



State of Ohio Environmental Protection Agency

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Lynn Buhl  
Regional Administrator  
U.S. EPA, Region 5  
77 West Jackson Blvd. R-19J  
Chicago, Illinois 60604-3507

Re: State Implementation plan for eight-hour ozone in the Columbus OH area

Dear Administrator Buhl:

I am writing to submit The Ohio Environmental Protection Agency plan for attaining the eight-hour ozone standard in the Columbus, OH nonattainment area. This area was designated as 'basic' nonattainment under provisions contained in the Clean Air Act, Subpart 1 as interpreted under the implementation rule for eight-hour ozone, which was vacated on December 22, 2006, by the U.S. Court of Appeals for the District of Columbia Circuit court. As encouraged by U.S. EPA, Ohio has moved forward with the development of this plan in order to meet general CAA requirements to submit a plan within three years after the effective date of the designation of an area, which was June 15, 2004 (69 FR 23858).

This submittal includes an attainment demonstration and identifies the rules deemed necessary to attain the air quality standard by June 15, 2009. This demonstration is based on air quality modeling using a 2005 base year inventory and a 2005 ozone design value. In conjunction with the other states in the Midwest Regional Planning Organization, Ohio EPA performed this additional air quality modeling based on a 2005 base year inventory and an updated base year design value.

This package is still undergoing public review. A public hearing on this package is scheduled for January 6, 2009. A follow up submittal will be forwarded once this process is complete. In the meantime, we believe that U.S. EPA can begin the review of certain components of this package, such as the rules addressing Architectural and Industrial Maintenance Coatings and Consumer Products as well as the 2005 inventory.

In the Columbus attainment demonstration modeling, Ohio EPA is taking credit for the statewide implementation of the Architectural and Industrial Maintenance Coatings and the Consumer Product rules as they are effective rules in Ohio. U.S. EPA has urged states to wait for the federal rule for these source categories. On May 30, 2007, U.S.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

EPA issued guidance allowing for a partial emission reduction credit for these rules and its anticipated aerosol coatings rule. Ohio EPA believes this is an acceptable alternative to implementing an accelerated compliance program in Ohio and will modify our rules to match the federal rules in all aspects, or rescind them in their entirety, in order to prevent conflicting rule requirements when U.S. EPA completes its rulemaking. The existing attainment modeling will be adjusted to account for only 75 percent of the emission reductions assumed in our current modeling from these source categories. We will, though, be able to assume a reduction from the aerosol coatings rule. We anticipate that the net impact of the revised modeling will be minimal.

The air quality modeling associated with this package utilizes a 2005 base year emission inventory and design values which indicate that with the proposed additional controls in place, the area will reach attainment by June 15, 2009. In fact, the 2006-2008 design value for the area indicates attainment has been achieved (84 ppb, not certified). Ohio EPA anticipates submitting a request for redesignation of this area in the near future.

In an effort to accommodate future variations in travel demand models (TDM), vehicle miles traveled forecast when no change to the network is planned, and in light of the expected attainment air quality for this area, Ohio EPA is requesting that a three percent cushion be added to the motor vehicle budget for the nonattainment area. A three percent cushion to the on-road mobile source budget also will assist the local metropolitan planning organization with demonstrating conformity for future transportation planning purposes.

I have been encouraged by the cooperation and willingness of our staffs to work together to address this significant milestone. If you have any questions concerning this submittal, please feel free to contact Bob Hodanbosi, Chief of the Division of Air Pollution Control (614-644-2270).

Sincerely

A handwritten signature in black ink, appearing to read "Chris Korleski". The signature is fluid and cursive, with a large initial "C" and "K".

Chris Korleski, Director