Ohio EPA held a public comment period on March 25-2019 regarding proposed amended rules in Ohio Administrative Code (OAC) Chapter 3745-18, "Sulfur Dioxide Regulations" and the draft Redesignation Request and Maintenance Plan for the Steubenville, OH-WV Sulfur Dioxide Nonattainment Area. This document summarizes the comments and questions received during the comment period, which ended on April 29, 2019.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General/Overall Concerns

Comment 1: Comments were received from JSW Steel USA Ohio, Inc. in support of the proposed rule amendments and the redesignation request. The full comment can be found at the end of this response to comments document. (John Hritz, JSW Steel)

Response 1: Thank you for your comments in support of the proposed amendments and redesignation request.

Comment 2: Comments were received from the Appalachian Partnership for Economic Growth (APEG) in support of the proposed rule amendments and the redesignation request. The full comment letter can be found at the end of this response to comments document. (Mike Jacoby, APEG)

Response 2: Thank you for your comments in support of the proposed amendments and redesignation request.

End of Response to Comments
April 16, 2019

Ms. Holly Kaloz  
Ohio Environmental Protection Agency, DAPC  
Lazarus Government Center  
P.O. Box 1049 Columbus, Ohio  43216-1049  
email: holly.kaloz@epa.ohio.gov

Subject:  Redesignation Request and Maintenance Plan for the Ohio Portion of the Steubenville, OH-WV Sulfur Dioxide Nonattainment Area

Dear Ms. Kaloz:

JSW Steel USA Ohio, Inc. (JSW) has reviewed and fully supports the draft actions prepared by the Ohio Environmental Protection Agency, Division of Air Pollution Control relevant to the Steubenville, OH-WV sulfur dioxide nonattainment area. These draft actions include the following:

- Proposed revisions to Ohio Administrative Code (OAC) Rules 3745-18-47 to incorporate a revised sulfur dioxide emissions limit for the coal-fired boilers at the Cardinal Power Plant in Jefferson County, Ohio
- Proposed revisions to OAC Rules 3745-1803 and 3745-18-04 to incorporate compliance time schedules and measurement methods and procedures relevant to the Cardinal emissions limit
- Redesignation Request and Maintenance Plan for the Ohio Portion of the nonattainment area to ensure compliance with the 2010 sulfur dioxide National Ambient Air Quality Standard
- Supplemental information relevant to Ohio EPA’s Attainment Demonstration

Ohio EPA’s efforts to bring Jefferson County into NAAQS attainment status are absolutely essential to JSW as a significant stakeholder creating hundreds of jobs at our facility in Mingo Junction, Ohio. Not moving forward with such efforts would unnecessarily stifle economic growth for a county that desperately needs jobs in the quantities that JSW has and continues to plan to create through further expansion at our Mingo Junction, Ohio facility. The proposed rules and eventual redesignation of Jefferson County as in attainment with the 2010 sulfur dioxide NAAQS will play a large role in JSW’s strategic decision business making processes as the Mingo Junction facility competes for capital investments among JSW’s facilities across the globe.

Sincerely,

John Hritz  
President and Chief Executive Officer  
JSW Steel (USA), Inc.
April 26, 2019

Ms. Holly Kaloz
Ohio Environmental Protection Agency, DPAC
Lazarus Government Center
P.O. Box 1049
Columbus, OH 43216-1049

Dear Ms. Kaloz:

On behalf of the Appalachian Partnership for Economic Growth (APEG), I am pleased to provide our support for redesignation request for sulfur dioxide (SO2) limits in the Steubenville-Weirton area. APEG is non-profit economic development organization serving 25 counties in southern and eastern Ohio. We believe this rule change will benefit the broader region in a couple of ways.

Firstly, it will help secure recent air quality improvements for the long-term. It is my understanding that the requested rule change being sought by the Ohio EPA from the federal EPA will lower the sulfur dioxide emissions limits on the Cardinal power plant near Brilliant, Ohio. I also understand the Cardinal Plant has been emitting SO2 well below its permit limits because of the installation of scrubbers at the plant. I commend American Electric Power for being a good corporate citizen by choosing to make significant investments to meet and exceed Clean Air Act requirements to help protect Ohioans and others in the region. This lower emission limit will ensure emissions for sulfur dioxide will be within the 2010 national ambient air standards, meaning Jefferson County will be in an air quality attainment area and fully compliant with all air quality standards.

Secondly, the rule modification will also make it easier to permit additional job-creating projects in the area. I know from experience that being a non-attainment county for air quality can be cause other industries to not consider new investments because additional air permits are harder to obtain. With new investments tied to steel and potentially shale gas in the region, Jefferson County should be on a level playing field with other communities competing for business. The economic decline that started nearly 50 years ago in the Upper Ohio River Valley, has caused Jefferson County to lose one-third of its population. More job losses are expected when the Sammis plant closes. Our region can’t be complacent about taking advantage of new opportunities. I commend OEPA’s efforts to position Jefferson County for the future.

Sincerely,

[Signature]

[Name]

President