



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

JUN 28 2017

Mr. Robert Kaplan  
Acting Regional Administrator  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: Update to Ohio's Recommended Cuyahoga County Designation for 2010 Sulfur Dioxide Standard – Round 3

Dear Administrator Kaplan:

I am writing to update and supplement Ohio's recommended Round 3 designation for the revised SO<sub>2</sub> standard for Cuyahoga County, Ohio in light of recent information. Ohio EPA submitted its recommendations for round three designations on January 13, 2017. The designation recommendations were developed in accordance with U.S. EPA's March 20, 2015 memorandum *Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard*, and were informed by U.S. EPA's August 21, 2015 *Data Requirements Rule for the 2010 1-hr Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS); Final Rule* (herein referred to as the Data Requirements Rule). The Data Requirements Rule requires characterization of sources with actual emissions greater than 2,000 tons per year (TPY) through modeling or monitoring. Round three designations were based on a five-factor analysis, including refined dispersion modeling for those areas identified by Ohio EPA as meeting the 2,000 TPY emissions criteria established in the Data Requirements Rule.

In that submission, Ohio EPA recommended a designation of unclassifiable/attainment for all of Cuyahoga County. Excluding emissions from retired/retiring boilers and accounting for conversions, the total SO<sub>2</sub> emissions from facilities in Cuyahoga County in 2015 was 1,635.31 tons and all four monitors located in Cuyahoga County were attaining the standard, as described in Ohio's previous submission.

However, since our January 13, 2017 recommendations, additional monitoring data has become available for 2016, allowing Ohio EPA to evaluate the 2014 to 2016 air quality period. Inclusion of data from the four Cuyahoga monitors for 2016 has subsequently shown a violation of the standard at the Harvard Yards monitor (39-035-0065) for the 2014 to 2016 air quality period. An investigation of the data indicates that two extended events occurred in February of 2016 resulting in extremely high readings of SO<sub>2</sub> at that monitor, each of which spanned two calendar days, resulting in a highest-4<sup>th</sup>-high SO<sub>2</sub> value of 370 ppb for 2016, and a 2014 to 2016 design value of 168 ppb for the Harvard Yards monitor. Excluding these four days from consideration,

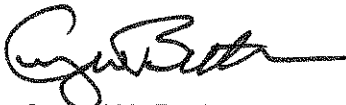
the 99<sup>th</sup> percentile maximum daily 1-hour value for all of 2016 at the Harvard Yards monitor would be 32 ppb, resulting in a 2014 to 2016 design value of 56 ppb, which would be much more in line with the trends demonstrated in the area.

Ohio EPA has subsequently performed an in-depth analysis in an attempt to understand these exceedance periods at the Harvard Yards monitor and determine an appropriate recommendation. Based upon this analysis, Ohio EPA believes that a combination of a malfunctioning large overhead door, the “west end door” of the melt shop at Charter Steel, and specific, infrequent meteorological conditions, was the cause of the exceedances. Ohio EPA believes that the issues leading to these exceedances have been determined and addressed, and that the monitors will continue to monitor attainment moving forward, as they have done in the past. Therefore, Ohio EPA continues to recommend a designation of unclassifiable/attainment for the entirety of Cuyahoga County

I appreciate the opportunity to provide this recommendation and will work cooperatively with U.S. EPA Region 5 staff moving forward. This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is available at <http://epa.ohio.gov/dapc/SIP/so2.aspx> under the heading “Nonattainment Area Recommendation”.

If you have any questions concerning this submittal, please feel free to contact Jennifer Van Vlerah of the Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Craig W. Butler  
Director

Enclosures

ec: Jennifer Van Vlerah, DAPC