

REDESIGNATION REQUEST AND  
MAINTENANCE PLAN FOR  
THE COLUMBUS, OHIO  
2015 8-HOUR OZONE  
NONATTAINMENT AREA

Delaware, Fairfield, Franklin, and Licking  
Counties, Ohio

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# REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE COLUMBUS, OH 2015 OZONE NONATTAINMENT AREA

Delaware, Fairfield, Franklin and Licking 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. On October 1, 2015, the United States Environmental Protection Agency (U.S. EPA) revised the air quality standard for ozone replacing the 2008 eight-hour standard of 0.075 parts per million (ppm) with a more stringent standard of 0.070 ppm (herein expressed as 70 parts per billion (ppb)).

On June 4, 2018 (83 FR 25776), U.S. EPA designated nonattainment areas for the 2015 eight-hour ozone standard effective August 3, 2018. 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 Columbus, OH nonattainment area includes the following Counties: Delaware, Fairfield, Franklin and Licking.

As part of the 1997 eight-hour ozone standard designations, the following Counties within the Columbus, OH area were designated as basic nonattainment pursuant to Subpart 1 of the CAA and, therefore, were subject to nonattainment area rulemakings: Delaware, Fairfield, Franklin, Knox, Licking, and Madison. The Columbus area was redesignated to attainment on September 15, 2009 (74 FR 47404) and a revision to the approved motor

vehicle emissions budgets was approved on March 19, 2013 (78 FR 16785). A maintenance plan was approved at that time.

As a result of the 2012 ozone designations for the 2008 eight-hour ozone standard, U.S. EPA designated the Columbus, OH area (Delaware, Fairfield, Franklin, Knox, Licking, and Madison Counties) marginal nonattainment, pursuant to Subpart 2 of the CAA. The Columbus area was redesignated to attainment for the 2008 standard on December 21, 2016 (81 FR 93631). Motor vehicle emissions budgets and a maintenance plan were approved at that time.

As a result of the 2018 ozone designations for the 2015 eight-hour ozone standard, U.S. EPA designated the Columbus, OH area (Delaware, Fairfield, Franklin, and Licking Counties) marginal nonattainment, pursuant to Subpart 2 of the CAA, and the Ohio Environmental Protection Agency (Ohio EPA) is required to submit certain nonattainment plan elements by August 3, 2020. However, if an area comes into attainment prior to that date, some elements will no longer be required while other elements may be approved as a part of the redesignation request and maintenance plan.

This document is intended to support Ohio's request that U.S. EPA approve the required maintenance plan and Motor Vehicle Emissions Budgets (MVEBs) and that the Columbus, OH area be redesignated from nonattainment to attainment for the 2015 eight-hour ozone standard. The Columbus, OH area has recorded three (3) years of complete quality-assured ambient air quality monitoring data for the years 2016 through 2018 demonstrating attainment of the 2015 eight-hour ozone standard.

### Geographical Description

The Columbus, OH eight-hour ozone nonattainment area is located in the center of Ohio and includes the following Counties: Delaware, Fairfield, Franklin and Licking. This area is shown in Figure 1 under Chapter Three.

### Status of Air Quality

Ozone monitoring data for the most recent three (3) years, 2016 through 2018, demonstrate that the air quality has met the NAAQS for ozone in this marginal nonattainment area. The NAAQS attainment, accompanied by decreases in emission levels discussed in Chapter Four, supports a redesignation to attainment for the Columbus, OH 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 Columbus, OH area.

i.) Attainment of the standard - CAA Section 107 (d)(3)(E)(i)

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. Chapter Three discusses this requirement in more detail.

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, Ohio EPA has incorporated photochemical modeling information in Chapter Seven to further support our request that the nonattainment area be redesignated to attainment.

ii.) SIP approval - CAA Section 107 (d)(3)(E)(ii)

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 4, 1994 (59 FR 23799), and March 23, 1995 (60 FR 15235) and includes the Columbus, OH area. In addition, on July 18, 2014, Ohio EPA submitted a SIP revision for this area and U.S. EPA published a proposal and direct final action approving that submittal on March 10, 2016 (81 FR 12626 and 81 FR 12591). The approval became effective May 9, 2016. Chapter Five discusses this requirement in more detail.

iii.) Permanent and enforceable improvement in air quality - CAA Section 107 (d)(3)(E)(iii)

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.

On December 6, 2018, U.S. EPA finalized the “Implementation of the 2015 National Ambient Air Quality Standards for Ozone: Nonattainment Area State Implementation Plan Requirements; Final Rule” (herein referred to as “Implementation Rule”). (83 FR 62998) In the Implementation Rule, U.S. EPA states “Under CAA section 182(a), states are not required to submit an attainment demonstration SIP for Marginal areas.” (83 FR 63003) Further, U.S. EPA states “For each nonattainment area for which an attainment demonstration is required ... the state must provide for implementation of all control measures needed for attainment as expeditiously as practicable.” (83 FR 63033) Therefore, an attainment demonstration, and specifically, the requirement to adopt specific state measures beyond federal measures, are not applicable to marginal areas, such as the Columbus, OH nonattainment area.

Regardless, Ohio has adopted and implemented control measures for these counties in the area beyond the federal measures in order to comply with the 1997 eight-hour ozone standard and Ohio also adopted the initial 1979/1981 statewide rules. These measures and rules remain in effect and have assisted the Columbus, OH area in reaching attainment for the 2015 eight-hour ozone standard. Below is a list of several previously adopted Ohio rules that have contributed to reducing ozone in this area:

- Portable Fuel Containers requirements
- Architectural and Industrial Maintenance (AIM) Coatings rules
- Consumer Products rules
- NO<sub>x</sub> SIP Call rules

Chapters Four and Five discuss this requirement in more detail.

iv.) Section 110 and Part D requirements - CAA Section 107 (d)(3)(E)(v)

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.

i.) Section 110(a) requirements

Section 110(a) of Title I of the CAA contains the general requirements for a SIP. Section 110(a)(1) generally directs states to submit a SIP that provides for implementation, maintenance, and enforcement of the air quality standards to the U.S. EPA after reasonable notice and public hearing. Section 110(a)(2) provides that the infrastructure SIP 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<sup>1</sup>, 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 September 28, 2018 infrastructure SIP submission, Ohio verified that the State fulfills the requirements of Section 110(a)(2) of the Act.

Subpart 1 of Part D, found in Sections 172-176 of the CAA, sets forth the basic nonattainment requirements applicable to all areas which are designated nonattainment based on a violation of the NAAQS. Subpart 2 of Part D, which includes Section 182 of the CAA, establishes more specific requirements depending on the area's ozone nonattainment classification.

The Columbus, OH area was designated under Subpart 2 of Part D as a marginal nonattainment area for ozone as part of U.S. EPA "Air Quality Designations for the 2015 Ozone NAAQS." (83 FR 25776) Therefore, the Columbus, OH area must meet the applicable requirements of both Subpart 1 and Subpart 2 of Part D. The applicable Subpart 1 requirements are contained in Section 172(c)(1)-(9) and in Section 176. The applicable

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<sup>1</sup> Other than nonattainment emission limitations and measures which are a part of nonattainment area plans and subject to the timing requirements of Section 172 of the CAA.

Subpart 2 requirements are contained in Section 182(a) (marginal nonattainment area requirements).

- ii.) Subpart 1 of Part D - Section 172(c) requirements  
Section 172(c)(1) requires the plans for all nonattainment areas to provide for the implementation of all RACM as expeditiously as practicable and to provide for attainment for the national primary ambient air quality standards. As discussed above, U.S. EPA's Implementation Rule did not require marginal nonattainment areas to implement RACT/RACM. In addition, because attainment has been reached in the Columbus, OH area, no additional measures are needed to provide for attainment.

The reasonable further progress (RFP) requirement under section 172(c)(2) is defined as progress that must be made toward attainment. This requirement is not relevant for purposes of redesignation because the Columbus, OH area is monitoring attainment of the 2015 eight-hour ozone standard. In addition, because the Columbus, OH area has attained the ozone standard and is no longer subject to an RFP requirement, the section 172(c)(9) contingency measures are not applicable for purposes of redesignation.

Section 172(c)(3) requires submission and approval of a comprehensive, accurate and current inventory of actual emissions. This requirement was superseded by the inventory requirement in Section 182(a)(1) discussed below.

Section 172(c)(4) requires the identification and quantification of allowable emissions for major new and modified stationary sources in an area, and Section 172(c)(5) requires source permits for the construction and operation of new and modified major stationary sources anywhere in the nonattainment area. Ohio has a fully approved new source review program which is discussed in more detail under Chapter Five.

Section 172(c)(6) requires the SIP to contain control measures necessary to provide for attainment of the standard. Because attainment has been reached, no additional measures are needed to provide for attainment.

Section 172(c)(7) requires the SIP to meet the applicable provisions of Section 110(a)(2). The Ohio SIP meets the requirements of Section 110(a)(2) for purposes of redesignation, as discussed above.

- iii.) Subpart 1 of Part D - Section 176(c) requirements  
Section 176(c) of the CAA requires states to establish criteria and procedures to ensure that Federally-supported or funded activities, including highway projects, conform to the air quality planning goals in the applicable SIPs. The requirement to determine conformity applies to transportation plans, programs and projects developed, funded or approved under Title 23 of the U.S. Code and the Federal Transit Act (transportation conformity) as well as to all other Federally-supported or funded projects (general conformity). State conformity revisions must be consistent with Federal conformity regulations relating to consultation, enforcement, and enforceability, which U.S. EPA promulgated pursuant to CAA requirements.

Ohio EPA established two SIPs for conformity. The rules in Ohio Administrative Code (OAC) Chapter 3745-101 contained Ohio's SIP approved rules for transportation conformity, and OAC Chapter 3745-102 contained Ohio's SIP approved rules for general conformity.

Ohio EPA's transportation conformity rules in OAC Chapter 3745-101 were approved as a part of Ohio's SIP on July 31, 2000 (65 FR 34395) and April 27, 2007 (72 FR 20945). However, Ohio's transportation conformity rules in OAC Chapter 3745-101 were completely removed from Ohio's SIP on March 2, 2015 (80 FR 11134) when the rules were replaced by a series of memorandums of understanding (MOUs) between Ohio EPA, U.S. EPA, and the various state and local agencies involved in the transportation conformity process. The currently effective MOUs are available on Ohio EPA's website at: [http://epa.ohio.gov/dapc/sip/trans\\_conform.aspx](http://epa.ohio.gov/dapc/sip/trans_conform.aspx).

Ohio EPA's general conformity rules in OAC Chapter 3745-102 were approved as part of Ohio's SIP on March 11, 1996 (61 FR 9644). In April 2010, U.S. EPA promulgated changes to 40 CFR 51.851. The language in paragraph (a) of the section was changed from "must" to "may", thereby eliminating the requirement for states to maintain a general conformity SIP. For this reason, Ohio

EPA requested, and U.S. EPA granted rescission of Ohio's general conformity SIP. The rules in OAC Chapter 3745-102 were removed from the state SIP on May 26, 2015 (80 FR 29968). The state SIP was replaced by the federal rules in 40 CFR Part 93, subpart B.

- iv.) Subpart 2 of Part D - Section 182(a) requirements  
Section 182(a)(1) requires the submission of a comprehensive emissions inventory. This requirement is addressed under Chapter Four.

Section 182(a)(2) requires the submission of certain corrections to VOC RACT rules, inspection and maintenance programs and permitting programs. These corrections were addressed for the Columbus, OH area under the one-hour ozone standard and do not need to be addressed again under the 2015 eight-hour standard.

Section 182(a)(3)(B) requires the submission of an emission statement SIP. This requirement is addressed under Chapter Five.

- v.) Maintenance plans - CAA Section 107 (d)(3)(E)(iv)  
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

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

#### Requirement 1 of 4

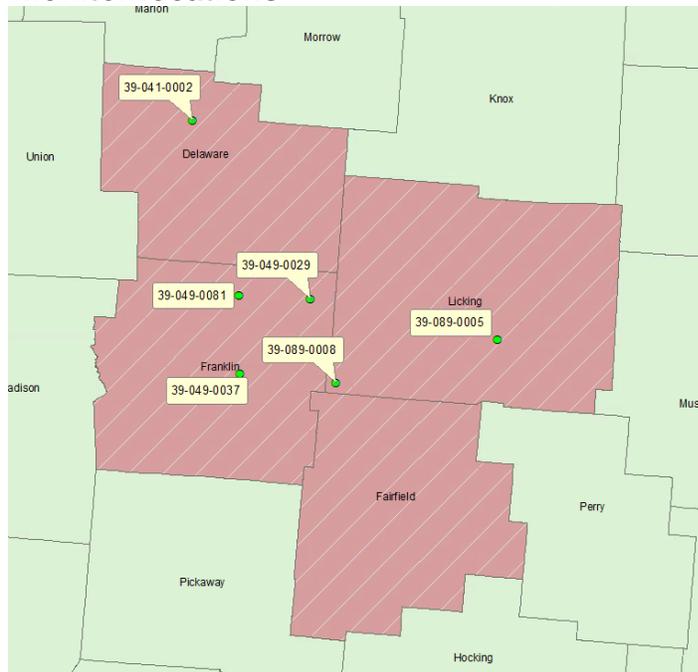
A demonstration that the NAAQS for ozone, as published in 40 CFR 50.15, has been attained.

#### Background

There are five monitors measuring ozone concentrations in this nonattainment area. The monitors are operated by Ohio EPA Division of Air Pollution Control Central District Office. 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 2016 through 2018 certified air quality data is shown in Table 1. The locations of the monitoring sites for this nonattainment area are shown on Figure 1. AQS Site ID 39-049-0037 in Franklin County was terminated on December 31, 2017 and the ozone monitor was relocated to Site ID 39-089-0008 in Licking County, which began operation on March 1, 2018. This change was approved by U.S. EPA.

#### Demonstration

**Figure 1 - Map of the Columbus, 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 EPA has quality assured all 2016 through 2018 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. All 2018 data included in Appendix A was quality assured on January 7, 2019.

#### **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 70 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 Appendix U, "Interpretation of the Primary and Secondary NAAQS for O<sub>3</sub>" of 40 CFR Part 50.

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 0.070 ppm. When this occurs, the site is said to be in attainment. Ozone concentrations are reported in ppm to the third decimal place, with additional digits to the right of the third decimal place truncated (truncating is performed at each step of the design value computation including one-hour, eight-hour and three-year averaging). 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 2016 – 2018 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 – Certified Monitoring Data for the Columbus, OH area for 2016 – 2018**

Data source: U.S. EPA Air Quality System (AQS)  
<http://www.epa.gov/aqs>

SITE ID	COUNTY	YEAR	% OBS	1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>	4 <sup>th</sup>	2016-2018
				8-HR	8-HR	8-HR	8-HR	AVER.
39-041-0002	Delaware	2016	98	74	70	68	67	64
39-041-0002	Delaware	2017	99	67	67	61	60	
39-041-0002	Delaware	2018	99	70	69	69	66	
39-049-0029	Franklin	2016	99	78	76	72	72	69
39-049-0029	Franklin	2017	100	74	73	70	70	
39-049-0029	Franklin	2018	100	71	70	70	66	
39-049-0037	Franklin	2016	97	71	70	67	67	66
39-049-0037	Franklin	2017	99	71	68	67	66	
39-049-0037	Franklin	2018	N/A (Site terminated effective 12/31/17)					
39-049-0081	Franklin	2016	100	76	75	72	71	66
39-049-0081	Franklin	2017	99	70	65	65	64	
39-049-0081	Franklin	2018	100	77	69	66	63	
39-089-0005	Licking	2016	99	73	72	71	67	64
39-089-0005	Licking	2017	100	70	66	66	65	
39-089-0005	Licking	2018	99	66	63	62	61	
39-089-0008	Licking	2016	N/A (Site began operation 3/1/18)					64
39-089-0008	Licking	2017						
39-089-0008	Licking	2018	99	70	65	64	64	

The area's design values have trended downward as emissions have declined due to such factors as cleaner automobiles and fuels, along with controls for electric generating units (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> <https://epa.ohio.gov/dapc/airohio/index>

## CHAPTER FOUR

### EMISSION INVENTORY

CAA Section 107 (d)(3)(E)(iii), & 107 (d)(3)(E)(v)

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 regarding emissions from the counties in the Columbus, OH area.

Area, non-road, on-road and point source emissions were compiled as follows:

- Area, non-road and point source (EGUs and non-EGUs) were collected from the data available on U.S. EPA's Air Emissions Modeling website<sup>3</sup>. Using Emissions Modeling platform 2011v6.3, data were collected for the 2011 National Emissions Inventory (NEI) year and the 2017, 2023 and 2028 U.S. EPA-projected inventories. Therefore, 2011 point emissions are actual reported emissions from the 2011 NEI.
  - Specific versions of the 2011v6.3 platform used were 2011el, 2017ek, 2023el and 2028el. Differences between the ek and el platforms are not expected to be significant in the Columbus, OH area as updated emissions were primarily for California, Mexico and Canada<sup>4</sup>.
- Ohio EPA derived 2014 and 2016 actual point emissions (for EGUs and non-EGUs) from state inventory databases (e.g., Ohio's EIS database which serves as the basis for the NEI).
- For the emissions collected from the Emissions Modeling platform 2011v6.3, tons per summer day emissions were derived by dividing July emissions by the number of days in July (i.e. the average July day). For emissions from the state inventory database, tons per summer day

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<sup>3</sup> <https://www.epa.gov/air-emissions-modeling/2011-version-63-platform>

<sup>4</sup> [https://www.epa.gov/sites/production/files/2017-11/documents/2011v6.3\\_2028\\_update\\_emismod\\_tsd\\_oct2017.pdf](https://www.epa.gov/sites/production/files/2017-11/documents/2011v6.3_2028_update_emismod_tsd_oct2017.pdf) (see p. 5)

emissions were derived by applying a conversion factor to the annual emissions. The conversion factor was derived from the Emissions Modeling platform 2011v6.3 as the ratio of the average July day to annual emissions for the non-EGU sector.

- Mobile source emissions for all years were developed in conjunction with the Ohio EPA, Ohio Department of Transportation (Ohio DOT), the Mid-Ohio Regional Planning Commission (MORPC) and the Licking County Area Transportation Study (LCATS) and were calculated from emission factors produced by U.S. EPA's MOVES2014a (Motor Vehicle Emissions Simulator) software program and data extracted from the region's travel-demand model. Appendix B contains detailed methodology and data for mobile source emissions for all years.
- Using the above datasets:
  - 2014 emissions for area and non-road were derived by interpolating between 2011 and 2017 U.S. EPA-projected emissions (2011el and 2017ek).
  - 2016 emissions for area and non-road were assumed to be equivalent to the 2017 U.S. EPA-projected emissions (2017ek).
  - 2023 emissions for area, non-road and point (EGU and non-EGU) were derived from 2023 U.S. EPA-projected emissions (2023el) without modification except as described below.
  - 2030 emissions for area, non-road and point (EGU and non-EGU) were derived by extrapolating from the 2028 U.S. EPA-projected emissions (2028el) using the TREND function in Microsoft Excel. If the TREND function resulted in a negative value, the emissions were assumed to be the same as in 2028.
  - The following adjustments were made to the 2023 and 2028 projections for non-EGUs:
    - Anchor Hocking in Fairfield County has not had NOx emissions from unit P006 since 2013. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.
    - Anheuser-Busch Columbus Brewery in Franklin County has seen steadily declining NOx and VOC emissions since 2011. Therefore, 2023 and 2030 NOx and VOC emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.
    - Columbus Southerly Wastewater Treatment Plant in Franklin County has seen steadily declining NOx emissions since 2011, and units N003 and N004 permanently shutdown in 2015. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.

- Columbus Steel Castings in Franklin County permanently shutdown in 2016. Therefore, 2023 and 2030 NOx and VOC emissions from this facility were assumed to be zero.
- Franklin County Sanitary Landfill in Franklin County installed a control device on P901 in 2014. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.
- Mars Petcare in Franklin County has not had NOx or VOC emissions since 2014 and is now classified as a non-Title V facility. Therefore, 2023 and 2030 NOx and VOC emissions from this facility were assumed to be zero.
- Plastic Packaging Technologies in Franklin County unit K011 permanently shutdown in 2016. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.
- QG Printing II, LLC in Franklin County permanently shutdown in 2017. Therefore, 2023 and 2030 NOx and VOC emissions from this facility were assumed to be zero.
- Denison University in Licking County has had no NOx emissions since the coal-fired boiler (B001) was permanently shutdown in 2014. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be zero.
- Owens Corning Insulating Systems in Licking County has seen steadily declining NOx emissions since 2011, and unit P005 has not operated since 2012. Therefore, 2023 and 2030 NOx emissions from this facility were assumed to be at the same level as the facility's most recent (2017) emissions.
- Biogenic emissions are not included in these summaries.

### **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.

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

**Demonstration**

The 2014 inventory is used as the nonattainment base year for the purpose of this submittal. The 2016 inventory is used as the attainment year inventory for the purposes of comparison. These inventories represent a comprehensive, accurate, and current inventory of actual emissions from all sources of the relevant pollutants in the Columbus, OH area. Emissions of VOC and NOx for 2014 and 2016 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**

As discussed above, Ohio EPA prepared a projected emissions inventory for the Columbus, OH area including area, non-road, mobile, and point sources for precursors of ozone (VOCs and NO<sub>x</sub>) for the nonattainment area.

**Demonstration**

In consultation with U.S. EPA and other stakeholders, Ohio EPA selected the year 2030 as the maintenance year for this redesignation request. The request also contains projected emission inventories for 2023.

**On-Road Mobile Emission Estimations**

Tables 2 through 6 contain the results of the emissions analysis for the appropriate years. All emissions estimations are expressed in tons per summer day (TSD).

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

	<b>2014</b>	<b>2016</b>	<b>2023</b>	<b>2030</b>
VOC (TSD)	4.72	4.02	2.73	2.14
NOx (TSD)	7.01	5.59	2.80	1.92
VMT (miles/day)	5,334,179	5,535,589	6,279,019	7,053,487

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

	2014	2016	2023	2030
VOC (TSD)	3.84	2.84	1.90	1.78
NOx (TSD)	4.96	3.94	1.94	2.70
VMT (miles/day)	3,923,825	4,057,889	4,584,678	5,124,130

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

	2014	2016	2023	2030
VOC (TSD)	31.26	26.55	17.60	13.20
NOx (TSD)	45.89	36.51	17.84	11.70
VMT (miles/day)	33,277,030	34,370,170	37,400,283	40,232,869

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

	2014	2016	2023	2030
VOC (TSD)	4.80	4.09	2.70	2.04
NOx (TSD)	7.34	5.86	2.88	1.92
VMT (miles/day)	5,552,030	5,758,512	6,372,786	6,985,922

**Table 6 - Emission Estimation Totals for On-Road Mobile Sources for the Columbus-OH Area**

	2014	2016	2023	2030
VOC (TSD)	44.62	37.50	24.93	19.16
NOx (TSD)	65.20	51.90	25.46	18.24
VMT (miles/day)	48,087,064	49,722,160	54,636,766	59,396,408

Motor Vehicle Emission Budget

Table 7 contains the motor vehicle emissions budgets for the Columbus, OH area.

**Table 7 - Mobile Vehicle Emissions Budget for Columbus, OH**

	2023 Estimated Emissions	2023 Mobile Safety Margin Allocation*	2023 Total Mobile Budget	2030 Estimated Emissions	2030 Mobile Safety Margin Allocation*	2030 Total Mobile Budget
VOC (TSD)	24.93	3.74	28.67	19.16	2.87	22.03
NOx (TSD)	25.46	3.82	29.28	18.24	2.74	20.98
VMT (miles/day)	54,636,766	-	-	59,396,408	-	-

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

The above budgets for the Columbus, OH area include the emission estimates calculated for 2023 and 2030 (from Table 6) 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 Columbus, OH nonattainment area.

The emission estimates are derived from the travel demand model and MOVES2014a as described above. 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 MORPC, LCATS, 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 Columbus, OH area well below the 2016 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 18.

In summary, the mobile budget safety margin allocation translates into:

- An allocation of 3.74 TSD for VOC and 3.82 TSD for NOx for 2023; and
- An allocation of 2.87 TSD for VOC and 2.74 TSD for NOx for 2030.

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 18).

The current eight-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 new 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**

Maintenance is demonstrated when the future-year (2030) projected emission totals are below the 2016 attainment year totals.

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

**Demonstration**

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

**Table 8 – Delaware County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

<b>Sector</b>	<b>2014 Base</b>	<b>2016 Attainment</b>	<b>2023 Interim</b>	<b>2030 Maintenance</b>	<b>Safety Margin</b>
<b>EGU</b>	0.00	0.00	0.00	0.00	0.00
<b>Non-EGU</b>	0.07	0.10	0.08	0.08	0.02
<b>Area</b>	2.45	2.30	1.97	1.56	0.74
<b>Non-road</b>	3.30	2.49	1.73	1.46	1.03
<b>On-road</b>	7.01	5.59	2.80	1.92	3.67
<b>Total</b>	12.83	10.48	6.58	5.02	5.46

<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.

**Table 9 – Fairfield County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
EGU	0.00	0.00	0.00	0.00	0.00
Non-EGU	4.05	3.85	3.55	3.55	0.30
Area	0.54	0.55	0.54	0.53	0.02
Non-road	2.08	1.56	1.06	0.85	0.71
On-road	4.96	3.94	1.94	2.70	1.24
<b>Total</b>	<b>11.63</b>	<b>9.90</b>	<b>7.09</b>	<b>7.63</b>	<b>2.27</b>

**Table 10 – Franklin County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
EGU	0.00	0.00	0.00	0.00	0.00
Non-EGU	1.48	1.34	1.08	1.08	0.26
Area	9.04	8.90	8.88	8.34	0.56
Non-road	11.53	8.37	5.96	5.42	2.95
On-road	45.89	36.51	17.84	11.70	24.81
<b>Total</b>	<b>67.94</b>	<b>55.12</b>	<b>33.76</b>	<b>26.54</b>	<b>28.58</b>

**Table 11 - Licking County, Ohio NO<sub>x</sub> Emission Inventory Totals (TSD)**

Sector	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
EGU	0.00	0.00	0.00	0.00	0.00
Non-EGU	0.95	0.89	0.75	0.75	0.14
Area	0.69	0.71	0.73	0.73	-0.02
Non-road	2.00	1.53	1.07	0.87	0.66
On-road	7.34	5.86	2.88	1.92	3.94
<b>Total</b>	<b>10.98</b>	<b>8.99</b>	<b>5.43</b>	<b>4.27</b>	<b>4.72</b>

**Table 12 – Columbus, OH Area NO<sub>x</sub> Emission Inventory Totals (TSD)**

County	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
Delaware	12.83	10.48	6.58	5.02	5.46
Fairfield	11.63	9.90	7.09	7.63	2.27
Franklin	67.94	55.12	33.76	26.54	28.58
Licking	10.98	8.99	5.43	4.27	4.72
<b>TOTAL NO<sub>x</sub></b>	<b>103.38</b>	<b>84.49</b>	<b>52.86</b>	<b>43.46</b>	<b>41.03</b>

**VOC**

**Table 13 - Delaware County, Ohio VOC Emission Inventory Totals (TSD)**

<b>Sector</b>	<b>2014 Base</b>	<b>2016 Attainment</b>	<b>2023 Interim</b>	<b>2030 Maintenance</b>	<b>Safety Margin</b>
<b>EGU</b>	0.00	0.00	0.00	0.00	0.00
<b>Non-EGU</b>	0.36	0.27	0.33	0.33	-0.06
<b>Area</b>	4.30	4.16	4.19	4.18	-0.02
<b>Non-road</b>	4.14	3.40	3.00	3.00	0.40
<b>On-road</b>	4.72	4.02	2.73	2.14	1.88
<b>Total</b>	13.52	11.85	10.25	9.65	2.20

**Table 14 – Fairfield County, Ohio VOC Emission Inventory Totals (TSD)**

<b>Sector</b>	<b>2014 Base</b>	<b>2016 Attainment</b>	<b>2023 Interim</b>	<b>2030 Maintenance</b>	<b>Safety Margin</b>
<b>EGU</b>	0.00	0.00	0.00	0.00	0.00
<b>Non-EGU</b>	0.59	0.55	0.53	0.53	0.02
<b>Area</b>	4.61	4.53	4.37	4.37	0.16
<b>Non-road</b>	1.44	1.19	1.14	1.20	-0.01
<b>On-road</b>	3.84	2.84	1.90	1.78	1.06
<b>Total</b>	10.48	9.11	7.94	7.88	1.23

**Table 15 - Franklin County, Ohio VOC Emission Inventory Totals (TSD)**

<b>Sector</b>	<b>2014 Base</b>	<b>2016 Attainment</b>	<b>2023 Interim</b>	<b>2030 Maintenance</b>	<b>Safety Margin</b>
<b>EGU</b>	0.00	0.00	0.00	0.00	0.00
<b>Non-EGU</b>	2.27	2.24	1.52	1.52	0.72
<b>Area</b>	28.24	27.52	27.61	27.62	-0.10
<b>Non-road</b>	13.29	11.16	11.26	12.17	-1.01
<b>On-road</b>	31.26	26.55	17.60	13.20	13.35
<b>Total</b>	75.06	67.47	57.99	54.51	12.96

**Table 16 – Licking County, Ohio VOC Emission Inventory**

**Totals (TSD)**

Sector	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
EGU	0.00	0.00	0.00	0.00	0.00
Non-EGU	0.70	0.62	0.41	0.41	0.21
Area	6.46	6.36	5.94	5.95	0.41
Non-road	2.59	2.11	1.84	1.84	0.27
On-road	4.80	4.09	2.70	2.04	2.05
<b>Total</b>	<b>14.55</b>	<b>13.18</b>	<b>10.89</b>	<b>10.24</b>	<b>2.94</b>

**Table 17 – Columbus, OH Area VOC Emission Inventory Totals (TSD)**

County	2014 Base	2016 Attainment	2023 Interim	2030 Maintenance	Safety Margin
Delaware	13.52	11.85	10.25	9.65	2.20
Fairfield	10.48	9.11	7.94	7.88	1.23
Franklin	75.06	67.47	57.99	54.51	12.96
Licking	14.55	13.18	10.89	10.24	2.94
<b>TOTAL VOC</b>	<b>113.61</b>	<b>101.61</b>	<b>87.07</b>	<b>82.28</b>	<b>19.33</b>

**VOC and NO<sub>x</sub>**

**Table 18 – Columbus, OH Area Comparison of 2016 attainment year and projected emission estimates (TSD)**

County	2016	2023	2023 Projected Decrease	2030	2030 Projected Decrease
VOC	101.61	87.07	14.54	82.28	19.33
NO <sub>x</sub>	84.491	52.86	31.63	43.46	41.03

As shown in the table above, VOC emissions in the nonattainment area are projected to decrease by 14.54 TSD in 2023 and 19.33 TSD in 2030. In general, emissions for all sectors are projected to decline or remain stable. Area emissions for Delaware and Franklin County show slight increases, as do non-EGU emissions in Delaware County and nonroad emissions in Fairfield and Franklin Counties. These increases do not affect the overall reduction in VOC emissions for the area and are likely due to slight changes in population projections.

NO<sub>x</sub> emissions in the nonattainment area are projected to

decrease by 31.63 TSD in 2023 and 41.03 TSD in 2030. In general, emissions for all sectors are projected to decline or remain stable. There are slight emission increases in Licking County for area emissions. However, the small increase in this category does not affect the overall attainment of the Columbus area and the emission totals from all categories in the nonattainment area show a decrease. Decreases from U.S. EPA rules covering EGUs (NOx SIP Call, CAIR and CSAPR), Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements<sup>6</sup>, Highway Heavy-Duty Engine Rule<sup>7</sup>, and the Non-Road Diesel Engine Rule<sup>8</sup> are factored into the changes.

As identified in Table 7 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 3.74 TSD for VOC and 3.82 TSD for NOx in the year 2023 and 2.87 TSD for VOC and 2.74 TSD for NOx in the year 2030. 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 2014 to 2030) to the mobile emissions budgets for future conformity:

- In 2023: 3.74 TSD of the 14.54 TSD safety margin for VOC and 3.82 TSD of the 31.63 TSD safety margin for NOx as a mobile emissions budget safety margin.
- In 2030: 2.87 TSD of the 19.33 TSD safety margin for VOC and 2.74 TSD of the 41.03 TSD safety margin for NOx as a mobile emissions budget safety margin.

#### **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**

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<sup>6</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/2000/February/Day-10/a19a.htm>

<sup>7</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/1997/October/Day-21/a27494.htm>

<sup>8</sup> <http://www.epa.gov/fedrgstr/EPA-AIR/1998/October/Day-23/a24836.htm>

Ambient air quality data from all monitoring sites indicate that air quality met the NAAQS for ozone in 2016 through 2018. 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 NOx 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 and non-road diesel engines.

Reductions achieved are discussed in greater detail under Chapter Five.

**Table 19 - Columbus, OH Area Combined Comparison of 2014 base year and 2016 attainment year non-road, and on-road reductions (TSD)**

	<b>2014</b>	<b>2016</b>
Non-road NOx	18.91	13.95
Non-road VOC	21.46	17.86
On-road NOx	65.20	51.90
On-road VOC	44.62	37.50

To further support Ohio’s demonstration that the 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, an analysis was performed by Ohio EPA in order to demonstrate the improvement in air quality is not based on unusually favorable meteorology.

Ohio EPA analyzed the maximum fourth-high eight-hour ozone value for May, June, July, August and September, years 2000 to 2017. The values were analyzed against average monthly temperatures, the number of days with a temperature exceeding 80° F, and the average relative humidity. While the formation of

tropospheric ozone is dependent on a large number of atmospheric variables, ozone formation is strongly and positively correlated with elevated temperatures and humidity. The utilization of an extended period of record (2000-2017) should eliminate or dampen the influence of other meteorological variables affecting ozone formation, such as wind direction and wind speed.

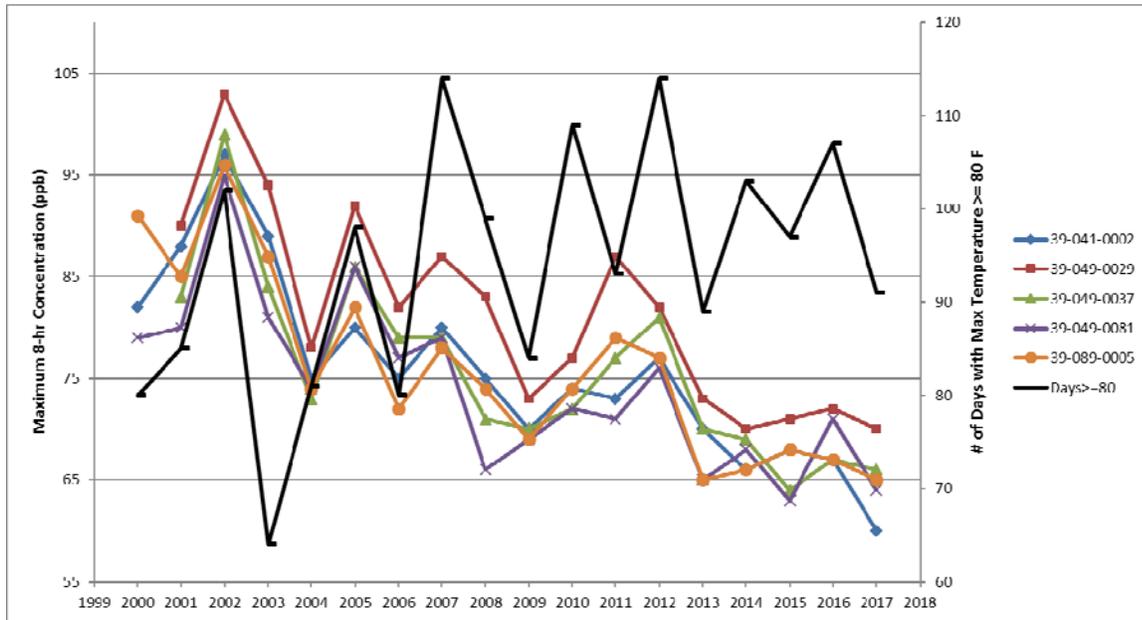
Meteorological data for the Columbus, OH area was compiled from monthly local climatological data obtained from the National Oceanic and Atmospheric Administration's National Climatic Data Center (NCDC)<sup>9</sup>. The data was recorded at the meteorological station located at the Port Columbus International Airport, WBAN 14821. Ohio EPA has previously determined that data from this meteorological station is representative of meteorological conditions across the nonattainment area, and utilizes this same data for New Source Review and Prevention of Significant Deterioration air quality permit modeling applications. Monitor data was compiled from the U.S. EPA's AQS database for the same period.

The first analysis compared the maximum eight-hour ozone concentration at each monitor in the Columbus, OH area to the number of days where the maximum temperature was greater than or equal to 80° F. The results of this analysis are shown in Figure 2.

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<sup>9</sup> <https://www.ncdc.noaa.gov/IPS/lcd/lcd.html>

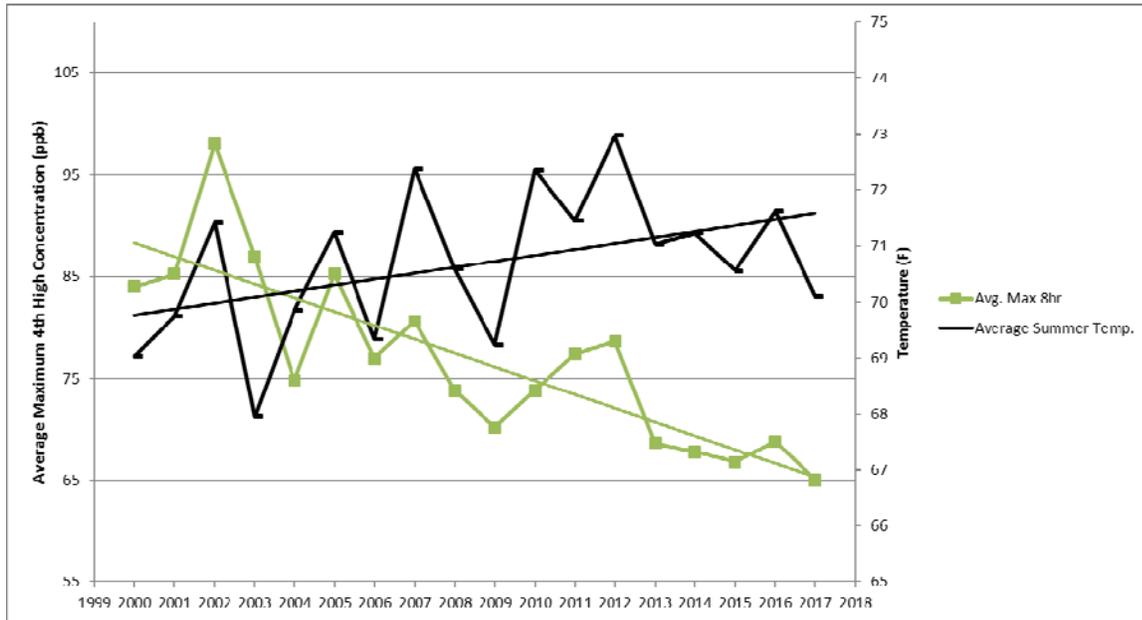
**Figure 2 – Maximum eight-hour ozone concentrations versus number of days greater than or equal to 80° F for Columbus Monitors**



The data shown in Figure 2 indicate that while there is some correlation between the numbers of days in which temperatures were at or exceeded 80° F, this correlation is not 1 to 1. While there is clearly some degree of correlation when comparing one year to the next, the same is not observed when examining the monitor values and temperature data over the period of study. Secondly, a clear trend in decreasing ozone concentrations at all monitors is apparent, while no such trend is observed in the temperature data. Lastly, there is a clear similarity in the recorded ozone values, which is consistent with the regional nature of ground-level ozone formation.

To further examine the relationship between meteorological factors and ozone concentrations, Ohio EPA examined the relationship between average summer temperatures for each year of the 2000 to 2017 period and the 4<sup>th</sup> maximum eight-hour ozone concentration. Given the similarity of ozone concentrations observed at each monitor (see Figure 2) and the regional nature of ozone formation, Ohio EPA conducted this analysis using the average 4<sup>th</sup> maximum eight-hour ozone concentration from all monitors in the Columbus, OH area. The results of this analysis are shown in Figure 3.

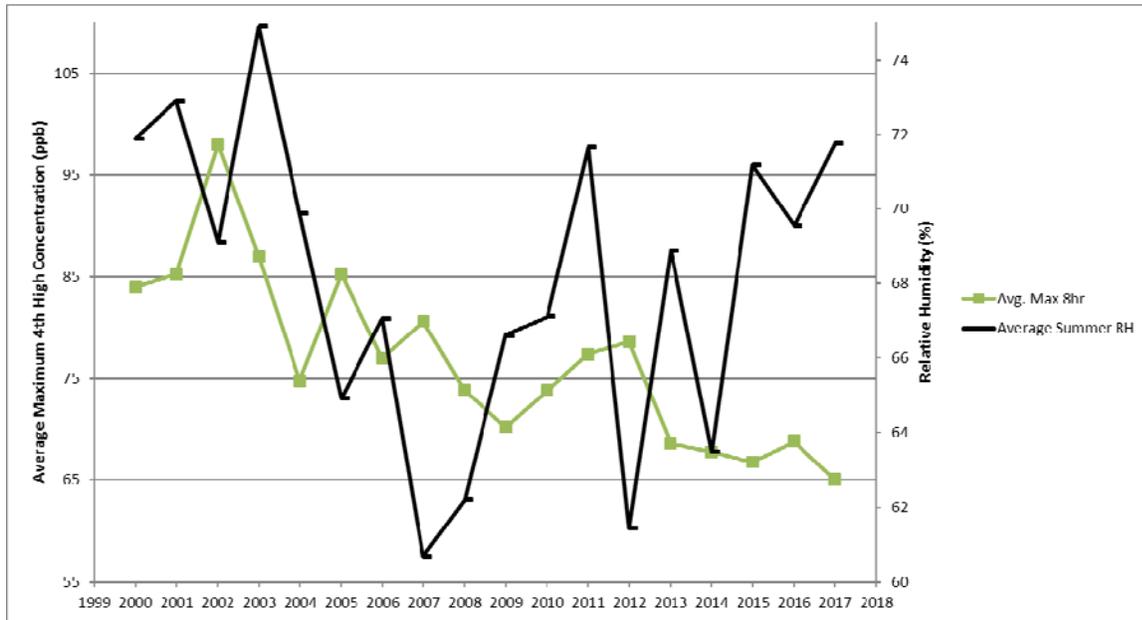
**Figure 3 – Average maximum 4<sup>th</sup> high eight-hour ozone concentrations versus average summer temperatures**



The data shown in Figure 3 indicates that while there is some correlation between average summer temperatures and ozone concentrations, this correlation does not exist over the study period. The linear regression lines for each data set demonstrate that average summer temperatures have increased over the 2000 to 2017 period, while average ozone concentrations have decreased. The correlation between temperature and ozone formation is well established; these data serve as strong evidence to suggest that reductions in precursors are responsible for the significant reductions in elevated ozone concentrations in the Columbus, OH area and not due to unusual or favorable summer temperatures.

Lastly, Ohio EPA analyzed the relationship between average summertime relative humidity and average 4<sup>th</sup> maximum eight-hour ozone concentrations in the Columbus, OH area. As with the data shown in Figure 3, Ohio EPA considered the overall trend in ozone monitors by analyzing the average of 4<sup>th</sup> maximum eight-hour concentrations across all monitors in the area. These data are shown in Figure 4.

**Figure 4 – Average maximum 4<sup>th</sup> high eight-hour ozone concentrations versus average summer relative humidity**



The data presented in Figure 4 do not indicate a correlation between relative humidity and ozone concentrations, and the period of study represents a significant spread of average summertime relative humidity.

The analyses of meteorological variables associated with ozone formation above further support Ohio’s demonstration that the 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 unusually favorable meteorology. The extended study period should dampen the effects of minor variations in wind directions and wind speeds, and provides a sufficient basis to examine long-term trends in both the meteorological variables and the regional ozone concentrations in the Columbus, OH area.

**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 2011 base year and the 2030 projected maintenance year inventories to assess emission trends, as necessary, and to assure continued compliance with the ozone standard.

## 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 4**

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). In addition, on July 18, 2014, Ohio EPA submitted a SIP revision for this area and U.S. EPA published a proposal and direct final action approving that submittal on March 10, 2016 (81 FR 12626 and 81 FR 12591). The approval was effective May 9, 2016. As discussed in Chapter Four (Requirement 4), Ohio EPA submits, and commits to submit, emission inventories (statements) every three years.

#### **Requirement 2 of 4**

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

##### **Background**

On October 27, 1998, U.S. EPA promulgated the NO<sub>x</sub> SIP Call requiring 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 promulgated 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.

As discussed in detail below, U.S. EPA subsequently replaced the NO<sub>x</sub> SIP Call with CAIR, CSAPR and CSAPR Update.

CSAPR Update continues to be implemented and amounts to even further reductions than that realized under the NO<sub>x</sub> SIP Call.

Section 182(b) contains additional provisions applicable to nonattainment areas, for which the Columbus, OH area was under the one-hour standard and the 1997 eight-hour standard. Section 182(b)(3) requires gasoline vapor recovery systems for gasoline dispensing stations in the area and Section 182(b)(2) requires RACT under Section 172(c)(1).

## **Demonstration**

### **NO<sub>x</sub> SIP Call**

Controls for EGUs under the NO<sub>x</sub> SIP Call 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>10</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 stayed in place through 2008, at which time the CAIR program superseded 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 was 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.

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<sup>10</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)

As discussed further below, starting January 1, 2009, CAIR commenced and emissions covered by this program have continued trending downward. While there are no EGUs in this nonattainment area, reductions elsewhere in Ohio and in neighboring states contribute to declining ozone levels in this area. CAIR's cap and trade program stayed in place through 2014, at which time the CSAPR and CSAPR Update programs superseded it. As Ohio non-EGUs are not covered under the CSAPR Update program, Ohio modified the NOx budget program rules in OAC Chapter 3745-14 effective January 29, 2018 to replace trading provisions for the non-EGUs with a demonstration that the statewide ozone season NOx budget established by the NOx SIP Call continues to be met. This SIP revision is currently pending U.S. EPA approval.

### VOC RACT

The Columbus area was required to adopt RACT for the following source categories under Section 182(b)(2) for the one-hour standard: (a) all VOC sources covered by Control Technique Guidelines (CTGs) issued between November 15, 1990 and the date the Columbus area attained the one-hour ozone standard; (b) all VOC sources covered by a CTG issued prior to November 15, 1990; and (c) all other major non-CTG stationary sources in the Columbus area.

U.S. EPA approved Ohio EPA's VOC RACT rules on September 7, 1994 (59 FR 46182), October 23, 1995 (60 FR 54308), April 25, 1996 (61 FR 18255), and June 21, 2005 (70 FR 35946).

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>11</sup>.

### Gasoline Vapor Recovery Systems

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

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<sup>11</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)

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. However, some areas, including Ohio, retained Stage II requirements to provide a control method to comply with rate-of-progress emission reduction targets. Congress recognized that onboard refueling vapor recovery and Stage II would eventually become redundant, and actually increase emissions, and provided the U.S. EPA authority to allow states to remove Stage II from their SIPs after U.S. EPA finds that onboard refueling vapor recovery is in widespread use. On May 16, 2012, the U.S. EPA determined that onboard refueling vapor recovery technology is in widespread use throughout the motor vehicle fleet for purposes of controlling motor vehicle refueling emissions. This action (77 FR 28772) also provided notice of an upcoming guidance document for states to use to prepare a SIP revision to remove or phase-out Stage II controls. U.S. EPA published this guidance on August 7, 2012 (EPA-457/B-12-001). The guidance noted that since Section 182(b)(3) requirements no longer applied, the only requirements for Stage II controls are state SIPs (which includes Ohio, as noted above), Section 184(b)(2) for areas in the ozone transport region (does not apply to Ohio), and section 193 for any area that adopted Stage II controls prior to November 15, 1990 (does not apply to Ohio). In order to remove Stage II control requirements from the SIP, CAA Section 110(l) is required to be addressed. Ohio EPA conducted this demonstration and submitted the SIP revision request to U.S. EPA on July 15, 2015. This demonstration included a new requirement for the use of low permeation hoses which will provide even greater VOC emissions reductions in the future.

In addition to the above, there are several measures beyond the CAA requirements that have been implemented in this area.

### 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 were phased in between 2004 and 2009. U.S. EPA has estimated that NO<sub>x</sub> emission reductions were 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 were 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.

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

In March 2014, U.S. EPA finalized a federal rule to further strengthen Tier II vehicle emission and fuel standards. This rule will require automakers to produce cleaner vehicles and refineries to make cleaner, lower sulfur gasoline. This rule will be phased in between 2017 and 2025. Tier III requires all passenger vehicles to meet an average standard of 0.03 gram/mile of NO<sub>x</sub>. Compared to Tier II, the Tier III tailpipe standards for light-duty vehicles are expected to reduce NO<sub>x</sub> and VOC emissions by approximately 80%. Tier III vehicle standards also include evaporative standards using onboard diagnostics that will result in a 50% reduction in VOC emissions compared to Tier II reductions. The rule reduces the sulfur content of gasoline to 10 ppm, beginning in January 2017.

### 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 was phased in from 2004 through 2007. This rule applies to heavy-duty gasoline and diesel trucks and buses. This rule resulted 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 cut emissions from non-road diesel engines by more than 90 percent. Non-road diesel equipment, as described in this rule, accounted for 47 percent of diesel particulate matter (PM) and 25 percent of NO<sub>x</sub> from mobile sources nationwide. Sulfur levels were reduced in non-road diesel fuel by 99 percent from previous levels, from approximately 3,000 parts per million (ppm) to 15 ppm in 2009. New engine standards took effect, based on engine horsepower, starting in 2008.

### Non-road Spark-Ignition Engines and Recreational Engine Standards

Effective in January 2003, this standard regulates NO<sub>x</sub>, VOCs, and carbon monoxide (CO) for groups of previously unregulated non-road engines. This standard applies to all new engines sold in the United States and imported after the standards went into effect. The standard applies to large spark-ignition engines (forklifts and airport ground service equipment), recreational vehicles (off-highway motorcycles and all-terrain vehicles), and recreational marine diesel engines. When all of the non-road spark-ignition engines and recreational engine standards are fully implemented, an overall 80% reduction in NO<sub>x</sub>, 72% reduction in VOC, and 56% reduction in CO emissions are expected by 2020.

### Reciprocating Internal Combustion Engine Standards

This new standard, effective in May 2010, regulates emissions of air toxics from existing diesel powered stationary reciprocating internal combustion engines that meet specific site rating, age, and size criteria. These engines are typically used at industrial facilities (e.g. power, chemical, and manufacturing plants) to generate electricity for compressors and pumps and to produce electricity to pump water for flood and fire control during emergencies.

The standard applies to stationary diesel engines: (1) that are located at a major source of air toxics emissions and that were installed prior to June 12, 2006; (2) used at major sources of air toxics, having a site rating of less than or equal to 500

horsepower and were constructed or reconstructed before June 12, 2006; and (3) used at major sources of air toxics for nonemergency purposes, having a site rating of greater than 500 horsepower and were constructed or reconstructed before December 19, 2002.

Operators of existing engines were required to: (1) install emission control equipment that would limit air toxics up to 70% for stationary non-emergency engines with a site rating greater than 300 horsepower; (2) perform emission tests to demonstrate engine performance and compliance with rule requirements; and (3) burn ultra-low sulfur fuel in stationary non-emergency engines with a site rating greater than 300 horsepower.

The engine standards took effect in 2013. According to U.S. EPA estimates, this rule has resulted in emission reductions from existing diesel-powered stationary reciprocating internal combustion engines of approximately 1,000, 2,800, and 27,000 tpy of air toxics, fine particles (PM<sub>2.5</sub>), and CO, respectively.

#### Category 3 Marine Diesel Engine Standards

This new standard, effective in June 2010, promulgated more stringent exhaust emission standards for new large marine diesel engines with per-cylinder displacement at or above 30 liters (commonly referred to as Category 3 compression-ignition marine engines) as part of a coordinated strategy to address emissions from all ships that affect U.S. air quality. These emission standards are equivalent to those adopted in the amendments to Annex VI to the International Convention for the Prevention of Pollution from Ships (MARPOL Annex VI). The emission standards apply in two stages: near-term standards, for newly built engines, which took effect in 2011 and long-term standards requiring an 80% reduction in NO<sub>x</sub> emissions that will begin in 2016.

U.S. EPA is adopting changes to the diesel fuel program to allow for the production and sale of diesel fuel with up to 1,000 ppm sulfur for use in Category 3 marine vessels. The regulations generally forbid production and sale of fuels with more than 1,000 ppm sulfur for use in most U.S. waters unless operators achieve equivalent emission reductions in other ways.

U.S. EPA is also adopting provisions to apply some emission and fuel standards to foreign flagged and in-use vessels that are covered by MARPOL Annex VI. When this strategy is fully

implemented in 2030, U.S. EPA estimates that NOx and PM2.5 emissions in the U.S. will be reduced by approximately 1.2 million tpy and 143,000 tpy, respectively.

### Clean Air Interstate Rule (CAIR)/Cross State Air Pollution Rule (CSAPR)

On May 12, 2005, U.S. EPA published the following regulation: “Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (CAIR); Revisions to Acid Rain Program; Revisions to the NOx SIP Call; Final Rule.” This rule established the requirement for states to adopt rules limiting the emissions of NOx and SO2 and provided a model rule for the states to use in developing their rules in order to meet federal requirements. The purpose of CAIR was to reduce interstate transport of PM2.5, SO2, and ozone precursors (NOx).

CAIR applied to any stationary, fossil fuel-fired boiler or stationary, fossil fuel-fired combustion turbine, or a generator with a nameplate capacity of more than 25 megawatt electrical (MWe) producing electricity for sale. This rule provided annual state caps for NOx and SO2 in two phases, with Phase I caps for NOx and SO2 taking effect in 2009 and 2010, respectively. Phase II caps were to become effective in 2015. U.S. EPA allowed limits to be met through a cap and trade program if a state chose to participate in the program. SO2 emissions from power plants in the 28 eastern states, as well as Washington D.C subject to CAIR were to be cut by 4.3 million tons from 2003 levels by 2010 and 5.4 million tons from 2003 levels by 2015. NOx emissions were to be cut by 1.7 million tons by 2009 and reduced by an additional 1.3 million tons by 2015. In response to U.S. EPA’s rulemaking, 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). Ohio’s rule included annual and seasonal NOx trading programs, and an annual SO2 trading program. This rule required compliance effective January 1, 2009.

In July 2008, the D.C. Circuit court vacated CAIR and issued a subsequent remand without vacatur of CAIR in December 2008. The court then directed U.S. EPA to revise or replace CAIR in order to address the deficiencies identified by the court. On July 6, 2011, U.S. EPA finalized CSAPR as a replacement for CAIR. On August 21, 2012, the U.S. Court of Appeals for the D.C.

Circuit vacated CSAPR and directed U.S. EPA to continue administering CAIR “pending the promulgation of a valid replacement.” In a subsequent decision on the merits, the Court vacated CSAPR based on a subset of petitioners’ claims, but on April 29, 2014, the U.S. Supreme Court reversed that decision and remanded the case to the D.C. Circuit court for further proceedings. Throughout the initial round of D.C. Circuit proceedings and the ensuing U.S. Supreme Court proceedings, the stay remained in place and U.S. EPA has continued to implement CAIR. In order to allow CSAPR to replace CAIR in an equitable and orderly manner while further D.C. Circuit Court proceedings were held to resolve petitioner’s remaining claims, U.S. EPA filed a motion asking the D.C. Circuit Court to lift the stay. U.S. EPA also asked the court to toll all CSAPR compliance deadlines that had not passed as of the date of the stay order by three years. On October 23, 2014, the Court granted the U.S. EPA’s motion. CSAPR became effective on January 1, 2015, for SO<sub>2</sub> and annual NO<sub>x</sub>, and May 1, 2015 for ozone season NO<sub>x</sub>. Combined with other final state and U.S. EPA actions, CSAPR will reduce power plant SO<sub>2</sub> emissions by 73% and NO<sub>x</sub> emissions by 54% from 2005 levels in the CSAPR region.

On November 16, 2015, U.S. EPA proposed an update to CSAPR that bring even greater reductions in NO<sub>x</sub> emissions [80 F.R. 75706, December 3, 2015]. U.S. EPA estimated the rule would reduce summertime NO<sub>x</sub> emissions from EGUs in the East (including Ohio) by 85,000 tons in 2017 compared to projections without the rule. Due to this rule and other changes already underway in the power sector, U.S. EPA estimated ozone season NO<sub>x</sub> emission will be 150,000 tons lower in 2017 than in 2014, a reduction of more than 30%.

### Oil and Natural Gas Industry Standards

This new standard, issued on April 17, 2012, regulates VOC and air toxic emissions from hydraulically fractured natural gas wells and also includes requirements for several other sources of pollution in the oil and natural gas industry that were previously unregulated in the United States. U.S. EPA estimates that these standards will apply to approximately 11,400 new natural gas wells hydraulically fractured each year and an additional 1,400 existing natural gas wells refractured annually. When these standards are fully implemented in 2015, U.S. EPA estimates that VOC and air toxic emissions in the U.S. will be reduced by approximately 190,000 to 290,000 tpy and 12,000 to 20,000 tpy, respectively.

## Mercury and Air Toxic Standards

This new standard, effective in April 2012, regulates emissions of mercury, acid gases, and non-mercury metallic toxic pollutants from new and existing coal and oil-fired EGUs. U.S. EPA estimates that this rule will apply to approximately 1,100 coal-fired and 300 oil-fired EGUs at 600 power plants in the U.S. According to U.S. EPA, most facilities will comply with these standards through a range of strategies, including the use of existing emission controls, upgrades to existing emission controls, installation of new pollution controls, and fuel switching.

Following promulgation of the rule, U.S. EPA received petitions for reconsideration of various provisions of the rule, including requests to reconsider the work practice standards applicable during startup periods and shutdown periods. U.S. EPA granted reconsideration of the startup and shutdown provisions as no opportunity to comment was provided to the public regarding the work practice requirements contained in the final rule. On November 30, 2012, U.S. EPA published a proposed rule reconsidering certain new source standards and startup and shutdown provisions in MATS. U.S. EPA proposed certain minor changes to the startup and shutdown provisions contained in the 2012 final rule based on information obtained in the petitions for reconsideration. On April 24, 2013, U.S. EPA took final action on the new source standards that were reconsidered and also the technical corrections contained in the November 30, 2012, proposed action. U.S. EPA did not take final action on the startup and shutdown provisions and, on June 25, 2013, added new information and analysis to the docket and reopened the public comment period for the proposed revisions. U.S. EPA took final action on the remaining topics open for reconsideration on November 19, 2014. The compliance date for existing sources was April 16, 2015, while the compliance date for new sources was April 16, 2012.

On November 25, 2014, the U.S. Supreme Court accepted several challenges to the rules brought by the utility industry and a coalition of nearly two dozen states. On June 29, 2015, the U.S. Supreme Court ruled that U.S. EPA did not properly account for compliance costs when crafting the MATS rule and remanded the decision to the D.C. Circuit Court for reconsideration.

### Portable Fuel Containers

On February 10, 2007, Ohio adopted OAC rule 3745-21-17<sup>12</sup>, “Portable fuel containers.” This rule, which was based on a model rule developed by the ozone transport commission (OTC) states, reduces emissions of VOCs from portable fuel canisters (PFC) which are any container or vessel with a nominal capacity of ten gallons or less intended for reuse that is designed, or used, sold, advertised or offered for sale primarily for receiving, transporting, storing, and dispensing fuel or kerosene. All PFCs sold in Ohio after July 1, 2007 must meet standards set by the California air resources board (CARB) pursuant to the certification requirements contained in Title 13, Division 3, Chapter 9, Article 6 of the California Code of Regulations; “Portable Containers and Spouts.”

### Consumer Products rules

On September 15, 2007, Ohio adopted rules in OAC Chapter 3745-112<sup>13</sup>, “Consumer products.” These rules reduce VOC emissions by regulating the VOC content of consumer products sold, supplied, offered for sale, or manufactured for use in the state of Ohio on or after January 1, 2009. This rule, which was based on a model rule developed by the ozone transport commission (OTC) states, establishes VOC content limitations in such products as sprays, paints, aerosols, waxes, varnishes, and other consumer oriented products.

### Architectural and Industrial Maintenance (AIM) Coatings rules

On September 21, 2007, Ohio adopted rules in OAC Chapter 3745-113<sup>14</sup>, “Architectural and Industrial Maintenance (AIM) Coatings.” These rules reduce VOC emissions by regulating the VOC content of AIM coatings sold, supplied, offered for sale, or manufactured for use in the state of Ohio on or after September 21, 2007. This rule, which was based on a model rule developed by the ozone transport commission (OTC) states, establishes VOC content limitations in coatings used un architectural or industrial applications such as paints, varnishes, specialty coatings, roof coatings, lacquers, fire retardant coatings, and similar or related coatings.

### Ohio’s Beneficiary Mitigation Plan for the Volkswagen settlement

Ohio EPA developed a Beneficiary Mitigation Plan to accept and distribute funds allocated to Ohio from the Volkswagen settlement.

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<sup>12</sup> [http://epa.ohio.gov/portals/27/regs/3745-21/3745-21-17\\_Final.pdf](http://epa.ohio.gov/portals/27/regs/3745-21/3745-21-17_Final.pdf)

<sup>13</sup> [http://epa.ohio.gov/dapc/regs/3745\\_112](http://epa.ohio.gov/dapc/regs/3745_112)

<sup>14</sup> [http://epa.ohio.gov/dapc/regs/3745\\_113.aspx](http://epa.ohio.gov/dapc/regs/3745_113.aspx)

Ohio's plan allocates \$40 million to on-road fleets (school bus replacements, transit bus replacements, and class 4-8 local freight and port drayage trucks and shuttle buses), \$19 million to off-road equipment (tugboats and ferries, switcher locomotives, and airport ground support and port cargo handling equipment), and \$11.25 million for infrastructure to support light-duty Zero Emissions Vehicles. Funds are planned to be distributed over the next six to eight years. Ohio EPA estimates that applying the entire amount of funding allocated to Ohio (\$75,302,522.67) to fund the Eligible Mitigation Actions will result in annual emission reductions of approximately 352 tons of NOx. Projects like these will also significantly reduce emissions of other pollutants of concern, such as PM2.5, hydrocarbons, carbon monoxide and carbon dioxide. Actual emission reductions are dependent on the types of projects that are ultimately selected to receive funding. Benefits will compound over the lifetime of the equipment purchased or repowered.

#### Area Source Boilers, Major Source Boilers and Commercial/Industrial Solid Waste Incinerators (CISWI) NESHAPs

On January 31, 2013, February 1, 2013 and February 7, 2013, U.S. EPA finalized revisions to the March 2011 Clean Air Act emissions standards for large boilers, small boilers and incinerators, respectively [78 F.R. 7138, 78 F.R. 7488, 78 F.R. 9112] These standards cover more than 200,000 boilers and incinerators that emit harmful air pollution, including mercury, cadmium, and particle pollution.

Boilers at large sources of air toxics emissions are known as major source boilers. They are located at large sources of air pollutants, including refineries, chemical plants, and other industrial facilities. Boilers located at small sources of air toxics emissions are known as area source boilers. These are located at universities, hospitals, hotels and commercial buildings. A CISWI unit is a device that is used to burn solid waste at a commercial or industrial facility. This includes units designed to discard solid waste; energy recovery units designed to recover heat that combust solid waste; and waste burning kilns that combust solid waste in the manufacturing of a product.

In a separate but related action, U.S. EPA revised the non-hazardous secondary materials rule (NHSM). This rule defines which materials are, or are not, "solid waste" when burned in combustion units. The NHSM rule helps determine which standards, either boiler or CISWI, a unit that burns these materials will be required to meet. These combined rules will lead to additional NOx and VOC reductions. The compliance deadlines for area boilers, major boilers and CISWI units were 2014, 2016 and 2018, respectively.

## Regional Haze Regulations and Guidelines for Best Available Retrofit Technology (BART) Determinations

In Ohio's Regional Haze SIP submission, one facility was found to have boilers subject to BART<sup>15</sup>. The facility elected to implement an alternative program to BART as allowed under 40 CFR 51.308(e)(2), projecting to achieve greater emissions reductions than through installation and operation of BART. Subsequently, due to the major source Boiler NESHAP, this source will now be converting to natural gas, achieving even further reductions. Implementation was planned no later than January 31, 2017.

## SO<sub>2</sub> Data Requirements Rule

On U.S. EPA's August 21, 2015, U.S. EPA finalized the Data Requirements Rule for the 2010 1-hr Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS) [80 FR 51052]. This rule required characterization of sources with actual SO<sub>2</sub> emissions greater than 2,000 tons per year (TPY) through modeling or monitoring. In response to this rule, several facilities accepted restrictions such that SO<sub>2</sub> emissions would be sufficiently below 2,000 TPY and further characterization of ambient air quality was unnecessary. NO<sub>x</sub> emissions reductions were also realized as a co-benefit due to these restrictions.

## NSPS for Residential Wood Heaters

On March 16, 2015, U.S. EPA finalized the residential wood heaters NSPS [80 F.R. 13672]. This rule does not affect existing woodstoves or other wood burning devices; however, it does provide more stringent emissions standards for new woodstoves, outdoor hydronic heaters and indoor wood-burning forced air furnaces. New "Phase 1" less-polluting heater standards begin in 2015, with even more-stringent Phase 2 standards beginning in 2020. However, new units are assumed to replace retired units beginning in 2015. U.S. EPA estimates 9,265 tons of VOC emissions will occur annually.

## Control of Hazardous Air Pollutants from Mobile Sources

This rule, also known as the Mobile Source Air Toxics (MSAT2) rule, was published on February 26, 2007 (revised October 16, 2008), requiring refiners and importers produce gasoline that has an annual average benzene content of 0.62 volume percent or less beginning in 2011 [72 F.R. 8428, 73 F.R. 61358]. U.S. EPA estimates that in 2030

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<sup>15</sup> <http://epa.ohio.gov/dapc/sip/haze>

this rule would reduce total emissions of mobile source air toxics by 330,000 tons and VOC emissions by over 1 million tons.

### NO<sub>x</sub> Emission Standard for New Commercial Aircraft Engines

On June 18, 2012, U.S. EPA finalized a rule to adopt NO<sub>x</sub> emission standards for certain commercial passenger and freighter aircraft engines in common use at airports across the U.S. [77 F.R. 36342]. The rule contains six major provisions, two of which are new NO<sub>x</sub> emission standards for newly certified-engine models. The first standards, Tier 6, took effect when the rule became effective and represents approximately a 12% reduction from current Tier 4 levels. The second standards, Tier 8, took effect in 2014 and represents approximately a 15% reduction from Tier 6 levels. Equipment turnover will ensure continued emissions reductions from this category for many years.

### Emissions Standards for Locomotives and Marine Compression-Ignition Engines

On June 30, 2008, U.S. EPA published regulations for a comprehensive program to dramatically reduce pollution from locomotives and marine diesel engines [73 F.R. 37096]. The controls will apply to all types of locomotives, including line-haul, switch, and passenger, and all types of marine diesel engines below 30 liters per cylinder displacement, including commercial and recreational, propulsion and auxiliary. The near-term emission standards for newly-built engines phase in starting in 2009. The near-term program also includes new emission limits for existing locomotives and marine diesel engines that apply when they are remanufactured, and take effect as soon as certified remanufacture systems are available, as early as 2008.

The long-term emissions standards for newly-built locomotives and marine diesel engines began to take effect in 2015 for locomotives and in 2014 for marine diesel engines. U.S. EPA estimates PM reductions of 90% and NO<sub>x</sub> reductions of 80% from engines meeting these standards, compared to engines meeting the current standards. U.S. EPA projects that by 2030, this program will reduce annual emissions of NO<sub>x</sub> and PM by 800,000 tons and 27,000 tons, respectively.

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

### **Requirement 3 of 4**

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>16</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 2014 emission inventory<sup>17</sup>, 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 4 of 4**

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 Columbus area, will be submitted to U.S. EPA for approval as a SIP revision.

Ohio, through Ohio EPA's Legal section and the Ohio Attorney General's Office, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, it intends to continue enforcing all rules that relate to the emission of ozone precursors in the Columbus area.

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<sup>16</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)

<sup>17</sup> Ohio EPA is requesting U.S. EPA approve the 2014 base year inventory in Appendix C in order to satisfy the nonattainment area planning requirements for an inventory. Appendix C identifies all non-EGUs in the nonattainment area; there are no EGUs in the nonattainment area.

## 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 74 ppb or greater 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 71 ppb or greater occurs within the maintenance area. A violation of the standard (three-year average fourth high value of 71 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.

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) Adopt VOC RACT on existing sources covered by U.S. EPA Control Technique Guidelines issued after the 1990 CAA.
- 2) Apply VOC RACT to smaller existing sources.
- 3) One or more transportation control measures sufficient to achieve at least half a percent reduction in actual area wide 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, area wide 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.
- 4) Alternative fuel and diesel retrofit programs for fleet vehicle operations.
- 5) Require VOC or NO<sub>x</sub> emission offsets for new and modified major sources.

- 6) Increase the ratio of emission offsets required for new sources.
- 7) Require VOC or NO<sub>x</sub> controls on new minor sources (less than 100 tons).
- 8) Adopt NO<sub>x</sub> RACT for existing combustion sources.
- 9) High volume, low pressure coating application requirements for autobody facilities.
- 10) Requirements for cold cleaner degreaser operations (low vapor pressure solvents).

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

- architectural and industrial maintenance coatings
- automobile refinishing shops
- cold cleaner degreasers
- 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

### MODELING ANALYSIS

Although U.S. EPA's Redesignation Guidance does not require modeling for ozone nonattainment areas seeking redesignation, extensive modeling has been performed covering the Columbus, OH, area to determine the effect of national emission control strategies on ozone levels. This area includes Delaware, Fairfield, Franklin, and Licking Counties in Ohio. These modeling analyses determined that this area was significantly impacted by ozone and ozone precursor transport and regional NO<sub>x</sub> reductions will help the area attain the 2015 eight-hour ozone standard of 70 ppb in this area.

U.S. EPA conducted modeling for the Interstate Transport "Good Neighbor" Provision. This analysis was provided to states in the March 27, 2018 memorandum "Information on the Interstate Transport State Implementation Plan Submissions for the 2015 Ozone National Ambient Air Quality Standards under Clean Air Act Section 110(a)(2)(D)(i)(I)"<sup>18</sup> to assist states in developing "Good Neighbor SIPs," as required by the CAA to address interstate transport of air pollution that affects downwind states' ability to attain and maintain the 2015 eight-hour ozone standard. This modeling was conducted to identify monitoring sites that may have difficulty attaining the 2015 eight-hour ozone standard in 2023 and identify states that were contributing to attainment issues at a given monitoring site. The air quality model used for this rulemaking was the Comprehensive Air Quality Model with Extensions (CAMx) version 6.40. Base year 2011 emissions were modeled. Meteorology from 2011 was created using the Weather Research Forecasting (WRF) Model and was used for the base case and projected year modeling runs. More detailed information on the CAMx input file and additional data used for the photochemical modeling can be found in U.S. EPA's "Air Quality Modeling Technical Support Document for the 2015 Ozone NAAQS Preliminary Interstate Transport Assessment," dated December 2016<sup>19</sup>.

LADCO also conducted interstate transport modeling to support Ohio's "Good Neighbor" SIP for the 2015 ozone standard. LADCO based their 2023 forecasts on the same CAMx modeling platform used by U.S. EPA except LADCO replaced the EGU emissions with 2023 EGU forecasts estimated with the ERTAC EGU Tool version 2.7<sup>20</sup>. A full description of LADCO's analysis including methodology and results is available in LADCO's August 13, 2018 Technical Support Document "Interstate Transport Modeling for the 2015

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<sup>18</sup> <https://www.epa.gov/airmarkets/memo-and-supplemental-information-regarding-interstate-transport-sips-2015-ozone-naaqs>

<sup>19</sup> [https://www.epa.gov/sites/production/files/2017-01/documents/air\\_modeling\\_tsd\\_2015\\_o3\\_naaqs\\_preliminary\\_interstate\\_transport\\_assessment.pdf](https://www.epa.gov/sites/production/files/2017-01/documents/air_modeling_tsd_2015_o3_naaqs_preliminary_interstate_transport_assessment.pdf)

<sup>20</sup> <http://www.marama.org/2013-ertac-egu-forecasting-tool-documentation>

Ozone National Ambient Air Quality Standard”<sup>21</sup>.

Table 20 shows the results of U.S. EPA’s and LADCO’s “Good Neighbor” Provision modeling for ozone impacts at the ozone monitors in the Columbus area. Model results are used in a relative rather than absolute sense. Relative use of the model results calculates the fractional change in maximum concentrations based on two different emission scenarios, 2011 NEI emissions and 2023 projected emissions for this exercise. This fractional change, also known as a relative response factor (RRF), can be applied to each monitor’s average base period design value to determine ozone impacts. This approach differs from using the absolute or actual modeled result, which may show under- or over-predictions with the actual monitored values. The 2009 – 2013 average design values, calculated by averaging the three 3-year design values from 2009 – 2011, 2010 – 2012, and 2011 – 2013, were multiplied by the corresponding RRF to determine all 2023 projected average design values.

**Table 20- Comparison of Columbus Area Average Design Values with U.S. EPA and LADCO “Good Neighbor” Provision Modeling Results (ppb)**

<b>Monitor ID</b>	<b>County</b>	<b>Monitored Average Design Value 2009-2013</b>	<b>U.S. EPA Projected Average Design Value 2023</b>	<b>LADCO Projected Average Design Value 2023</b>
39-041-0002	Delaware	73.0	58.5	58.2
39-049-0029	Franklin	80.3	65.3	64.8
39-049-0037	Franklin	75.0	60.8	60.4
39-049-0081	Franklin	71.0	57.7	57.4
39-089-0005	Licking	74.3	57.5	57.2

U.S. EPA and LADCO modeling demonstrates that the Columbus, OH ozone nonattainment area will attain and maintain the 2015 eight-hour ozone standard. Future national and local emission control strategies will ensure that the area’s attainment will be maintained with an increasing margin of safety over time.

<sup>21</sup> [https://epa.ohio.gov/portals/27/SIP/App3A\\_2015O3Inf\\_LADCO\\_TSD\\_8-13-18.pdf](https://epa.ohio.gov/portals/27/SIP/App3A_2015O3Inf_LADCO_TSD_8-13-18.pdf)

## **CHAPTER EIGHT**

### **PUBLIC PARTICIPATION**

Ohio published notification for the public comment period, including an opportunity to request a public hearing, concerning the draft redesignation petition and maintenance plan in the widely distributed county publication on March 5, 2019.

The public comment period closed on April 9, 2019. No public hearing was held because no requests were received. Appendix D includes a copy of the public notice and a response to comments document.

## **CHAPTER NINE**

### **CONCLUSIONS**

The Columbus, OH ozone nonattainment area has attained the 2015 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 Columbus, OH 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 Columbus, OH 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 2015 ozone standard.