



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

JAN 13 2017

Mr. Robert Kaplan
Acting Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio's Recommended Nonattainment Areas for 2010 Sulfur Dioxide Standard – Round 3

Dear Administrator Kaplan:

I am writing to submit Ohio's recommended Round 3 nonattainment area designations for the revised SO₂ standard. The designation recommendations were developed in accordance with U.S. EPA's March 20, 2015 memorandum *Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard*, and were informed by U.S. EPA's August 21, 2015 *Data Requirements Rule for the 2010 1-hr Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS); Final Rule* (herein referred to as the Data Requirements Rule). The Data Requirements Rule requires characterization of sources with actual emissions greater than 2,000 tons per year (TPY) through modeling or monitoring. Round three designations were based on a five-factor analysis, including refined dispersion modeling for those areas identified by Ohio EPA as meeting the 2,000 TPY emissions criteria established in the Data Requirements Rule. Ohio is also providing recommended designations for areas that do not contain SO₂ sources that would require further characterization.

Ohio EPA's Round 3 designation recommendations are for all areas of Ohio not previously designated on August 15, 2013 or July 12, 2016 to be designated unclassifiable/attainment, with the exception of the General James M. Gavin Plant area. This source area, which includes Kyger Creek Generating Station, was designated as unclassifiable under the Round 2 designations. Ohio EPA intends to use monitoring to characterize this source area and will address a final designation recommendation under Round 4 of designations.

Ohio EPA held a public hearing on these recommendations on December 16, 2016. No testimony was provided at the public hearing. One set of comments in support of the recommended designations were received from the Ohio Utility Group during the public comment period which ended on December 16, 2016.

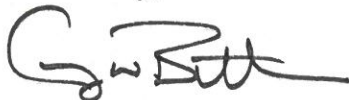
I appreciate the opportunity to provide these recommendations and will work cooperatively with U.S. EPA Region 5 staff as U.S. EPA prepares their comments which are due 120 days prior to promulgation of the actual designations. This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is

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Mr. Robert Kaplan

available at <http://epa.ohio.gov/dapc/SIP/so2.aspx> under the heading "Nonattainment Area Recommendation".

If you have any questions concerning this submittal, please feel free to contact Jennifer Van Vlerah of the Division of Air Pollution Control at (614) 644-3696.

Sincerely,

A handwritten signature in black ink, appearing to read "C. W. Butler". The signature is stylized with a large initial "C" and a long horizontal stroke.

Craig W. Butler
Director

Enclosures

cc: Jennifer Van Vlerah, DAPC