



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

June 23, 2020

Mr. Kurt Thiede
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Supplement to Ohio's Attainment Demonstration for the Sulfur Dioxide National Ambient Air Quality Standard for the Muskingum River, OH Nonattainment Area

Dear Administrator Thiede:

I am writing to supplement Ohio's attainment demonstration state implementation plan (SIP) for the 2010 sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) for the Muskingum River, OH nonattainment area. The United States Environmental Protection Agency (U.S. EPA) promulgated the revised NAAQS for SO₂ effective August 23, 2010 (75 FR 35520). On August 15, 2013, U.S. EPA published (78 FR 47191) the initial SO₂ nonattainment area designations for the 1-hour SO₂ standard across the country (effective October 4, 2013), including the Muskingum River, OH nonattainment area (Center Township in Morgan County and Waterford Township in Washington County).

The Clean Air Act (CAA), as amended, requires each state with areas failing to meet the 1-hour SO₂ NAAQS to develop and submit SIPs to expeditiously attain and maintain the standard. These nonattainment area SIPs were due by April 4, 2015. Ohio EPA submitted its attainment demonstration SIP on April 3, 2015 and submitted revisions on October 13, 2015 and March 13, 2017. On June 25, 2019, Ohio EPA submitted a supplement to the attainment demonstration for the Steubenville, OH-WV nonattainment area.

Ohio is now submitting a supplement to the attainment demonstration for the Muskingum River, OH nonattainment area. This supplement contains an updated Reasonably Available Control Measures (RACM)/Reasonably Available Control Technologies (RACT) analysis and an updated Attainment Demonstration/Control Strategy, which include SO₂ emission limits for Globe Metallurgical.

Air quality monitoring data collected between 2017 and 2019 in the nonattainment area demonstrates attainment of the NAAQS. Significant SO₂ emission reductions resulted from the permanent shutdown of the Muskingum River Power Plant. Air quality modeling demonstrates that the emission limits for Globe Metallurgical in conjunction with the shutdown of the Muskingum River Power Plant will provide for attainment of the SO₂ standard throughout the area.

Ohio EPA issued Director's Final Findings and Orders (DFFOs) to Globe Metallurgical establishing 24-hour average SO₂ emission limits. In the near future, Ohio EPA will initiate

rulemaking that incorporates the emission limits for Globe Metallurgical and associated requirements into Ohio's SIP approved SO₂ regulations (Ohio Administrative Code Chapter 3745-18). To provide an additional level of assurance that air quality standards are being met in the area, Globe will be required to deploy install an SO₂ monitor. Ohio EPA will operate this monitor for a minimum of three years.

The public comment period for the draft supplemental attainment demonstration was held from February 20, 2020 through April 2, 2020. Ohio EPA has made revisions based on comments received during the comment period and a response to comments is included in the appendices.

Ohio EPA requests U.S. EPA approve Ohio's attainment demonstration for the Muskingum River, OH nonattainment area, as supplemented with the updated Reasonably Available Control Measures (RACM)/Reasonably Available Control Technologies (RACT) analysis and Attainment Demonstration/Control Strategy.

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

Sincerely,

A handwritten signature in black ink that reads "Laurie A. Stevenson". The signature is written in a cursive style.

Laurie A. Stevenson
Director

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

Enclosure