



**Environmental  
Protection Agency**

John R. Kasich, **Governor**  
Mary Taylor, **Lt. Governor**  
Scott J. Nally, **Director**

JUN 25 2012

Ms. Susan Hedman  
Regional Administrator  
U.S. EPA Region 5  
77 W. Jackson Blvd.  
Chicago, IL 60604

**Re: Attainment Demonstration State Implementation Plan Revision for the  
Lead NAAQS for the Partial Cuyahoga County Nonattainment Area in  
the State of Ohio**

Dear Administrator Hedman:

I am writing to submit the Ohio Environmental Protection Agency (Ohio EPA) plan for attaining and maintaining the lead NAAQS in the partial Cuyahoga County nonattainment area. On November 22, 2010 (75 FR 71033), effective December 31, 2010, U.S. EPA promulgated the initial lead nonattainment areas for the revised lead standard across the country. The CAA Amendments requires states with lead nonattainment areas to submit a plan within eighteen months of the effective date of the designations (June 30, 2012) detailing how the lead standard will be attained by December 31, 2015.

This document is the Lead State Implementation Plan (SIP) for the partial Cuyahoga County nonattainment area in the State of Ohio. This partial nonattainment area encompasses emissions from the Ferro Corporation Cleveland Frit Plant. Ferro (Ohio EPA facility identification # 1318170235) is located at 4150 East 56th Street, Cleveland, Ohio, 44101.

This submittal includes a demonstration of attainment of the air quality standard by December 15, 2015. Ohio EPA has performed a Reasonably Available Control Measure (RACM) analysis for Ferro and has determined that existing controls and practices constitutes RACM. In addition, Ferro is voluntarily implementing additional controls and monitoring to ensure the 2010 and early 2011 exceedances are addressed. These include secondary HEPA filtration and bag leak detection devices on all control devices emitting lead.

Ohio EPA notified the public of the draft and the opportunity to provide comments on May 11, 2012. This notice was also published in a newspaper of general circulation in Cleveland, Ohio. The public hearing for this package was held on June 13, 2012 in Parma, Ohio. No testimony was provided at the hearing and written comments were received only from U.S. EPA.

If you have questions, please contact Jennifer Dines in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Scott J. Nally  
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosure