Testimony
of
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Dayton, Ohio

Regarding Ohio EPA's Proposed Redesignation of Clark, Greene, and Montgomery Counties To Attainment for the Annual National Ambient Air Quality Standard for PM-2.5

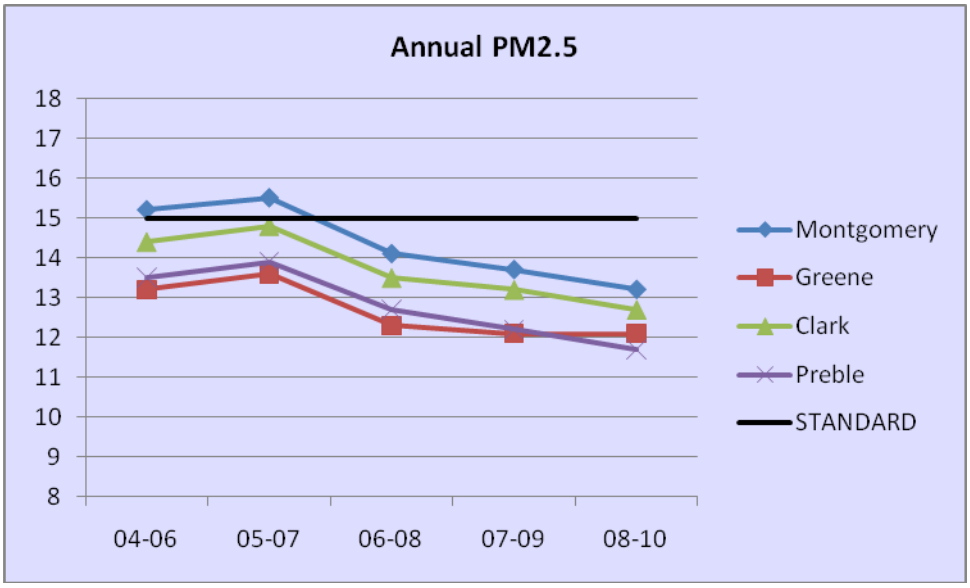
May 3, 2011

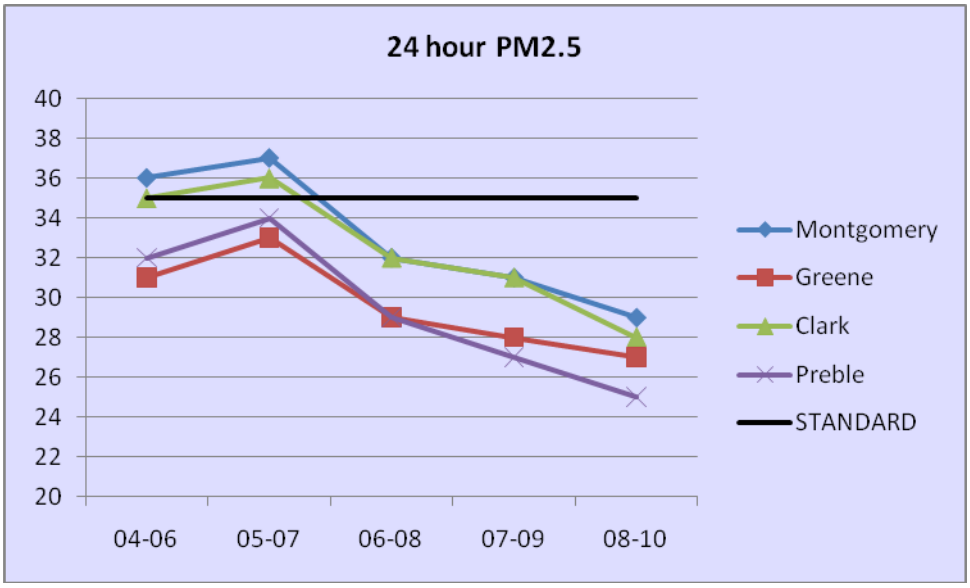
Good afternoon, my name is John A. Paul and I am the Administrator of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio. RAPCA is the local agency responsible for air pollution control activities in the Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble.

This testimony is offered in support of Ohio EPA's proposal for redesignation of Clark, Greene, and Montgomery Counties as attainment of the annual National Ambient Air Quality Standard (NAAQS) for PM-2.5. We commend Ohio EPA for the completeness of the redesignation package, and offer both this testimony and written comments as supplemental support.

The Ohio EPA proposal discusses the five criteria for redesignation from USEPA's *Procedures for Processing Requests to Redesignate Areas to Attainment*. RAPCA staff reviewed the complete OHIO EPA document and offer the following in support.

RAPCA operates four PM-2.5 air quality monitoring stations. Three-year average PM-2.5 concentrations, along with the applicable standards are shown in the following two figures. "Montgomery" are data from the urban core of Dayton, and represent the highest concentrations of PM-2.5 in RAPCA jurisdiction. "Greene" is located in the Village of Yellow Springs, Greene County, which is downwind of Dayton. "Clark" is located on the roof of a fire station in the City of Springfield, Clark County, which is an urban location. Our rural upwind site denoted "Preble" represents PM-2.5 levels transported into RAPCA jurisdiction.

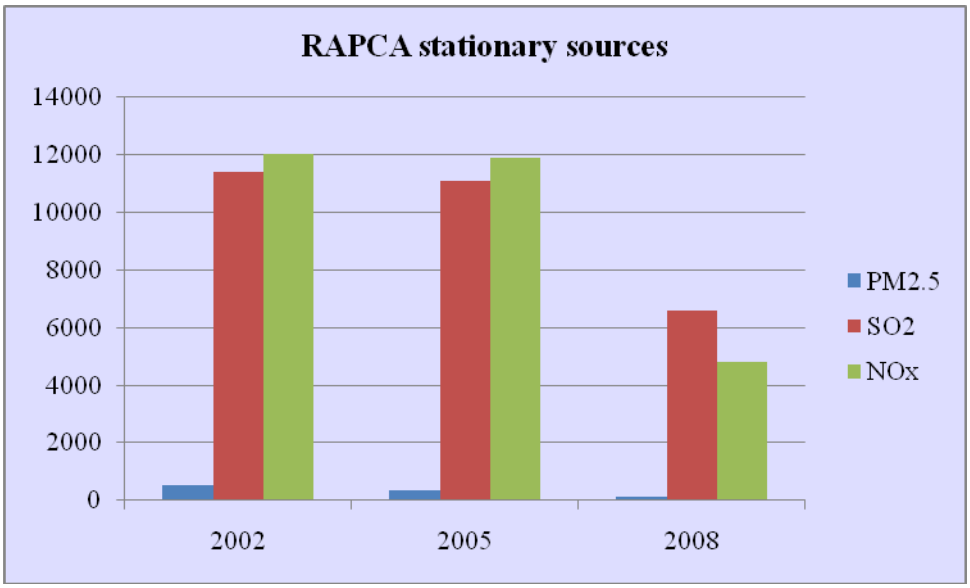


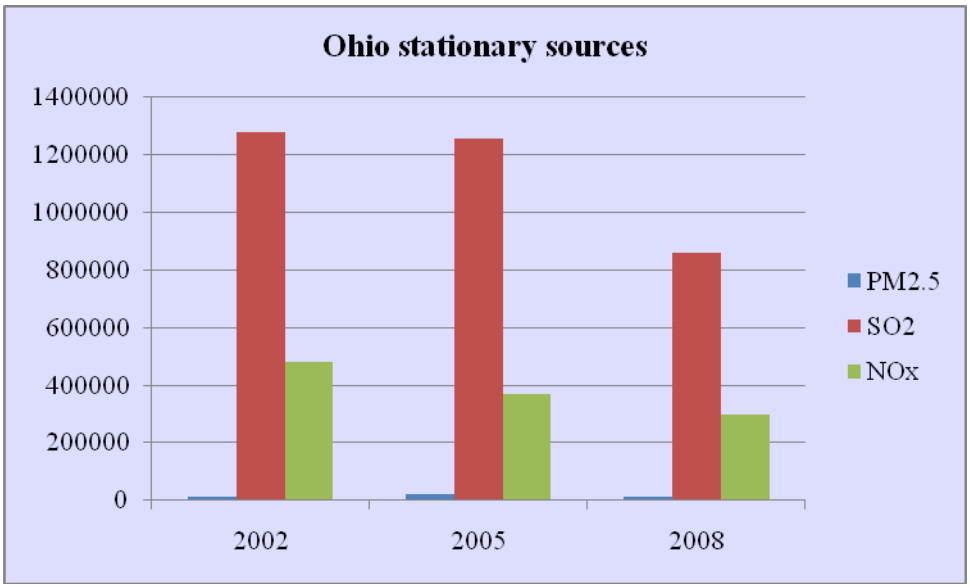


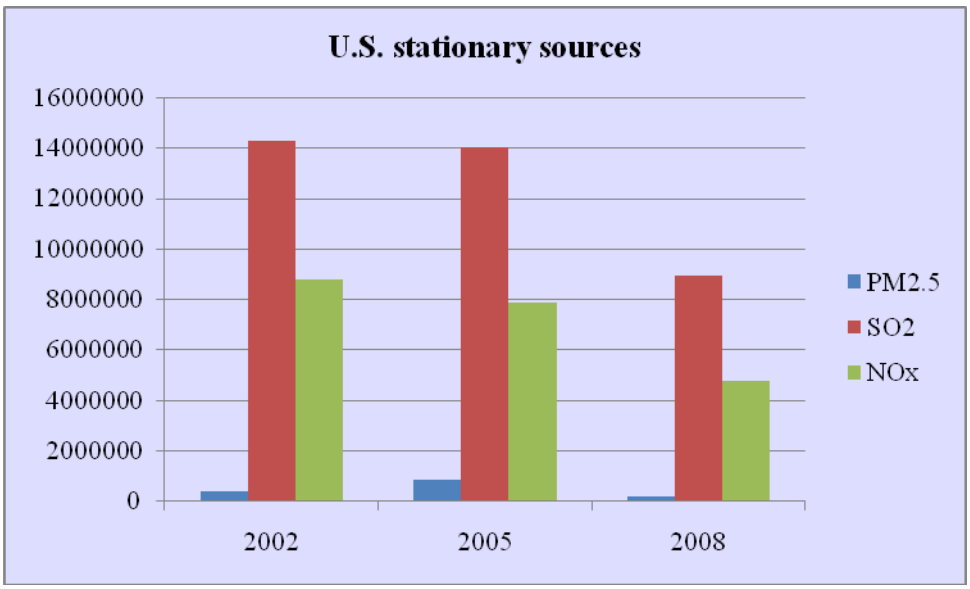
As can be seen from these graphs, the monitored data are clearly below the standard and are trending downward. The monitored data clearly show attainment.

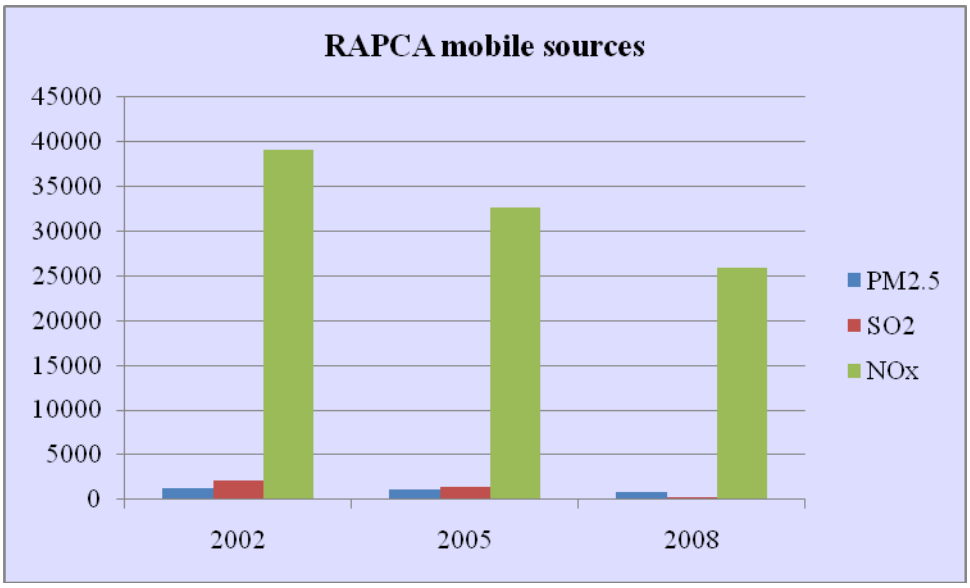
We believe these monitored data reflect decreases in both direct emissions of PM-2.5 and precursors (SO2 and NO2) from both stationary and mobile sources. These decreases in emissions are within RAPCA's six counties, as well as state-wide and nation-wide as is shown in the following figures.

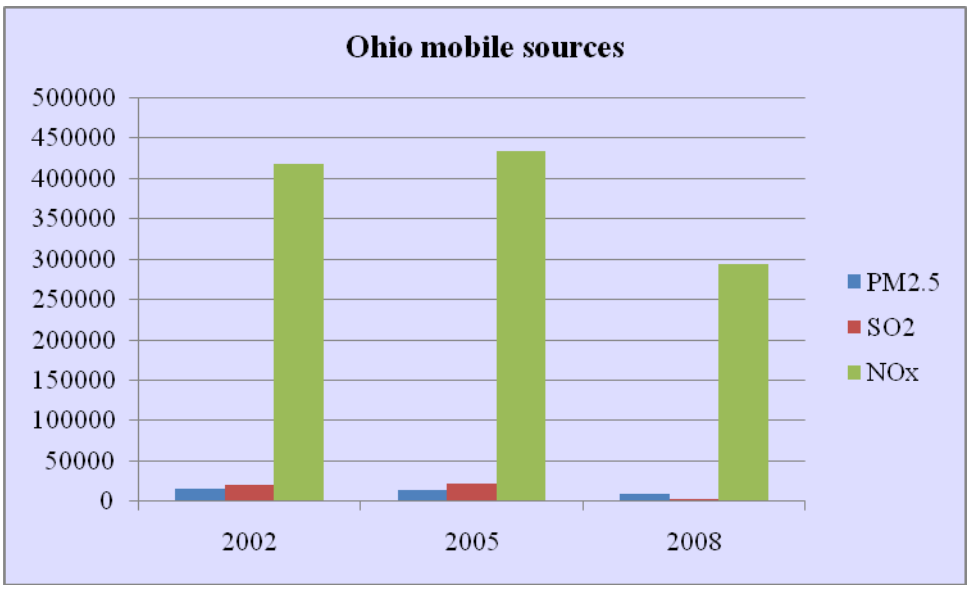
Emissions Inventory – extracted from 2002, 2005, 2008 National Emission Inventory

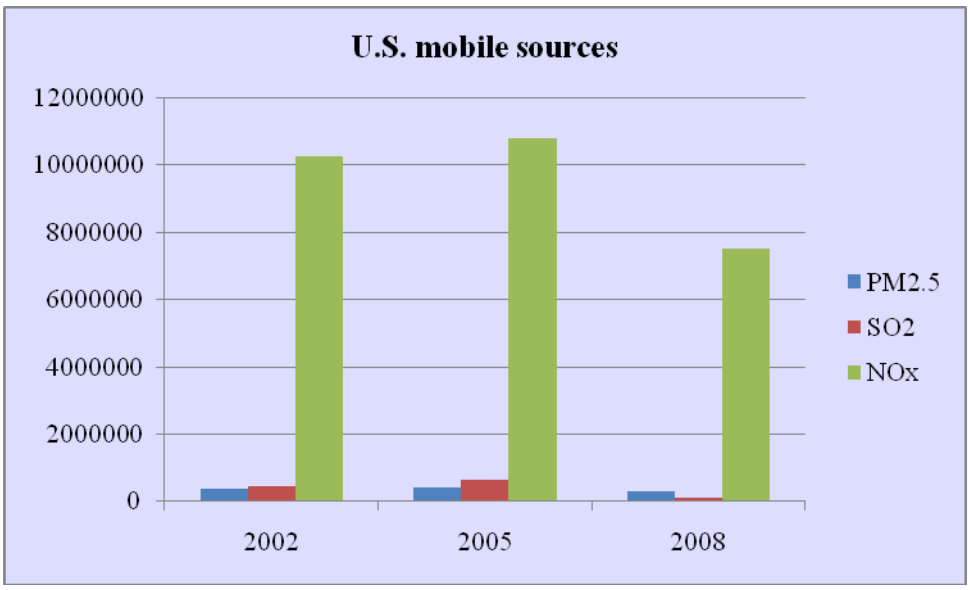



Ohio stationary sources
1400000
1200000
1000000
800000
600000
400000
200000
0
2002
2005
2008
PM2.5
SO2
NOx


U.S. stationary sources
16000000
14000000
12000000
10000000
8000000
6000000
4000000
2000000
0
2002
2005
2008
PM2.5
SO2
NOx


RAPCA mobile sources
45000
40000
35000
30000
25000
20000
15000
10000
5000
0
2002
2005
2008
PM2.5
SO2
NOx


Ohio mobile sources
500000
450000
400000
350000
300000
250000
200000
150000
100000
50000
0
2002
2005
2008
PM2.5
SO2
NOx



These emissions reductions are due to adopted rules and consent decrees which are enforceable and projected to produce further reductions into the future. Additional major rules are on schedule for adoption. Examples of such rules and consent decrees are as follows.

Rules

- Tier II Vehicle and Gasoline sulfur program
- Heavy Duty Diesel Engines rule (includes low sulfur diesel for highway vehicles)
- Clean Air Non-road diesel rule (includes 99% sulfur reduction in non-road diesel fuel: 15ppm in 2010, down from 3,000ppm)
- NOx SIP Call (OAC 3745-14)
- CAIR (OAC 3745-109)
- Federal Transport Rule (anticipated to be finalized this summer)
- Federal EGU MACT Rule (anticipated to be finalized this fall)
- ICI Boiler MACT (recently adopted)
- NOx RACT rule (OAC 3745-110)

Enforcement/Consent Decrees

- April 2011 – TVA
- January 2011 – Northern Indiana Public Service Company
- February 2011 – CEMEX
- July 2010 – Hoosier Energy Rural Electric Cooperative
- May 2010 – American Municipal Power
- Dec 2009 – Duke Energy, Gallagher Plant
- Sept 2009 – East Kentucky Power

- August 2009 - Ohio Edison (First Energy)
- October 2007 – American Electric Power
- July 2007 – East Kentucky Power
- June 2003 – Southern Indiana Gas & Electric

Descriptions for each of these enforcement actions, including a copy of the consent decrees, are available at http://cfpub.epa.gov/compliance/cases/.

We have full confidence that the emissions of direct PM-2.5 and its precursors will continue to decrease in future years.

In conclusion, RAPCA staff believe the criteria for redesignation to attainment for PM-2.5 have been clearly met.

- The monitored air quality data show attainment; we believe these data are accurate.
- Reductions in emissions of both direct PM-2.5 and precursors have been significant and will continue into the future.
- Adoption of the federal Transport Rule, EGU MACT, and ICI Boiler MACT, combined with additional mobile source measures (including diesel fuel improvements) should assure continued emissions reductions and air quality improvement into the future.

Thus, we fully support this proposal to redesignate Greene, Clark, and Montgomery Counties as attainment for the annual PM-2.5 National Ambient Air Quality Standard.

Thank you for this opportunity to give this testimony. We appreciate very much the work that Ohio EPA has accomplished on this proposal. I am happy to answer any questions you might have.