



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

March 30, 2022

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

**Re: Ohio's Reasonably Available Control Technology (RACT) State Implementation Plan for the 2015 Ozone National Ambient Air Quality Standards and Submittal of Revisions to SIP Approved Rules in OAC Chapter 3745-21 and New SIP Rules in OAC Chapter 3745-110**

Dear Administrator Shore:

I am writing to submit a revision to Ohio's State Implementation Plan (SIP) to address Reasonably Available Control Technology (RACT) requirements for the 2015 8-hour ozone National Ambient Air Quality Standards (NAAQS), including revisions to rules contained in Ohio Administrative Code (OAC) Chapters 3745-21 (VOC RACT) and 3745-110 (NOx RACT).

The Ohio Environmental Protection Agency (Ohio EPA) has prepared this SIP revision to address RACT requirements for the 2015 8-hour ozone NAAQS with respect to two nonattainment areas that are anticipated to be bumped-up to moderate nonattainment: the Cleveland OH 2015 ozone nonattainment area (Cuyahoga, Geauga, Lake, Lorain, Medina, Portage and Summit counties) and the Ohio portion of the Cincinnati OH-KY 2015 ozone nonattainment area (Butler, Clermont, Hamilton and Warren counties). For certain source categories, Ohio EPA is submitting regulations that establish new or more stringent RACT controls in OAC Chapters 3745-21 and 3745-110. For other source categories, Ohio EPA is certifying that previously adopted RACT regulations and controls represent RACT for implementing the 2015 ozone NAAQS.

Ohio held an interested party comment period on draft revisions to OAC Chapter 3745-21 from May 17 to June 18, 2021, and on draft revisions to OAC Chapter 3745-110 from May 20 to June 22, 2021. Ohio's response to comments received during the interested party comment periods are included in Appendices A and B. Ohio published notification for the public comment period and public hearing on the proposed rules and draft RACT SIP on November 29, 2021. No comments were received on Ohio EPA's proposed amendments to the rules in OAC Chapter 3745-110 or the RACT SIP. One question was received during the public hearing for proposed amendments to the rules in OAC Chapter 3745-21 which is addressed in the response to comments for that rulemaking (see Appendix A).

This SIP does not include the relaxation of any existing requirements and therefore will not interfere with the attainment or maintenance of the NAAQS in accordance with section 110(l) of the CAA. Appendix E contains a 110(l) demonstration regarding pleasure craft coatings.

Ohio requests approval of the revisions to OAC Chapters 3745-21 and 3745-110 into Ohio's SIP. As described in detail below, Ohio EPA is also requesting a determination that these revisions along with existing regulations satisfy Ohio's RACT requirements for the 2015 ozone NAAQS.

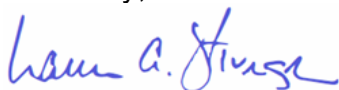
U.S. EPA previously approved OAC Chapter 3745-21 into Ohio's SIP under previous ozone standards. Ohio EPA is now requesting approval of revisions to OAC Chapter 3745-21 for the Cleveland OH 2015 ozone nonattainment area, Ashtabula county<sup>1</sup>, and the Ohio portion of the Cincinnati OH-KY 2015 ozone nonattainment area. In addition, Ohio EPA is requesting:

- Approval of the updated 5% RACT equivalency analysis to incorporate a 3 gallons/day exemption in OAC rule 3745-21-26 for the Cincinnati 2015 ozone nonattainment area (Appendix D);
- Approval of the 110(l) demonstration for pleasure craft coatings (Appendix E);
- Approval of permitting terms for two sources subject to the CTG for the Oil and Natural Gas Industry (Appendix F);
- Approval of the negative declarations (Appendix G) for:
  - a. High-Density Polyethylene or Polypropylene Resin;
  - b. Equipment Leaks from Natural Gas/Gasoline Processing Plants;
  - c. Oil and Gas CTG for the Cincinnati area;
- A determination that non-CTG categorical VOC RACT limits still constitute RACT for the purposes of the 2015 ozone standard (Appendix H).

OAC Chapter 3745-110 has not been previously submitted or approved into Ohio's SIP<sup>2</sup>. Ohio EPA is now requesting approval of OAC Chapter 3745-110 into Ohio's SIP only for the Cleveland OH 2015 ozone nonattainment area<sup>3</sup>. The Cincinnati OH-KY 2015 ozone nonattainment area recently attained the 2015 ozone standard based on the 2019-2021 design value, and Ohio EPA submitted a redesignation request and maintenance plan for the Ohio portion of the area on December 21, 2021. In addition, Ohio EPA is requesting a determination that the presumptive NOx emission limits as revised constitute RACT for the purposes of the 2015 ozone standard (Appendix I).

Ohio EPA is submitting this SIP via U.S. EPA's State Planning Electronic Collaboration System (SPeCS). If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Laurie A. Stevenson  
Director

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<sup>1</sup> This request includes Ashtabula county which is not in the Cleveland OH 2015 ozone nonattainment area, but was included in the OAC Chapter 3745-21 rules approved into the SIP under previous ozone standards.

<sup>2</sup> Except for OAC 3745-110-03(N) and 3745-110-05(A) which were used as an offset in a 110(l) anti-backsliding demonstration for architectural aluminum coatings.

<sup>3</sup> This request does not include Ashtabula county, which was in the ozone nonattainment area under previous standards but is not included in the 2015 ozone nonattainment area.

OAC Chapters 3745-21 and 3745-110 and RACT SIP  
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Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosures