



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 18 2016

Robert Hodanbosi  
Chief, Division of Air Pollution Control  
Ohio Environmental Protection Agency  
50 West Town St.  
P.O. Box 1049  
Columbus, Ohio 43216-1049

REPLY TO THE ATTENTION OF

Dear Mr. Hodanbosi:

On behalf of the U.S. Environmental Protection Agency, I would like to thank you for your January 15, 2016 submittal identifying sources to be characterized under the sulfur dioxide (SO<sub>2</sub>) Data Requirements Rule (DRR).<sup>1</sup> I am writing to respond to your submittal and provide additional information about the next steps in this source characterization effort, which will result in important data that states and EPA will use to protect public health.

On August 21, 2015, EPA finalized the DRR, which requires state air agencies to characterize ambient SO<sub>2</sub> levels in areas with large sources of SO<sub>2</sub> emissions to help implement the 1-hour SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS). Under the DRR, state air agencies must, at a minimum, model or monitor air quality around sources that emit 2,000 tons per year (tpy) or more of SO<sub>2</sub> and that are not located in an area already designated nonattainment. For a source listed because it emitted more than 2,000 tpy, an air agency may avoid this requirement by adopting federally enforceable emission limits by January 13, 2017 that ensure that the source will emit less than 2,000 tpy of SO<sub>2</sub>.

Under the DRR implementation schedule, state air agencies were required to submit to EPA by January 15, 2016 a list that identifies all sources within the state's jurisdiction with SO<sub>2</sub> emissions of 2,000 tpy or more during the most recent year for which emissions data are available. Air agencies or EPA may also include sources with SO<sub>2</sub> emissions below 2,000 tpy on a state's source list where characterization of air quality around the sources is warranted.

On February 1, 2016, an email from Jennifer VanVlerah of your staff provided evidence that Kraton Polymers, in Washington County, although included in your state's list, should not be listed as subject to the DRR. Specifically, the email indicated that this source permanently and enforceably shut down its two primary emission sources as of August 31, 2015, which suggests further that 2015 emissions were below 2,000 tpy. Accordingly, EPA is revising the list of sources to remove this source.

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<sup>1</sup> "Data Requirements Rule for the 2010 1-Hour Sulfur Dioxide (SO<sub>2</sub>) Primary National Ambient Air Quality Standard (NAAQS); Final Rule," 80 *Federal Register* 51052, August 21, 2015.

EPA has reviewed your agency's submittal and, aside from the removal of Kraton Polymers, we concur with the list of sources provided. As such, EPA is not adding other sources to the list at this time.

Your submittal identifies a pair of sources, namely Graymont Dolime (in Ottawa County) and Martin Marietta Magnesia Specialties (in Sandusky County) which each emit less than 2,000 tpy but which have sufficient proximity and sufficient emissions to raise questions about their combined impacts. Your submittal indicates an intent to analyze the combined impacts of these sources and indicates a preference that these sources not be listed pending completion of that analysis. We find this an appropriate request, consistent with the principles of the DRR, and so we will defer any decision on whether to list these sources pending receipt of further information on whether these sources warrant listing.

The next key milestone for purposes of DRR implementation is July 1, 2016, the date by which each air agency must identify, for each listed source, the approach it will use to characterize air quality in the respective area (air quality modeling, ambient monitoring, or establishment of a federally enforceable emission limit). We anticipate that your analysis for Graymont Dolime/Martin Marietta Magnesia Specialties will be completed sufficiently in advance of that deadline to be able to meet this and other DRR requirements for these sources in timely fashion, should the listing of these sources prove warranted.

For sources that an air agency decides to evaluate through air quality modeling, the DRR requires the air agency to submit a modeling protocol to the EPA Regional Administrator by July 1, 2016, and the completed modeling analysis by January 13, 2017. For sources that an air agency decides to evaluate through ambient monitoring, the air agency will need to identify appropriate sites to characterize peak 1-hour SO<sub>2</sub> concentrations, and may need to relocate existing monitors or install new monitors at such sites. As further required under the DRR, the air agency must submit information about monitoring sites to the EPA Regional Administrator by July 1, 2016, as part of its annual monitoring network plan and in accordance with EPA's monitoring requirements specified in 40 CFR part 58. The air agency must also ensure that ambient monitors will be operational by January 1, 2017.

As noted earlier, in lieu of characterizing air quality around a source with SO<sub>2</sub> emissions that are at or above 2,000 tpy, air agencies may indicate by the July 1, 2016 deadline that they will adopt federally enforceable emissions limitations that will limit the SO<sub>2</sub> emissions of a source to a suitable level below 2,000 tpy. (For sources listed based on emissions below 2,000 tpy, further analysis would generally be needed to determine the level of emissions that would address concerns about nearby air quality.) Such limits must be adopted and effective by January 13, 2017. The DRR requires that an air agency provide a description of the requirements and emission limits that the air agency intends to apply for the affected sources in their July 1, 2016, submittal.

We look forward to a continued dialogue with you and your staff as you prepare the required submittals that are due on July 1, 2016. To assist in this process, we are available to discuss any technical issues that you may have concerning either modeling or monitoring in order to assist you in meeting this requirement.

Please note that a copy of each state air agency's submittal and a compiled national list of sources subject to DRR requirements are posted on EPA's SO<sub>2</sub> implementation website at [www3.epa.gov/airquality/sulfurdioxide/implement.html](http://www3.epa.gov/airquality/sulfurdioxide/implement.html). We also plan to post this letter on that site and to update the compiled national list with the source removed by this letter as described above in the near future.

Again, thank you for your letter and for your efforts to implement this important standard. For additional information concerning the DRR, please visit our SO<sub>2</sub> implementation website listed above. For additional information regarding designations under the SO<sub>2</sub> standard, please visit our website at [www.epa.gov/so2designations](http://www.epa.gov/so2designations). Should you have any questions, please do not hesitate to call me or contact George Czerniak, Air and Radiation Division Director, at 312-353-2212 or [czerniak.george@epa.gov](mailto:czerniak.george@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Kaplan". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert A. Kaplan  
Acting Regional Administrator