



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

JAN 15 2016

Ms. Susan Hedman
Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

**Re: Ohio's List of Applicable SO₂ Sources Pursuant to 40 CFR 51.1202
for the 2010 1-hour SO₂ Standard**

Dear Administrator Hedman:

I am writing to submit Ohio's list of applicable sources under "Subpart BB – Data Requirements for Characterizing Air Quality for the Primary Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS)" (Data Requirements Rule (DRR)). Under 40 CFR 51.1203, each state is required to submit a list of applicable SO₂ sources identified pursuant to 40 CFR 51.1202 by January 15, 2016. Under 40 CFR 51.1202, applicable sources include sources of SO₂ emissions that have annual actual SO₂ emissions of 2,000 tons or more or other sources of SO₂ emissions that have been identified by the State or U.S. EPA Regional Administrator as requiring further air quality characterization. Further, 40 CFR 51.1202 states the most recently available annual SO₂ emissions data is to be used for determining the applicable sources.

Based upon 2014 emissions reported to Ohio EPA, the following list of sources (that have not permanently shutdown) have annual actual SO₂ emissions of 2,000 tons or more:

Facility Name	Ohio EPA Facility Identification	2014 Emissions (TPY)
Miami Fort Station Dynegy	1431350093	28,479
Bay Shore First Energy	0448020006	2,002
Conesville AEP	0616000000	7,370
W.H. Sammis First Energy	0641160017	10,263
J.M. Stuart DP&L	0701000007	10,768
Killen DP&L	0701000060	13,095
Carmeuse Lime Inc. Maple Grove	0374000010	4,438
Avon Lake Power Plant NRG	0247030013	34,935
P.H. Glatfelter Comp.	0671010028	18,444
City of Orrville DPU	0285010188	12,454
Morton Salt Inc.	0285020059	5,329
KRATON Polymers	0684010011	2,709
The Medical Center Comp.	1318003059	2,403

In addition to the above, three other sources fall under the requirements of 40 CFR 51.1202 but these sources were already analyzed under the U.S. EPA Consent Decree requirements:

Facility	Ohio EPA Facility Identification	2014 Emissions (TPY)
Kyger Creek OVEC	0627000003	13,748
General J.M. Gavin AEP	0627010056	36,873
W.H. Zimmer Station	1413090154	13,498

On March 20, 2015, U.S. EPA notified states regarding a settled consent decree with Sierra Club that affects the above three sources that fall under 40 CFR 51.1202. Specifically, General J.M. Gavin AEP and W.H. Zimmer Station were required to be analyzed on a separate, accelerated timeline. Ohio EPA also included Kyger Creek OVEC in the analysis due to the proximity of Kyger Creek OVEC to General J.M. Gavin AEP. U.S. EPA allowed states an opportunity to submit recommendations on the designations of the areas around the subject facilities by September 18, 2015. Ohio EPA performed the required analysis and submitted our recommendations on September 16, 2015.

In addition to the above, Ohio EPA has identified one additional source requiring further characterization:

Facility	Ohio EPA Facility Identification	2014 Emissions (TPY)
BP-Husky Refining LLC	0448020007	1,618

BP-Husky Refining LLC is being characterized due to its close proximity to the Bay Shore First Energy facility.

Lastly, Ohio EPA is aware that the U.S. EPA Regional Administrators are also looking at other sources of SO2 emissions that may require further air quality characterization. Specifically, U.S. EPA is looking at collections of sources within five kilometers of each other that collectively exceed 2,000 tons per year. Ohio EPA is working with Region 5 to discuss these other potential sources. Ohio EPA is currently working with two sources that fall under U.S. EPA's criteria and is determining the suitability of using the U.S. EPA methodology for subjecting these sources to the DRR. These two sources are Graymont Dolime (OH), Inc. (0362000079) and Martin Marietta Magnesia Specialties, Inc. (0372000127). The sources of SO2 emissions from these two facilities are located within approximately 4.85 kilometers of each other and combined 2014 SO2 emissions were 2,620 tons.

At this time, Ohio EPA has significant concerns regarding inclusion of these sources as subject to the DRR and is therefore, not including them in our initial list. U.S. EPA appears to have arbitrarily determined criteria (five kilometers and >2,000 tons) for subjecting other sources to the DRR. It is Ohio EPA's understanding once a source is identified on Ohio's list and subject to the DRR, that source will be subject to the modeling or monitoring requirements of 40 CFR 51.1203 and the ongoing data requirements under 40 CFR 51.1205. Significant state resources are required to fulfill these requirements and Ohio cannot at this time commit to the use of such resources based upon what appears to be arbitrary criteria. Ohio EPA will continue to analyze these two sources and work with U.S. EPA Region 5 in determining the suitability of subjecting these sources to the DRR. Until our analysis is complete, we are not including Graymont Dolime (OH), Inc. and Martin Marietta Magnesia Specialties, Inc. on our list.

I appreciate the opportunity to provide our initial list of sources subject to the DRR and will work cooperatively with U.S. EPA Region 5 staff as we both continue the process of fulfilling the DRR obligations. 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 'CWB', with a long horizontal flourish extending to the right.

Craig W. Butler
Director, Ohio EPA

Cc: Robert F. Hodanbosi, Chief Division of Air Pollution Control