



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

JAN 18 2013

Ms. Susan Hedman
Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Revised- Ohio's Recommended Designations for the 2010 1-hour SO₂ Standard

Dear Administrator Hedman:

I am writing to submit a revision to Ohio's designations recommendation for the new sulfur dioxide (SO₂) 1-hour primary standard of 75 ppb. Ohio's recommended designations for the 2010 1-hour SO₂ standard were submitted on June 3, 2011. Our analysis and recommendation for designations was based, in part, on ambient data for the period 2008 to 2010. A revised recommendation for designations was submitted on April 12, 2012, based on a review and analysis of 2011 ambient data. With this letter, we are now requesting an additional revision to our recommendations based on an analysis of 2012 ambient data. Although the entirety of the 2012 ambient data is not certified, Ohio EPA is committed to completing all QA/QC and certification for any Ohio monitors that are affected under this revision request by March 29, 2013.

The following designation recommendations are based on the most current SO₂ monitoring data along with the June 22, 2010 final rule (75 FR 33520), and March 24, 2011 memorandum entitled "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards." The final rule and memorandum directs states to submit their recommendations to U.S. EPA, designating all areas in the state as "attainment," "nonattainment" or "unclassifiable" based on a review of five factors: air quality data, emissions-related data, meteorology, geography/topography, and jurisdictional boundaries. Furthermore, the memorandum states that an area will be designated as:¹

- nonattainment when monitoring or modeling indicate a violation
- attainment when there are no monitored violations and any "needed" modeling analysis or other relevant information demonstrates no violations, or

¹ Refer to Ohio's original June 3rd submittal for a general discussion on meteorology, geography/topography, and jurisdictional boundaries. Ohio EPA believes these three factors are not uniquely relevant to this revised designation.

- unclassifiable when there are no monitored violations and the area lacks any “needed” modeling or other information sufficient to support an alternative designation.

As stated in our original June 3rd submittal:

Ohio EPA is recommending certain areas be designated as attainment. Any area where monitoring is lacking and modeling is not appropriate (based on a lack of sources emitting 100 TPY and a lack of smaller sources with the potential to cause or contribute to a violation of the new SO₂ standard) is recommended as an attainment area. As stated in U.S. EPA’s final rule, the agency only intends to designate an area as attainment if monitoring and appropriate modeling data show no violations. As further stated in the SO₂ Designation Guidance, an area can be designated as attainment if there are no monitored violations and where appropriate modeling analysis is conducted, “if needed.” This approach is suitable as not all areas of a Ohio contained monitoring or have sources that emit over 100 TPY of SO₂ or have a collection of smaller sources that have the potential to cause or contribute to a violation of the SO₂ standard. In these cases modeling is not appropriate or necessitated and these areas should be designated as attainment consistent with U.S. EPA’s broader approach for designations. This document will provide adequate justification for such areas using data from the 2008 actual emissions information submitted by Ohio’s sources for incorporation into the 2008 National Emissions Inventory (NEI).

The remaining areas of the State are recommended as unclassifiable.

This revision request addresses portions of Meigs, Gallia, Washington, and Jefferson Counties. Since our initial and revised designations, Ohio EPA has held several conversations with Region 5 U.S. EPA, wherein violating monitors in West Virginia were discussed. Ohio EPA was informed of the potential for townships in Ohio that border these violating monitors to also be designated nonattainment, and several of these townships will be addressed herein.

Based on the most recent ambient SO₂ monitoring data, Ohio EPA is recommending an unclassifiable designation for Salisbury Township in Meigs County and Cheshire Township in Gallia County, rather than the original nonattainment designation in our June 3rd submittal. We are also recommending an unclassifiable designation for Addison Township in Gallia County, which was identified by U.S. EPA as a potential nonattainment area during previous discussions. This extends to any other townships in Gallia County which might be considered for nonattainment designation by U.S. EPA based on previous violations of monitors 39-105-1001 and 39-105-0003 in Ohio, as these monitors now attain the standard.

Ohio EPA is also recommending Saline, Knox, and Island Creek Townships in Jefferson County be designated unclassifiable rather than the original nonattainment designation.

These recommendations are based on the attainment of the standard shown by all monitors in Hancock County, WV, which borders these townships.

Lastly, Ohio EPA is recommending that Warren, Dunham, and Belpre Townships in Washington County, identified as potential nonattainment areas by U.S. EPA due to monitor 54-107-1002 in Wood County, WV being in violation of the standard, be designated as unclassifiable as recommended by Ohio EPA. At this time, this monitor is showing attainment with the standard. Ohio EPA is also recommending that any other townships in Washington County which border Wood County, WV, be designated unclassifiable. Please find included with this letter our technical evaluation in support of these recommendations.

I appreciate the opportunity to provide these revised recommendations and will work cooperatively with U.S. EPA Region V staff as final designations are made. If you have any questions concerning this submittal, please feel free to contact Jennifer Dines of the Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Robert F. Hodanbosi
Chief, Division of Air Pollution Control

Cc: Jennifer Dines, Manager, State Implementation Plan and Rulemaking Section
John Summerhays, U.S. EPA Region V