



Division of Air Pollution Control Response to Comments

Rule: OAC Chapter 3745-21 Carbon Monoxide, Photochemically Reactive Materials, Hydrocarbons, and Related Materials Standards

Agency Contact for this Package

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Ohio EPA held a public hearing on January 3, 2022 regarding the adoption of mandatory Reasonably Available Control Technology (RACT) requirements for the Cincinnati and Cleveland 2015 ozone nonattainment areas and the five year review of OAC Chapter 3745-21. This document summarizes the comments and questions received at the public hearing and during the associated 30 day comment period, which ended on January 3, 2022.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General Comments

Comment 1: GMA is an Association supporting members of the Printing and Graphic Communication Industry. With the ongoing pandemic, supply chain issues, and labor shortages, many of our members find it difficult to sustain. Is there a proposed timeline in place for the proposed RACT changes, and has the current market conditions been considered? **(Andrew Schall, President of Graphic Media Alliance)**

Response 1: The deadline to comply with control technique guidelines (CTGs) for facilities located in the Cincinnati 2015 ozone nonattainment area (Butler, Clermont, Hamilton and Warren counties) is March 1, 2023. For facilities subject to non-CTG RACT, the deadline to submit a new or updated RACT study is within one year after the effective date of the rule.

Ohio EPA understands the challenges to the regulated community posed by the pandemic, supply chain issues and labor shortages.

The compliance dates coordinate with the last year for attainment under the moderate nonattainment timeline. Continued reductions in the Cincinnati area will help to ensure additional bump-ups don't occur in the future with additional federally mandated requirements.

With that in mind, Ohio EPA acknowledges that there may be rare circumstances that pose challenges for specific facilities, and in those instances, we typically work with the facilities on a case-by-case basis in collaboration with U.S. EPA Region 5. In the unusual circumstance a facility cannot comply with a requirement or meet an established deadline, Ohio EPA urges the facility to reach out early in the process so we can review the specific circumstances and work with the facility in collaboration with U.S. EPA to find alternatives, where alternatives are justified.

End of Response to Comments