

Bharat Mathur  
Acting Regional Administrator  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: PM 2.5 letter to Governor Taft

Dear Mr. Mathur:

I am responding on behalf of Governor Taft to your June 29, 2004 letter identifying U.S. EPA's proposed PM 2.5 nonattainment boundaries. I appreciate the opportunity to clarify our recommendations and to provide additional information in support of the final State of Ohio recommendations.

In general, I believe that the boundaries U.S. EPA is proposing are too broad. U.S. EPA is incorporating areas into the nonattainment regions that are not experiencing nonattainment air quality and do not include sources which will need to be controlled by the state to resolve the nonattainment air quality problem. The addition of these areas will unnecessarily subject several counties to new source review requirements which could further impact growth in areas which are already economically depressed. I wish to provide an alternative set of boundaries which will both define the problem more appropriately and allow the State of Ohio to implement a solution.

The nonattainment levels of PM 2.5 in Ohio consists of two major components. First, there is a regional component associated primarily, but not entirely, with sulfur dioxide and oxides of nitrogen from coal fired electric generating utilities. The second component is an urban/industrial component which is not as well defined at this time, but is impacting air quality in our urban cores.

The first component (sulfates, nitrates) has been significantly reduced by Title IV of the 1990 Clean Air Act Amendments. Monitors throughout the state and the region have shown measurable reductions as utilities implemented sulfur dioxide control programs to comply with phase two acid rain requirements. The Clean Air Interstate Rule (CAIR) should also result in significant additional air quality improvements throughout the region. U.S. EPA has previously indicated that several of our nonattainment areas will be solved by the implementation of CAIR. It is inconsistent for U.S. EPA to now attempt to ascribe culpability to emission sources surrounding an urban area which is forecasted by U.S. EPA to attain the standards without the need for additional local controls.

Ohio EPA's remaining concern is the identification and control of those sources associated with the urban/industrial excess in areas where the CAIR requirements will not be sufficient to attain the standards. U.S. EPA has made major assumptions about the source of the urban excess concentrations which have been found at the violating monitors. An extensive analysis was prepared by U.S. EPA which purports to identify the location of the sources of the urban excess. In this weighted emissions analysis, all emissions within and adjacent to the metropolitan area have been assumed to have equal potential to contribute to the urban excess. We believe this fundamental assumption underlying the weighted emissions analysis is flawed.

As was clearly demonstrated in Scioto County, local industrial sources can have a significant impact on monitored PM 2.5 concentrations. A monitor currently having a three year average above the standard has read values below the standard since the closing of New Boston Coke on April 2, 2002. Likewise, the distribution of monitored concentrations in cities such as Cleveland, Cincinnati, Detroit, Indianapolis, St. Louis and Chicago, as presented in PM 2.5 in Urban Areas in the Upper Midwest (Lake Michigan Air Directors, February 2004, enclosed) clearly shows the limited areal extent of the PM 2.5 urban excess. A significant component of these emissions is likely to be primary and secondary organic carbon from local industrial sources and nearby onroad and offroad diesel emissions. Suburban controls will not affect these contributors to elevated concentrations. While a certain component of the urban excess may be attributable to onroad light duty vehicles, it is not conceivable that an urban and suburban wide automobile control program would be developed to address the urban PM 2.5 violations.

The inclusion of adjacent "power plant" counties represents an inconsistent implementation of U.S. EPA's findings that all power plants in the NOx SIP Call/CAIR region contribute to nonattainment. For U.S. EPA to be consistent, all areas containing coal fired power plants should be designated nonattainment. Based on the technical support for both the NOx SIP call and the Clean Air Interstate Rule, U.S. EPA has indicated that all power plants within the region contribute significantly to nonattainment, but yet only counties with power plants that are in or adjacent to an area with a measured violation are included into the nonattainment area.

The inconsistent application of a nonattainment designations will put a number of counties in Ohio at a disadvantage to similar power plant counties in other states. This is especially unfortunate given the faulty logic U.S. EPA has used to justify this eleventh hour inclusion. For example, the inclusion of Adams County will not affect the ability of the Scioto County monitor to reach attainment. Air quality data indicate that the Scioto County monitor is already attaining the standard without the implementation of the CAIR requirements or the area being designated nonattainment.

Including all power plant counties, though, is not what we would propose. Ohio EPA does not believe that designating power plant counties nonattainment will improve air quality or in any way assist states in developing plans to bring attainment to these areas. Adams, Ashtabula, Belmont, Coshocton and Gallia Counties should not be designated nonattainment.

Washington County has been identified by U.S. EPA as an additional county that would be included as part of the Parkersburg-Marietta nonattainment area. Washington County is part of the Parkersburg-Marietta MSA. In addition to the CAIR requirements, though, Ohio EPA believes that the recently approved SIP revision to the AMP Ohio Gorsuch facility greatly reduces the potential emissions of PM 2.5 precursors. The monitor in this area is also trending downward and should attain the standard by January 2005. Washington County should be excluded from the list of nonattainment areas.

In addition, Ohio EPA believes that Geauga County should not be included in the nonattainment designation for the Cleveland nonattainment area. U.S. EPA has proposed to include Geauga County even though it only has a weighted emissions score of 3.6. U.S. EPA has cited commuting patterns and population growth as the justifications for inclusion even though Geauga County has the second lowest total commuting numbers in the MSA. It does have a high percentage of commuters, but that represents a high percentage of a small number. The only County in the MSA with lower commuting numbers than Geauga County is Ashtabula County.

It should also be noted that population growth in Geauga County has occurred primarily in the population sector greater than 50 years old. There was a significant decrease in population aged between 20-40 years old. People are moving to Geauga County to retire, not to commute to downtown Cleveland.

The State of Ohio also believes that Scioto, Lawrence, Lucas, Mahoning and Trumbull Counties and Wood County, West Virginia are now monitoring attainment of the standard and are not significantly contributing to air quality problems. Air quality data for these counties over the most recent ten quarters of ambient data are attaining the PM 2.5 standards. It is clear that these areas will have collected three years of attainment air quality data by the time the U.S. EPA designations become effective in 2005.

Columbiana, Wood and Washington Counties are also part of Metropolitan areas which the State of Ohio believes are now attaining the PM 2.5 ambient standards. As noted above, design values in Lucas, Mahoning and Trumbull Counties for the most recent ten quarters are below the PM 2.5 standards. Inclusion of these counties as nonattainment would serve no purpose. Air quality trends have clearly shown improvement and no local controls will be necessary. These areas should not be classified nonattainment and efforts

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should not be expended developing State Implementation Plans for these areas. Nonattainment new source review should not apply. Likewise, resources should not be expended to designate an area nonattainment only to immediately initiate an effort to redesignate the area back to attainment.

Please call if you have any questions.

Sincerely,

Christopher Jones  
Director

enclosures