



Division of Air Pollution Control

Ohio's 1997 Eight-Hour Ozone Redesignation Request for the Columbus Area

Agency Contact for this Package

Sarah VanderWielen, Division of Air Pollution Control, (614) 644-3632,
sarah.vanderwielen@epa.state.oh.us

Ohio EPA held a public hearing in Columbus, OH on March 2, 2009, regarding the Redesignation Request and Maintenance Plan for the Columbus Ozone Nonattainment Area. This document summarizes the comments and questions received at the public hearing and during the associated comment period, which ended on March 3, 2009.

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: **The emissions in Table 8 for the years 2012 and 2020 do not equal the sum of the emissions in tables 2 through 7 for those years. This then impacts Table 9 when applying the 15% increase to the table 8 values. (Nick Gill, MORPC)**

Response 1: This was a calculation error. Tables 8 and 9 have been changed to reflect the corrected values.

Comment 2: **We actually are no longer using the one-hour budgets for conformity purposes. During the 2007 redesignation submittal (before it was realized that we would have high 2007 values taking us back above the standard), US EPA did make a finding that the 8-hour budget in that submittal was adequate for transportation conformity purposes. This was in the May 1, 2007 Federal Register. As there has been no other official action these are still in effect and is what we have been using. I believe this paragraph on the top of page 17 needs revised. (Nick Gill, MORPC)**

Response 2: In the initial draft, Ohio EPA stated:

“The current one-hour budgets will no longer be applicable either after the effective date of the approved redesignation or after the effective date of any U.S. EPA action approving a finding that the eight-hour conformity budget included in this submittal is adequate for transportation conformity purposes, whichever date comes first.”

Ohio EPA has deleted this paragraph, consistent with the comment and 72 FR 23815. In the referenced Federal Register notice, Ohio EPA had submitted motor vehicle emissions budgets (MVEBs) for the Columbus area as part of a redesignation request submitted on December 28, 2006. This redesignation request was not processed; however, the MVEBs were noticed and approved for future transportation conformity determination use.

In consultation with U.S. EPA, Ohio has requested as part of this redesignation request that the MVEBs established under the prior Federal Register notice be replaced by the MVEBs established in this redesignation request. The following language has been incorporated into the final redesignation request:

“The current eight-hour budgets were adopted (72 FR 23815) based on a previous redesignation request submitted for the Columbus area. Those budgets were found adequate and adopted as a separate action as the redesignation request was not approved. Those eight-hour budgets will no longer be applicable either after the effective date of the approved redesignation or after the effective date of any U.S. EPA action approving a finding that the eight-hour conformity budget included in this submittal is adequate for transportation conformity purposes, whichever date comes first.”

Comment 3:

I have a question whether for Tables 10 through 23 the on road values for years 2012 and 2020 should be the actual projections or those values increased by 15% because that is the extra that was allocated to the mobile source budget. With the way they are currently portrayed (the actual projected amount), there is no discussion that some of this calculated "safety margin" has been used up in establishing the mobile source budgets. I suggest putting an increased amount for on road mobile in tables 10 through 23 or explicitly stating in table 24 and the following discussion that some of this has

been allocated to the mobile source budget with a very substantial "safety margin" still being maintained. (Nick Gill, MORPC)

Response 3:

The emission projections in tables 10 through 23 should include only the emissions as they were projected by the modeling completed by LADCO and MORPC. This modeling projects the emissions that will result in the future emissions for VOC and NOx intended to demonstrate maintenance of the ozone standard in the future. Based on this modeling, total future projected emissions for VOC and NOx are compared to the 2006 attainment year. As long as there is a reduction in emissions, this is considered the overall safety margin for maintaining the ozone standard. Ohio currently shows a safety margin for all sectors for the entire State of 66.74 tpd for VOC and 115.51 tpd of NOx. U.S. EPA's conformity regulations allow for allocation, through a revision to its SIP, of all or some portion of this safety margin to the MVEBs for future conformity. Ohio chose to allocate 4.77 tpd of VOC and 6.08 tpd of NOx from the overall safety margin as a MVEB 15% safety margin. In order to address the commenter's concern, additional language has been added as follows:

“As identified in Table 9 above, an additional 15 percent margin of safety is being requested for mobile emissions. The additional 15 percent translates into an additional 4.77 tons/day for VOC and 6.08 tons/day for NOx for 2020. U.S. EPA's conformity regulations allow for allocation, through a revision to the SIP, of all or some portion of the overall area's safety margin (emission reductions from 2006 to 2020) to the mobile emissions budgets for future conformity. Ohio chose to allocate 4.77 tpd of the 66.74 tpd safety margin for VOC and 6.08 tpd of the 115.51 tpd safety margin for NOx as a mobile emissions budget 15% safety margin.”