



State of Ohio Environmental Protection Agency

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FEB 22 2008

Cheryl Newton, Deputy Director
Air and Radiation Division
U.S. EPA, Region 5 AR-18J
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Re: State Implementation Plan for eight-hour ozone for the Cleveland-Akron-Lorain, OH area

Dear Ms. Newton:

I am writing to submit additional technical documentation for the Ohio Environmental Protection Agency (Ohio EPA) plan for attaining the eight-hour ozone standard in the northeast Ohio nonattainment area containing the Cleveland-Akron-Lorain combined statistical metropolitan area. Ohio submitted the original package for this area on June 15, 2007.

The June 15, 2007 submittal included an interim attainment demonstration based on the 2002 base year inventory and the 2002 based ambient design values. In conjunction with the other states in the Midwest Regional Planning Organization, additional air quality modeling was performed which is based on a 2005 base year inventory and an updated base year design value. This submittal provides the updated 2005 base year technical support (Appendices A and B). The alternative attainment demonstration using the revised base year is discussed below.

One component of the June 15, 2007 package was that Ohio EPA requested that U.S. EPA not act on the mobile source conformity budget for this area. The latest network information and planning assumptions were included in the 2005 based modeling package and the mobile source information contained in this submittal should serve as the basis for the mobile source budgets (Appendix C).

The reasonable further progress submittal(s) contained in the June 15, 2007 submittal addressed both the 1990 one-hour 15 percent VOC rate of progress requirement and the eight-hour reasonable further progress requirements. The one-hour had previously been submitted but not acted on due to U.S. EPA redesignating this area to attainment. The eight-hour plan is based on the 2002 base year inventory as instructed by U.S. EPA and is not being amended at this time. Both plans can be acted on by U.S. EPA.

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncellik, Director

Information on the 2002 and 2005 statewide emissions inventories were included in the June 15, 2007 package to fulfill the base year inventory requirements. Both packages were submitted for public review and the results of the hearing are being submitted at this time (Appendix D).

This final package is still undergoing public review. A public hearing is scheduled for April 2, 2008. A follow-up submittal will be forwarded following the completion of this process. We believe that this submittal will be available to Region 5 by April 25, 2008.

The air quality modeling associated with this package utilizes 2005 base year emission inventory and design values indicates, with the existing controls, the area will reach attainment by June 15, 2010. The projected 2009 design value at the worst case monitor location indicates a future year design value of 83.4 ppb (Attachment A).

In addition to the existing demonstration, Ohio EPA is aware that U.S. EPA has proposed a tighter ambient ozone standard. Ohio EPA is continuing to identify additional control measures that will both assist in achieving the existing standard on time as well as prepare for the new standard. These additional rules include required RACT categories as well as any other control measures deemed to be reasonable. If necessary, Ohio will then consider adopting lower Reid-Vapor Pressure requirements for gasoline sold in this area. Director Korleski has indicated he supports this approach and will be inviting the northeast Ohio stakeholders to discuss control options as well.

I have been encouraged by the cooperation and willingness of our staffs to work together throughout this effort. If you have any questions concerning this submittal, please feel free to contact Jim Orlemann of my staff at (614) 644-2270.

Sincerely

A handwritten signature in cursive script that reads "Bob Hodanbosi".

Bob Hodanbosi, Chief
Division of Air Pollution Control

Attachment A

Ohio Ozone Modeling Results

Key Site	Base Year Design Value	2009	2012	2018
Lake Michigan Area				
Chiwaukee (WI)	84.7	82.3	80.9	76.2
Sheboygan (WI)	88.0	84.0	81.9	75.4
Door County (WI)	88.7	83.9	81.6	74.7
Holland (WI)	90.0	85.3	82.9	76.1
St. Louis Area				
Orchard (MO)	87.0	82.0	80.4	76.2
Maryland Heights (MO)	87.3	83.4	81.9	78.1
Detroit Area				
New Haven	86.0	81.4	80.2	76.1
Cleveland Area				
Ashtabula	89.0	83.4	81.0	75.1
Cincinnati Area				
Lebanon	87.7	83.0	80.8	74.2
Columbus Area				
New Albany	86.3	81.8	79.6	73.0