Four and Five discuss this requirement in more detail.

iv.) Section 110 and Part D requirements

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.

Part D consists of general requirements applicable to all areas which are designated nonattainment based on a violation of the NAAQS.

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 provides for public and local agency participation in planning and emission control rule development. In Ohio's December 5, 2007 and September 4, 2009 infrastructure SIP submissions, Ohio verified that the State fulfills the requirements of Section 110(a)(2) of the Act.

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.

ii.) 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.

v.) Maintenance plans

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 must 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

### OZONE MONITORING<sup>1</sup>

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

#### **Requirement 1 of 4**

A demonstration that the NAAQS for ozone, as published in 40 CFR 50.4, has been attained.

#### **Background**

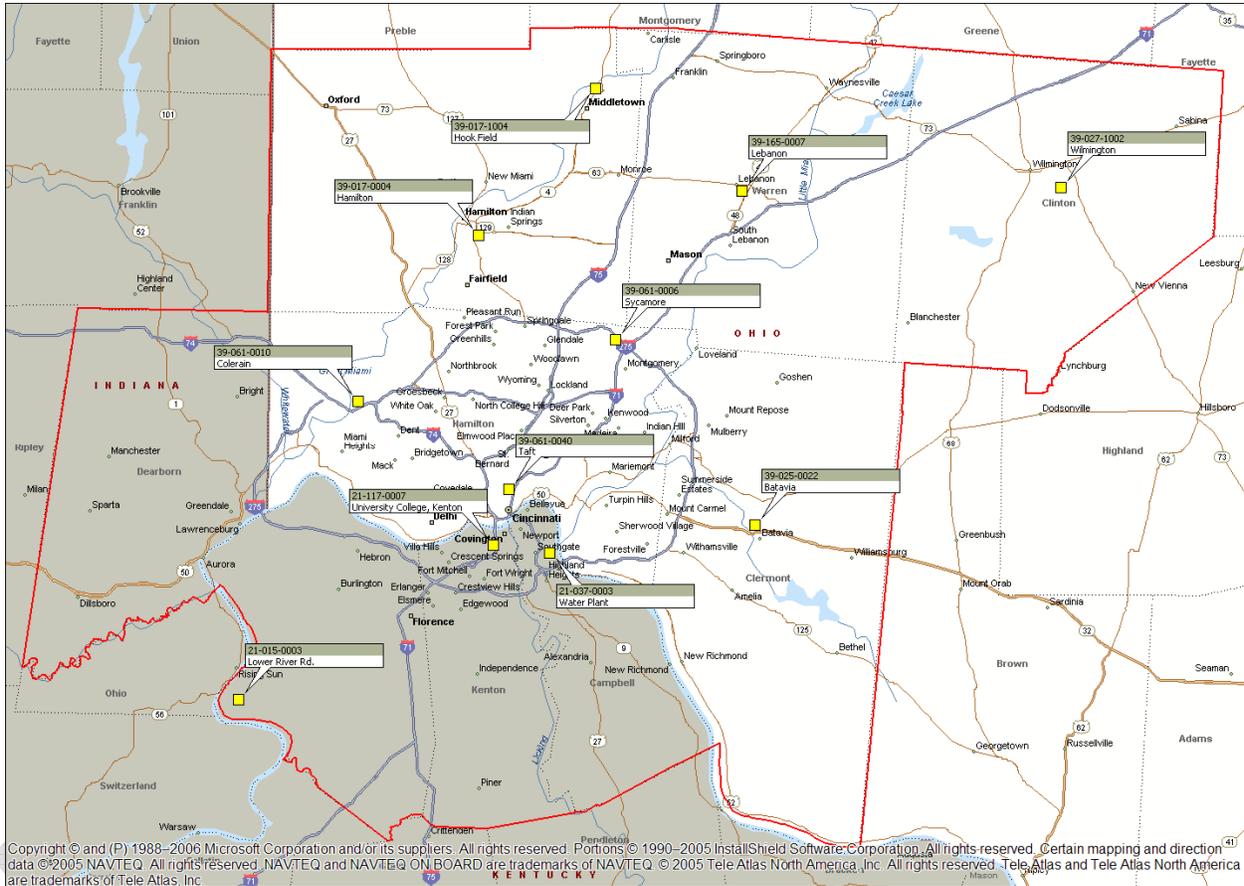
There are eleven monitors measuring ozone concentrations in this nonattainment area. Eight of the eleven monitors, located in Ohio, are operated by Ohio EPA Division of Air Pollution Control, Southwest District Office and the Hamilton County Division of Environmental Services. A listing of the design values based on the three-year average of the annual fourth highest daily maximum eight-hour average ozone concentrations from 2007 through 2009 is shown in Table 1. The locations of the monitoring sites for this nonattainment area are shown on Figure 1.

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<sup>1</sup> The draft version of this redesignation request primarily contains data through the end of August and has not been fully quality assured. However, all data will be incorporated and quality assured, as described in the text of this document, prior to official submittal to U.S. EPA. Ohio EPA does not believe the data as provided in this draft will change appreciably.

## Demonstration

**Figure 1 Map of the Cincinnati-Hamilton, OH nonattainment area and monitor locations**



### **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

The Ohio Environmental Protection Agency (Ohio EPA) has quality assured all data shown in Appendix A in accordance with 40 CFR 58.10 and the Ohio Quality Assurance Manual. Ohio EPA has recorded the data in the AQS database and, therefore, the data are available to the public.

### **Requirement 3 of 4**

A showing that the three-year average of the fourth highest values, based on data from all monitoring sites in the area or its affected downwind environs, are below 85 parts per billion (ppb). (This showing must rely on three complete, consecutive calendar years of quality assured data.)

### **Background**

The following information is taken from U.S. EPA's "Guideline on Data Handling Conventions for the eight-hour ozone National Ambient Air Quality Standard (NAAQS)," U.S. EPA-454/R-98-017, December 1998.

Three complete years of ozone monitoring data are required to demonstrate attainment at a monitoring site. The eight-hour primary and secondary ozone ambient air quality standards are met at an ambient air quality monitoring site when the three-year average of the annual fourth-highest daily maximum eight-hour average ozone concentrations is less than or equal to 0.08 ppm. When this occurs, the site is said to be in attainment. Three significant digits must be carried in the computations. Because the third decimal digit, in ppm, is rounded, 0.084 ppm is the largest concentration that is less than or equal to 0.08 ppm. Therefore, for the purposes of this request, the eight-hour standard is considered to be 0.085 ppm. Values below 0.085 ppm meet the standard, values equal to or greater than 0.085 ppm exceed the standard. These data handling procedures are applied on an individual basis at each monitor in the area. An area is in compliance with the eight-hour ozone NAAQS if, and only if, every monitoring site in the area meets the NAAQS. An individual site's three-year average of the annual fourth highest daily maximum eight-hour average ozone concentrations is also called the site's design value.

Table 1 shows the monitoring data for 2007 – 2009 that were retrieved from the U.S. EPA AQS. The air quality design value for the area is the highest design value among all sites in the area. *Please note that the standard is measured in ppm while the commonly used unit is ppb. For the remainder of this document, ppb will be used.*

## Demonstration

**Table 1 Monitoring Data for the Cincinnati-Hamilton, OH area for 2007 – 2009**

Data source: U.S. EPA Air Quality System (AQS)  
<http://www.epa.gov/ttn/airs/airsaqs/index.htm>

SITE ID	COUNTY	ADDRESS	YEAR	%OBS	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	2007-2009
					8-HR	8-HR	8-HR	8-HR	AVERAGE
39-017-0004	Butler	Hamilton	2007	100	97	96	91	91	78
39-017-0004	Butler	Hamilton	2008	99	89	75	72	71	
39-017-0004	Butler	Hamilton	2009	98	79	78	74	73	
39-017-1004	Butler	Middletown	2007	100	104	97	95	91	82
39-017-1004	Butler	Middletown	2008	96	91	87	82	79	
39-017-1004	Butler	Middletown	2009	100	78	76	76	76	
39-025-0022	Clermont	Batavia	2007	98	93	92	90	86	75
39-025-0022	Clermont	Batavia	2008	97	72	71	71	71	
39-025-0022	Clermont	Batavia	2009	99	71	71	69	69	
39-027-1002	Clinton	Wilmington	2007	99	91	89	85	82	76
39-027-1002	Clinton	Wilmington	2008	96	87	80	77	76	
39-027-1002	Clinton	Wilmington	2009	96	73	72	71	70	
39-061-0006	Hamilton	Cincinnati	2007	96	100	92	91	89	82
39-061-0006	Hamilton	Cincinnati	2008	96	93	89	87	86	
39-061-0006	Hamilton	Cincinnati	2009	98	80	76	75	72	
39-061-0010	Hamilton	Cleves	2007	99	93	91	88	86	76
39-061-0010	Hamilton	Cleves	2008	96	85	79	78	77	
39-061-0010	Hamilton	Cleves	2009	80	69	66	65	65	
39-061-0040	Hamilton	Cincinnati	2007	99	97	93	88	86	80
39-061-	Hamilton	Cincinnati	2008	100	86	83	81	80	

					1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	2007-2009
SITE ID	COUNTY	ADDRESS	YEAR	%OBS	8-HR	8-HR	8-HR	8-HR	AVERAGE
0040									
39-061-0040	Hamilton	Cincinnati	2009	99	77	76	74	74	
39-165-0007	Warren	Lebanon	2007	100	103	89	88	88	82
39-165-0007	Warren	Lebanon	2008	95	92	87	84	82	
39-165-0007	Warren	Lebanon	2009	100	80	80	78	77	
21-015-0003	Boone	Not in City	2007	100	81	79	78	78	68
21-015-0003	Boone	Not in City	2008	98	65	64	64	64	
21-015-0003	Boone	Not in City	2009	98	69	67	65	64	
21-037-3002	Campbell	Highland Heights	2007	100	95	92	88	86	76
21-037-3002	Campbell	Highland Heights	2008	99	84	83	75	75	
21-037-3002	Campbell	Highland Heights	2009	100	75	72	70	68	
21-117-0007	Kenton	Covington	2007	100	93	89	85	85	77
21-117-0007	Kenton	Covington	2008	99	80	77	74	73	
21-117-0007	Kenton	Covington	2009	99	76	75	75	74	
<b>Highest Average</b>									<b>82 ppb</b>

The area's design values have trended downward as emissions have declined due to such factors as cleaner automobiles and fuels, and controls for EGUs, both regionally and locally.

**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 ozone levels at the Ohio sites indicated in Figure 1. Ohio EPA will consult with U.S. EPA Region V 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 58 and all other

federal requirements. Connection to a central station and updates to the Ohio EPA web site<sup>2</sup> will provide real time availability of the data and knowledge of any exceedances. Ohio EPA will enter all data into AQS on a timely basis in accordance with federal guidelines.

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<sup>2</sup> [www.epa.state.oh.us/dapc/](http://www.epa.state.oh.us/dapc/)

## 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 ozone precursor emissions (VOC and NO<sub>x</sub>) representative of the year when the area achieves attainment of the ozone 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 ozone standard; and a commitment to provide future updates of the inventory to enable tracking of emission levels during the 10-year maintenance period.

The emissions inventory development and emissions projection discussion below, with the exception of the mobile (on-road) emissions inventory and projections, identifies procedures used by Ohio EPA and the Lake Michigan Air Directors Consortium (LADCO) regarding emissions from Ohio's portion of the Cincinnati-Hamilton area. Specific emissions data are provided for all Counties, including those in Ohio, Kentucky and Indiana. Indiana and Kentucky emissions data were obtained directly from Indiana and Kentucky, respectively. All of these inventories and emissions projections were prepared using similar methodologies. Ohio recognizes that revisions to the emissions data below may be necessary once Kentucky and Indiana prepare a redesignation request and maintenance plan for their portion of the nonattainment area. Mobile emissions inventories and projections for all Counties were prepared by the Ohio, Kentucky, Indiana Council of Governments (OKI).

#### **Requirement 1 of 5**

A comprehensive emission inventory of the precursors of ozone completed for the base year.

#### **Background**

The point source data are taken from Ohio's annual emissions reporting program. The 2005 periodic inventory has been identified as one of the preferred databases for SIP development and coincides with nonattainment air quality in the Cincinnati-Hamilton area.

Periodic inventories, which include emissions from all sectors - mobile, area, non-road, and point sources - are prepared every three years.

### **Demonstration**

The 2005 inventory is used as the base year for the purpose of this submittal and was submitted to U.S. EPA on June 15, 2007 along with the attainment demonstration for this area. The detailed emission inventory information for the Ohio portion of the Cincinnati-Hamilton area is provided in Appendix B. Emissions of VOC and NO<sub>x</sub> for 2005 are identified 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.

### **Background**

Ohio EPA prepared a comprehensive inventory for the Ohio portion of the Cincinnati-Hamilton area including area, mobile, and point sources for precursors of ozone (VOCs and NO<sub>x</sub>) for base year 2005. The 2005 inventory was submitted to U.S. EPA on June 15, 2007 as part of the attainment demonstration for this area. The information below describes the procedures Ohio EPA used to generate the 2005 base year inventory and to develop SIP-ready modeling inventories and future year projections (Pechan Report<sup>3</sup>). The report by Pechan generated future year estimates of annual emissions for each source sector using accepted growth surrogates. These inventories were provided to the LADCO and have been processed to develop summer-day emissions for use in the air quality analyses. These processed modeling inventories have been identified as the correct iteration of the inventory for use in the redesignation. In this document, references to LADCO include the Midwest Regional Planning Organization. Note, the on-road mobile source sector was addressed by specific modeling as discussed below.

- Area sources were taken from the Ohio 2005 periodic inventory submitted to U.S. EPA. These projections were made from the U.S. Department of Commerce

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[http://www.ladco.org/tech/emis/r5/reports/LADCO%202005%20Base%20Yr%20Growth%20and%20Controls%20Report\\_Final.pdf](http://www.ladco.org/tech/emis/r5/reports/LADCO%202005%20Base%20Yr%20Growth%20and%20Controls%20Report_Final.pdf)

Bureau of Economic Analysis (BEA) growth factors, with some updated local information.

- Mobile source emissions were calculated from MOVES2010-produced emission factors.
- Point source information was compiled from Ohio EPA's 2005 annual emissions inventory database and the 2005 U.S. EPA Air Markets acid rain database<sup>4</sup>.
- Biogenic emissions are not included in these summaries.
- Non-road emissions were generated using U.S. EPA's National Mobile Inventory Model (NMIM) 2002 application. To address concerns about the accuracy of some of the categories in U.S. EPA's non-road emissions model, LADCO contracted with two (2) companies to review the base data and make recommendations. One of the contractors also estimated emissions for three (3) non-road categories not included in U.S. EPA's non-road model. Emissions were estimated for aircraft, commercial marine vessels, and railroads. Recreational motorboat population and spatial surrogates (used to assign emissions to each county) were significantly updated. The populations for the construction equipment category were reviewed and updated based upon surveys completed in the midwest, and the temporal allocation for agricultural sources also was updated.

## **Demonstration**

### **On-Road Emission Estimations**

In coordination with the Ohio Department of Transportation (Ohio DOT), OKI utilizes a regional travel demand forecast model to simulate traffic in the area and to forecast traffic flows for given growth expectations. The model has been validated to observed traffic volumes for the model base year 2005. The model is primarily used as a long range planning tool to evaluate the transportation system including determination of locations where additional travel capacity may be needed and to determine the infrastructure requirements necessary to meet that need. It is also used as a tool for air quality purposes to estimate the total emissions of pollution caused by vehicles in the area. The travel demand forecasting model is used to predict the total daily vehicle miles traveled (VMT), and a U.S. EPA computer program called MOVES2010 is used to calculate

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<sup>4</sup> <http://www.epa.gov/airmarkets/acidrain>

emissions per mile. The product of these is the total amount of pollution emitted by the on-road vehicles for the area. Clinton County is outside the area covered by the regional travel demand model. The Ohio DOT uses traffic counts and local traffic growth rates for the VMT estimates.

## Overview

### Emission Factor Model

OKI's generation of this ozone inventory utilized U.S.EPA's emissions model MOVES 2010 to develop both running and non-running vehicle emission factors for VOC and NO<sub>x</sub>. Emission factors represent summer weekday travel. Local parameters utilized as input to MOVES include 1) average July meteorological data, 2) vehicle type and age data as provided by the Ohio DOT, 3) VMT by vehicle type, 4) fuel formulation reflective of the summer fuel requirements in Southwest Ohio, and 5) VMT distributions by road type and average speeds from the OKI Travel Demand Model.

### OKI Travel Demand Model

Vehicle miles traveled and vehicle hours were estimated using the OKI Travel Demand Model Version 7.6. The OKI Travel Demand Model is composed of CUBE Voyager programs and a series of FORTRAN programs written by OKI. It is a state of the practice model that uses the standard 4 phase sequential modeling approach of trip generation, distribution, modal choice and assignment. The model uses demographic and land use data and capacity and free-flow speed characteristics for each roadway segment in the network to produce a "loaded" highway network with forecasted traffic volumes with revised speeds based on specified speed/capacity relationships.

Travel analysis zones are the basic geographic unit for estimating travel in the OKI model. The OKI region is subdivided into 1608 traffic analysis zones to permit detail as well as manageability. A variety of socioeconomic data items are used in the OKI transportation planning process. These data are used primarily to forecast future travel patterns by serving as independent variables in OKI trip generation equations. The following categories of planning data are utilized:

- Population (household and group quarter)
- Households

- Household vehicles
- Employment (by employment category and zone of work)
- Labor force participation (by zone of residence)
- Area type

The principal data requirements of the OKI travel demand forecasting model are population and employment. From these variables, other characteristics including households, labor force, and personal vehicles may be derived.

OKI utilizes both base year (2005) and future year data (2015, 2020, and 2030) in the planning process. Planning data are maintained at the Traffic Analysis Zone (TAZ) level, and originate in the 2000 Census of Population and Housing. Base year and future year population, households, household vehicles, labor force and employment are developed through various methods. All of the variables represent the latest OKI planning assumptions. OKI's Travel Demand Model has been validated to observed traffic volumes for the model base year 2005. The modeling network also includes Greene, Miami and Montgomery counties in Ohio and the remainder of Dearborn County Indiana. The difference between estimated vehicle miles traveled (VMT) and 2005 observed VMT is less than 1%. The modeling network encompasses the entire ozone maintenance area with the exception of Clinton County, Ohio. Clinton County is outside the area covered by the regional travel demand model. The Ohio DOT uses traffic counts and local traffic growth rates for the VMT estimates in Clinton County.

OKI incorporates a variety of sources of local data to both improve and confirm the accuracy of VMT, as well as other travel-related parameters. Free flow speeds used on the highway and transit networks are based on travel time studies performed locally. The OKI post-processing program, IMPACT, uses the loaded highway network to generate VMT by hour, VMT by speed distribution and VMT by facility type. These tables are then included as input into MOVES. The VMT by hour tables utilize hourly traffic distribution and directional split factors for different roadway types as developed by OKI. The main source of the data was the permanent traffic counting stations located throughout the OKI region for the years of 2004-2006. This data was supplemented with data collected at coverage count stations (locations with counts taken on only one-two days). The stations were classified by area type: urban and rural, and functional classification: freeway, arterial and

collector. Speeds representing various “loaded” conditions (with traffic volumes) are estimated using techniques from the Highway Capacity Manual. This permits the estimation of speeds as conditions vary from hour to hour on the different facility types throughout the region. The IMPACT program performs the appropriate summation by area and roadway type as well as regional totals. OKI has also developed seasonal conversion factors to adjust traffic volumes to summer conditions. The factors were derived from local data collected at permanent traffic counting stations utilizing the average daily traffic monthly conversion factors for June, July and August.

#### Local Road VMT

Most local roads such as subdivision streets are not explicitly modeled in a travel demand model. Local roads within each traffic analysis zone are represented by centroid connectors. Local road VMT and speeds are included in the OKI post process by including the traffic loaded on centroid connectors. In addition, some local road traffic is captured as intra-zonal trips which travel demand models usually do not assign to roadway segments. The OKI post process assigns these trips as local road VMT.

#### Analysis Years

Analysis years for this revision request include 2005, 2008 (attainment year), 2015 (interim year), and 2020. The travel demand model presents the transportation system conditions for each of these years. Model runs for each future analysis year contain the road network OKI and Ohio DOT expect to exist in July of that year with corresponding socioeconomic forecasts for that year.

#### On-Road Mobile Emission Estimations

Tables 2 through 13 contain the results of the emissions analysis for the appropriate years. All emissions estimations are expressed in tons per summer day (TSD).

**Table 2 - Butler County, Ohio Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
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VOC (TSD)	17.20	17.55	8.95	6.84
NOx (TSD)	28.88	24.09	15.04	11.68
VMT (miles/day)	7,804,476	8,133,554	8,721,511	9,277,916

**Table 3 - Clermont County, Ohio Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	11.46	11.69	5.97	4.56
NOx (TSD)	19.24	16.05	10.02	7.78
VMT (miles/day)	5,391,578	5,599,530	5,810,859	6,181,573

**Table 4 - Clinton County, Ohio Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	2.92	2.51	1.37	0.93
NOx (TSD)	6.53	5.50	3.01	1.86
VMT (miles/day)	1,956,501	1,939,190	2,215,886	2,349,923

**Table 5 - Hamilton County, Ohio Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	50.49	51.51	26.28	20.08
NOx (TSD)	84.75	70.70	44.15	34.28
VMT (miles/day)	23,170,766	23,481,421	25,598,858	27,231,982

**Table 6 - Warren County, Ohio Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	12.96	13.22	6.75	5.15
NOx (TSD)	21.76	18.15	11.33	8.80
VMT (miles/day)	6,263,010	6,464,217	6,571,210	6,990,432

**Table 7 – Dearborn County, Indiana Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	1.35	1.38	0.70	0.54
NOx (TSD)	2.27	1.90	1.18	0.92
VMT (miles/day)	599,761	613,027	686,339	730,126

**Table 8 – Summary of Ohio and Indiana Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	96.38	97.86	50.02	38.10
NOx (TSD)	163.43	136.39	84.73	65.32
VMT (miles/day)	45,186,092	46,230,939	49,604,663	52,761,952

**Table 9 - Boone County, Kentucky Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	9.71	6.37	3.5	2.27
NOx (TSD)	30.88	21.32	12.16	7.22
VMT (miles/day)	4,186,006	4,355,527	4,712,497	5,129,347

**Table 10 - Campbell County, Kentucky Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	5.62	3.69	2.03	1.31
NOx (TSD)	17.87	12.34	7.04	4.18
VMT (miles/day)	2,437,698	2,495,174	2,727,746	2,969,033

**Table 11 - Kenton County, Kentucky Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	9.87	6.47	3.56	2.31
NOx (TSD)	31.40	21.68	12.36	7.34
VMT (miles/day)	4,182,042	4,197,027	4,791,791	5,215,655

**Table 12 – Summary of Kentucky Emission Estimations for On-Road Mobile Sources**

	2005	2008	2015	2020
VOC (TSD)	25.20	16.53	9.09	5.89
NOx (TSD)	80.15	55.34	31.56	18.74
VMT (miles/day)	10,805,746	11,047,728	12,232,034	13,314,035

**Table 13 - Emission Estimation Totals for On-Road Mobile Sources for the Cincinnati-Hamilton Area**

	2005	2008	2015	2020
VOC (TSD)	121.58	114.39	59.11	43.99
NOx (TSD)	243.58	191.73	116.29	84.06
VMT (miles/day)	55,991,838	57,278,667	61,836,697	66,075,987

Motor Vehicle Emission Budget

Table 14 and Table 15 contain the motor vehicle emissions budgets for the Cincinnati-Hamilton area. For planning purposes, budgets are established for the combined Ohio and Indiana portions and for the separate Kentucky portion.

**Table 14 - Mobile Vehicle Emissions Budget for Ohio and Indiana**

	2015 Estimated Emissions	2015 Mobile Safety Margin Allocation*	2015 Total Mobile Budget	2020 Estimated Emissions	2020 Mobile Safety Margin Allocation*	2020 Total Mobile Budget
VOC (TSD)	50.02	7.50	57.52	38.10	5.72	43.82
NOx (TSD)	84.73	12.71	97.44	65.32	9.80	75.12
VMT (miles/day)	49,604,663	-	-	52,761,952	-	-

\*The 15 percent margin of safety was calculated by taking 15 percent of the mobile source emission estimates.

**Table 15 - Mobile Vehicle Emissions Budget for Kentucky**

	<b>2015 Estimated Emissions</b>	<b>2015 Mobile Safety Margin Allocation</b>	<b>2015 Total Mobile Budget</b>	<b>2020 Estimated Emissions</b>	<b>2020 Mobile Safety Margin Allocation</b>	<b>2020 Total Mobile Budget</b>
VOC (TSD)	9.09	1.36	10.45	5.89	0.88	6.77
NOx (TSD)	31.56	4.73	36.29	18.74	2.81	21.55
VMT (miles/day)	12,232,034	-	-	13,314,035	-	-

The above budgets for the Ohio and Indiana portion of the area, agreed upon as part of the interagency consultation process, include the emission estimates calculated for 2015 and 2020 (from Table 8) with an additional 15 percent margin of safety allocated to those estimates.

In an effort to accommodate future variations in travel demand models and VMT forecast when no change to the network is planned, Ohio EPA consulted with U.S. EPA to determine a reasonable approach to address this variation. Based on this discussion, a 15 percent margin of safety allocation was agreed upon and has been added to the emissions estimates for the Ohio and Indiana portions of this nonattainment area.

The above budget for the Kentucky portion of the area was provided directly by Kentucky as part of the consultation process and also includes a margin of safety allocated to the emission estimates calculated for 2015 and 2020 (from Table 12).

The emission estimates are derived from the travel demand model and MOVES2010 as described above under the expected OKI 2030 Long Range Plan. All methodologies, the latest planning assumptions, and the safety margins allocations were determined through the interagency consultation process described in the Transportation Conformity Memorandum of Understanding (MOU) among OKI, Ohio DOT, and Ohio EPA.

A 15 percent margin of safety is appropriate because: 1) there is an acknowledged potential variation in VMT forecast and potential estimated mobile source emissions due to expected modifications to TDM and mobile emissions models; and 2) the

total decrease in emissions from all sources is sufficient to accommodate this 15 percent allocation of safety margin to mobile sources while still continuing to maintain the total emissions in the Cincinnati-Hamilton area well below the 2006 attainment level of emissions.

The 15 percent margin of safety was calculated by taking 15 percent of the mobile source emission estimates. Safety margin, as defined by the conformity rule, looks at the total emissions from all sources in the nonattainment area. The actual allocation is less than 15 percent of the total emission reduction from all sources as can be seen from Table 36.

In summary, for all three states combined, the mobile budget safety margin allocation translates into:

- An allocation of 7.50 TSD for VOC and 12.71 TSD for NOx for 2015; and
- An allocation of 5.72 TSD for VOC and 9.80 TSD for NOx for 2020.

When compared to the overall safety margin, as defined in 40 CFR 93.101<sup>5</sup>, discussed under "Requirement 3 of 5" below, it is evident this allocation is significantly below the total safety margin for this area (see Table 36).

The current one-hour budgets will no longer be applicable either after the effective date of the approved redesignation or after the effective date of any U.S. EPA action approving a finding that the eight-hour conformity budget included in this submittal is adequate for transportation conformity purposes, whichever date comes first.

### **Requirement 3 of 5**

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

### **Background**

In consultation with U.S. EPA, Ohio EPA selected the year 2020 as the maintenance year for this redesignation request. This

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<sup>5</sup> "safety margin" means the amount by which the total projected emissions from all sources of a given pollutant are less than the total emissions that would satisfy the applicable requirement for reasonable further progress, attainment, or maintenance.

document contains projected emissions inventories for 2015 and 2020.

Emission projections for the Cincinnati-Hamilton area were performed using the following approaches:

- As performed by OKI, mobile source emission projections are based on the U.S. EPA MOVES2010 model. The analysis is described in more detail in Appendix C. All projections were made in accordance with “Procedures for Preparing Emissions Projections” U.S. EPA-45/4-91-019.
- Emissions inventories are required to be projected to future dates to assess the influence growth and future controls will have. LADCO has developed growth and control files for point, area, and non-road categories. These files were used to develop the future-year emissions estimates used in this document. This was done so the inventories used for redesignation are consistent with modeling performed in the future. Appendix D contains LADCO’s technical support document detailing the analysis used to project emissions (Base M<sup>6</sup>).
- For the Ohio portion of the Cincinnati-Hamilton area, for the 2008 attainment year, emissions were grown from the 2005 LADCO modeling inventory, using LADCO’s growth factors, for all sectors except point sources (electrical generating units and non-electrical generating units). Point source emissions for 2008 were compiled from Ohio EPA’s 2008 annual emissions inventory database. The 2015 interim year emissions were estimated based on the 2009 and 2018 LADCO modeling inventory, using LADCO’s growth factors, for all sectors. The 2020 maintenance year is based on emissions estimates from the 2018 LADCO modeling.

The detailed inventory information for the Ohio portion of the Cincinnati-Hamilton area for 2005 is in Appendix B. Emission trends are an important gauge for continued compliance with the ozone standard. Therefore, Ohio EPA performed an initial comparison of the inventories for the base year and

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<sup>6</sup> <http://www.ladco.org/tech/emis/current/index.php>

maintenance years. Mobile source emission inventories are described in Section 5 of Appendix B.

Sectors included in the following tables are: Electrical Generating Unit (EGU-Point); Non-Electrical Generating Unit (Non-EGU); Non-road Mobile (Non-road); Other Area (Other); Marine; Aircraft; Rail (MAR); and On-road Mobile (On-road).

Maintenance is demonstrated when the future-year (2020) projected emission totals are below the 2008 attainment year totals.

The emissions data in the tables below are based on the following data sources:

**Demonstration**

**NO<sub>x</sub>**

**Table 16 - Butler County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)<sup>7</sup>**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	3.88	2.87	2.86	2.95	
Non-EGU	12.03	10.53	13.29	13.22	
Non-road	7.76	6.55	4.06	3.01	
Other	2.15	2.18	2.19	2.19	
MAR	2.49	2.34	1.85	1.63	
On-road	28.88	24.09	15.04	11.68	
<b>TOTAL</b>	<b>57.19</b>	<b>48.56</b>	<b>39.29</b>	<b>34.68</b>	<b>13.88</b>

<sup>7</sup> Ohio EPA has revised the Butler County, Ohio NO<sub>x</sub> Emissions Inventory to incorporate the total emissions reduction credits available and used to offset the allowed emissions of a major source modified within the maintenance area that will begin operating during the maintenance period. The total emissions included for this facility is 479.57 tons per year (assumed TSD = TPY/365). The emissions increase does not significantly impact the safety margin for this area or prevent the area from maintaining the standard in future years.

**Table 17 - Clermont County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	42.96	22.61	50.07	51.49	
Non-EGU	0.15	0.18	0.16	0.16	
Non-road	4.07	3.48	2.21	1.67	
Other	1.65	1.67	1.67	1.67	
MAR	0.96	0.74	0.55	0.50	
On-road	19.24	16.05	10.02	7.78	
<b>TOTAL</b>	<b>69.03</b>	<b>44.73</b>	<b>64.68</b>	<b>63.27</b>	<b>-18.54</b>

**Table 18 - Clinton County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.00	0.00	0.00	0.00	
Non-road	2.21	1.96	1.34	1.07	
Other	0.42	0.43	0.43	0.43	
MAR	0.05	0.05	0.05	0.06	
On-road	6.53	5.5	3.01	1.86	
<b>TOTAL</b>	<b>9.21</b>	<b>7.94</b>	<b>4.83</b>	<b>3.42</b>	<b>4.52</b>

**Table 19 - Hamilton County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	15.23	12.92	28.32	29.13	
Non-EGU	6.72	6.17	7.39	7.56	
Non-road	16.08	13.28	8.04	5.89	
Other	5.19	5.27	5.30	5.30	
MAR	4.49	3.93	3.14	2.84	
On-road	84.75	70.70	44.15	34.28	
<b>TOTAL</b>	<b>132.46</b>	<b>112.27</b>	<b>96.34</b>	<b>85.00</b>	<b>27.27</b>

**Table 20 - Warren County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	2.68	3.14	2.70	2.70	
Non-road	5.84	4.94	3.01	2.19	
Other	1.15	1.17	1.17	1.17	
MAR	0.26	0.25	0.21	0.19	
On-road	21.76	18.15	11.33	8.80	
<b>TOTAL</b>	<b>31.69</b>	<b>27.65</b>	<b>18.42</b>	<b>15.05</b>	<b>12.60</b>

**Table 21 - Dearborn County, Indiana NO<sub>x</sub> Emission Inventory (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	25.31	27.34	25.3	26.03	
Non-EGU	5.09	3.21	5.12	5.19	
Non-road *	1.26	1.14	0.78	0.65	
Other	0.26	0.26	0.27	0.27	
On-road	2.27	1.90	1.18	0.92	
<b>TOTAL</b>	<b>34.19</b>	<b>33.85</b>	<b>32.65</b>	<b>33.06</b>	<b>0.79</b>

\*MAR emissions are included in the Non-road emissions

**Table 22 - Boone County, Kentucky NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	23.80	23.15	24.97	26.35	
Non-EGU	0.14	0.12	0.11	0.12	
Non-road *	12.96	11.02	9.77	9.48	
Other	4.99	5.02	5.03	5.03	
On-road	30.88	21.32	12.16	7.22	
<b>TOTAL</b>	<b>72.77</b>	<b>60.63</b>	<b>52.04</b>	<b>48.2</b>	<b>12.43</b>

\*MAR emissions are included in the Non-road emissions

**Table 23 - Campbell County, Kentucky NO<sub>x</sub> Emission Inventory Total (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.00	0.02	0.02	0.03	
Non-road*	6.33	5.34	4.57	4.34	
Other	1.41	1.32	1.30	1.30	
On-road	17.87	12.34	7.04	4.18	
<b>TOTAL</b>	<b>25.61</b>	<b>19.02</b>	<b>12.93</b>	<b>9.85</b>	<b>9.17</b>

\*MAR emissions are included in the Non-road emissions

**Table 24 - Kenton County, Kentucky NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.04	0.03	0.03	0.03	
Non-road*	8.43	7.33	6.15	5.75	
Other	4.17	4.06	4.02	4.02	
On-road	31.40	21.68	12.36	7.34	
<b>TOTAL</b>	<b>44.04</b>	<b>33.1</b>	<b>22.56</b>	<b>17.14</b>	<b>15.96</b>

\*MAR emissions are included in the Non-road emissions

**Table 25 - Cincinnati-Hamilton Area NO<sub>x</sub> Emission Inventory Totals (TSD)**

<b>NO<sub>x</sub></b>	<b>2005 Base</b>	<b>2008 Attainment</b>	<b>2015 Interim</b>	<b>2020 Maintenance</b>	<b>Safety Margin</b>
<b>Butler</b>	57.19	48.56	39.29	34.68	
<b>Clermont</b>	69.03	44.73	64.68	63.27	
<b>Clinton</b>	9.21	7.94	4.83	3.42	
<b>Hamilton</b>	132.46	112.27	96.34	85.00	
<b>Warren</b>	31.69	27.65	18.42	15.05	
<b>Dearborn</b>	34.19	33.85	32.65	33.06	
<b>Boone</b>	72.77	60.63	52.04	48.20	
<b>Campbell</b>	25.61	19.02	12.93	9.85	
<b>Kenton</b>	44.04	33.10	22.56	17.14	
<b>COMBINED <u>NO<sub>x</sub></u> TOTAL</b>	<b>476.19</b>	<b>387.75</b>	<b>343.74</b>	<b>309.67</b>	<b>78.08</b>

**VOC**

**Table 26 - Butler County, Ohio VOC Emission Inventory Totals (TSD)**

<b>Sector</b>	<b>2005 Base</b>	<b>2008 Attainment</b>	<b>2015 Interim</b>	<b>2020 Maintenance</b>	<b>Safety Margin</b>
<b>EGU Point</b>	0.03	0.03	0.02	0.02	
<b>Non-EGU</b>	3.64	2.77	4.25	4.56	
<b>Non-road</b>	6.73	5.54	4.85	4.71	
<b>Other</b>	11.96	10.31	9.76	9.76	
<b>MAR</b>	0.15	0.14	0.10	0.09	
<b>On-road</b>	17.20	17.55	8.95	6.84	
<b>TOTAL</b>	<b>39.71</b>	<b>36.34</b>	<b>27.93</b>	<b>25.98</b>	<b>10.36</b>

**Table 27 - Clermont County, Ohio VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.49	0.27	0.52	0.53	
Non-EGU	0.24	0.09	0.26	0.27	
Non-road	4.31	3.66	3.11	2.95	
Other	6.98	6.05	5.74	5.74	
MAR	0.02	0.02	0.02	0.01	
On-road	11.46	11.69	5.97	4.56	
<b>TOTAL</b>	<b>23.5</b>	<b>21.78</b>	<b>15.62</b>	<b>14.06</b>	<b>7.72</b>

**Table 28 - Clinton County, Ohio VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.00	0.00	0.00	0.00	
Non-road	1.73	1.60	1.20	1.02	
Other	3.24	2.85	2.72	2.72	
MAR	0.04	0.05	0.06	0.06	
On-road	2.92	2.51	1.37	0.93	
<b>TOTAL</b>	<b>7.93</b>	<b>7.01</b>	<b>5.35</b>	<b>4.73</b>	<b>2.28</b>

**Table 29 - Hamilton County, Ohio VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.28	0.24	0.31	0.31	
Non-EGU	2.66	2.85	2.97	3.12	
Non-road	17.25	14.47	12.55	12.06	
Other	33.04	28.80	27.38	27.38	
MAR	0.20	0.19	0.15	0.13	
On-road	50.49	51.51	26.28	20.08	
<b>TOTAL</b>	<b>103.92</b>	<b>98.06</b>	<b>69.64</b>	<b>63.08</b>	<b>34.98</b>

**Table 30 - Warren County, Ohio VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.53	0.82	0.57	0.57	
Non-road	4.78	4.09	3.38	3.14	
Other	8.40	7.30	6.94	6.94	
MAR	0.01	0.01	0.01	0.01	
On-road	12.96	13.22	6.75	5.15	
<b>TOTAL</b>	<b>26.68</b>	<b>25.44</b>	<b>17.65</b>	<b>15.81</b>	<b>9.63</b>

**Table 31 - Dearborn County, Indiana VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.33	0.35	0.44	0.46	
Non-EGU	2.91	3.23	3.51	3.69	
Non-road	0.82	0.74	0.62	0.60	
Other	2.07	2.42	1.79	1.79	
On-road	1.35	1.38	0.7	0.54	
<b>TOTAL</b>	<b>7.48</b>	<b>8.12</b>	<b>7.06</b>	<b>7.08</b>	<b>1.04</b>

\*MAR emissions are included in the Non-road emissions

**Table 32 - Boone County, Kentucky VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.17	0.17	0.18	0.19	
Non-EGU	2.40	2.64	2.86	3.01	
Non-road*	1.71	5.07	4.55	4.36	
Other	8.13	8.41	8.50	8.50	
On-road	9.71	6.37	3.50	2.27	
<b>TOTAL</b>	<b>22.12</b>	<b>22.66</b>	<b>19.59</b>	<b>18.33</b>	<b>4.33</b>

\*MAR emissions are included in the Non-road emissions

**Table 33 - Campbell County, Kentucky VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	0.25	0.28	0.30	0.31	
Non-road*	1.76	1.51	1.29	1.22	
Other	4.77	4.34	4.20	4.20	
On-road	5.62	3.69	2.03	1.31	
<b>TOTAL</b>	<b>12.15</b>	<b>9.82</b>	<b>7.82</b>	<b>7.04</b>	<b>2.78</b>

\*MAR emissions are included in the Non-road emissions

**Table 34 - Kenton County, Kentucky VOC Emission Inventory Totals (TSD)**

Sector	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	
Non-EGU	1.20	1.17	1.31	1.42	
Non-road*	2.33	1.95	1.76	1.73	
Other	8.53	7.88	7.66	7.66	
On-road	9.87	6.47	3.56	2.31	
<b>TOTAL</b>	<b>21.93</b>	<b>17.47</b>	<b>14.29</b>	<b>13.12</b>	<b>4.35</b>

\*MAR emissions are included in the Non-road emissions

**Table 35 - Cincinnati-Hamilton Area VOC Emission Inventory Totals (TSD)**

VOC	2005 Base	2008 Attainment	2015 Interim	2020 Maintenance	Safety Margin
Butler	39.71	36.34	27.93	25.98	
Clermont	23.50	21.78	15.62	14.06	
Clinton	7.93	7.01	5.35	4.73	
Hamilton	103.92	98.06	69.64	63.08	
Warren	26.68	25.44	17.65	15.81	
Dearborn	7.48	8.12	7.06	7.08	
Boone	22.12	22.66	19.59	18.33	
Campbell	12.15	9.82	7.82	7.04	
Kenton	21.93	17.47	14.29	13.12	
<b>COMBINED VOC TOTAL</b>	<b>265.42</b>	<b>246.70</b>	<b>184.95</b>	<b>169.23</b>	<b>77.47</b>

**VOC and NOx**

**Table 36 - Cincinnati-Hamilton Area Comparison of 2008 attainment year and projected emission estimates (TSD)**

	2008	2015	2015 Projected Decrease	2020	2020 Projected Decrease
VOC	246.7	184.95	61.75	169.23	77.47
NO <sub>x</sub>	387.75	343.74	44.01	309.67	78.08

As shown in the table above, VOC emissions in the nonattainment area are projected to decrease by 61.75 TSD in 2015 and 77.47 TSD in 2020. Point sources in the Kentucky area show a slight increase due to expectations that the population will grow in this area; however, cleaner vehicles and fuels are expected to be in place in 2009 and 2018, and they cause an overall drop in VOC emissions.

NO<sub>x</sub> emissions in the nonattainment area are projected to decrease by 44.01 TSD in 2015 and 78.08 TSD in 2020. Again, area source emissions and, to a lesser extent, point sources show a slight increase due to expectations that the population will grow in this area. Decreases from U.S. EPA rules covering

Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements<sup>8</sup>, Highway Heavy-Duty Engine Rule<sup>9</sup>, and the Non-Road Diesel Engine Rule<sup>10</sup> are factored into the changes.

All projections do not take into account reductions expected from the Clean Air Interstate Rule<sup>11</sup>. In many cases, Ohio utilities subject to CAIR have already, or will be installing controls and reducing NOx emissions beyond those projected for EGU's above.

As can be seen from the projected decreases above, even in the absence of consideration of reductions resulting from CAIR, the area will be able to maintain the standard.

As identified in Table 14 and Table 15 above, an additional mobile budget margin of safety allocation is being requested for mobile emissions. The mobile budget margin of safety allocation translates into an additional 7.50 TSD for VOC and 12.71 TSD for NOx in the year 2015 and 5.72 TSD for VOC and 9.80 TSD for NOx in the year 2020. U.S. EPA's conformity regulations allow for allocation, through a revision to the SIP, of all or some portion of the overall area's safety margin (emission reductions from 2008 to 2020) to the mobile emissions budgets for future conformity. As identified in Table 14 and Table 15 above, the mobile budget margin of safety allocation and the total budget is distributed separately between Kentucky (alone) and Ohio/Indiana (combined). For the entire area, Ohio, Indiana and Kentucky chose to allocate:

- In 2015: 7.50 TSD of the 61.75 TSD safety margin for VOC and 12.71 TSD of the 44.01 TSD safety margin for NOx as a mobile emissions budget safety margin.
- In 2020: 5.72 TSD of the 77.47 TSD safety margin for VOC and 9.80 TSD of the 78.08 TSD safety margin for NOx as a mobile emissions budget safety margin.

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<sup>8</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/2000/February/Day-10/a19a.htm>

<sup>9</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/1997/October/Day-21/a27494.htm>

<sup>10</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/1998/October/Day-23/a24836.htm>

<sup>11</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/2005/May/Day-12/a5723a.pdf>

#### **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 conditions or unusually favorable meteorology.

#### **Background**

Ambient air quality data from all monitoring sites indicate that air quality met the NAAQS for ozone in 2007-2009. 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**

Permanent and enforceable reductions of VOC and NO<sub>x</sub> emissions have contributed to the attainment of the eight-hour ozone standard. Some of these reductions were due to the application of tighter federal standards on new vehicles. Reductions achieved are discussed in greater detail under Chapter Five.

**Table 37 - Cincinnati-Hamilton Area Combined Comparison of 2005 base year and 2008 attainment year on-road reductions**

	<b>2005</b>	<b>2008</b>
On-road VOC	121.58	114.39
On-road NO <sub>x</sub>	243.58	191.73

#### **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 ozone precursor emission sectors every three years. These ozone

precursor 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 2020 projected maintenance year inventories to assess emission trends, as necessary, and to assure continued compliance with the ozone standard.

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## CHAPTER FIVE

### CONTROL MEASURES AND REGULATIONS

CAA Section 107 (d)(3)(E)(ii), 107(d)(3)(iv) & 107(d)(3)(E)(v)

#### **Requirement 1 of 5**

Section 182(a) of the 1990 Clean Air Act Amendments requires states with marginal nonattainment areas to implement RACT under Section 172(b).

#### **Background**

Section 182(b) of the 1990 Clean Air Act Amendments requires states with moderate nonattainment areas to submit a SIP to correct, or add, RACT requirements under Section 172(b) (as in effect immediately before the enactment of the Clean Air Act Amendments of 1990).

#### **Demonstration**

As required under the 1-hour ozone standard, Ohio EPA submitted VOC RACT rules which U.S. EPA approved on April 25, 1996 (61 FR 18255) and September 7, 1994 (59 FR 46182).

Statewide RACT rules have been applied to all new sources locating in Ohio since that time. RACT requirements are incorporated into permits along with monitoring, recordkeeping, and reporting necessary to ensure ongoing compliance. Ohio EPA also has an active enforcement program to address violations discovered by field office staff. The Ohio RACT rules are found in OAC Chapter 3745-21<sup>12</sup>.

#### **Requirement 2 of 5**

Section 182(a)(3)(B) requires states to submit emissions statements.

#### **Background**

Section 182(a)(3)(B) requires states to submit emissions statements within two years of the enactment of the Clean Air Act Amendments and then every three years thereafter.

#### **Demonstration**

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),

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<sup>12</sup> [http://www.epa.state.oh.us/dapc/regs/3745-21/3745\\_21.html](http://www.epa.state.oh.us/dapc/regs/3745-21/3745_21.html)

Ohio EPA submits, and commits to submit, emission inventories (statements) every three years.

### **Requirement 3 of 5**

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

#### **Background**

In addition to the historic RACT requirements and those mentioned above, the U.S. EPA NO<sub>x</sub> SIP Call required 22 states to pass rules that would result in significant emission reductions from large EGUs, industrial boilers, and cement kilns in the eastern United States. Ohio passed this rule in 2001. NO<sub>x</sub> SIP Call requirements are incorporated into permits along with monitoring, recordkeeping, and reporting necessary to ensure ongoing compliance. Ohio EPA also has an active enforcement program to address violations discovered by field office staff. Compliance is tracked through the Clean Air Markets data monitoring program. Beginning in 2004, this rule accounts for a reduction of approximately 31 percent of all NO<sub>x</sub> emissions statewide compared to previous uncontrolled years. The other 21 states also have adopted these rules.

On March 10, 2004, the U.S. EPA promulgated the CAIR. Beginning in 2009, U.S. EPA's CAIR rule requires EGUs in 28 eastern states and the District of Columbia to significantly reduce emissions of NO<sub>x</sub>. CAIR replaced the NO<sub>x</sub> SIP Call for EGUs. National NO<sub>x</sub> emissions will be cut from 4.5 million tons in 2004, to a cap of 1.5 million tons by 2009, and 1.3 million tons in 2018 in 28 states. States were required to submit a CAIR SIP as part of this effort. Ohio submitted a CAIR SIP which was approved by U.S. EPA on February 1, 2007. Revisions to the CAIR SIP were again submitted on July 15, 2009. The revised CAIR SIP was approved as a direct final action on September 25, 2009 (74 FR 48857). As a result of CAIR, U.S. EPA projects that in 2009 emissions of NO<sub>x</sub> will decrease from a baseline of 264,000 tons per year to 91,000 tons per year within Ohio<sup>13</sup>.

On December 23, 2008, U.S. EPA's CAIR program was remanded without vacatur by the D.C. Circuit Court. As mentioned above, Ohio EPA has not incorporated these expected CAIR reductions into this redesignation request. It

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<sup>13</sup> <http://www.epa.gov/cair/pdfs/0053-2228.pdf>

should also be noted that Ohio's SIP-approved NO<sub>x</sub> SIP Call program and regulations are still in place. Ohio EPA is currently in the process of revising these regulations to provide a "back stop" for the reinstatement of the NO<sub>x</sub> SIP Call program in the event the CAIR program, or an equivalent, is no longer implemented by U.S. EPA.

Section 182(b) contains additional provisions applicable to moderate nonattainment areas, for which the Cincinnati-Hamilton area was under the one-hour standard. Section 182(b)(3) requires gasoline vapor recovery systems for gasoline dispensing stations in the area and section 182(b)(4) requires motor vehicle inspection and maintenance programs.

### **Demonstration**

U.S. EPA and Ohio EPA performed modeling that indicated this area would attain the eight-hour ozone standard with the implementation of the NO<sub>x</sub> SIP Call. Controls for EGUs formally commenced May 31, 2004. Emissions covered by this program have been generally trending downward since 1998 with larger reductions occurring in 2002 and 2003. Data taken from the U.S. EPA Clean Air Markets web site, quantify the gradual NO<sub>x</sub> reductions that have occurred in Ohio as a result of Title IV of the 1990 CAA Amendments and the beginning of the NO<sub>x</sub> SIP Call Rule. Ohio developed the NO<sub>x</sub> Budget Trading Program rules in OAC Chapter 3745-14<sup>14</sup> in response to the SIP Call. OAC Chapter 3745-14 regulates EGUs and certain non-EGUs under a cap and trade program based on an 85 percent reduction of NO<sub>x</sub> emissions from EGUs and a 60 percent reduction of NO<sub>x</sub> emissions from non-EGUs, compared to historical levels. This cap will stay in place through 2008, at which time the CAIR program will supersede it as discussed above.

On April 21, 2004, U.S. EPA published Phase II of the NO<sub>x</sub> SIP Call that establishes a budget for large (greater than 1 ton per day emissions) stationary internal combustion engines. Ohio EPA's OAC rule 3745-14-12 addresses stationary internal combustion engines, all used in natural gas pipeline transmissions. U.S. EPA approved this revision to the SIP on April 4, 2008. An 82 percent NO<sub>x</sub> reduction from 1995 levels is

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<sup>14</sup> [http://www.epa.state.oh.us/dapc/regs/3745-14/3745\\_14.html](http://www.epa.state.oh.us/dapc/regs/3745-14/3745_14.html)

anticipated. Completion of the compliance plan occurred by May 1, 2006, and the compliance demonstration began May 1, 2007. The 2007 controlled NO<sub>x</sub> emissions are 599 tons statewide for the ozone season.

Section 182(b)(3) requires states to submit Stage II vapor recovery rules no later than November 15, 1992. The U.S. EPA partially approved and partially disapproved Ohio's SIP revision for implementation of Stage II on October, 20, 1994 (59 FR 52911). As stated in that rulemaking action, with the exception of paragraph 3745-21-09 (DDD)(5), U.S. EPA considers Ohio's Stage II program to fully satisfy the criteria set forth in the September 17, 1993, U.S. EPA guidance document for such programs entitled "Enforcement Guidance for Stage II Vehicle Refueling Control Programs." Furthermore, the September 17, 1993, guidance memorandum states that once onboard vapor recovery regulations are promulgated, the Stage II regulations are no longer applicable for moderate ozone nonattainment areas. The U.S. EPA promulgated onboard vapor recovery rules in February 1994. Therefore, pursuant to Section 202(a)(6) of the CAA, Stage II would no longer be required. Stage I and Stage II requirements are still being implemented in the original one-hour attainment area (excludes Clinton County).

The U.S. EPA's final I/M regulations in 40 CFR Part 85 require the states to submit a fully adopted I/M program by November 15, 1993. U.S. EPA approved Ohio's enhanced I/M program (E-Check), on April 4, 1995 (60 FR 16989) and January 6, 1997 (62 FR 646). The E-check program is no longer being implemented in this area. On November 3, 2005, Ohio EPA submitted a request for replacement of the E-Check program in this area. In order to transfer the E-Check program from the active maintenance plan to a contingency plan, alternative emission reduction programs were adopted to replace the benefits associated with the E-Check program in the one-hour maintenance plan approved at that time. The following programs were implemented in place of the E-Check program and are still being implemented today in the original one-hour attainment area (excludes Clinton County):

- OAC rule 3745-21-09(O)(2)(e) - Vapor pressure limit for cold cleaning degreasing operations. Approved July 28, 2009 (74 FR 37171)
- OAC rule 3745-21-18 - Mobile equipment refinishing emission reduction via high transfer efficiency spray guns. Approved July 28, 2009 (74 FR 37171)

- OAC Chapter 3745-72 - Low Reid Vapor Pressure Fuels. Approved May 25, 2007 (72 FR 29269)
- OAC rule 3745-21-17 - Portable Fuel Containers. Approved October 14, 2009 (74 FR 52691)

### Tier II Emission Standards for Vehicles and Gasoline Sulfur Standards

In February 2000, U.S. EPA finalized a federal rule to significantly reduce emissions from cars and light trucks, including sport utility vehicles (SUVs). Under this proposal, automakers will be required to sell cleaner cars, and refineries will be required to make cleaner, lower sulfur gasoline. This rule will apply nationwide. The federal rules will phase in between 2004 and 2009. U.S. EPA has estimated that NO<sub>x</sub> emission reductions will be approximately 77 percent for passenger cars, 86 percent for smaller SUVs, light trucks, and minivans, and 65 to 95 percent reductions for larger SUVs, vans, and heavier trucks. VOC emission reductions will be approximately 12 percent for passenger cars, 18 percent for smaller SUVs, light trucks, and minivans, and 15 percent for larger SUVs, vans, and heavier trucks.

### Heavy-Duty Diesel Engines

In July 2000, U.S. EPA issued a final rule for Highway Heavy Duty Engines, a program which includes low-sulfur diesel fuel standards, which will be phased in from 2004 through 2007. This rule applies to heavy-duty gasoline and diesel trucks and buses. This rule will result in a 40 percent reduction in NO<sub>x</sub> from diesel trucks and buses, a large sector of the mobile sources NO<sub>x</sub> inventory.

### Clean Air Non-road Diesel Rule

In May 2004, U.S. EPA issued the Clean Air Non-road Diesel Rule. This rule applies to diesel engines used in industries such as construction, agriculture, and mining. It also contains a cleaner fuel standard similar to the highway diesel program. The new standards will cut emissions from non-road diesel engines by more than 90 percent. Non-road diesel equipment, as described in this rule, currently accounts for 47 percent of diesel particulate matter (PM) and 25 percent of NO<sub>x</sub> from mobile sources nationwide. Sulfur levels will be reduced in non-road diesel fuel by 99 percent from current levels, from approximately 3,000 parts per million (ppm) now to 15 ppm in

2009. New engine standards take effect, based on engine horsepower, starting in 2008.

Together, these rules will substantially reduce local and regional sources of ozone precursors.

#### **Requirement 4 of 5**

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<sup>15</sup>. 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 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 5 of 5**

Assure that all existing control measures will remain in effect after redesignation unless the State demonstrates through photochemical modeling that the standard can be maintained without one (1) or more control measures.

##### **Demonstration**

Ohio commits to maintaining the aforementioned control measures after redesignation. Ohio hereby commits that any changes to its rules or emission limits applicable to VOC and/or NO<sub>x</sub> sources, as required for maintenance of the ozone standard in the Cincinnati-Hamilton area, will be submitted to U.S. EPA for approval as a SIP revision.

Ohio, through Ohio EPA's Legal section, has the legal authority and necessary resources to actively enforce any violations of its

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<sup>15</sup> [http://www.epa.state.oh.us/dapc/regs/3745-31/3745\\_31.html](http://www.epa.state.oh.us/dapc/regs/3745-31/3745_31.html)

rules or permit provisions. After redesignation, it intends to continue enforcing all rules that relate to the emission of ozone precursors in the Cincinnati-Hamilton area.

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## CHAPTER SIX

### CONTINGENCY MEASURES

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

#### **Requirement 1 of 4**

A commitment to submit a revised plan eight (8) years after redesignation.

#### **Demonstration**

Ohio hereby commits to review its maintenance plan eight (8) 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 an annual (1-year) fourth high monitored value of 88 ppb occurs in a single ozone season within the maintenance area. A warning level response will consist of a study to determine whether the ozone value indicates a trend toward higher ozone values or whether emissions appear to be increasing. 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 ozone season (October 31).

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 fourth high monitored value of 85 parts per billion (ppb) or greater occurs within the maintenance area. A violation of the standard (three-year average fourth high value of 85 ppb or greater) 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 metropolitan planning organization or regional council of governments, will determine additional control measures needed to assure future attainment of the NAAQS for ozone. 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 ozone season 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.

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 selected from a comprehensive list of measures deemed appropriate and

effective at the time the selection is made. The selection of measures will be based on cost-effectiveness, emission reduction potential, economic and social considerations or other factors that Ohio EPA deems appropriate. Ohio EPA will solicit input from all interested and affected persons in the maintenance area prior to selecting appropriate contingency measures. Because it is not possible at this time to determine what control measures will be appropriate at an unspecified time in the future, the list of contingency measures outlined below is not exhaustive.

- 1) Implementation of an enhanced I/M program (E-Check) in Butler, Clermont, Hamilton and Warren Counties.
- 2) Tighten or adopt VOC RACT on existing sources covered by U.S. EPA Control Technique Guidelines issued after the 1990 CAA.
- 3) Apply VOC RACT to smaller existing sources.
- 4) One or more transportation control measures sufficient to achieve at least half a percent reduction in actual areawide VOC emissions. Transportation measures will be selected from the following, based upon the factors listed above after consultation with affected local governments:
  - a) trip reduction programs, including, but not limited to, employer-based transportation management plans, areawide rideshare programs, work schedule changes, and telecommuting;
  - b) traffic flow and transit improvements; and
  - c) other new or innovative transportation measures not yet in widespread use that affected local governments deem appropriate.
- 5) Alternative fuel and diesel retrofit programs for fleet vehicle operations.
- 6) Require VOC or NO<sub>x</sub> emission offsets for new and modified major sources.

- 7) Increase the ratio of emission offsets required for new sources.
- 8) Require VOC or NO<sub>x</sub> controls on new minor sources (less than 100 tons).
- 9) Adopt NO<sub>x</sub> RACT for existing combustion sources.

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 VOC and NO<sub>x</sub> sources potentially subject to future additional control requirements.

#### **Demonstration**

The following is a list of VOC and NO<sub>x</sub> sources potentially subject to future controls.

##### NO<sub>x</sub> RACT

- EGUs
- asphalt batching plants
- industrial/commercial and institutional boilers
- process heaters
- internal combustion engines
- combustion turbines
- other sources greater than 100 tons per year

##### VOC RACT

- synthetic organic compound manufacturing
- organic compound batch processes
- wood manufacturing
- industrial wastewater
- aerospace industry
- bakeries
- plastic parts coating
- volatile organic liquid storage
- industrial solvent cleaning
- offset lithography
- industrial surface coating
- other sources greater than 50 tons per year

## 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 \_\_\_\_\_ Cincinnati, Ohio. The public comment period closed on \_\_\_\_\_. \_\_\_\_\_ testimony was provided at the public hearing and \_\_\_\_\_ comments were received during the public comment period. Appendix E includes a copy of the public notice from the public hearing and comment period.

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## CHAPTER EIGHT

### CONCLUSIONS

The Cincinnati-Hamilton ozone nonattainment area has attained the 1997 NAAQS for ozone and complied with the applicable provisions of the 1990 Amendments to the CAA regarding redesignations of ozone 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 Cincinnati-Hamilton ozone 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 this area is subject to significant transport of pollutants, significant regional NO<sub>x</sub> reductions will ensure continued compliance (maintenance) with the standard with an increasing margin of safety.

The State of Ohio hereby requests that the Cincinnati-Hamilton ozone nonattainment area be redesignated to attainment simultaneously with U.S. EPA approval of the maintenance plan provisions contained herein. In addition, the State of Ohio requests that this maintenance plan satisfy the requirements of CAA Section 175A (b), for subsequent plan revisions required for areas redesignated for the one-hour ozone standard.

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