Ohio Environmental Protection Agency

REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE DAYTON-SPRINGFIELD ANNUAL $PM_{2.5}$ NONATTAINMENT AREA

Clark, Greene, and Montgomery Counties, Ohio

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REDESIGNATION REQUEST AND MAINTENANCE PLAN FOR THE DAYTON-SPRINGFIELD ANNUAL $PM_{2.5}$ NONATTAINMENT AREA

Clark, Greene, and Montgomery Counties, Ohio

CHAPTER ONE

Introduction

The Clean Air Act (CAA), as amended, requires each State with areas failing to meet the National Ambient Air Quality Standards (NAAQS) for the annual $PM_{2.5}$[1] to develop State Implementation Plans (SIPs) to expeditiously attain and maintain the standard. The United States Environmental Protection Agency (U.S. EPA) revised the NAAQS for particulate matter in July 1997. It replaced the existing PM_{10} standard with a health-based $PM_{2.5}$ standard and retained the PM_{10} standard as a particulate standard protecting welfare. The standards include an annual standard set at 15.0 micrograms per cubic meter ($\mu g/m^3$), based on the 3-year average of annual mean $PM_{2.5}$ concentrations, and a 24-hour standard of 65 $\mu g/m^3$, based on the 3-year average of the 98^{th} percentile of 24-hour concentrations.

The revised NAAQS was legally challenged in the U.S. Court of Appeals for the District of Columbia Circuit (the D.C. Circuit). On May 14, 1999, the D.C. Circuit remanded, without vacatur, the standards back to U.S. EPA. The remand did not question the level at which U.S. EPA set the standards but rather the constitutionality of the CAA provision that authorizes U.S. EPA to set national air quality standards. U.S. EPA requested a rehearing which the D.C. Circuit denied. Therefore, in December 1999, U.S. EPA appealed the D.C. Circuit decision to the U.S. Supreme Court. The U.S. Supreme Court issued a decision on February 27, 2001 that unanimously affirmed the constitutionality of the CAA provision but did remand several other issues back to the D.C. Circuit, including the issue of whether U.S. EPA acted arbitrarily and capriciously in establishing the specific levels of the standards.

The D.C. Circuit heard arguments in this remanded case in December 2001, and issued its decision on March 26, 2002. The D.C. Circuit rejected the claims that

1 Particle pollution is a mixture of microscopic solids and liquid droplets suspended in air. This pollution, also known as particulate matter, is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, soil or dust particles, and allergens (such as fragments of pollen or mold spores).
Fine particle pollution or $PM_{2.5}$ describes particulate matter that is 2.5 micrometers in diameter and smaller - $1/30^{th}$ the diameter of a human hair. Fine particle pollution can be emitted directly or formed secondarily in the atmosphere.

the U.S. EPA had acted arbitrarily and capriciously in setting the levels of the standards.

On December 17, 2004, U.S. EPA promulgated the initial $PM_{2.5}$ nonattainment areas designations for the $PM_{2.5}$ standards across the country. Modifications to those designations were made and an effective date was set at April 5, 2005. Unlike Subpart 2 of the CAA Amendments of 1990 which defined five ozone nonattainment classifications for the areas that exceed the NAAQS based on the severity of the ozone levels, $PM_{2.5}$ nonattainment designations are simply labeled "nonattainment." The CAA Amendments require states with $PM_{2.5}$ nonattainment areas to submit a plan within three years of the effective date of the designations (April 5, 2008) detailing how the $PM_{2.5}$ standards will be attained by April 5, 2010. Ohio EPA submitted its attainment demonstration for the entire State of Ohio on July 16, 2008.

Section 107(d)(3)(E) of the CAA allows states to request nonattainment areas to be redesignated to attainment provided certain criteria are met. The following are the criteria that must be met in order for an area to be redesignated from nonattainment to attainment:

i) A determination that the area has attained the $PM_{2.5}$ standard.
ii) An approved State Implementation Plan (SIP) for the area under Section 110(k).
iii) A determination that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the SIP and other federal requirements.
iv) A fully approved maintenance plan under Section 175(A).
v) A determination that all Section 110 and Part D requirements have been met.

This document addresses each of these requirements, and provides additional information to support continued compliance with the annual $PM_{2.5}$ standard.

<u>Geographical Description and Background</u>
The current Dayton-Springfield nonattainment area is located in southwest Ohio and includes the following counties: Clark, Greene, and Montgomery. This area is shown in Figure 1 under Chapter Three.

The Dayton-Springfield area has not previously been subject to nonattainment area rulemakings for fine particles.

As a result of the 2005 $PM_{2.5}$ designations, U.S. EPA designated the Dayton-Springfield area nonattainment for the 15.0 $\mu g/m^3$ annual standard[2], and Ohio EPA was required to develop a plan to reduce oxides of nitrogen (NO_x), sulfur

2 There were no monitors in Ohio that violated the 1997 24-hour $PM_{2.5}$ standard of 65$\mu g/m^3$.

dioxide (SO_2) and direct $PM_{2.5}$ emissions and to demonstrate that the area will meet the federal annual air quality standard by April 5, 2010. Ohio's main $PM_{2.5}$ components are primary particles (organic carbon, crustal material, and elemental carbon), SO_2 and NO_x, which were included in the attainment demonstration analysis. Volatile organic compounds (VOCs) and ammonia (NH_3) were not included in the analysis since they were not part of Ohio's current attainment strategy for $PM_{2.5}$ (although controls for VOCs have been implemented for ozone nonattainment). This is consistent with U.S. EPA's "Clean Air Particle Implementation Rule" [74FR 20856] (hereafter referred to as "Implementation Rule"). In the Implementation Rule U.S. EPA presumes NH3 emissions are not a $PM_{2.5}$ attainment plan precursor and that States are not required to address VOC unless the State or U.S. EPA makes technical demonstration that emissions of VOCs significantly contribute to nonattainment of the annual $PM_{2.5}$ standard.

This document is intended to support Ohio's request that the Dayton-Springfield area be redesignated from nonattainment to attainment for the annual $PM_{2.5}$ standard.

Status of Air Quality

$PM_{2.5}$ complete quality-assured ambient air quality monitoring data for the most recent three (3) years, 2008 through 2010, demonstrate that the air quality has met the NAAQS for annual $PM_{2.5}$ in this nonattainment area. The NAAQS attainment, accompanied by decreases in emission levels discussed in Chapter Four, supports a redesignation to attainment for the Dayton-Springfield area based on the requirements in Section 107(d)(3)(E) of the CAA as amended.

CHAPTER TWO

Requirements for Redesignation

U.S. EPA has published detailed guidance in a document entitled *Procedures for Processing Requests to Redesignate Areas to Attainment* (redesignation guidance), issued September 4, 1992, to Regional Air Directors. The redesignation request and maintenance plan are based on the redesignation guidance, supplemented with additional guidance received from staff of U.S. EPA Region 5.

Below is a summary of each redesignation criterion as it applies to the Dayton-Springfield area.

i.) Attainment of the standard (CAA Section 107(d)(3)(E)(i))

There are two components involved in making this demonstration. The first component relies on ambient air quality data. The data that are used to demonstrate attainment should be the product of ambient monitoring that is representative of the area of highest concentration. The data should be collected and quality-assured in accordance with 40 CFR 58 and recorded in the Air Quality System (AQS) in order for it to be available to the public for review.

The second component relies upon supplemental U.S. EPA-approved air quality modeling. While no modeling is required for redesignating nonattainment areas, the redesignation guidance states it is "generally necessary" for particulate matter redesignations. Appendix C and Appendix D contains the most recent modeling results showing future attainment and maintenance are provided. Chapter Three discusses this requirement in more detail and provides the attainment demonstration.

ii.) Permanent and enforceable improvement in air quality (CAA Section 107(d)(3)(E)(iii))

The state must be able to reasonably attribute the improvement in air quality to emission reductions which are permanent and enforceable. The state should estimate the percent reduction achieved from federal measures as well as control measures that have been adopted and implemented by the state.

It was not necessary for Ohio to adopt or implement control measures for these counties beyond the federal measures.

Ohio EPA has adopted several rules recently that will have an impact statewide on $PM_{2.5}$ emissions in the future:

- Clean Air Interstate Rule (CAIR)
- NO_x SIP Call Rules

In addition, since the initial designations were made federally enforceable consent decrees have resulted in reductions in emissions from utilities across the state.

Chapters Four and Five discuss this requirement in more detail.

iii.) Section 110 and Part D requirements (CAA Section 107(d)(3)(E)(v))

For purposes of redesignation, a state must meet all requirements of Section 110 and Part D that were applicable prior to submittal of the complete redesignation request.

Subpart 1 of Part D consists of general requirements applicable to all areas which are designated nonattainment based on a violation of the NAAQS. Subpart 4 of Part D consists of more specific requirements applicable to particulate matter (specifically to address PM_{10}). However, for the purpose of implementing the 1997 $PM_{2.5}$ standard, U.S. EPA's Implementation Rule stated Subpart 1, rather than Subpart 4, is appropriate for the purpose of implementing $PM_{2.5}$.[72 FR 20589]

i.) Section 110(a) requirements

Section 110(a) of Title I of the CAA contains the general requirements for a SIP. Section 110(a)(2) provides that the implementation plan submitted by a state must have been adopted by the state after reasonable public notice and hearing, and that, among other things, it must include enforceable emission limitations and other control measures, means or techniques necessary to meet the requirements of the CAA; provide for establishment and operation of appropriate devices, methods, systems and procedures necessary to monitor ambient air quality; provide for implementation of a source permit program to regulate the modification and construction of any stationary source within the areas covered by the plan; include provisions for the implementation of Part C, prevention of significant deterioration (PSD) and Part D, NSR permit programs; include criteria for stationary source emission control measures, monitoring, and reporting; include provisions for air quality modeling; and provides for public and local agency participation in planning and emission control rule development. In Ohio's December 5, 2007 and September 4, 2009 infrastructure SIP submissions, Ohio

verified that the State fulfills the requirements of Section 110(a)(2) of the Act.

Section 110(a)(2)(D) also requires State plans to prohibit emissions from within the State which contribute significantly to nonattainment or maintenance areas in any other State, or which interfere with programs under Part C to prevent significant deterioration of air quality or to achieve reasonable progress toward the national visibility goal for Federal class I areas (national parks and wilderness areas). In order to assist States in addressing their obligations regarding regionally transported pollution, U.S. EPA finalized CAIR to reduce SO_2 and NO_x emissions from large electric generating units (EGU). Ohio has met the requirements of the federal CAIR to reduce NO_x and SO_2 emissions contributing to downwind states. On February 1, 2008, U.S. EPA approved Ohio's CAIR program, which can be found in Ohio Administrative Code (OAC) Chapter 3745-109[3]. On July 6, 2010, U.S. EPA proposed a replacement to the CAIR program, the Transport Rule. [75 FR 45210] Upon finalization, it will further assist States in addressing their obligations regarding regionally transported pollution by providing reductions in NO_x and SO_2 emissions in 2012 and 2014.

ii.) Section 172(c) requirements

This Section contains general requirements for nonattainment plans. The requirements for reasonable further progress, identification of certain emissions increases, and other measures needed for attainment will not apply for redesignations because they only have meaning for areas not attaining the standard. The requirements for an emission inventory will be satisfied by the inventory requirements of the maintenance plan. Chapters Four and Five discuss this requirement in more detail.

iii.) Conformity

The state must work with U.S. EPA to show that its SIP provisions are consistent with the Section 176(c)(4) conformity requirements. The redesignation request should include conformity procedures, if the state already has these procedures in place. If a state does not have conformity procedures in place at the time that it submits a

3 http://www.epa.ohio.gov/dapc/regs/regs.aspx#3745-109

redesignation request, the state must commit to follow U.S. EPA's conformity regulation upon issuance, as applicable.

iv.) Maintenance plans (CAA Section 107(d)(3)(E)(iv))

Section 107(d)(3)(E) stipulates that for an area to be redesignated, U.S. EPA must fully approve a maintenance plan that meets the requirements of Section 175(A). The maintenance plan will constitute a SIP revision and must provide for maintenance of the relevant NAAQS in the area for at least 10 years after redesignation. Section 175(A) further states that the plan shall contain such additional measures, if any, as may be necessary to ensure such maintenance.

In addition, the maintenance plan shall contain such contingency measures as the Administrator deems necessary to ensure prompt correction of any violation of the NAAQS. At a minimum, the contingency measures must include a requirement that the state will implement all measures contained in the nonattainment SIP prior to redesignation.

States seeking redesignation of a nonattainment area should consider the following provisions:

a) attainment inventory;
b) maintenance demonstration;
c) monitoring network;
d) verification of continued attainment; and
e) contingency plan.

Chapter Six discusses this requirement in more detail.

CHAPTER THREE

$PM_{2.5}$ MONITORING
CAA Section 107(d)(3)(E)(i)

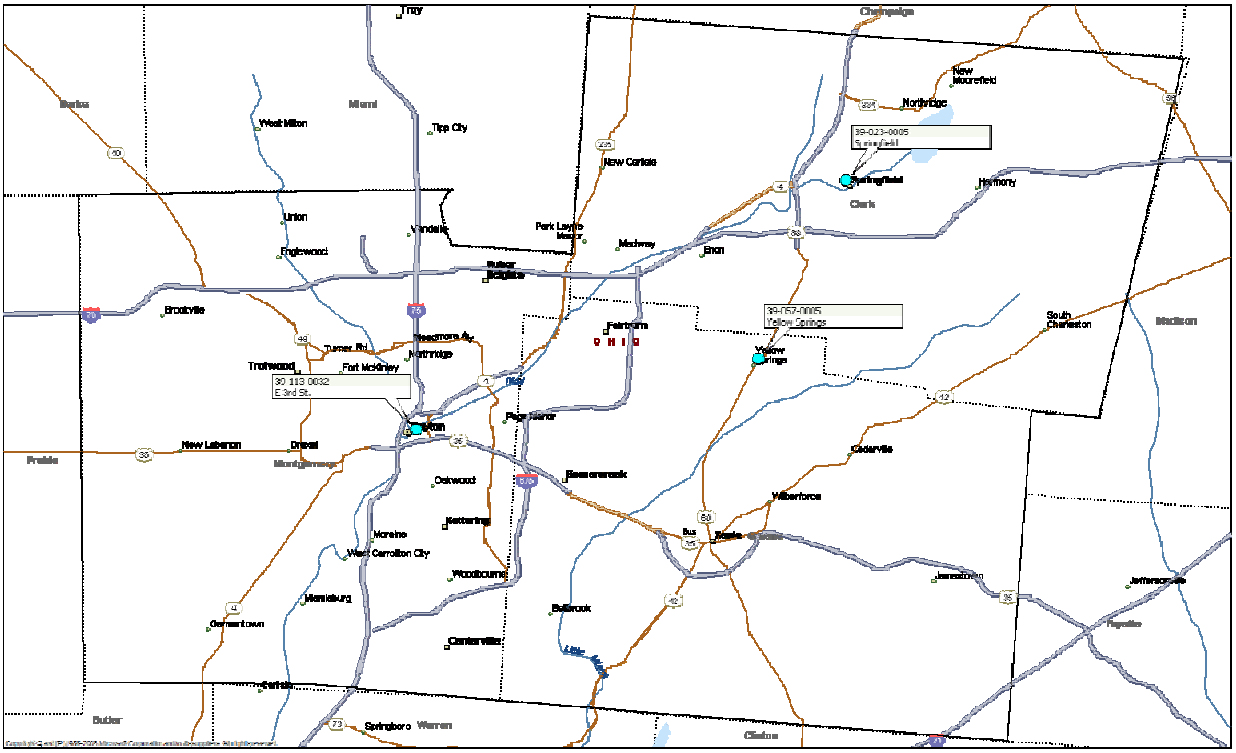
Requirement 1 of 4
A demonstration that the NAAQS for annual $PM_{2.5}$, as published in 40 CFR 50.7, has been attained.

Background
There are three monitors measuring $PM_{2.5}$ concentrations in this nonattainment area, with are operated by the Regional Air Pollution Control Agency (RAPCA)[4], which is part of the Montgomery County Health Department. A listing of the design values based on the three-year average of the annual mean concentrations from 2008 through 2010 is shown in Table 1. The locations of the monitoring sites for this nonattainment area are shown on Figure 1.

4 RAPCA is a Local Air Agency that contracts with Ohio EPA and receives grants from U.S. EPA to enforce state and local air pollution control regulations in the six-county region (Preble, Darke, Miami, Montgomery, Clarke, and Greene).

Demonstration

Figure 1 - Map of the Dayton-Springfield nonattainment area and monitor locations



Requirement 2 of 4

Ambient monitoring data quality assured in accordance with 40 CFR 58.10, recorded in the U.S. EPA air quality system (AQS) database, and available for public view.

Demonstration

Ohio EPA has quality assured all data shown in Appendix A in accordance with 40 CFR 58.10 and all other federal requirements. Ohio EPA has recorded the data in the AQS database and, therefore, the data are available to the public.

Requirement 3 of 4

A showing that the three-year average of the annual mean values, based on data from all monitoring sites in the area or its affected downwind environs, are below 15.0 µg/m^3. (This showing must rely on three complete, consecutive calendar years of quality assured data.)

Background

The following information is taken from U.S. EPA's "Guideline on Data Handling Conventions for the PM NAAQS," U.S. EPA-454/R-99-008, April 1999.

In accordance with the CAA Amendments, three complete years of monitoring data are required to demonstrate attainment at a monitoring site. The annual $PM_{2.5}$ primary and secondary ambient air quality standards are met at an ambient air quality monitoring site when the three-year average of the annual average is less than 15.0 $\mu g/m^3$. While calculating design values, three significant digits must be carried in the computations, with final values rounded to the nearest 0.1 $\mu g/m^3$. Decimals 0.05 or greater are rounded up, and those less than 0.05 are rounded down, so that 15.049 $\mu g/m^3$ is the largest concentration that is less than, or equal to 15.0 $\mu g/m^3$. Values at or below 15.0 $\mu g/m^3$ meet the standard; values equal to or greater than 15.1 $\mu g/m^3$ exceed the standard. An area is in compliance with the annual $PM_{2.5}$ NAAQS only if every monitoring site in the area meets the NAAQS. An individual site's 3-year average of the annual average concentrations is also called the site's design value. The air quality design value for the area is the highest design value among all sites in the area.

Table 1 shows the monitoring data for 2008 - 2010 that were retrieved from the U.S. EPA AQS. The air quality design value for the area is the highest design value among all sites in the area.

Demonstration

Table 1 - Monitoring Data for the Dayton-Springfield area for 2008 – 2010

Site	County	Annual Standard			
		Year			Average
		2008	2009	2010	2008-2010
39-023-0005	Clark	12.7	12.4	13.1	12.7
39-057-0005	Greene	11.6	11.5	13.2	12.1
39-113-0032	Montgomery	13.2	12.4	14.0	13.2

Less than 75% capture in at least one quarter

Source: U.S. EPA Air Quality System (AQS); http://www.epa.gov/ttn/airs/airsaqs/index.htm

The design values calculated for the Dayton-Springfield area shows that the annual $PM_{2.5}$ NAAQS has been attained. However, the monitor site in Greene County (site 39-057-0005) did not meet the 75% data capture requirement in 2010 although it should be noted it has the lowest three-year average of all sites in this area for $PM_{2.5}$, in this area. Specifically, the third quarter of 2010 achieved only 45% capture due to roofing repairs necessitated by the property owner between August 12, 2010 and September 29, 2010.

Under 40 CFR Part 50, Appendix N, the use of less than complete data may be approved by U.S. EPA considering such factors as monitoring site closures/moves, monitoring diligence, and nearby concentrations in determining whether to use such data. As noted above, construction at the property necessitated temporary suspension of monitoring activities. This site has historically been a low monitoring site. Since 2005, this site has always met the 75% data capture requirement with the exception of this third quarter of 2010. The design values for the previous three-year periods have also shown attainment of the standard: 13.6 µg /m^3 for the 2005 to 2007 period, 12.3 µg /m^3 for the 2006 to 2008 period, and 12.1 µg /m^3 for the 2007 to 2009 period. However, in order to further demonstrate that this monitor has attained the standard, Ohio EPA prepared a statistical analysis using multiple imputations. Ohio EPA has imputed missing values for this site and then done an ordinary analysis as if the imputed values were real measurements. Multiple imputations use random draws from the conditional distribution of the target variable given the other variables. When a regression model is used for imputation, the process involves adding a random residual to the “best guess” for missing values, to yield the same conditional variance as the original variable. Appendix E describes and includes the full statistical analyses performed to show that the three-year average (2008 to 2010) of the annual mean values, based on missing data imputations, is below 15.0 µg/m^3.

Table 2 shows site 39-057-0005 before and after the imputation of

missing data. Also the "new" site (with imputed values) shows a passing design value for 2008 to 2010 of 11.8 µg/m^3.

Table 2 – Comparison Between Original and Imputed Values for Monitor 39-057-0005 from 2004 to 2010

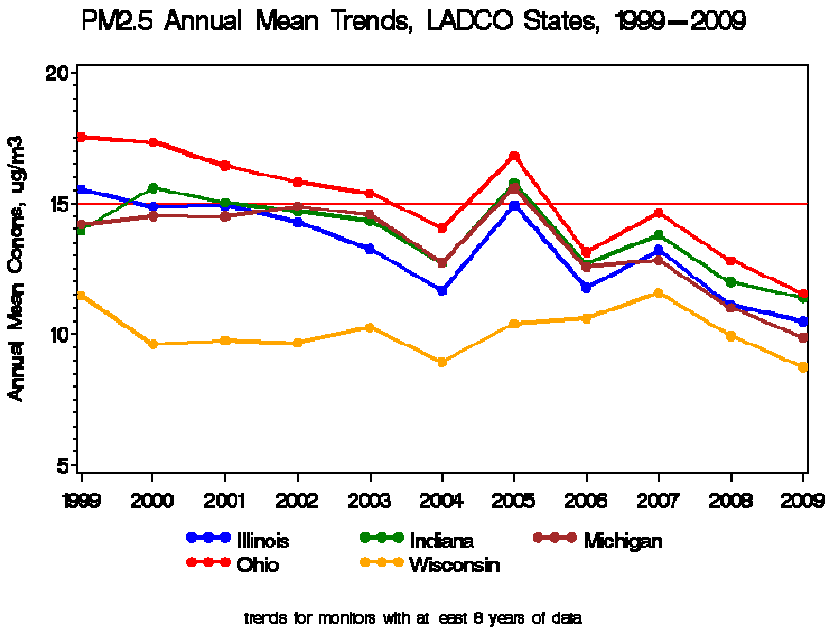
	Site	Year							Annual Design Value				
		2004	2005	2006	2007	2008	2009	2010	2004-2006	2005-2007	2006-2008	2007-2009	2008-2010
OLD	39-057-0005	12.1	15.5	11.9	13.3	11.6	11.5	13.2	13.2	13.6	12.3	12.1	12.1
NEW	39-057-0005	11.7	15.2	11.9	13.5	11.6	11.5	12.2	12.9	13.5	12.3	12.2	11.8

incomplete data (quarter with <75% capture)

With the data imputation analysis and results, Requirement 3 of 4 has been met.

National monitoring for $PM_{2.5}$ began in 1999. With respect to each of the Lake Michigan Air Directors Consortium (LADCO) states, there has been a clear downward trend in design values:

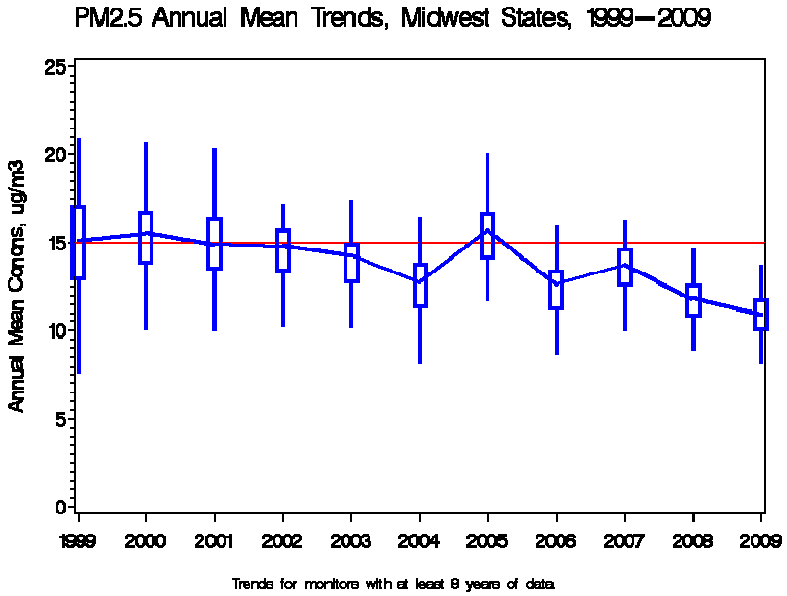
Figure 2 - $PM_{2.5}$ Annual Mean Trends LADCO States



Source: LADCO; Recent Ozone and PM2.5 Trends – Aug 26 2010.pptx

The same trend can be seen within the Midwest States as a whole:

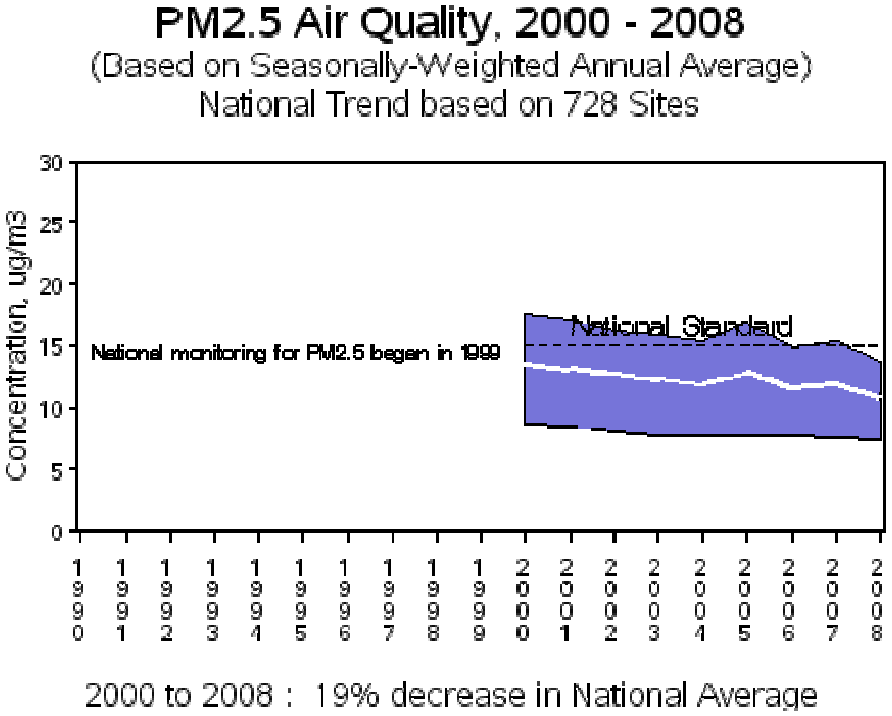
Figure 3 - $PM_{2.5}$ Annual Mean Trends Midwest States



Source: LADCO; Recent Ozone and PM25 Trends - Aug 26 2010.pptx

Design values have also trended downward nationally:

Figure 4 - $PM_{2.5}$ Annual Mean National Trends



Source: http://www.epa.gov/airtrends/pm.html

Requirement 4 of 4

A commitment that once redesignated, the state will continue to operate an appropriate monitoring network to verify the maintenance of the attainment status.

Demonstration

Ohio EPA commits to continue monitoring $PM_{2.5}$ levels at the Ohio sites indicated in Figure 1 and Table 1. Ohio EPA will consult with U.S. EPA Region 5 prior to making changes to the existing monitoring network, should changes become necessary in the future. Ohio EPA will continue to quality assure the monitoring data to meet the requirements of 40 CFR 58 and all other federal requirements. Connection to a central station and updates to the Ohio EPA web site[5] will provide real time availability of the data and knowledge of any exceedances. Ohio EPA will enter all data into AQS on a timely basis in accordance with federal guidelines.

5 www.epa.ohio.gov/dapc

CHAPTER FOUR

EMISSION INVENTORY

CAA Section 107(d)(3)(E)(iii)

U.S. EPA's redesignation guidance requires the submittal of a comprehensive inventory of $PM_{2.5}$ precursor emissions (primary particles (organic carbon, crustal matter, and elemental carbon), SO_2 and NO_x[6]) representative of the year when the area achieves attainment of the annual $PM_{2.5}$ air quality standard. Ohio also must demonstrate that the improvement in air quality between the year that violations occurred and the year that attainment was achieved is based on permanent and enforceable emission reductions. Other emission inventory related requirements include a projection of the emission inventory to a year at least 10 years following redesignation; a demonstration that the projected level of emissions is sufficient to maintain the annual $PM_{2.5}$ standard; and a commitment to provide future updates of the inventory to enable tracking of emission levels during the 10-year maintenance period.

The emissions inventory development and emissions projection discussion below, with the exception of the mobile (on-road) emissions inventory and projections, identifies procedures used by Ohio EPA and the LADCO regarding emissions of all the counties in the Dayton-Springfield area. All of these inventories and emissions projections were prepared using similar methodologies. Mobile emissions inventories and projections for all counties were prepared by the Ohio Department of Transportation (ODOT) and the Miami Valley Regional Planning Commission (MVRPC)[7].

Requirement 1 of 5

A comprehensive emission inventory of $PM_{2.5}$, SO_2 and NO_x completed for the base year.

Background

The point source data are taken from Ohio's annual emissions reporting program. The 2005 periodic inventory has been identified as one of the preferred databases for SIP development and coincides with nonattainment air quality in the Dayton-Springfield area.

6 VOC and NH_3 are not addressed.

7 The Dayton-Springfield Annual PM2.5 nonattainment area is comprised of the counties of Clark, Greene, and Montgomery. Clark County Springfield Transportation Coordinating Committee (CCS-TCC) serves as the Metropolitan Planning Organization (MPO) for Clark County while MVRPC serves as the MPO for the remainder counties: Greene and Montgomery.

Periodic inventories, which include emissions from all sectors - mobile, area, non-road, and point sources - are prepared every three years.

Demonstration

The 2005 inventory is used as the base year for the purpose of this submittal and was submitted to U.S. EPA with Ohio's $PM_{2.5}$ attainment demonstration SIP submitted on July 18, 2008 and revised on June 7, 2010. The detailed emission inventory information for the Dayton-Springfield area is provided in Appendix B. Emissions of $PM_{2.5,}$ SO_2 and NO_x for 2005 are identified under Requirement Three of this Chapter.

Requirement 2 of 5

A projection of the emission inventory to a year at least 10 years following redesignation.

Background

Ohio EPA prepared a comprehensive inventory for the Dayton-Springfield area including area, mobile, and point sources for $PM_{2.5}$, SO_2 and NO_x for base year 2005. The 2005 inventory was submitted to U.S. EPA on July 18, 2008 as part of Ohio's $PM_{2.5}$ attainment demonstration SIP for this area. The information below describes the procedures Ohio EPA used to generate the 2005 base year inventory and to develop SIP-ready modeling inventories and future year projections (Pechan Report[8]) based on a 2005 base year inventory. The report by Pechan generated future year estimates of annual emissions for each source sector using accepted growth surrogates. These inventories were provided to the LADCO and have been processed to develop average daily emissions for use in the air quality analyses. These processed modeling inventories have been identified as the correct iteration of the inventory for use in the redesignation. In this document, references to LADCO include the Midwest Regional Planning Organization. Note, the on-road mobile source sector was addressed by specific $PM_{2.5}$ and NO_x modeling as discussed below.

- Area sources were taken from the Ohio 2005 periodic inventory submitted to U.S. EPA. These projections were made from the U.S. Department of Commerce Bureau of Economic Analysis (BEA) growth factors, with some updated local information.

8 http://www.ladco.org/tech/emis/r5/reports/LADCO%202005%20Base%20Yr%20Growth%20and%20Controls%20Report_Final.pdf

- Mobile source emissions were calculated from MOVES2010 -produced emission factors. Only $PM_{2.5}$ and NO_x necessitate emissions inventory analysis. As documented in Ohio EPA's attainment demonstration SIP, Ohio EPA in consultation with U.S. EPA determined mobile sources are insignificant contributors for SO_2. Consistent with Ohio EPA's attainment demonstration, Ohio EPA continues to consider mobile source SO_2 to be an insignificant contributor to fine particles for this nonattainment area. Based on the demonstration below, SO_2 constitutes less than four percent (<4%) of the area's total SO_2 emissions in 2005 (3.8%), 2008 (1.3%), 2015 (0.6%) and 2022 (0.6%).
- Point source information was compiled from Ohio EPA's 2005 annual emissions inventory database and the 2005 U.S. EPA Air Markets acid rain database[9].
- Biogenic emissions are not included in these summaries.
- Non-road emissions were generated using U.S. EPA's National Mobile Inventory Model (NMIM) 2002 application. To address concerns about the accuracy of some of the categories in U.S. EPA's non-road emissions model, LADCO contracted with two (2) companies to review the base data and make recommendations. One of the contractors also estimated emissions for three (3) non-road categories not included in U.S. EPA's non-road model. Emissions were estimated for aircraft, commercial marine vessels, and railroads. Recreational motorboat population and spatial surrogates (used to assign emissions to each county) were significantly updated. The populations for the construction equipment category were reviewed and updated based upon surveys completed in the Midwest, and the temporal allocation for agricultural sources also was updated.

Demonstration

On-Road Emission Estimations

In coordination with the ODOT, MVRPC utilizes a regional travel demand forecast model to simulate traffic in the area and to forecast traffic flows for given growth expectations. The model has been validated to observed traffic volumes for the model base year 2000 (CCS-TCC) or year 2005 (MVRPC) depending on available data. The model is primarily used as a long range planning tool to evaluate the transportation system including determination of

9 http://www.epa.gov/airmarkets/acidrain

locations where additional travel capacity may be needed and to determine the infrastructure requirements necessary to meet that need. It is also used as a tool for air quality purposes to estimate the total emissions of pollution caused by vehicles in the area. The travel demand forecasting model is used to predict traffic volumes vehicle miles traveled (VMT), vehicle trips, and a U.S. EPA computer program called MOVES is used to calculate emissions per mile. The product of these is the total amount of pollution emitted by the on-road vehicles for the area.

Overview

U.S.EPA published a Federal Register notice[10] of availability on March 2, 2010, to approve MOVES2010 (Motor Vehicle Emissions Simulator), hereafter referred to as MOVES. Upon publication of the Federal Register notice, MOVES became U.S. EPA's approved motor vehicle emission factor model for estimating VOCs, NO_x, CO, PM_{10} and $PM_{2.5}$ and other pollutants and precursors from cars, trucks, motorcycles, and buses by state and local agencies. MOVES is a computer program designed by the U.S. EPA to estimate air pollution emissions from mobile sources. MOVES replaces U.S. EPA's previous emissions model for on-road mobile sources, MOBILE6.2. MOVES can be used to estimate exhaust and evaporative emissions as well as brake and tire wear emissions from all types of on-road vehicles.

The CAA requires U.S. EPA to regularly update its mobile source emission models. U.S. EPA continuously collects data and measures vehicle emissions to make sure the Agency has the best possible understanding of mobile source emissions. This assessment, in turn, informs the development of U.S. EPA's mobile source emission models. MOVES represents the Agency's most up-to-date assessment of on-road mobile source emissions. MOVES also incorporates several changes to the U.S. EPA's approach to mobile source emission modeling based upon recommendations made to the Agency by the National Academy of Sciences.

U.S. EPA believes that MOVES should be used in ozone, CO, PM, and nitrogen dioxide SIP development as expeditiously as possible. The CAA requires that SIP inventories and control measures be based on the most current information and applicable models that are available when a SIP is developed.

10 http://www.regulations.gov/search/Regs/home.html#documentDetail?R=0900006480ab1f98

Regarding transportation conformity, U.S. EPA and U.S. DOT intend to establish a two-year grace period before MOVES is required for new transportation conformity analyses.

The MOVES more detailed approach (when compared with the previous MOBILE model) to modeling allows U.S. EPA to easily incorporate large amounts of in-use data from a wide variety of sources, such as data from vehicle inspection and maintenance (I/M) programs, remote sensing device (RSD) testing, certification testing, portable emission measurement systems (PEMS), etc. This approach also allows users to incorporate a variety of activity data to better estimate emission differences such as those resulting from changes to vehicle speed and acceleration patterns. MOVES has a graphical user interface which allows users to more easily set up and run the model. MOVES database-centered design provides users much greater flexibility regarding output choices. Unlike earlier models which provided emission factors in grams-per-mile in fixed output formats, MOVES output can be expressed as total mass (in tons, pounds, kilograms, or grams) or as emission factors (grams-per-mile and in some cases grams-per-vehicle). Output can be easily aggregated or disaggregated to examine emissions in a range of scales, from national emissions impacts down to the emissions impacts of individual transportation projects. The database-centered design also allows U.S. EPA to update emissions data incorporated in MOVES more easily and will allow users to incorporate a much wider array of activity data to improve estimation of local emissions. For example, the improvements in MOVES will allow project-level $PM_{2.5}$ emissions to be estimated.

CCS-TCC and MVRPC maintain regional travel demand forecasting models for use in the urban transportation planning process. The models employ the traditional four step modeling process to project existing and future traffic volumes and travel patterns on the regional transportation network. The four step process consists of trip generation, trip distribution, modal split, and route assignment. Output from the urban models is link-by-link directional 24-hour traffic volumes.

During 2000-2002 MVRPC, in cooperation with the Ohio Kentucky Indiana Regional Council of Governments (OKI), updated its travel demand model. The new model includes the combined regions under the jurisdictions of OKI and MVRPC. In 2005, the combined model was updated again to incorporate the results of a household interview survey in the MVRPC Region, change the model interface to Cube Voyager, and improve model functionality. The

changes primarily affected trip generation distribution functions in the MVRPC Region. In 2007 in preparation for the 2008 Transportation Plan Update the model was validated using circa 2005 traffic counts. The 2005 Cube Voyager model with the latest planning assumptions (networks and socio-economic data) is used to calculate 2005-2022 emissions in the MVRPC Region. Similarly, the Springfield Region also has a new travel demand model that combined with the latest planning assumptions was used to generate emissions in Clark County. The new travel demand model now covers all of Clark County and was validated in December 2005. More details on the use of MOVES are found on Appendix C.

Travel analysis zones are the basic geographic unit for estimating travel in the Dayton-Springfield model. A variety of socioeconomic data items are used in the Dayton-Springfield transportation planning process. These data are used primarily to forecast future travel patterns by serving as independent variables in Dayton-Springfield trip generation equations.

The principal data requirements of the Dayton-Springfield travel demand forecasting model are population and employment, from these variables other characteristics including household, labor force, and personal vehicles may be derived.

Both CCS-TCC and MVRPC's socioeconomic model variables reflect the current and expected future regional land uses. Independent variables are available for 4 analysis years (2000, 2005, 2010, and 2030) and the travel demand model has the ability of interpolating data for any year between available data sets. A summary of MVRPC's socio-economic data is available in Appendix C - Table 5. From that Table, population and households are expected to decline over the planning period with employment making modest gains through 2010 and then remaining fairly constant until 2030. Both population and employment are expected to decline in the older urban areas of the region as the trend to develop in the suburban fringes and rural areas continues. Appendix C - Table 6 shows a summary of CCS-TCC's socio-economic data. This summary shows a slight decline in population, while households and employment show a moderate gain.

Dayton-Springfield model uses OKI's Travel Demand Model, which has been validated to observed traffic volumes for the model base year 2005. The modeling network encompasses the entire $PM_{2.5}$ nonattainment area. The modeling network also includes Greene, Miami and Montgomery counties in Ohio and the remainder of

Dearborn County, Indiana. The differences between estimated vehicle miles traveled (VMT) and 2005 observed VMT is less than 1%. A highway screenline analysis compares the screenline observed and simulated traffic volume discrepancies with the Ohio Department of Transportation (ODOT) standard of maximum desirable deviation. The comparison shows that the model performs at a satisfactory level and all the errors were under the ODOT curve (OKI's 2007 report, "OKI/MVRPC Travel Demand Model Methodology/Validation Report").

Total emissions (post processing) were computed with the aid of several custom programs by ODOT. The process uses data on daily and directional traffic distributions as well as more up to date volume/delay functions from the 2000 Highway Capacity Manual (HCM). This process also uses rewritten code able to handle the newer model network formats and MOVES generated emission factors.

On-Road Mobile Emission Estimations

Tables 3 through 6 contain the results of the emissions analysis for the appropriate years. All emissions estimations are expressed in tons per year (tpy).

Table 3 - Clark County, Emissions Estimations for On-Road Mobile Sources

	2005*	2008	2015	2022
$PM_{2.5}$ (tpy)	165.42	138.01	68.73	42.74
NO_x (tpy)	5,636.55	4,598.38	2,393.85	1,166.50
SO_2 (tpy)	83.66	26.06	11.46	11.06

*2005 emissions include I/M program

Table 4 – Greene County, Emissions Estimations for On-Road Mobile Sources

	2005*	2008	2015	2022
$PM_{2.5}$ (tpy)	166.48	140.31	67.89	45.22
NO_x (tpy)	5,330.02	4,334.23	2,112.11	1,043.75
SO_2 (tpy)	81.69	25.62	10.69	10.84

*2005 emissions include I/M program

Table 5 – Montgomery County, Emissions Estimations for On-Road Mobile Sources

	2005*	2008	2015	2022
$PM_{2.5}$ (tpy)	539.18	446.43	215.06	139.28
NO_x (tpy)	17,089.70	13,721.08	6,681.47	3,242.48
SO_2 (tpy)	258.31	79.79	32.81	32.23

*2005 emissions include I/M program

Table 6 – Emissions Estimations Totals for On-Road Mobile Sources for the Dayton-Springfield Area

	2005*	2008	2015	2022
$PM_{2.5}$ (tpy)	871.08	724.75	351.68	227.24
NO_x (tpy)	28,056.27	22,653.69	11,187.43	5,452.73
SO_2 (tpy)	423.66	131.47	54.96	54.13

*2005 emissions include I/M program

Motor Vehicle Emission Budget

Table 7 contains the motor vehicle emissions budgets for the Dayton-Springfield area.

Table 7 - Mobile Vehicle Emissions Budget

	2015 Estimated Emissions	2015 Mobile Safety Margin Allocation*	2015 Total Mobile Budget	2022 Estimated Emissions	2022 Mobile Safety Margin Allocation*	2022 Total Mobile Budget
PM2.5 (tpy)	351.68	52.75	404.43	227.24	34.09	261.33
NOx (tpy)	11,187.43	1,678.11	12,865.54	5,452.73	817.91	6,270.64

*The 15 percent margin of safety was calculated by taking 15 percent of the mobile source emission estimates.

The above budgets for the Dayton-Springfield area, agreed upon as part of the interagency consultation process, include the emission estimates calculated for 2015 and 2022 (from Table 6) with an additional 15 percent margin of safety allocated to $PM_{2.5}$ and NO_x in 2015 and 2022.

In an effort to accommodate future variations in travel demand models and VMT forecast when no change to the network is planned, Ohio EPA consulted with U.S. EPA to determine a reasonable approach to address this variation. Based on this discussion, a 15 percent margin of safety allocation was agreed upon and has been added to the emissions estimates for this nonattainment area.

All methodologies, the latest planning assumptions, and the safety margins allocations were determined through the interagency

consultation process described in the Transportation Conformity Memorandum of Understanding (MOU) among MVRPC, Ohio DOT, and Ohio EPA.

A 15 percent margin of safety is appropriate because: 1) there is an acknowledged potential variation in VMT forecast and potential estimated mobile source emissions due to expected modifications to TDM and mobile emissions models; and 2) the total decrease in emissions from all sources is sufficient to accommodate this 15 percent allocation of safety margin (as defined in 40 CFR 93.101[11]) to mobile sources while still continuing to maintain the total emissions in the Dayton-Springfield area well below the 2008 attainment level of emissions.

The 15 percent margin of safety was calculated by taking 15 percent of the mobile source emission estimates. Safety margin, as defined by the conformity rule, looks at the total emissions from all sources in the nonattainment area. The actual allocation is less than 15 percent of the total emission reduction from all sources as can be seen from Table 22.

In summary, the mobile budget safety margin allocation translates into an additional 52.75 tpy for $PM_{2.5}$ and 1,678.11 tpy for NO_x for 2015 and an additional 34.09 tpy for $PM_{2.5}$ and 817.91 tpy for NO_x for 2022.

When compared to the overall safety margin, as defined in 40 CFR 93.101, discussed under “Requirement 3 of 5” below, it is evident this allocation is significantly below the total safety margin for this area.

The current $PM_{2.5}$ and NO_x mobile budgets for the fine particle NAAQS 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 $PM_{2.5}$ and NO_x conformity budgets included in this submittal are adequate for transportation conformity purposes, whichever date comes first.

Finally, it is important to underline that all motor vehicle emission budgets in this redesignation submittal, which are based on MOVES2010, will replace previous motor vehicle emission budgets on Attainment Demonstration submittals based on MOBILE6.2.

11 "Safety margin" means the amount by which the total projected emissions from all sources of a given pollutant are less than the total emissions that would satisfy the applicable requirement for reasonable further progress, attainment, or maintenance.

Requirement 3 of 5

A demonstration that the projected level of emissions is sufficient to maintain the $PM_{2.5}$ standard.

Background

In consultation with U.S. EPA, Ohio EPA selected the year 2022 as the maintenance year for this redesignation request. This document contains projected emissions inventories for 2015 and 2022.

Emission projections for the Dayton-Springfield area were performed using the following approaches:

- As performed by ODOT and MVRPC mobile source emission projections are based on the U.S. EPA MOVES model. The analysis is described in more detail in Appendix C. All projections were made in accordance with "Procedures for Preparing Emissions Projections" U.S. EPA-45/4-91-019.

- Emissions inventories are required to be projected to future dates to assess the influence growth and future controls will have. LADCO has developed growth and control files for point, area, and non-road categories. These files were used to develop the future-year emissions estimates used in this document. This was done so the inventories used for redesignation are consistent with modeling performed in the future. Appendix D contains LADCO's technical support document detailing the analysis used to project emissions (Base M[12]).

- For the 2008 attainment year, emissions were grown from the 2005 LADCO modeling inventory, using LADCO's growth factors, for all sectors except point sources (electrical generating units and non-electrical generating units). Point source emissions for 2008 were compiled from Ohio EPA's 2008 annual emissions inventory database. The 2015 interim year emissions were estimated based on the 2009 and 2018 LADCO modeling inventory, using LADCO's growth factors, for all sectors. The 2022 maintenance year is based on emissions estimates from the 2018 LADCO modeling.

[12] http://www.ladco.org/tech/emis/current/index.php

The detailed inventory information for Dayton-Springfield area for 2005 is in Appendix B. Emission trends are an important gauge for continued compliance with the $PM_{2.5}$ standard. Therefore, Ohio EPA performed an initial comparison of the inventories for the base year and maintenance years. Mobile source emission inventories are described in Section 5 of Appendix B.

Sectors included in the following tables are: Electrical Generating Unit (EGU-Point); Non-Electrical Generating Unit (Non-EGU); Non-road Mobile (Non-road); Other Area (Other); Marine; Aircraft; Rail (MAR); and On-road Mobile (On-road).

Ohio EPA is identifying emissions projections for 2015 and 2022 for EGUs without the implementation of the CAIR program. U.S. EPA has raised concerns regarding the CAIR program and its remand. As discussed below, with the proposed CAIR replacement, the Transport Rule, Ohio EPA believes additional reductions will be occurring in the future.

On March 10, 2004, the U.S. EPA promulgated the CAIR. Beginning in 2009, U.S. EPA's CAIR rule requires EGUs in 28 eastern states and the District of Columbia to significantly reduce emissions of NO_x and SO_2. CAIR replaced the NOx SIP Call for EGUs. The intent of the CAIR program is for national NO_x emissions to be cut from 4.5 million tons in 2004, to a cap of 1.5 million tons by 2009, and 1.3 million tons in 2018 in 28 states. States were required to submit a CAIR SIP as part of this effort. Ohio submitted a CAIR SIP which was approved by U.S. EPA on February 1, 2007. Revisions to the CAIR SIP were again submitted on July 15, 2009. The revised CAIR SIP was approved as a direct final action on September 25, 2009 (74 FR 48857). As a result of CAIR, U.S. EPA projects that in 2009 emissions of NO_x will decrease from a baseline of 264,000 tons per year to 93,000 tons per year while in 2010 emissions of SO_2 will decrease from a baseline of 1,373,000 tons per year to 298,000 tons per year, within Ohio. And by 2015 U.S. EPA projects emissions of NO_x will decrease to 83,000 tons per year while emissions of SO_2 will decrease to 208,000 tons per year, within Ohio[13].

On December 23, 2008, U.S. EPA's CAIR program was remanded without vacatur by the D.C. Circuit Court. As mentioned above, Ohio EPA has not incorporated these expected CAIR reductions into this redesignation request. It should also be noted that Ohio's SIP-approved NOx SIP Call program and regulations are still in

13 http://www.epa.gov/CAIR/oh.html

place. Ohio EPA is currently in the process of revising these regulations to provide a "back stop" for the reinstatement of the NOx SIP Call program in the event the CAIR program, or an equivalent, is no longer implemented by U.S. EPA.

As can be seen in Table 8 below, Ohio has seen a significant decline in the 264,000 tons of NO_x and 1,373,000 tons of SO_2 emitted in 2005. In 2008 and 2009 facilities began preparing for and implementing control programs to address CAIR[14] and consent decrees.

Table 8 - Reductions in SO_2 and NO_x EGU Emissions Between 2008 and 2009

	SO_2			NO_x		
	2008	**2009**	**Change**	**2008**	**2009**	**Change**
Ohio	709,444	601,101	15%	235,018	96,351	59%
LADCO States	2,019,036	1,620,071	20%	702,384	393,930	44%
National	7,616,262	5,747,353	25%	2,996,287	1,990,385	34%

Source: Clean Air Markets Quarterly Emissions Tracking[15]

Significant reductions also occurred regionally and nationally as can be seen from the above. Data is also available for the first two quarters of 2010, the year SO_2 reductions are to be implemented under CAIR:

Table 9 – Reductions in SO_2 and NO_x EGU Emissions Between the First Half of 2008 and 2010

	SO_2			NO_x		
	2008 (1st half)	**2010 (1st half)**	**Change**	**2008 (1st half)**	**2010 (1st half)**	**Change**
Ohio	373,798	279,854	25%	130,598	53,187	59%
LADCO States	1,190,497	854,282	28%	419,114	220,907	47%
National	3,895,472	2,502,965	36%	1,487,179	930,148	37%

Source: Clean Air Markets Quarterly Emissions Tracking[16]

The following was reported by U.S. EPA's Clean Markets Division:

"Based on emissions monitoring data, EPA has observed substantial reductions in SO_2 emissions from 2005 to 2009 and in the first two quarters of 2010 as companies installed more controls, electric demand declined, and low natural gas prices made combined-cycle gas-fired units more competitive in several parts of the country. Thus, even after CAIR's vacatur and subsequent remand in late 2008, the controls in place generally

14 Under CAIR, NOx reductions are to occur beginning in 2009 while SO2 reductions are to occur beginning in 2010.
15 http://www.epa.gov/airmarkets/quarterlytracking.html
16 http://www.epa.gov/airmarkets/quarterlytracking.html

have continued to operate, helping to drive continued progress in reducing emissions."[17]

On July 6, 2010, U.S. EPA proposed a replacement to the CAIR program, the Transport Rule. [75 FR 45210] U.S. EPA intends to finalize the Transport Rule in time for reductions to begin in 2012. As proposed, the Transport Rule will preserve those initial reductions achieved under CAIR and provide more reductions in NO_x and SO_2 emissions in 2012 and 2014, ahead of the 2015 CAIR Phase 2.

Ohio EPA is in agreement with the analysis by U.S. EPA that the CAIR program is providing real reductions at this time, Ohio EPA believes these reductions have assisted with $PM_{2.5}$ attainment in this nonattainment area and throughout Ohio. It is also Ohio EPA's belief that the Transport Rule, when finalized, will continue to provide the necessary reductions, and likely even greater reductions, that will be necessary for maintenance of the annual $PM_{2.5}$ standard to occur. As stated by U.S. EPA regarding the proposed Transport Rule, "the results of the air quality modeling indicate that all but one site[18] is projected to be in attainment and only one site[19] is projected to have a maintenance problem for annual PM2.5 in 2014 with the emissions reductions expected from this proposal." [75 FR 45345] Furthermore, modeling conducted as part of the Transport Rule projects the counties within this area will not have maintenance issues in 2014 even without the Transport Rule (or CAIR)[20]**.**

Maintenance is demonstrated when the future-year (2022) projected emission totals are below the 2008 attainment year totals.

The Ohio emissions data in the tables below are based on the following data sources:

- All On-Road data source: The MVRPC and the ODOT's Division of Transportation System Development-Modeling and Forecasting Section.
- 2008 EGU and non-EGU: Ohio EPA's 2008 annual emissions inventory database.
- All other data source: Lake Michigan Air Directors Consortium (LADCO).

17 http://www.epa.gov/airmarkets/background.htm
18 Allegheny, PA
19 Birmingham, AL
20 See supplemental table "Impacts of the Proposed Transport Rule on Counties with Monitors Projected to have Ozone and/or Fine Particle Air Quality Problems."

Demonstration

$PM_{2.5}$

Table 10 - Clark County, Ohio $PM_{2.5}$ Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) – Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	3.16	2.40	2.19	2.11	0.29
Non-road	66.40	56.55	37.85	18.75	37.80
Area	132.50	134.97	133.93	131.76	3.21
MAR	9.96	9.04	5.84	2.74	6.30
On-road	165.42	138.01	68.73	42.74	95.27
TOTAL	377.44	340.97	248.54	198.10	142.87

Table 11 - Greene County, Ohio $PM_{2.5}$ Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) – Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	96.44	101.90	116.95	131.79	-29.89
Non-road	92.72	79.01	52.29	25.07	53.94
Area	133.39	135.86	134.65	134.09	1.77
MAR	2.12	1.83	1.04	0.27	1.56
On-road	166.48	140.31	67.89	45.22	95.09
TOTAL	491.15	458.91	372.82	336.44	122.47

Table 12 - Montgomery County, Ohio $PM_{2.5}$ Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) – Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	173.19	173.28	182.74	190.49	-17.21
Non-EGU	110.86	126.55	117.01	112.92	13.63
Non-road	232.23	199.93	141.92	82.28	117.65
Area	435.20	445.64	443.65	437.26	8.38
MAR	25.91	23.57	14.76	6.27	17.30
On-road	539.18	446.43	215.06	139.28	307.15
TOTAL	1,516.57	1,415.40	1,115.14	968.50	446.90

Table 13 – Dayton-Springfield Area $PM_{2.5}$ Emission Inventory Totals for Base Year 2005, Estimated 2008, and projected 2015 and 2022 (tpy) – Without CAIR

PM2.5	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
Clark	377.44	340.97	248.54	198.10	142.87
Greene	491.15	458.91	372.82	336.44	122.47
Montgomery	1,516.57	1,415.40	1,115.14	968.50	446.90
COMBINED $PM_{2.5}$ TOTAL	2,385.16	2,215.28	1,736.50	1,503.04	712.24

NO_x

Table 14 - Clark County, Ohio NO_x Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	52.22	53.04	55.75	58.30	-5.26
Non-road	806.83	686.72	439.04	188.29	498.43
Area	554.05	560.20	564.02	568.84	-8.64
MAR	277.53	261.32	177.64	98.27	163.05
On-road	5,636.55	4,598.38	2,393.85	1,166.50	3,431.88
TOTAL	7,327.18	6,159.66	3,630.30	2,080.20	4,079.46

Table 15 - Greene County, Ohio NO_x Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	2,530.80	2,671.64	2,910.81	3,186.30	-514.66
Non-road	1,016.05	881.39	565.19	249.19	632.20
Area	504.30	509.58	512.17	515.68	-6.10
MAR	67.80	62.60	40.66	19.65	42.95
On-road	5,330.02	4,334.23	2,112.11	1,043.75	3,290.48
TOTAL	9,448.97	8,459.44	6,140.94	5,014.57	3,444.87

Table 16 - Montgomery County, Ohio NO_x Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	2,835.31	1,870.13	1,717.61	1,224.22	645.91
Non-EGU	1,481.03	1,513.71	1,491.85	1,466.81	46.90
Non-road	3,141.22	2,607.86	1,586.11	543.42	2064.44
Area	1,886.52	1,907.49	1,921.02	1,937.87	-30.38
MAR	931.14	879.59	606.49	347.74	531.85
On-road	17,089.70	13,721.08	6,681.47	3,242.48	10,478.60
TOTAL	27,364.92	22,499.86	14,004.55	8,762.54	13,737.32

Table 17 - Dayton-Springfield Area NO_x Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

NOx	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
Clark	7,327.18	6,159.66	3,630.30	2,080.20	4,079.46
Greene	9,448.97	8,459.44	6,140.94	5,014.57	3,444.87
Montgomery	27,364.92	22,499.86	14,004.55	8,762.54	13,737.32
COMBINED NOx TOTAL	44,141.07	37,118.96	23,775.79	15,857.31	21,261.65

SO_2

Table 18 - Clark County, Ohio SO_2 Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	12.94	13.12	13.56	13.99	-0.87
Non-road	80.70	29.69	4.80	0.85	28.84
Area	79.06	77.92	74.27	70.71	7.21
MAR	22.45	22.08	17.55	13.36	8.72
On-road	83.66	26.06	11.46	11.06	15.00
TOTAL	278.81	168.87	121.64	109.97	58.90

Table 19 - Greene County, Ohio SO_2 Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	0.00	0.00	0.00	0.00	0.00
Non-EGU	2,046.74	2,116.50	2,248.36	2,304.87	-188.37
Non-road	122.29	44.78	6.98	1.00	43.78
Area	87.71	86.36	81.72	77.23	9.13
MAR	5.76	5.63	4.46	3.37	2.26
On-road	81.69	25.62	10.69	10.84	14.78
TOTAL	2,344.19	2,278.89	2,352.21	2,397.31	-118.42

Table 20 - Montgomery County, Ohio SO_2 Emission Inventory Totals for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

Sector	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
EGU Point	5,914.75	5,069.93	5,176.34	4,900.70	169.23
Non-EGU	1,883.72	1,865.78	1,870.70	1,876.61	-10.83
Non-road	307.32	112.67	18.33	3.59	109.08
Area	206.17	203.43	197.26	191.07	12.36
MAR	83.13	81.86	64.71	48.88	32.98
On-road	258.31	79.79	32.81	32.23	47.56
TOTAL	8,653.40	7,413.46	7,360.15	7,053.08	360.38

Table 21 - Dayton-Springfield Area SO_2 Emission Inventory Totals

for Base Year 2005, Estimated 2008, and Projected 2015 and 2022 (tpy) - Without CAIR

SO2	2005 Base	2008 Attainment	2015 Interim	2022 Maintenance	Safety Margin
Clark	278.81	168.87	121.64	109.97	58.90
Greene	2,344.19	2,278.89	2,352.21	2,397.31	-118.42
Montgomery	8,653.40	7,413.46	7,360.15	7,053.08	360.38
COMBINED SO2 TOTAL	11,276.40	9,861.22	9,834.00	9,560.36	300.86

$PM_{2.5}$, NO_x, and SO_2

Table 22 - Dayton-Springfield Area Comparison of 2008 attainment year and 2015 and 2022 projected emission estimates (tpy)

	2008 Base	2015 Interim	2015 Projected Decrease	2022 Maintenance	2022 Projected Decrease
$PM_{2.5}$	2,215.28	1,736.50	478.78	1,503.04	712.24
NO_x	37,118.96	23,775.79	13,343.17	15,857.31	21,261.65
SO_2	9,861.22	9,834.00	27.22	9,560.36	300.86

As shown in the table above (Table 22), $PM_{2.5}$ emissions in the nonattainment area are projected to decrease by 478.78 tpy in 2015 and 712.24 tpy in 2022. NO_x emissions in the nonattainment area are projected to decrease by 13,343.17 tpy in 2015 and 21,261.65 tpy in 2022. SO_2 emissions in the nonattainment area are projected to decrease by 27.22 tpy in 2015 and 300.86 tpy in 2022.

In some cases, area source emissions and point sources show an increase due to expectations that the population will grow in this area; however, cleaner vehicles and fuels are expected to be in place in 2009 and 2018, and the Transport Rule will be implemented in 2012 and 2014 and these programs should cause an overall drop in all three pollutants emissions. Decreases from U.S. EPA rules covering Tier 2 Motor Vehicle Emissions Standards and Gasoline Sulfur Control Requirements[21], Highway Heavy-Duty Engine Rule[22], and the Non-Road Diesel Engine Rule[23] are factored into the changes.

21 http://www.epa.gov/fedrgstr/EPA-AIR/2000/February/Day-10/a19a.htm
22 http://www.epa.gov/fedrgstr/EPA-AIR/1997/October/Day-21/a27494.htm
23 http://www.epa.gov/fedrgstr/EPA-AIR/1998/October/Day-23/a24836.htm

All projections ($PM_{2.5}$, SO_2, and NO_x) do not take into account reductions expected from the CAIR. In many cases, Ohio utilities subject to CAIR have already, or will be installing controls and reducing NO_x and SO_2 emissions beyond those projected for EGU's above.

As can be seen from the projected decreases above, even in the absence of consideration of reductions resulting from CAIR, and its future replacement, the Transport Rule, the area will be able to maintain the standard.

Requirement 4 of 5

A demonstration that improvement in air quality between the year violations occurred and the year attainment was achieved is based on permanent and enforceable emission reductions and not on temporary adverse economic conditions or unusually favorable meteorology.

Background

Ambient air quality data from all monitoring sites indicate that air quality met the NAAQS for $PM_{2.5}$ in 2008-2010. U.S. EPA's redesignation guidance (p 9) states: "A state may generally demonstrate maintenance of the NAAQS by either showing that future emissions of a pollutant or its precursors will not exceed the level of the attainment inventory, or by modeling to show that the future mix of sources and emissions rates will not cause a violation of the NAAQS."

Demonstration

Permanent and enforceable reductions of $PM_{2.5}$, NO_x, and SO_2 emissions have contributed to the attainment of the annual $PM_{2.5}$ standard. Some of these reductions were due to the application of tighter federal standards on new vehicles. Also Title IV of the CAA, the NO_x SIP Call, CAIR, and federal consent decrees required the reductions of SO_2 and NO_x emissions from utility sources. Reductions achieved are discussed in greater detail under Chapter Five.

Table 23 - Dayton-Springfield Area Comparison of 2005 base year and 2008 attainment year on-road and EGU reductions

	2005	2008
On-road $PM_{2.5}$	871.08	724.75
On-road NO_x	28,056.27	22,653.69
On-road SO_2	423.66	131.47
EGU $PM_{2.5}$	173.19	173.28
EGU NO_x	2,835.31	1,870.13
EGU SO_2	5,914.75	5,069.93

Requirement 5 of 5

Provisions for future annual updates of the inventory to enable tracking of the emission levels, including an annual emission statement from major sources.

Demonstration

In Ohio, major point sources in all counties are required to submit air emissions information annually, in accordance with U.S. EPA's Consolidated Emissions Reporting Rule (CERR). Ohio EPA prepares a new periodic inventory for all $PM_{2.5}$ precursor emission sectors every three years. These $PM_{2.5}$ precursor inventories will be prepared for future years as necessary to comply with the inventory reporting requirements established in the CFR. Emissions information will be compared to the 2005 base year and the 2022 projected maintenance year inventories to assess emission trends, as necessary, and to assure continued compliance with the annual $PM_{2.5}$ standard.

CHAPTER FIVE

CONTROL MEASURES AND REGULATIONS

CAA Section107 (d)(3)(E)(ii), 107(d)(3)(iv), and 107(d)(3)(E)(v)

Requirement 1 of 6

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to implement RACM and RACT.

Background

Section 172(c)(1) of the 1990 Clean Air Act Amendments requires states with nonattainment areas to submit a SIP providing for implementation of all reasonably available control measures and expeditiously as practicable (including such reductions in emissions from existing sources in the area as may be obtained through the adoption, at a minimum, of reasonable available control technology).

U.S. EPA's Implementation Rule interprets this requirement in great detail. Under U.S. EPA's approach, RACT is determined as part of the broader RACM analysis and identification of all measures (for stationary, mobile, and area sources) that are technically and economically feasible, and that would collectively contribute to advancing the attainment date (i.e., by one year or more). States are required to use a combined approach to RACT and RACM, that (1) identifies potential measures that are reasonable, (2) uses modeling to identify the attainment date that is as expeditious as practicable, and (3) selects the appropriate RACT and RACM.

The Implementation Rule also provides for a presumption that in States that fulfill their CAIR emission reduction requirements, EGU compliance with CAIR is equivalent to RACM/RACT.

Demonstration

In 1972, 1980, and 1991, Ohio promulgated rules requiring reasonably available control measures for particulate emissions from stationary sources.

Statewide RACT rules have been applied to all new sources locating in Ohio since that time. RACT requirements are incorporated into permits along with monitoring, recordkeeping, and reporting necessary to ensure ongoing compliance. Ohio EPA also has an active enforcement program to address violations

discovered by field office staff. The Ohio RACT rules are found in OAC Chapter 3745-17[24].

In addition, Ohio EPA promulgated NO_x SIP Call rules (OAC Chapter 3745-14[25]), CAIR (OAC Chapter 3745-109[26]), and NO_x Reasonably Available Control Technology rules (OAC Chapter 3745-110[27]) over the past five years. Emissions from EGUs make up a significant contribution to Ohio's inventory. Beginning in 2009, Ohio implemented CAIR which has, and will, provide for significant reductions in NO_x, $PM_{2.5}$, and SO_2 until such time it is replaced by U.S. EPA's proposed Transport Rule. Then the Transport Rule will provide for even greater reductions.

As part of a larger initiative, LADCO, in consultation with two contractors, performed a series of studies exploring control measures for reducing both ozone precursors and $PM_{2.5}$ precursors in Ohio, Illinois, Indiana, Michigan, and Wisconsin area. The first consultant, MACTEC, prepared a series of white papers[28] researching different stationary source categories. The results were compiled into two reports[29]. The second consultant, Environ, investigated control options for mobile sources. The results were compiled into two reports[30]. The stationary and mobile source sectors (and associated control measures) were selected by the LADCO States based on several factors presented in the report (See Chapter 2).

Photochemical modeling was then conducted (as part of LADCO Round 4 modeling) to assess the air quality benefit of the candidate control measures and a modeling report was developed[31]. Based on the results, the LADCO project team felt it would not be possible to advance the attainment date for $PM_{2.5}$. Ohio EPA, in its attainment demonstration submitted on July 18, 2008, demonstrated (using a weight of evidence approach) that

24 http://www.epa.ohio.gov/dapc/regs/3745_17.aspx
25 http://www.epa.ohio.gov/dapc/regs/3745_14.aspx
26 http://www.epa.ohio.gov/dapc/regs/3745_109.aspx
27 http://www.epa.ohio.gov/dapc/regs/3745_110.aspx
28 http://www.ladco.org/reports/control/white_papers
29 http://www.ladco.org/reports/control/final_reports/identification_and_evaluation_of_candidate_control_measures_i_april_2005.pdf; http://www.ladco.org/reports/control/final_reports/identification_and_evaluation_of_candidate_control_measures_ii_june_2006.pdf
30 http://www.ladco.org/reports/control/final_reports/final_report_evaluation_of_candidate_mobile_source_control_measures_february_2006.pdf; http://www.ladco.org/reports/control/final_reports/final_report_evaluation_of_candidate_mobile_source_control_measures_for_ladco_states_in_2009_and_2012_march_2007.pdf
31 http://www.ladco.org/reports/control/modeling/round4_modeling.pdf

attainment would be achieved in this area by 2009. Because of a projected 2009 attainment date, it would not have been reasonably possible or practicable for Ohio to develop RACT/RACM requirements, promulgate regulations and implement a control program prior to the projected attainment date.

Requirement 2 of 6

Section 172(c)(2) of the 1990 CAA Amendments requires attainment demonstration SIPs for nonattainment areas to show reasonable further progress (RFP).

Background

U.S. EPA's Implementation Rule requires RFP only for any area which a State projects an attainment date beyond 2010. The RFP would provide emission reductions showing linear progress between 2002 and 2009. If a State demonstrates attainment will occur by 2010 or earlier, U.S. EPA considers the attainment demonstration to demonstrate achievement of RFP.

Demonstration

In Ohio's attainment demonstration submitted on July 18, 2008, Ohio demonstrated (using a weight of evidence approach) that attainment would be achieved in this area by 2009; and therefore, it was not necessary to submit a separate RFP plan.

Requirement 3 of 6

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions.

Background

Section 172(c)(3) requires states to submit a comprehensive inventory of actual emissions in the area, including the requirement for periodic revisions as determined necessary. 40 CFR 51.1008 requires such inventory to be submitted within three years of designation and requires a baseline emission inventory for calendar year 2002 or other suitable year to be used for attainment planning.

Demonstration

The 2005 comprehensive inventory was submitted to U.S. EPA with Ohio's $PM_{2.5}$ attainment demonstration SIP submitted on July 18, 2008. It was then subsequently revised and resubmitted on June 7, 2010.

Ohio also updates its inventory in accordance with U.S. EPA's CERR rule (i.e. emissions statements). Ohio EPA submitted its emissions statement SIP on March 18, 1994 which was approved by U.S. EPA on October 13, 1995 (59 FR 51863). As discussed in Chapter 4 (Requirement 4), Ohio EPA submits, and commits to submit, emission inventories (statements) every three years.

Requirement 4 of 6

Evidence that control measures required in past $PM_{2.5}$ SIP revisions have been fully implemented.

Background

In addition to the historic RACT requirements for PM, the U.S. EPA NO_x SIP Call required 22 states to pass rules that would result in significant emission reductions from large EGUs, industrial boilers, and cement kilns in the eastern United States. Ohio passed this rule in 2001. NOx SIP Call requirements are incorporated into permits along with monitoring, recordkeeping, and reporting necessary to ensure ongoing compliance. Ohio EPA also has an active enforcement program to address violations discovered by field office staff. Compliance is tracked through the Clean Air Markets data monitoring program. Beginning in 2004, this rule accounts for a reduction of approximately 31 percent of all NO_x emissions statewide compared to previous uncontrolled years. The other 21 states also have adopted these rules.

On March 10, 2004, the U.S. EPA promulgated the CAIR. Beginning in 2009, U.S. EPA's CAIR rule requires EGUs in 28 eastern states and the District of Columbia to significantly reduce emissions of NO_x and SO_2. CAIR replaced the NOx SIP Call for EGUs. National NO_x emissions will be cut from 4.5 million tons in 2004, to a cap of 1.5 million tons by 2009, and 1.3 million tons in 2018 in 28 states. States were required to submit a CAIR SIP as part of this effort. Ohio submitted a CAIR SIP which was approved by U.S. EPA on February 1, 2007. Revisions to the CAIR SIP were again submitted on July 15, 2009. The revised CAIR SIP was approved as a direct final action on September 25, 2009 (74 FR 48857).

Demonstration

Controls for EGUs under the NO_x SIP Call formally commenced May 31, 2004. Emissions covered by this program have been generally trending downward since 1998 with larger reductions occurring in 2002 and 2003. Data taken from the U.S. EPA Clean Air Markets web site, quantify the gradual NO_x reductions that

have occurred in Ohio as a result of Title IV of the 1990 CAA Amendments and the beginning of the NO_x SIP Call Rule. Ohio developed the NO_x Budget Trading Program rules in OAC Chapter 3745-14[32] in response to the SIP Call. OAC Chapter 3745-14 regulates EGUs and certain non-EGUs under a cap and trade program based on an 85 percent reduction of NOx emissions from EGUs and a 60 percent reduction of NO_x emissions from non-EGUs, compared to historical levels. This cap was in place through 2008, at which time the CAIR program superseded it as discussed above. Requirement 3 of 5 under Chapter 4 above discussed the reductions Ohio has seen as a result of CAIR.

On April 21, 2004, U.S. EPA published Phase II of the NO_x SIP Call that establishes a budget for large (greater than 1 ton per day emissions) stationary internal combustion engines. Ohio EPA's OAC rule 3745-14-12 addresses stationary internal combustion engines, all used in natural gas pipeline transmissions. U.S. EPA approved this revision to the SIP on April 4, 2008. An 82 percent NO_x reduction from 1995 levels is anticipated. Completion of the compliance plan occurred by May 1, 2006, and the compliance demonstration began May 1, 2007.

Tier II Emission Standards for Vehicles and Gasoline Sulfur Standards

In February 2000, U.S. EPA finalized a federal rule to significantly reduce emissions from cars and light trucks, including sport utility vehicles (SUVs). Under this proposal, automakers will be required to sell cleaner cars, and refineries will be required to make cleaner, lower sulfur gasoline. This rule will apply nationwide. The federal rules will phase in between 2004 and 2009. U.S. EPA has estimated that NO_x emission reductions will be approximately 77 percent for passenger cars, 86 percent for smaller SUVs, light trucks, and minivans, and 65 to 95 percent reductions for larger SUVs, vans, and heavier trucks. The sulfur content of gasoline is estimated to be reduced by up to 90 percent. VOC emission reductions will be approximately 12 percent for passenger cars, 18 percent for smaller SUVs, light trucks, and minivans, and 15 percent for larger SUVs, vans, and heavier trucks.

Heavy-Duty Diesel Engines

In July 2000, U.S. EPA issued a final rule for Highway Heavy Duty Engines, a program which includes low-sulfur diesel fuel standards, which will be phased in from 2004 through 2007. This rule applies to heavy-duty gasoline and diesel trucks and buses.

32 http://www.epa.ohio.gov/dapc/regs/3745_14.aspx

This rule will result in a 40 percent reduction in NO_x from diesel trucks and buses, a large sector of the mobile sources NO_x inventory. It also estimated the level of sulfur in highway diesel fuel will be reduced by 97 percent by mid-2006.

Clean Air Non-road Diesel Rule

In May 2004, U.S. EPA issued the Clean Air Non-road Diesel Rule. This rule applies to diesel engines used in industries such as construction, agriculture, and mining. It also contains a cleaner fuel standard similar to the highway diesel program. The new standards will cut emissions from non-road diesel engines by more than 90 percent. Non-road diesel equipment, as described in this rule, currently accounts for 47 percent of diesel particulate matter (PM) and 25 percent of NO_x from mobile sources nationwide. Sulfur levels will be reduced in non-road diesel fuel by 99 percent from current levels, from approximately 3,000 parts per million (ppm) now to 15 ppm in 2009. New engine standards take effect, based on engine horsepower, starting in 2008. Together, these rules will substantially reduce local and regional sources of $PM_{2.5}$ precursors.

Requirement 5 of 6

Acceptable provisions to provide for new source review.

Background

Ohio has a longstanding and fully implemented New Source Review (NSR) program. This is addressed in OAC Chapter 3745-31[33]. The Chapter includes provisions for the Prevention of Significant Deterioration (PSD) permitting program in OAC rules 3745-31-01 to 3745-31-20. Ohio's PSD program was conditionally approved on October 10, 2001 (66 FR 51570) and received final approval on January 22, 2003 (68FR 2909) by U.S. EPA as part of the SIP.

Demonstration

Any facility that is not listed in the 2005 emission inventory, or for the closing of which credit was taken in demonstrating attainment, will not be allowed to construct, reopen, modify, or reconstruct without meeting all applicable NSR requirements. Once the area is redesignated, Ohio EPA will implement NSR through the PSD program.

33 http://www.epa.ohio.gov/dapc/regs/3745_31.aspx

Requirement 6 of 6

Assure that all existing control measures will remain in effect after redesignation unless the State demonstrates through modeling that the standard can be maintained without one or more control measures.

Demonstration

Ohio commits to maintaining the aforementioned control measures after redesignation. Ohio hereby commits that any changes to its rules or emission limits applicable to $PM_{2.5}$, SO_2, and NO_x as required for maintenance of the annual $PM_{2.5}$ standard in the Dayton-Springfield area, will be submitted to U.S. EPA for approval as a SIP revision.

Ohio, through Ohio EPA's Legal office, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, it intends to continue enforcing all rules that relate to the emission of $PM_{2.5}$ precursors in the Dayton-Springfield area.

CHAPTER SIX

CONTINGENCY MEASURES
CAA Section 107(d)(3)(E)(v)

Requirement 1 of 4
A commitment to submit a revised plan eight years after redesignation.

Demonstration
Ohio hereby commits to review its maintenance plan eight years after redesignation, as required by Section 175(A) of the CAA.

Requirement 2 of 4
A commitment to expeditiously enact and implement additional contingency control measures in response to exceeding specified predetermined levels (triggers) or in the event that future violations of the ambient standard occur.

Demonstration
Ohio hereby commits to adopt and expeditiously implement necessary corrective actions in the following circumstances:

Warning Level Response:
A warning level response shall be prompted whenever the $PM_{2.5}$ average of the weighted annual mean of 15.5 µg/m^3 occurs in a single calendar year within the maintenance area. A warning level response will consist of a study to determine whether the $PM_{2.5}$ value indicates a trend toward higher $PM_{2.5}$ values or whether emissions appear to be increasing. The study will evaluate whether the trend, if any, is likely to continue and, if so, the control measures necessary to reverse the trend taking into consideration ease and timing for implementation as well as economic and social considerations. Implementation of necessary controls in response to a warning level response trigger will take place as expeditiously as possible, but in no event later than 12 months from the conclusion of the most recent calendar year.

Should it be determined through the warning level study that action is necessary to reverse the noted trend, the procedures for control selection and implementation outlined under “action level response” shall be followed.

Action Level Response:
An action level response shall be prompted whenever a two-year

average of the weighted annual means of 15.0 µg/m^3 or greater occurs within the maintenance area. A violation of the standard (three-year average of the weighted annual means of 15.0 µg/m^3 or greater) shall also prompt an action level response. In the event that the action level is triggered and is not found to be due to an exceptional event, malfunction, or noncompliance with a permit condition or rule requirement, Ohio EPA in conjunction with the metropolitan planning organization or regional council of governments, will determine additional control measures needed to assure future attainment of the NAAQS for annual $PM_{2.5}$. In this case, measures that can be implemented in a short time will be selected in order to be in place within 18 months from the close of the calendar year that prompted the action level. Ohio EPA will also consider the timing of an action level trigger and determine if additional, significant new regulations not currently included as part of the maintenance provisions will be implemented in a timely manner and will constitute our response.

Control Measure Selection and Implementation

Adoption of any additional control measures is subject to the necessary administrative and legal process. This process will include publication of notices, an opportunity for public hearing, and other measures required by Ohio law for rulemaking.

If a new measure/control is already promulgated and scheduled to be implemented at the federal or State level, and that measure/control is determined to be sufficient to address the upward trend in air quality, additional local measures may be unnecessary. Furthermore, Ohio will submit to U.S. EPA an analysis to demonstrate the proposed measures are adequate to return the area to attainment.

Requirement 3 of 4

A list of potential contingency measures that would be implemented in such an event.

Demonstration

Contingency measures to be considered will be selected from a comprehensive list of measures deemed appropriate and effective at the time the selection is made. The selection of measures will be based on cost-effectiveness, emission reduction potential, economic and social considerations or other factors that Ohio EPA deems appropriate. Ohio EPA will solicit input from all interested and affected persons in the maintenance area prior to selecting appropriate contingency measures. Because it is not possible at

this time to determine what control measures will be appropriate at an unspecified time in the future, the list of contingency measures outlined below is not exhaustive.

1) Diesel reduction emission strategies.
2) Alternative fuel (e.g., liquid propane and compressed natural gas) and diesel retrofit programs for fleet vehicle operations.
3) Tighter $PM_{2.5}$, SO_2, and NO_x emissions offsets for new and modified major sources.
4) Impact crushers located at recycle scrap yards – upgrade wet suppression.
5) Concrete manufacturing – upgrade wet suppression.
6) Additional NO_x RACT statewide.

No contingency measure shall be implemented without providing the opportunity for full public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be fully evaluated.

Requirement 4 of 4

A list of $PM_{2.5}$, SO_2, and NO_x sources potentially subject to future additional control requirements.

Demonstration

The following is a list of $PM_{2.5}$, SO_2, and NO_x sources potentially subject to future controls.

- ICI Boilers - SO_2 and NO_x controls;
- EGUs;
- process heaters;
- internal combustion engines;
- combustion turbines;
- other sources greater than 100 tons per year;
- fleet vehicles;
- concrete manufacturers;
- aggregate processing plants;

CHAPTER SEVEN

PUBLIC PARTICIPATION

Ohio published notification for a public hearing and solicitation for public comment concerning the draft redesignation petition and maintenance plan in the widely distributed county publications on April 1, 2011.

The public hearing to receive comments on the redesignation request was held on May 3, 2011, at Ohio EPA's Southwest District Office located at 401 E. Fifth Street in Dayton, Ohio. The public comment period closed on May 3, 2011Appendix F includes a copy of the public notice, certification of publication, and the transcript from the public hearing.

CHAPTER EIGHT

CONCLUSIONS

The Dayton-Springfield annual $PM_{2.5}$ nonattainment area has attained the 1997 annual NAAQS for $PM_{2.5}$ and complied with the applicable provisions of the 1990 Amendments to the CAA regarding redesignations of $PM_{2.5}$ nonattainment areas. Documentation to that effect is contained herein. Ohio EPA has prepared a redesignation request and maintenance plan that meet the requirements of Section 110 (a)(1) of the 1990 CAA.

Based on this presentation, the Dayton-Springfield annual $PM_{2.5}$ nonattainment area meets the requirements for redesignation under the CAA and U.S. EPA guidance. Ohio has performed an analysis that shows the air quality improvements are due to permanent and enforceable measures. Furthermore, because this area is subject to significant transport of pollutants, significant regional SO_2 and NO_x reductions will ensure continued compliance (maintenance) with the standard with an increasing margin of safety.

The State of Ohio hereby requests that the Dayton-Springfield annual $PM_{2.5}$ nonattainment area be redesignated to attainment simultaneously with U.S. EPA approval of the maintenance plan provisions contained herein.

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