

September 18, 2018

Holly Kaloz
Ohio Environmental Protection Agency,
Department of Air Pollution Control
Columbus, OH 43215-1045

Via email: holly.kaloz@epa.ohio.gov

Re: Proposed SIP Revisions of August 2018 Regarding Infrastructure Elements for the 2015 Ozone National Ambient Air Quality Standards.

Dear Ms. Kaloz,

The Connecticut Department of Energy and Environmental Protection (DEEP) appreciates the opportunity to comment on the Ohio Environmental Protection Agency's (Ohio) proposed State Implementation Plan (SIP) revisions regarding Clean Air Act (CAA) section 110 requirements for the 2015 ozone standards. These SIP revisions, known as infrastructure SIPs (ISIPs), contain elements critical to solving downwind ozone nonattainment problems caused by interstate transport. This is especially relevant to Connecticut which measures some of the highest ozone concentrations measured in the eastern United States -- most of which is caused by transport.

DEEP appreciates the efforts Ohio has made thus far to reduce the emissions of ozone precursors. However, DEEP is concerned that the proposed ISIP is inadequate to meet the requirements of the CAA. Therefore, DEEP offers the following comments:

- Ohio should make all emission reductions projected in its air quality modeling permanent and enforceable to assure that the anticipated emissions reductions will actually occur.
- Ohio acknowledges that modeled projections to 2023 indicate continued non-compliance and maintenance concerns in Connecticut.¹ However, many of the receptors to which Ohio contributes significantly are designated marginal nonattainment and thereby required to measure attainment in 2020. This includes two receptors in the Greater Connecticut nonattainment area. Therefore, Ohio should both model and target emission reductions for the 2020 ozone season.
- Ohio should use a more relevant cost effectiveness threshold for the 2015 Ozone NAAQS. Ohio's considered use of the \$1,400 threshold that USEPA developed to address the less stringent 2008 ozone standard. The cost threshold Ohio uses should be consistent with the costs incurred by states downwind of Ohio. For example, Connecticut's latest ozone related regulations include a cost threshold of \$13,000/ton.²

¹ Appendix 3A of Ohio's Proposed ISIP, "LADCO 2015 O3 NAAQS Transport Modeling TSD"

² Regulations of Connecticut State Agencies section 22a-174-22e(h).

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- Ohio did not demonstrate that it made any evaluation of the costs necessary for obtaining even minimal reduction of ozone precursor emissions from Ohio sources. Ohio should include a cost analysis to demonstrate that it fulfills step three of the four-step framework outlined in USEPA's March 27, 2018 memo.³

In assessing strategies to determine what could be cost effective, DEEP offers the following examples that have been implemented in Connecticut:

- NOx RACT (Regulations of Connecticut State Agencies ([RCSA 22a-174-22e](#) and [RCSA 22a-174-22f](#)),
- Municipal Waste Combustors ([RCSA 22a-174-38](#)),
- Architectural and industrial maintenance coatings ([RCSA 22a-174-41](#) and [RCSA 22a-174-41a](#)), and
- Adhesives and sealants ([RCSA 22a-174-44](#)).

Additional opportunities for stationary and area sources⁴ are provided by the Ozone Transport Commission (OTC) and could inform Ohio's analyses of available cost-effective emissions reductions:

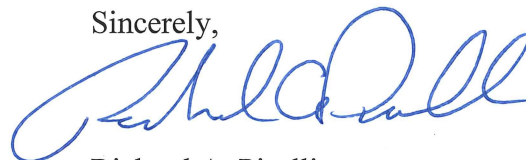
- High electric demand days,
- Oil and gas,
- Consumer products,
- Natural gas boilers, and
- Asphalt paving.

Ohio has noted that on-road emissions also contribute to the ozone problem in the east. DEEP concurs. As demonstrated in the recently proposed ISIP for New York, Ohio's on-road sector accounts for nearly 30% of the total on-road sector contribution to Connecticut's highest monitor (Westport). Therefore, Ohio should consider adopting the following low cost on-road strategies:

- Expanding Ohio's Inspection and Maintenance program to a statewide program, or at a minimum include most of the highly populated areas of the state,
- Adopt the California clean cars program, and
- Adopt idling restrictions.

We hope that by addressing these comments, Ohio will fully satisfy CAA requirements for addressing interstate ozone transport. Please feel free to contact Ms. Kathleen Knight of my staff at 860-424-3823 if you have any questions regarding these comments.

Sincerely,



Richard A. Pirolli
Director, Planning and Standards Division

³ The four-step framework is outlined in USEPA's [March 27, 2018 memo](#).

⁴ For specific guidance, model rules regarding these suggestions can be found through the [Ozone Transport Commission](#).