



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

Mr. Robert Kaplan
Acting Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Demonstration under Section 110(l) of the Clean Air Act for Removal of Low Reid Vapor Pressure (RVP) Fuel Requirements from Ohio's State Implementation Plan (SIP)

Dear Administrator Kaplan:

I am writing to request the removal of Low Reid Vapor Pressure (RVP) fuel requirements in the Cincinnati and Dayton areas from Ohio's State Implementation Plan (SIP).

Background

Ohio's low RVP requirements were originally implemented to address the ozone National Ambient Air Quality Standards (NAAQS) through the reductions of nitrogen oxides (NOx) and volatile organic compound (VOC) emissions in the Cincinnati and Dayton areas. The low RVP program fuel requirements are currently effective in Butler, Clermont, Hamilton and Warren counties in the Cincinnati area, and in Clark, Greene, Miami and Montgomery Counties in the Dayton area. U.S. EPA approved Ohio's low RVP rules on May 25, 2007 (72 FR 29269). Because of a delay in the implementation of the program in 2006, Ohio adopted revisions to the low RVP rules, which was approved by U.S. EPA on February 13, 2008 (73 FR 8197).

The Cincinnati area is currently in attainment for the 1979 and 1997 ozone standards, and is in the process of being redesignated to attainment for the 2008 ozone standard. The Cincinnati, OH-KY-IN area was redesignated to attainment for the 1979 one-hour standard on June 21, 2005 [70 FR 35946], and for the 1997 eight-hour ozone standard on May 11, 2010 (revised Nov. 29, 2010 and Jan. 29, 2013 [75 FR 26118, 75 FR 72954 and 78 FR 6035]). The Cincinnati, OH-KY-IN area was designated marginal nonattainment for the 2008 ozone standard on May 21, 2012 (77 FR 30118). U.S. EPA proposed redesignation to attainment for the Ohio portion of the Cincinnati, OH-KY-IN area (Butler, Clermont, Clinton, Hamilton and Warren counties) for the 2008 ozone standard on September 28, 2016 [81 FR 66602]. The Cincinnati area is anticipated to be designated marginal nonattainment under the 2015 ozone standard.

The Dayton area is currently in attainment for all ozone standards. The Dayton-Springfield, OH area (Clark, Greene, Miami and Montgomery Counties) was redesignated to attainment for the 1997 eight-hour ozone standard on August 13, 2007 (72 FR 45169). The Dayton area was

designated attainment for the 2008 ozone standard on May 21, 2012 (77 FR 30141), and is anticipated to be designated attainment under the 2015 ozone standard.

Numerous concerns have been raised to Ohio EPA regarding the increased burden of providing a boutique fuel, and the higher cost of low RVP fuel requirements compared to similarly sized metropolitan areas. During the 2016 low RVP season (June 1 to September 15), low RVP fuel in the Cincinnati area was on average 13.8 cents higher per gallon than in Columbus and 15.9 cents higher than in Cleveland. In the Dayton area, low RVP fuel was on average 12.2 cents higher per gallon than in Columbus and 14.3 cents higher than in Cleveland.

This letter demonstrates that removal of the low RVP fuel program in the Cincinnati and Dayton areas will not interfere with the attainment of the ozone standard or violate the requirements of Section 110(l) of the Clean Air Act (CAA). Therefore, Ohio EPA is requesting U.S. EPA approve Ohio's request so that the program may be eliminated beginning with the June 1, 2017 low RVP period.

CAA 110(l) Demonstration

States wishing to phase out SIP-approved low RVP fuel programs must submit a SIP revision to U.S. EPA demonstrating that the revision does not interfere with progress towards any area in the state achieving compliance with any NAAQS. U.S. EPA's draft guidance "Demonstrating Noninterference Under Section 110(l) of the Clean Air Act When Revising a State Implementation Plan", dated June 8, 2005¹ was used as the basis for the following demonstration.

Under CAA section 110(l), U.S. EPA cannot approve a SIP revision if it would interfere with attainment of the NAAQS, reasonable further progress toward attainment, or any other applicable requirement of the Clean Air Act. Therefore, a SIP revision requesting removal of an approved low RVP fuel program from the SIP may only be approved if the state has demonstrated that the revision will not interfere with attainment or maintenance with any NAAQS. In evaluating whether a given SIP revision would interfere with attainment or maintenance, as required by section 110(l), U.S. EPA generally considers whether the SIP revision will preserve or improve the status quo in air quality.

In accordance with section 110(l) of the CAA, the analysis below demonstrates that the removal of low RVP fuel requirements from the Cincinnati and Dayton areas will not interfere with the attainment or maintenance of the NAAQS. Ohio EPA is using the "substitution option" whereby one measure is substituted with another with equivalent or greater emissions reductions/air quality benefit. In this case, low RVP fuel requirements will be substituted with equivalent or greater emissions reductions from facilities in the Cincinnati and Dayton areas which have or will cease coal operations or convert from coal to natural gas due to U.S. EPA's Boiler Maximum Achievable Control Technology (MACT)² regulations. These substitute emissions are quantifiable, permanent, surplus (i.e. NO_x and VOC emissions reductions are a co-benefit of the

¹ <http://www.4cleanair.org/Oldmembers/members/committee/criteria/110STAPPA.pdf>

² Industrial, Commercial, and Institutional Boilers and Process Heaters: National Emission Standards for Hazardous Air Pollutants (NESHAP) for Major Sources, 40 CFR Part 63 Subpart DDDDD (<https://www.epa.gov/stationary-sources-air-pollution/industrial-commercial-and-institutional-boilers-and-process-heaters>)

chosen compliance strategy for the Boiler MACT regulations), enforceable and contemporaneous (i.e. occurring within approximately one year before/after this demonstration and/or the anticipated cessation of the low RVP fuel program).

Quantification of Emissions Reductions from Low RVP Fuel Program

To determine if the cessation of the low RVP fuel program will interfere with the attainment of the ozone standard, Ohio EPA must first determine the emissions increases resulting from the cessation of the program. Ohio EPA used the most current MOVES model to estimate the area-wide NOx and VOC inventory emissions benefits from low RVP fuel requirements, on a county level basis, from the four counties in the Cincinnati area and the four counties in the Dayton area in which the low RVP fuel requirements are currently effective. In the MOVES modeling, low RVP fuel was assumed to be in use from May 1 to September 15, rather than the required control period of June 1 to September 15, as Ohio EPA expects some amount of low RVP fuel to be utilized in May as fuel distributors prepare to meet the requirements. This provides for an extra layer of conservatism in the estimated emissions reductions from the low RVP program. A detailed description of the MOVES modeling and results are contained in Appendix A.

Table 1 presents a summary of MOVES generated emissions in tons per year (TPY) for the Cincinnati and Dayton areas for VOC and NOx emissions for calendar year 2017.

Table 1. Emissions Reductions from Low RVP Fuel Program

Fuel Scenario	Cincinnati area		Dayton area	
	NOx (TPY)	VOC (TPY)	NOx (TPY)	VOC (TPY)
RVP 8.8*	12,773.96	10,733.49	9,260.45	6,773.04
RVP 9.7	12,790.29	10,749.32	9,274.37	6,789.05
Total Emissions Benefit of Low RVP (RVP 9.7 - RVP 8.8)	16.33	15.83	13.93	16.01

* includes special provision allowing 1 psi exceedance of RVP limit for gasoline containing 10% ethanol per Ohio Administrative Code (OAC) rule 3745-72-07

In accordance with the U.S. EPA's "NOx Substitution Guidance", dated December 1993³, Ohio EPA will be substituting NOx for VOC emissions, using all-NOx reductions to offsets both NOx and VOC emissions increases. In the Cincinnati area, a NOx:VOC ratio of 1.53:1 for the counties currently in the low RVP fuel program (Butler, Clermont, Hamilton and Warren) was calculated using the most recent inventories available (specifically, the 2014 attainment year inventories contained in the April 21, 2016 redesignation request for the Cincinnati 2008 ozone nonattainment area⁴). Applying this factor, 40.50 TPY of NOx reductions will need to be offset by equivalent or greater emissions reductions.

In the Dayton area, a NOx:VOC ratio of 1.02:1 for the counties currently in the low RVP fuel program (Clark, Greene, Miami and Montgomery) was calculated using the most recent inventories available (specifically, 2011 NEI v2 inventories). Applying this factor, 30.27 TPY of NOx reductions will need to be offset by equivalent or greater emissions reductions.

³ <https://www3.epa.gov/ttn/oarpg/t1/memoranda/noxsubst.pdf>

⁴ http://epa.ohio.gov/Portals/27/sip/Cin_2008Ozone_Redesig_Final.pdf

Detailed NOx:VOC ratio calculations are available in Appendix B.

Table 2. NOx emissions to be replaced

Emissions	Cincinnati area (TPY)	Dayton area (TPY)
NOx	16.33	13.93
VOC	15.83	16.01
NOx:VOC ratio	1.53	1.02
VOC converted to NOx	24.17	16.35
Total NOx emissions to be replaced	40.50	30.27

The amount of total emissions⁵ in the Cincinnati and Dayton areas being substituted with this revision is not significant. Only 0.03% of total combined NOx and VOC emissions in the Cincinnati area is being substituted (40.50 out of 135,334.44 TPY). Likewise, only 0.04% of total combined NOx and VOC emissions in the Dayton area is being substituted (30.27 out of 77,118.02 TPY).

Substitution of Reductions from Facilities Which Ceased Coal Operations or Converted from Coal to Natural Gas

In the Cincinnati area, the low RVP fuel requirements will be substituted with emissions reductions at the MillerCoors LLC (Facility ID 1409000353) facility resulting from the shutdown of coal/gas fired boilers and installation of new natural gas fired boilers due to the Boiler MACT regulations. The relevant emissions units are B001, B002, B010 and B011. B001 and B002 coal/gas boilers were permanently shut down on April 1, 2016. Federally-enforceable permits⁶ prior to the shutdown include NOx emission limits for B001 and B002 of 1,375.9 TPY combined, based on rolling 12-month summations. These were replaced with two new natural gas boilers, B010 and B011, which commenced operation on January 20, 2016. Federally-enforceable permits⁷ for the new boilers B010 and B011 include NOx emission limits of 1.17 tons of NOx per month over a rolling 12-month period for each boiler.

To calculate emissions reductions, Ohio EPA assumed the heat input (million British thermal units (mmBTU)) from the two retired coal/gas boilers would be replaced with equivalent gas usage in the two new gas boilers. Projected NOx emissions were calculated using the newly-permitted emission rate of 0.10 lb/mmBTU, at the historical heat input (mmBTU) for each year 2011 to 2015 as well as for 2011-2015 average mmBTU. The amount of reductions due to shutdowns/conversion to natural gas was calculated as the difference between historical actual emissions and projected emissions from the new gas boilers. NOx emissions reductions were 175.29 TPY using 5-year historical averages (2011-2015), and 111.00 TPY using most recent 2015 actual data.

As indicated above, 40.50 TPY of NOx reductions will need to be offset by equivalent or greater emissions reductions from the MillerCoors facility. Therefore, Ohio EPA has determined that more than adequate emission reductions from the shutdowns/conversions of B001, B002, B010

⁵ From 2011 NEI v 2; includes point, air/rail, nonpoint, nonroad, onroad and fires sectors

⁶ PTI P0111979, effective 5/9/13 (http://wwwapp.epa.ohio.gov/dapc/permits_issued/1009737.pdf)

⁷ PTI P0120019, effective 4/5/16 (http://wwwapp.epa.ohio.gov/dapc/permits_issued/1405008.pdf)

and B011 at MillerCoors LLC are available to offset the removal of the low RVP program in Cincinnati. Tables containing the relevant permit limits and offset calculations for MillerCoors are included in Appendix C.

In the Dayton area, the low RVP fuel requirements will be substituted with emissions reductions at the Wright-Patterson Air Force Base (Facility ID 0829700441) facility resulting from shutdowns and conversions from coal to natural gas due to compliance with Boiler MACT regulations. The relevant emissions units are B606, B607, and B608. Coal boiler B606 was permanently shut down on June 7, 2016. Coal boilers B607 and B608 will be converted to natural gas by January 31, 2017 due to Boiler MACT. No changes are anticipated for an existing natural gas boiler, B609, which is included in this analysis only because it is part of the emissions unit group and has combined emission limitations with the converted units (B607 and B608). Federally-enforceable permits⁸ prior to the shutdown/conversions include NOx emission limits of 33.20 TPY from B609, and 350.32 TPY NOx from each B606, B607 and B608 with total combined NOx emissions not to exceed 788 tons, as a rolling, 12-month summation from the coal-fired boilers identified as emissions units B309, B310, B311, B606, B607, and B608 combined (Note: B309, B310 and B311 underwent similar shutdown/conversions in 2015 with B311 shutdown and B309 and B310 converted to natural gas). Federally-enforceable permits⁹ following the shutdown/conversions include NOx emission limits of 120 TPY combined for B607, B608 and B609.

To calculate available offsets, Ohio EPA assumed the heat input (mmBTU) generated from the four coal/gas boilers prior to the change would be replaced with equivalent gas usage among the remaining three gas boilers. Projected NOx emissions were calculated using the newly-permitted emission rate of 0.10 lb/mmBTU, at the historical heat input (mmBTU) for each year 2011 to 2015 as well as for 2011-2015 average mmBTU. The amount of reductions due to shutdowns/conversion to natural gas was calculated as the difference between historical actual emissions and projected emissions from the converted coal boilers. NOx emissions reductions were 64.97 TPY using 5-year historical averages (2011-2015), and 46.27 TPY using most recent 2015 actual data.

As indicated above, 30.27 TPY of NOx reductions will need to be offset by equivalent or greater emissions reductions from the Wright-Patterson Air Force Base facility. Therefore, Ohio EPA has determined that more than adequate emission reductions from the shutdowns/conversions of B606, B607 and B608 at Wright-Patterson Air Force Base are available to offset the removal of the low RVP program in Dayton. Tables containing the relevant permit limits and offset calculations for Wright-Patterson Air Force Base are included in Appendix D.

These substitute emissions from both MillerCoors and Wright-Patterson Air Force Base are from permanent and enforceable shutdowns and conversions to natural gas. When an owner or operator notifies¹⁰ Ohio EPA of a permanent shut down, the facility cannot resume operations without being considered a new facility and being subject to the new source review (NSR) requirements. OAC Chapter 3745-31¹¹ contains Ohio's Permits-to-Install New Sources and

⁸ PTI 08-04162, effective 7/3/01 (http://wwwapp.epa.ohio.gov/dapc/permits_issued/10068.pdf) and PTI 08-03436, effective 3/8/01 (http://wwwapp.epa.ohio.gov/dapc/permits_issued/1042134.pdf)

⁹ PTI P0119472, effective 12/30/15 (http://wwwapp.epa.ohio.gov/dapc/permits_issued/1358202.pdf)

¹⁰ Notification may occur by official letter or electronically through the STARS2/Air Services tracking system.

¹¹ http://epa.ohio.gov/dapc/regs/3745_31.aspx

Permit-to-Install and Operate Program rules. OAC rule 3745-31-02 prevents installation or modification, and subsequent operation of new sources without properly obtaining appropriate permits. A new source is defined in OAC rule 3745-31-01 as any air contaminant source for which an owner or operator undertakes a continuing program of installation or modification, wherein a modification is defined as any physical change in, or change in the method of operation of any air contaminant source that results in an increase in the allowable emissions. In addition, it has been Ohio's longstanding policy and memorialized under OAC Chapter 3745-31 that for any emission unit that is permanently shut down (physically removed from service or altered in such a way that it can no longer operate without a subsequent "modification" or installation), authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. No emission unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31. Thus, the cessation of emissions from shut down facilities or units is permanent and enforceable.

Further, these conversions to natural gas were undertaken as the facility's chosen option to comply with Boiler MACT regulations. Conversion back to coal would be impractical, if not impossible, as the facility would still be required to comply with Boiler MACT regulations. In addition, the units are no longer permitted to burn coal and should the facility desire to burn coal again, the units would have to undergo new source review (NSR) and these retired credits would not be available to the facility (or any other facility) for netting or offset purposes in the future.

In addition, Wright-Patterson has indicated they are not projecting a substantial increase in the utilization of these boilers over the next decade. These boilers are specifically used for heating and hot water needs of buildings within the property. Wright-Patterson has initiated a U.S. Air Force program to reduce infrastructure life-cycle funding requirements 20% by 2020 through efficiencies and management strategies. Reducing the base-wide building footprint is one program identified to capitalize on maintenance and energy savings by eliminating underutilized infrastructure. This initiative reinforces the permanence of these emissions reductions.

These NO_x reductions are surplus as they are a co-benefit of the chosen compliance strategy for the Boiler MACT regulations. The Boiler MACT regulations established emission standards for control of mercury, hydrogen chloride, particulate matter (as a surrogate for non-mercury metals), and carbon monoxide (as a surrogate for organic hazardous emissions) from coal-fired, biomass-fired, and liquid-fired major source boilers based on the maximum achievable control technology. Compliance with Boiler MACT regulations is possible via many compliance options that do not result in NO_x or VOC reductions, therefore the NO_x reductions realized from the chosen compliance strategy are surplus.

These reductions are also surplus in that they were not previously relied on for credit toward attainment or maintenance purposes. Ohio EPA will ensure these reductions are permanently retired and cannot be relied on for future Clean Air Act requirements. Ohio EPA maintains a database of all reductions used for the purpose of CAA 110(l) demonstrations to ensure they cannot be used again. These reductions will be entered into and tracked within this database. As demonstrated above, Ohio EPA has calculated that more than adequate surplus emission reductions are available to offset the cessation of the low RVP fuel requirements in the Cincinnati and Dayton areas. Based on Ohio EPA's calculations, the emissions increase in the Cincinnati area due to cessation of the low RVP program is 16.33 TPY NO_x and 15.83 TPY VOC

(equivalent to 40.50 TPY NO_x after VOC to NO_x substitution). This amount is more than offset by the 111.0 to 175.29 TPY NO_x (depending on the calculation method) potentially available from the MillerCoors facility.

Likewise, the emissions increase in the Dayton area due to cessation of the low RVP program is 13.93 TPY NO_x and 16.01 TPY VOC (equivalent to 30.27 TPY NO_x after VOC to NO_x substitution). This amount is more than offset by the 46.27 to 64.97 TPY NO_x (depending on the calculation method) potentially available from at the Wright-Patterson Air Force Base facility.

However, it should be noted that Ohio EPA is not permanently retiring all of the available emissions reductions. **Upon approval of this SIP revision, 40.50 TPY of NO_x from MillerCoors LLC (Facility ID 1409000353) and 30.27 TPY of NO_x from Wright-Patterson Air Force Base (Facility ID 0829700441) will be permanently retired.** Any use of additional reductions in excess of those being retired under this action that may be used in the future will be evaluated for the surplus criteria at the time of use, which will include discounting what is retired under this action.

Table 3. Summary of available offsets and NO_x emissions to be retired

Emissions		Cincinnati area (TPY)	Dayton area (TPY)
NO _x emissions to be replaced		40.50	30.27
Offsets available from shutdowns/conversion to natural gas	2011-2015 average emissions	175.29	64.97
	2015 actual emissions	111.00	46.27
Excess credits (available 2015 offsets minus emissions to be replaced)		70.50	16.00
NO_x emissions to be retired		40.50	30.27

PM_{2.5} and Other NAAQS

NO_x and VOCs also contribute to the formation of particulate matter (PM) although the extent of the contribution varies significantly by location or region within the United States.

The Cincinnati area is in attainment for all PM_{2.5} standards, except that the area is technically in nonattainment for the 1997 PM_{2.5} standard (although the air quality continues to meet the 1997 and subsequent standards). U.S. EPA previously approved a redesignation request for the Ohio portion of the Cincinnati-Hamilton area (Butler, Clermont, Hamilton and Warren Counties) for the 1997 annual PM_{2.5} standard [76 FR 80253], but it was vacated by the U.S. Court of Appeals for the Sixth Circuit on March 18, 2015¹². A revised redesignation request was submitted to U.S.

¹² 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].

EPA on July 22, 2016. The Cincinnati area was designated attainment on November 13, 2009 (74 FR 58754) for the 2006 24-Hour PM_{2.5} Standard, and on April 7, 2015 (80 FR 18535) for the 2012 PM_{2.5} Annual Standard.

The Dayton area is currently in attainment for all PM_{2.5} standards. The Dayton-Springfield, OH area (Clark, Greene and Montgomery Counties) was redesignated to attainment for the 1997 Annual PM_{2.5} standard on September 26, 2013 (78 FR 59258). The Dayton area was designated attainment on November 13, 2009 (74 FR 58754) for the 2006 24-Hour PM_{2.5} Standard, and on April 7, 2015 (80 FR 18535) for the 2012 PM_{2.5} Annual Standard.

As with ozone, any NO_x and VOC emissions increases resulting from the removal of the low RVP fuel requirements are being offset through equivalent or greater emissions reductions from facilities in the Cincinnati and Dayton areas which have or will convert from coal to natural gas due to Boiler MACT regulations (specifically, 40.50 TPY of NO_x from MillerCoors LLC (Facility ID 1409000353) and 30.27 TPY of NO_x from Wright-Patterson Air Force Base (Facility ID 0829700441) will be permanently retired). Also, as noted above, the amount of total emissions being substituted with this revision is not significant with only 0.03 and 0.04% of emissions being substituted.

Furthermore, a study¹³ indicates that in portions of the Midwest (including portions of Ohio where low RVP fuel requirements have been implemented), emissions of direct fine particulate matter (PM_{2.5}) and the precursor sulfur dioxide (SO₂) are more significant to ambient PM_{2.5} concentrations than NO_x and VOC. Specifically, PM_{2.5} sensitivities to anthropogenic VOC emissions are near zero for the entire region, including the Cincinnati region. This study also indicated that the impact of SO₂ emissions, especially from electric generating units, was most significant in the Cincinnati area due to SO₂ emissions in the entire mid-west region (Wisconsin, Illinois, Indiana, Michigan and Ohio). In fact, emissions from the mid-west had the largest effect on PM_{2.5} sensitivities in the Cincinnati region. For this reason, a similar impact is expected in the Dayton area. The technical analysis provided has met U.S. EPA's guidance and demonstrates anthropogenic VOCs are insignificant to the formation of PM_{2.5} in these areas.

Therefore, Ohio EPA has determined that the removal of low RVP fuel requirements will not interfere with the attainment or maintenance of the 8-hour ozone or PM_{2.5} NAAQS, or any other applicable requirement of the CAA in either the Dayton or Cincinnati areas.

In addition, the cessation of the low RVP fuel requirements does not affect attainment or maintenance of the carbon monoxide, nitrogen dioxide, lead or sulfur dioxide NAAQS, as the Cincinnati and Dayton areas are currently in attainment for these standards.

Revisions to Ohio Administrative Code (OAC) Chapter 3745-72

Ohio EPA added a provision to OAC rule 3745-72-01, effective August 1, 2016, that the low RVP fuel requirements of OAC Chapter 3745-72 shall no longer be effective for the Dayton area or Cincinnati area, or any part thereof, upon the effective date of approval by U.S. EPA of the removal, suspension or replacement of the requirements of this chapter in the Dayton area or

¹³ Quantifying the sources of ozone, fine particulate matter, and regional haze in the Southeastern United States, Journal of Environmental Engineering, June 24, 2009

Cincinnati area, or any part thereof, as a part of Ohio's state implementation plan. Therefore, immediate rulemaking to incorporate the cessation of the low RVP program is not necessary.

Summary

Ohio EPA hereby requests the removal of Low RVP fuel requirements in the Cincinnati and Dayton areas from Ohio's SIP. In accordance with section 110(l) of the CAA, the analysis above demonstrates that the removal of low RVP fuel requirements will not interfere with the attainment or maintenance of the 8-hour ozone or PM_{2.5} NAAQS, or any other applicable requirement of the CAA in either the Dayton or Cincinnati areas.

The low RVP fuel requirements will be substituted with equivalent or greater emissions reductions from facilities in the Cincinnati and Dayton areas which have or will convert from coal to natural gas. These substitute emissions are quantifiable, permanent, surplus, enforceable and contemporaneous. Specifically, 40.50 TPY of NO_x from MillerCoors LLC (Facility ID 1409000353) and 30.27 TPY of NO_x from Wright-Patterson Air Force Base (Facility ID 0829700441) will be permanently retired upon U.S. EPA's approval of this SIP revision.

Ohio EPA requests U.S. EPA process this package to facilitate the cessation of the low RVP fuel requirements prior to the next fuel season which begins on June 1, 2017.

Please contact Jennifer Van Vlerah at 614-644-3696 or jennifer.vanvlerah@epa.ohio.gov if you have any questions about this submittal.

Sincerely,

Craig W. Butler
Director

cc: Jennifer Van Vlerah, DAPC

Appendices

Appendix A

Technical Memorandum
Low RVP Fuel Removal
Mobile Source Emissions (VOC and NO_x)

Appendix B

NO_x:VOC ratio calculations

Appendix C

NOx/VOC Offsets in the Cincinnati Area Using MillerCoors NOx Reductions

Appendix D

NOx/VOC Offsets in the Dayton Area Using Wright-Patterson Air Force Base NOx
Reductions

Appendix E

OAC rule 3745-72-01, effective August 1, 2016

Appendix F

Public Notice