



**Environmental
Protection Agency**

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

April 7, 2011

Cheryl Newton
Director, Air and Radiation Division
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604-3950

Re: Clarification on Ohio's December 5, 2007 Infrastructure State Implementation Plan (SIP) to address the 1997 fine particulate matter (PM2.5) national ambient air quality standard (NAAQS).

Dear Ms. Newton:

This letter is in response to a request by your staff for clarification regarding U.S. EPA concerns with Ohio's Infrastructure SIP for the 1997 PM2.5 NAAQS. Your staff has requested clarification regarding Ohio's authority to implement the federal New Source Review (NSR) provisions for prevention of significant deterioration (PSD) and nonattainment NSR permitting. Specifically, there is concern regarding the end (May 16, 2011) of the grace period for using PM10 as a surrogate for PM2.5.

As you are aware, Ohio has a fully approved NSR program. Quite often there is action at the federal level that requires Ohio to update our NSR regulations and submit those as a revision to Ohio's SIP. Frequently, and naturally, there is a lag of time between the federal action, Ohio's rulemaking process (which takes a minimum of six months), Ohio's SIP revision submittal, and action by U.S. EPA on that submittal. Ohio's Infrastructure SIP is not the direct mechanism used to revise Ohio's NSR program as revisions are needed. Rather, the Infrastructure SIP provides assurance that Ohio continues to have a permit program for regulation of the modification or construction of sources. It further provides assurance that Ohio has the authority revise the plan as needed revisions of the NAAQS or improved methods for attaining those standards. Ohio continues to provide those assurances.

However, like many other states, Ohio is in need of sufficient guidance from U.S. EPA before an appropriate and meaningful revision of Ohio's NSR SIP program to address the surrogate policy can be initiated. Ohio is adamant that it would not be appropriate to expect states to commit already strained resources to a SIP revision process that would likely result in an unapprovable submittal without the needed U.S. EPA guidance on this matter. Ohio will continue to work with U.S. EPA to remedy this problem and commits to

making necessary revisions of our NSR SIP program provided sufficient guidance from U.S. EPA is forthcoming. Ohio anticipates a revised NSR SIP program submission could be submitted to U.S. EPA within one year of receiving sufficient guidance.

In closing, Ohio wishes to reiterate the need for meaningful guidance that addresses the issues to ensure states can develop approvable SIPs without wasting resources. Ohio believes the following issues, at a minimum, must be addressed in this guidance:

- Can offset ratios be seasonal or only annual?
- Can offset ratios vary among portions of the state, or must one ratio apply to the entire state?
- If data supports it, can precursor pollutants addressed in Ohio's program vary among portions of the state?
- How consistent must the ratios and precursor pollutants selected by Ohio be in comparison to other states?
- Can Ohio's demonstration rely on speciated monitoring data or must it rely solely on dispersion modeling?
- If speciated monitoring data is used to support a demonstration, how would U.S. EPA expect Ohio to treat the precursor pollutants that account for a more significant portion of the mass than SO₂ and NO_x?
- Can states utilize their own modeling protocol for PM_{2.5} since secondary formation is essential for such a demonstration?

Sincerely,



Robert Hodanbosi
Chief, Division of Air Pollution Control
Ohio EPA