



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

JUL 22 2016

Mr. Robert Kaplan
Acting Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Revised PM_{2.5} redesignation request for the 1997 PM_{2.5} Annual Standard for the Cincinnati-Hamilton Area

Dear Administrator Kaplan:

I am writing to formally request a redesignation to attainment of the Ohio portion of the Cincinnati-Hamilton, OH-IN-KY area (Butler, Clermont, Hamilton, and Warren Counties in Ohio; Dearborn Township in Indiana; and Boone, Campbell, and Kenton Counties in Kentucky) with respect to the 1997 PM_{2.5} annual standard.

U.S. EPA previously approved a redesignation request for the Ohio portion of the Cincinnati-Hamilton area from nonattainment to attainment for the 1997 annual PM_{2.5} NAAQS. U.S. EPA also approved Ohio's 1997 annual PM_{2.5} maintenance plan for the Cincinnati-Hamilton area as revisions to the State Implementation Plan (SIP), approved the 2005 emissions inventories for primary PM_{2.5}, NO_x, and SO₂, and approved the PM_{2.5} Motor Vehicle Emission Budgets for 2015 and 2021 for the Cincinnati-Hamilton area [76 FR 80253].

On March 18, 2015, the U.S. Court of Appeals for the Sixth Circuit vacated the previous redesignation of the Ohio and Indiana portions of the Cincinnati-Hamilton area. The Sixth Circuit found that U.S. EPA erred when it approved the redesignations because Ohio and Indiana's SIPs did not provide for reasonably available control measures, including reasonably available control technologies (RACT/RACM) as required by 42 USC 7502(c)(1). The maintenance plan, emissions inventories and Motor Vehicle Emission Budgets remain approved per U.S. EPA's action on December 23, 2011 [76 FR 80253].

The enclosed submittal combines the revised redesignation request and the updated maintenance plan for this area. This redesignation request has been updated to reflect the provisions of Subpart 4 (Title I, Part D) of the CAA, including RACT/RACM analysis and updated emissions inventories to include VOCs and ammonia.

Monitoring of existing air quality indicates that the 1997 National Ambient Air Quality Standard (NAAQS) for PM_{2.5} has been attained throughout this area based on 2013 to 2015 air quality data. Emissions projections indicate that current controls, existing State rules, existing federal

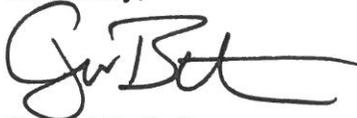
rules, and Ohio's PSD program will be more than sufficient to maintain the NAAQS indefinitely into the future. These programs will, therefore, constitute the attainment and maintenance plan for Ohio's portion of the Cincinnati-Hamilton area.

The enclosed information, compiled by the Ohio Environmental Protection Agency (Ohio EPA), Ohio Department of Transportation, and the Ohio, Indiana, and Kentucky Regional Council of Governments (associated planning organization), shows significant emission reductions in point and mobile sources since ambient violations have occurred. A significant portion of the improved air quality can be attributed to federal programs for the mobile source sector, the regional reductions associated with the NO_x Trading Program, and control strategies implemented by Ohio, such as Low Reid Vapor Pressure Fuel requirements.

The public hearing for this package was held on July 6, 2016, in Cincinnati, Ohio and public comments were accepted through July 6, 2016.

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

Sincerely,

A handwritten signature in black ink, appearing to read "C. Butler", with a long horizontal flourish extending to the right.

Craig W. Butler
Director