



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

OCT 13 2015

Ms. Susan Hedman
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio's Final Nonattainment Area State Implementation Plan and Ohio Administrative Code Chapter 3745-18 Revisions for the 2010 Sulfur Dioxide National Ambient Air Quality Standard.

Dear Administrator Hedman:

I am writing to submit Ohio's final nonattainment area state implementation plan (SIP) for the 2010 sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). The United States Environmental Protection Agency (U.S. EPA) promulgated the revised NAAQS for SO₂ effective August 23, 2010 (75 FR 35520).

On August 15, 2013, U.S. EPA published (78 FR 47191) the initial SO₂ nonattainment area designations for the 1-hour SO₂ standard across the country (effective October 4, 2013). Four areas of Ohio were designated nonattainment in 2013: Lake County, OH nonattainment area (all of Lake County); Muskingum River, OH nonattainment area (Center Township in Morgan County and Waterford Township in Washington County); Steubenville OH-WV nonattainment (Cross Creek Township, Steubenville Township, Warren Township, Wells Township, and Steubenville City in Jefferson County, Ohio and Cross Creek Tax District in Brooke County, West Virginia); and Campbell-Clermont KY-OH nonattainment area (Pierce Township in Clermont County, Ohio and portions of Campbell County, Kentucky).

The Campbell-Clermont KY-OH nonattainment area is not addressed in this submittal. Air quality data from the 2012 to 2014 period indicates this area is now attaining the standard. On March 12, 2015 Ohio EPA provided a draft redesignation request and maintenance plan to U.S. EPA and the public for

comment. Areas that attain before the required date for submitting a plan do not have to submit a full nonattainment area SIP.

The remaining three areas are addressed in Ohio's attached nonattainment area SIP and Ohio has performed analyses that provide for attainment of the standard. The following significant strategies will provide for attainment in each of these areas:

- Lake County, OH: the permanent shutdown of Eastlake Power Plant and reductions made at Painesville Municipal Power.
- Muskingum River, OH: the permanent shutdown of Muskingum River Power Plant.
- Steubenville, OH-WV: reductions will be achieved at the former Wheeling Pittsburgh Mingo Junction Steel Plant and the Mingo Junction Energy Center in Ohio. Additional reductions will be required of Mountain State Carbon in West Virginia.

The Clean Air Act (CAA), as amended, requires each state with areas failing to meet the 1-hour SO₂ NAAQS to develop and submit SIPs to expeditiously attain and maintain the standard. These nonattainment area SIPs were due by April 4, 2015. Ohio EPA submitted its attainment demonstration SIP on April 3, 2015. However, at the time of that submittal Ohio EPA had not yet incorporated the reduction strategies into Ohio's SIP approved and federally enforceable Ohio Administrative Code (OAC) Chapter 3745-18 regulations that address SO₂. Ohio EPA also had not completed the public comment process on both the control/attainment strategy analysis and the OAC Chapter 3745-18 revisions.

On May 22 and June 4, 2015, Ohio EPA provided the OAC Chapter 3745-18 revisions and control/attainment strategy analysis to the public for comment. Comments were accepted through July 9, 2015 and three public hearings were held on both the OAC Chapter 3745-18 revisions and control/attainment strategy analysis. Additional comment periods and hearings were held on only the OAC Chapter 3745-18 revisions in accordance with Ohio's rulemaking requirements. All documentation regarding comments received and Ohio EPA's responses are included in this package.

In addition to the OAC Chapter 3745-18 revisions and control/attainment strategy portions of this nonattainment area SIP submittal, Ohio EPA is also submitting all other elements required under CAA Section 172(c), such as Ohio's inventory.

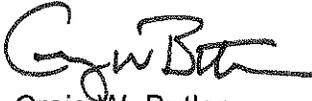
This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is available at

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<http://www.epa.ohio.gov/dapc/SIP/so2.aspx> under the heading "Attainment Demonstration."

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 "Craig W. Butler". The signature is fluid and cursive, with the first name "Craig" being the most prominent.

Craig W. Butler
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosure
