



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

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

Re: Revision to Ohio's State Implementation Plan (SIP) for Regional Haze – Replacing CAIR with CSAPR to Address 2008 Ozone Infrastructure SIP

Dear Administrator Hedman:

On March 11, 2011, Ohio EPA submitted our Regional Haze SIP to U.S. EPA. Ohio's SIP was subsequently approved on July 2, 2012 (77 FR 39177). In a separate submittal, On December 27, 2012, Ohio EPA submitted its Infrastructure SIP for the 2008 ozone standard. Elements of the Infrastructure SIP were approved on October 17, 2014 (79 FR 62019); however, one element was not acted on, Clean Air Act (CAA) Section 110(2)(D)(i)(II) (or Prong 4), which deals with visibility protection. Ohio is submitting this revision request in order for U.S. EPA to take action on this portion of Ohio's Infrastructure SIP for the 2008 ozone standard.

As part of Ohio EPA's 2011 Regional Haze SIP, with respect to emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂) from electric generating units (EGUs), Ohio chose the option allowed under 40 CFR 51.308(e)(2). This provision provides that a state may impose a cap-and-trade emissions program in lieu of Best Available Retrofit Technology (BART) requirements, if it can be shown that the program will provide a greater rate of progress toward visibility improvement goals than would BART. U.S. EPA previously determined that the cap-and-trade provisions of the Clean Air Interstate Rule (CAIR) under 40 CFR Part 96 AAA-EEE established such a program in relation to emissions of NO_x and SO₂ from EGUs, and the determination that CAIR is an acceptable alternative to BART for EGUs was codified in 40 CFR 51.308(e)(4). Upon the replacement of CAIR with the Cross State Air Pollution Rule (CSAPR), on June 7, 2012 U.S. EPA determined that a trading program established in accordance with 40 CFR 52.38 or 40 CFR 52.39 under the Transport Rule Federal Implementation Plan is an acceptable alternative to BART for EGUs. However, Ohio EPA had not yet revised its 2011 Regional Haze SIP to now show that Ohio is relying on CSAPR, rather than CAIR, in lieu of BART for Ohio's EGUs. This revision completes that task.

In addition, on April 14, 2014, Ohio submitted a Regional Haze SIP revision letter requesting that the portion of the 2011 Regional Haze SIP that established deadlines for Ohio's only non-EGU BART source, P.H. Glatfelter, be extended. In order to keep the Regional Haze SIP

document up to date, as a part of this submittal, Ohio EPA has incorporated the updated compliance dates identified in our letter explicitly into the SIP document. As outlined in our April 14, 2014 letter, Ohio EPA had already held a public hearing process for that revision. Subsequently, Ohio EPA also explicitly revised the Title V permit terms addressing the compliance dates, holding an additional public hearing, and submitted that documentation to U.S. EPA on _____.

For Ohio's reliance on CSAPR for EGUs, Ohio EPA held a public hearing on _____ and accepted written comments through that date. The Federal Land Managers were consulted and included in the public comment process. Appendix J contains the public notice and results of this public comment period and hearing. Please note that this submittal only includes the addition of Appendix I and Appendix J to our 2011 Regional Haze SIP. Appendices A through H of the original submittal remain unchanged and are therefore not included in this revision request.

The revisions in today's submittal will allow for Ohio to have a fully approved Regional Haze SIP. Ohio EPA finds that this meets the requirements for the visibility portion of CAA Section 110(a)(2)(D)(II) and should be applied to Ohio's 2008 ozone, 2010 nitrogen oxides (February 8, 2013) and 2010 sulfur dioxide (June 7, 2013) Infrastructure SIP submittals.

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/haze.aspx>.

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 or jennifer.vanvlerah@epa.ohio.gov.

Sincerely,

Craig W. Butler
Director

Enclosures

cc: Bob Hodanbosi, Ohio EPA, DAPC
John Summerhays, U.S. EPA