



Division of Air Pollution Control

Ohio's 2012 Annual PM_{2.5} Standard Draft Area Designation Recommendation

Agency Contact for this Package

Jennifer Van Vlerah, Division of Air Pollution Control, (614) 644-3696,
jennifer.vanvlerah@epa.ohio.gov

Ohio EPA held public hearings in Magnolia, OH on December 4, 2013 and Cincinnati, OH on December 5, 2013, regarding the 2012 annual PM_{2.5} national ambient air quality standard designation recommendations for the State of Ohio. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on December 5, 2013.

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: My testimony is intended to alert all interested parties—Ohio EPA, USEPA, and others to the fact that whereas the 2010 thru 2012 data indicate nonattainment of the standard, the 2011 thru 2013 data, once certified, will show attainment. Thus, whereas we agree with the proposed recommendation at this time, we want to alert interested parties to the fact that once the 2013 data are certified, we will be recommending that the nonattainment proposal not go final. We believe current air quality meets the annual standard for PM-2.5. (John Paul, Administrator, RAPCA)

In conclusion, we recognize that Ohio EPA is proposing a nonattainment designation for Montgomery County for the annual PM-2.5 standard based on air quality data for the three-year period of 2010-2012. However we submit for the record our belief that once the 2013 air quality monitoring data are quality assured and certified, the three year period of 2011-2013 will demonstrate attainment of the standard. Thus, we

ask that those data be considered for the final designation and that the area remain designated attainment. We recognize that with this attainment designation comes a responsibility for RAPCA to take appropriate measures to assure this attainment is maintained into the future. We stand ready to take these measures. (John Paul, Administrator, RAPCA)

Response 1: Ohio EPA will be preparing our final recommendation to USEPA based upon preliminary 2011-2013 design values based on nearly complete 2013 data. We will be recommending attainment/unclassifiable for Montgomery County contingent upon final certification of the 2013 data. This certification will occur prior to USEPA proposing recommendations to the states. In the event the air quality does not show attainment after all air quality data is in for 2013, Ohio EPA will revise our recommendation accordingly.

Comment 2: **RAPCA staff have prepared an analysis of the air quality data and the emissions inventory for our six counties over the past several years and will work with Ohio EPA staff to supplement these data as necessary. We also have looked closely at national inventories of those pollutants that are transported across regions. Our analysis shows a steady decrease in emissions and a corresponding steady increase in air quality over the years. In fact, the 2013 data will show the cleanest air quality measured over our monitoring history of more than 40 years. (John Paul, Administrator, RAPCA)**

Response 2: Ohio EPA will be reviewing the information submitted to help us inform our recommendation. Thank you.

Comment 3: **As stated above, attainment and maintenance of the NAAQS is important to the agency. In order to assure continued maintenance of the standards, it is important to document the sources of emissions and assure that enforceable controls are in place to limit those emissions to levels that correspond to healthy air quality. Given the sources of fine particulates and their precursors (direct PM, SO₂, and NO_x), and given the ability of these emissions to be transported over long distances, we are active supporters of national rules on major sources. In fact we believe that the following national rules must be upheld by USEPA:**

- **The Clean Air Interstate Rule (CAIR) or the Cross State Air Pollution Rule (CSAPR) or a replacement transport rule.**

- The Utility Maximum Achievable Control Technology (MACT) rule for Electric Generating Units (EGUs).
- The Portland Cement MACT.
- The Industrial Boiler MACT.
- The Tier 3 Tailpipe and Evaporative Emission and Vehicle Fuel Standards.

Each of these rules are under various legal attacks, but must be preserved for current air quality (both for PM-2.5 and ozone) to be maintained. We urge Ohio EPA's support of these rules. (John Paul, Administrator, RAPCA)

Response 3: Ohio EPA will be providing a copy of your comments to USEPA.

Comment 4: Wright-Patterson AFB supports Ohio EPA's recommendation to designate Greene County to attainment/unclassifiable for the 2012 annual PM2.5 NAAQS, but would like to offer an alternative approach for determining the Montgomery County PM2.5 design value. For the past fifteen years, the Dayton-Springfield area has demonstrated steady progress in reducing PM2.5 pollution, which resulted in re-designating the area to attainment for the 1997 annual PM2.5 NAAQS effective September 26, 2013. As shown on the attached table¹, the five major sources of sulfur dioxide in Montgomery and Greene counties have collectively reduced sulfur dioxide emissions by 47% and nitrogen oxides by 43% from 2008 through 2011 (Note: sulfur dioxide and nitrogen oxides are precursors of PM2.5). These area emission reductions are, for the most part, the result of permanent operational changes or unit shutdowns which will leave only one operating coal-fired industrial boiler in the Dayton-Springfield region by spring of 2016.

Wright-Patterson AFB has committed to further reduce future area PM2.5 pollution levels by changing from coal to natural gas combustion at both of our main central heating plants by January 2016. Through federally enforceable air permit terms, the base will reduce annual emissions by over 1,000 tons of sulfur dioxide, 200 tons of nitrogen oxides, and 5 tons of particulate emissions within the next two years. Additionally, Wright-Patterson AFB will continue to proactively implement energy programs designed to promote efficiency and reduce fuel consumption.

¹ Please see the submittal letter by Mr. Baker to view the table.

Ohio EPA has selected the calendar years 2010 through 2012 for the three-year averaging period to determine the Montgomery County annual PM2.5 NAAQS design value. The annual quality assured monitoring data are 14.0, 12.1, and 10.7 µg/m³ for each year respectively, averaged together for 12.3 µg/m³ design value. Wright-Patterson AFB believes that the significant reduction of monitored PM2.5 data comparing 2010 to 2012 is reflective of the recent permanent PM2.5 precursor emissions reductions enacted by the largest sulfur dioxide sources in the region. For this reason, the base believes that the 2010 PM2.5 data do not represent current conditions in Montgomery County and should be replaced with quality assured monitored data from 2013 for use in determining the three-year averaging period and design value. Any annual average data result from 2013 that would be 12.8 µg/m³ or less for Montgomery County will result in an annual PM2.5 NAAQS design value of 11.9 µg/m³ or less, thus making the county attainment/unclassifiable for the 2012 annual PM2.5 NAAQS. It is highly anticipated that the 2013 PM2.5 quality assured monitored data will resemble 2011 or 2012 data.

Wright-Patterson AFB understands that Ohio EPA must meet certain regulatory deadlines for submitting recommended designation area boundaries to the US EPA and that the 2013 quality assured PM2.5 monitored data may not be available prior to submittal. Therefore, the base proposes that Ohio EPA recommend Montgomery County to be in attainment/unclassifiable for the 2012 annual PM2.5 NAAQS, contingent upon submittal of supplemental quality assured PM2.5 monitored data for 2013. The basis for supporting this contingency is that the significant PM2.5 emissions reductions affecting Montgomery County after 2010 are for the most part permanent and/or federally enforceable through air permit term revisions. In the long run, Ohio EPA will benefit from this approach by eliminating the years of time and effort needed for the Montgomery County re-designation process in the future, when attainment data may in fact be available today. (Mr. Raymond Baker, Chief, Environmental Branch, Wright-Patterson AFB)

Response 4: Please see response 1.

Comment 5: The commentor requests Lake and Lorain Counties (or partial townships around power plants) be included in the Cleveland-Akron Lorain area recommended nonattainment areas. Please see the attached comments for their detailed analysis. (Rich

**Zavoda, Regional Manager, Air Quality Program,
Environmental Affairs, Arcelor Mittal)**

Response 5: Ohio EPA continues to believe the PM2.5 nonattainment issues surrounding Cuyahoga County emanate from sources located locally and nearby the monitors. Other monitors to the west and east of the violating monitors but between the violating monitors and the power plants referenced in Arcelor Mittal's comments continue to show attainment. Ohio EPA will be requesting only Cuyahoga County be designated nonattainment.

Comment 6: The commentor did not provide any specific comments regarding Ohio's recommended nonattainment designations and boundaries. Rather the commentor cited several issues regarding USEPA regulatory actions and/or policy and guidance regarding the 2012 PM2.5 NAAQS level and implementation. The commentor goes on to state "The State of Ohio, under the Clean Air Act, has the opportunity to control its own economic destiny and the success of its manufacturers. Therefore, NADCA believes that the state should not designate areas as nonattainment, nor should it include surrounding communities in a nonattainment boundary." Please see the attached comments for complete details. (Daniel Twarog, President, North American Die Casting Association)

Response 6: Ohio EPA based recommendations for Ohio's nonattainment areas on USEPA rule, policy and guidance, as has been done historically, also taking into consideration Ohio EPA's knowledge regarding those sources we believe impact violating monitors and which may necessitate reductions in the future in order to achieve the 2012 PM2.5 standard. Ohio EPA will be providing your comments regarding the new standard, USEPA's policy and guidance, directly to USEPA.