



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

MAR 13 2013

Susan Hedman
Regional Administrator
Attn.: R-19J
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Comments on US EPA's proposal on the intended air quality designations in Ohio for the revised National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO₂)

Dear Administrator Hedman:

Ohio EPA received your February 6, 2013 letter and draft technical support document indicating US EPA's response to Ohio's designation recommendations. Your letter also included information indicating your approach for completing the designations for the revised lead NAAQS.

Ohio EPA understands that after carefully considering our June 3, 2012¹ recommendation letter and all the associated technical information for the 2010 SO₂ NAAQS, US EPA is proposing to adopt Ohio's recommended nonattainment designations and boundaries for Lake County, Muskingum River, and Steubenville-Weirton OH-WV areas.

In addition, US EPA is proposing to designate a portion of Belmont County², Ohio nonattainment as part of the Wheeling WV-OH nonattainment area and a portion of Clermont County³, Ohio nonattainment as part of the Campbell County KY-OH nonattainment area. These recommendations by US EPA are a result of violations occurring at monitors in West Virginia and Kentucky. As a part of Ohio's recommendations, Ohio EPA did not analyze monitoring data in neighboring states and, therefore, had recommended these areas be designated as unclassifiable. Upon further review of these recommendations, Ohio EPA still urges US EPA to

¹ Supplemented and/or amended on June 29, 2012, April 12, 2012, and January 18, 2013.

² Mead Township

³ Pierce Township

designate all of Belmont County as unclassifiable. As recognized in both the West Virginia and Ohio technical support documents (TSD) supplied by US EPA, the only source in Ohio that may have been a significant source is the R.E. Burger power plant. As indicated in Table 9 of Ohio's TSD, R.E. Burger represented just over 15,000 tons of SO₂ emissions out of over 66,700 tons in the area in 2008. At that time the monitor located in Ohio was at 105 ppb while the monitor in West Virginia was at 113 ppb. Since that time, emissions have decreased at the R.E. Burger plant to include zero emissions in 2011 and 2012. This is a result of the permanent shut down of two larger units (156 MW each) and the cold storage of two smaller units (94 MW each). Since the shutdown and cold storage, the Ohio monitor has shown attainment while the West Virginia monitor has continued to show nonattainment. It is Ohio EPA's belief that any future consideration of Belmont County sources should be a part of the upcoming unclassifiable planning; therefore, we recommend an unclassifiable designation for all of Belmont County.

Thank you for your timely response and your proposed recommended designations for the SO₂ standard. Ohio EPA does not believe any additional changes in boundaries are necessary or warranted.

In addition to recommended designations, your letter also indicates US EPA has developed a common sense strategy for implementation of the SO₂ standard based on stakeholder input. Ohio EPA appreciates US EPA's efforts on this strategy but urges US EPA to provide the necessary detailed implementation policy in a timely manner so that states may begin to prepare for this process.

Ohio EPA thanks you for consideration of Ohio's recommendations on designations and looks forward to working with you towards attaining the 2010 SO₂ standard.

Sincerely,



Scott Nally
Director
Ohio EPA

Cc: Bob Hodanbosi, Chief, Ohio EPA DAPC