



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

JUL 17 2014

Ms. Susan Hedman
Regional Administrator
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Revision to Attainment Demonstration State Implementation Plan for the Lead NAAQS for the Partial Cuyahoga County Nonattainment Area in the State of Ohio

Dear Administrator Hedman:

On November 22, 2010 (75 FR 71033), effective December 31, 2010, U.S. EPA promulgated the initial lead nonattainment areas for the revised lead standard across the country. This partial nonattainment area encompasses emissions from the Ferro Corporation Cleveland Frit Plant. Ferro (Ohio EPA facility identification # 1318170235) is located at 4150 East 56th Street, Cleveland, Ohio, 44101.

The CAA Amendments required states with lead nonattainment areas to submit a plan within eighteen months of the effective date of the designations (June 30, 2012) detailing how the lead standard will be attained by December 31, 2015. On June 25, 2012, Ohio EPA submitted Ohio's plan for attaining and maintaining the lead NAAQS in the partial Cuyahoga County nonattainment area. U.S. EPA has not yet taken action on this plan.

The submittal included a demonstration of attainment of the air quality standard by December 15, 2015. Ohio EPA performed a Reasonably Available Control Measure (RACM) analysis for Ferro and determined that existing controls and practices constitutes RACM. In addition, Ferro implemented additional controls and monitoring to ensure the 2010 and early 2011 exceedances were addressed. These included secondary HEPA filtration and bag leak detection devices on all control devices emitting lead. Since that time no exceedances of the standard have occurred.

At this time Ohio EPA is submitting a revision to this plan. Ferro has requested to add an additional one (1), 5-gallon wet mill for milling of lead containing frit with

either solvent or water to emissions unit P071 identified in Table 3 of the Attainment Demonstration. This emissions unit currently consists of 11 mills. This revision requests the addition of one (1) additional mill to Table 3. Ferro's allowable emissions, used as part of the demonstration of attainment, identified in Table 3, will not increase. The addition of the 12th mill will not increase the impact of Ferro's lead operations predicted by the modeling conducted by Ohio EPA. Ferro previously did not take credit for the control efficiency provided by the secondary HEPA filtration system. When considering this additional control, Ferro is able to maintain compliance with the existing federally-enforceable allowable emission limitation contained in the SIP submittal and their permit. Therefore, no other revisions to the originally submitted attainment demonstration are necessary. Attached to this letter is the request and analysis provided by Ferro regarding this addition.

Ohio EPA notified the public of the draft and the opportunity to provide comments on May 20, 2014. This notice was also published in a newspaper of general circulation in Cleveland, Ohio (attached). The public hearing for this package was held on June 24, 2014 in Cleveland, Ohio. No testimony was provided at the hearing and written comments were not received.

Also attached to this document is the revised Attainment Demonstration document submitted on June 25, 2012. The only change incorporated into this document is the identification of 12 mills within emission unit P071 rather than 11 mills. The appendices to the original submittal are not included with this submission. No changes resulted to the appendices and therefore, the original appendices are still applicable.

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://www.epa.ohio.gov/dapc/SIP/lead.aspx> under the heading "Attainment Demonstration."

If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Craig W. Butler
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosure