



United States Department of the Interior

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Jennifer Van Vlerah
Manager, SIP, Inventory and Rulemaking
Ohio EPA Division of Air Pollution Control
P.O. Box 1049
Columbus, OH 43216-1049

Dear Ms. Van Vlerah:

Thank you for the opportunity to review and comment on Ohio's draft Regional Haze Five Year Progress Report. Ohio Division of Air Pollution Control has minimally addressed the requirements for the regional haze periodic progress report as outlined in 40 CFR 51.308(g) and (h). The progress report briefly summarizes the federal emission control programs that have been implemented by Ohio through its 2011 Regional Haze State Implementation Plan. In 2002, utilities in Ohio had the highest emissions of sulfur dioxide and nitrogen oxides of any state in the country.¹ Ohio reports that under the Clean Air Interstate Rule and the Cross State Air Pollution Rule, between 2002 and 2014, electric utilities in the state have reduced emissions of sulfur dioxide and nitrogen oxides by 74 and 77%, respectively. These reductions have contributed to regional air quality improvements.

No Class I areas are located in Ohio. However, to meet 40 CFR 51.308 (g) (6), Ohio needs to demonstrate that the current implementation plan is sufficient to enable other States with Class I areas that are affected by emissions from Ohio to meet their visibility progress goals. We request that, at a minimum, Ohio provide additional discussion of causes of visibility impairment (e.g., ammonium sulfate is the primary pollutant contributing to visibility impairment at Class I areas in the eastern U.S.²) and reference state regional haze progress reports that demonstrate

¹ EPA Clean Air Markets, Air Markets Program Data. <http://ampd.epa.gov/ampd/>

² Hand, J.L., Copeland, S.A., Day, D.E., Dillner, A.M., Indresand, H., Malm, W.C., McDade, C.E., Moore, T., Pitchford, M.L., Schichtel, B.A., Watson, J.G. 2011. Spatial and Seasonal Patterns and Temporal Variability of Haze and its Constituents in the United States: Report V.
<http://vista.cira.colostate.edu/improve/Publications/Reports/2011/2011.htm>

visibility trends and contributions to visibility impairment at Class I areas (e.g., Kentucky,³ Maine⁴, North Carolina,⁵ Virginia,⁶ and West Virginia⁷). These reports demonstrate that visibility is improving at Class I areas and Ohio is not interfering with the ability of these states to meet reasonable progress goals for Class I areas in their states.

In Section D, Emissions Progress, we agree that emissions calculation methods have changed and thus direct comparisons of 2005, 2011, and 2018 inventories are difficult. However, Tables 3-5 using a modified 2011 inventory are confusing. We recommend that Ohio state the differences in methods per pages 10-14 and use only Table 6, the 2011 LADCO inventory for Ohio based on the 2011 National Emissions Inventory, to document progress. This is the same approach that other states have taken to the changes in inventory methods.

We appreciate the opportunity to work with Ohio to improve visibility in our Class I national parks and wilderness areas. If you have questions, please contact Pat Brewer at patricia_f_brewer@nps.gov or 303-969-2153.

Sincerely,



Susan Johnson
Chief, Policy, Planning, and Permit Review Branch

Enclosure

cc: John Summerhays, EPA Region 5

³ Kentucky State Implementation Plan (SIP) Revision: Regional Haze 5-Year Periodic Report 2008-2013 For Kentucky's Class I Federal Area. 2014. http://air.ky.gov/SiteCollectionDocuments/Kentucky_Regional_Haze_5-Year_Periodic_Report_SIP%20Revision_Sept_2014.pdf

⁴ Revision to the Maine State Implementation Plan Regional Haze 5-Year Progress Report. Draft 2015. http://www.maine.gov/dep/ftp/AIR/SIP/Regional_Haze_Progress_Report_Draft.pdf

⁵ Regional Haze 5-Year Periodic Review State Implementation Plan for North Carolina Class I Areas. 2013. http://daq.state.nc.us/planning/haze/regional_haze_sip.shtml

⁶ Air Quality State Implementation Plans; Approval and Promulgation: Virginia; Regional Haze Five-Year Progress Report. 2014. 79 FR 25019. EPA-R03-OAR-2014-0006-0006 <http://www.regulations.gov>.

⁷ Air Quality State Implementation Plans; Approval and Promulgation: West Virginia; Regional Haze Five-Year Progress Report State Implementation Plan. 2015. 80 FR 32019. EPA-R03-OAR-2013-0423-0008 <http://www.regulations.gov>.