



State of Ohio Environmental Protection Agency

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JUN 15 2007

Mary Gade
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd. R-19J
Chicago, Illinois 60604-3507

Re: State Implementation Plan for eight hour ozone in the Cincinnati-Hamilton, OH area

Dear Administrator Gade:

I am writing to submit The Ohio Environmental Protection Agency (Ohio EPA) plan for attaining the eight-hour ozone standard in the Cincinnati-Hamilton, OH nonattainment area. This area was designated as 'basic' nonattainment under provisions contained in the Clean Air Act (CAA), Subpart 1 as interpreted under the implementation rule for eight-hour ozone, which was vacated on December 22, 2006, by the U.S. Court of Appeals for the District of Columbia Circuit court. As encouraged by U.S. EPA, Ohio has developed this plan in order to meet general CAA requirements to submit a plan within three years of the effective designation date of June 15, 2004 (69 FR 23858).

This submittal includes an attainment demonstration and identifies the rules deemed necessary to attain the air quality standard by June 15, 2009. This demonstration is based on air quality modeling using a 2005 base year inventory and a 2005 ozone design value. In conjunction with the other states in the Midwest Regional Planning Organization, Ohio EPA performed this additional air quality modeling based on a 2005 base year inventory and an updated base year design value.

This package is still undergoing public review. A public hearing on this package is scheduled for July 23, 2007. A follow-up submittal will be forwarded once this process is complete. In the meantime, we believe that U.S. EPA can begin reviewing certain components of this package, such as the rules addressing Architectural and Industrial Maintenance Coatings and Consumer Products as well as the 2005 inventory.

In the Cincinnati attainment demonstration modeling, Ohio EPA is taking credit for the statewide implementation of the Architectural and Industrial Maintenance Coatings and the Consumer Product rules as though they are effective rules requiring compliance by the 2008 ozone season. U.S. EPA has urged states to wait for the federal rule for these source categories. On May 30, 2007, U.S. EPA

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

issued guidance allowing for a partial emission reduction credit for these rules and its anticipated aerosol coatings rule. Ohio EPA believes this is an acceptable alternative to implementing an accelerated compliance program in Ohio and will modify our rules to match the anticipated federal rules in all aspects including the compliance date. Provided that U.S. EPA completes its rulemaking, Ohio EPA will either modify or vacate our rules to prevent conflicting rules. The existing attainment modeling will be adjusted to account for only 75 percent of the emission reductions assumed in our current modeling from these source categories. We will, though, be able to assume a reduction from the aerosol coatings rule. We anticipate that the net impact of the revised modeling will be minimal.

As required, information documenting the 2005 emissions inventory is included in this package. While the components of this inventory have been previously supplied, the inventory has not undergone public review and has not been officially submitted as a state implementation plan (SIP) package. The scheduled public hearing will address the 2005 emissions inventory.

The air quality modeling associated with this submittal utilizes a 2005 base year emission inventory and design values which indicate that with the proposed additional controls in place, the area will reach attainment by June 15, 2009. In addition, the 2004-2006 design value at the worst case monitor in the area indicates that the area has already improved to 86 ppb. All but three of the eleven monitoring locations in the four Ohio and three Kentucky counties are projected to have future year (2008) design values below 80 ppb. These data and the remainder of the technical information such as ambient air quality trends and emission trends, components of what is termed the weight of evidence, corroborate that the Cincinnati area should attain the standard by the attainment date.

In an effort to accommodate future variations in travel demand models (TDM), vehicle miles traveled forecast when no change to the network is planned, and in light of the expected attainment air quality for this area, Ohio EPA, together with the Ohio Department of Transportation and the local metropolitan planning organization, Ohio-Kentucky-Indiana Council of Governments, are requesting that a three percent cushion be added to the motor vehicle budget for the Ohio and Indiana portions of this nonattainment area. A three percent cushion to the on-road mobile source budget also will assist the local metropolitan planning organization with demonstrating conformity for future transportation planning purposes.

Ohio EPA is currently relying on the latest available Base M 2008 modeling results as well as source apportionment results previously performed for the Cincinnati area. Mobile source emissions from the entire grid contribute approximately 20 ppb to the design value forecast for this area. A three percent increase in this impact would result in an approximate 0.6 ppb to the forecast future design value. This is a conservative estimate since some of the mobile

source impact originates from Northern Kentucky and other areas where the budget is not being increased.

While Ohio EPA believes that this is sufficient to support the requested increase, we will conduct additional air quality modeling which will include the adjusted on-road mobile emissions as well as any additional corrections and modifications that may be necessary due to the constant review and evaluation of the model inputs.

Ohio EPA is also identifying voluntary diesel emission reduction programs such as truck stop electrification and diesel retrofits. Both programs will be brought into the SIP process. While this work is ongoing and will provide air quality benefits related to ozone, the process of identification, quantification and verification will take time and be incorporated into the PM2.5 SIP submittal in April 2008.

I have been encouraged by the cooperation and willingness of our staffs to work together to address this significant milestone. If you have any questions concerning this submittal, please feel free to contact Bob Hodanbosi, Chief of the Division of Air Pollution Control (614) 644-2270.

Sincerely

A handwritten signature in cursive script, appearing to read "Chris Korleski".

Chris Korleski
Director