



## REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery & Preble Counties

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April 26, 2007

John M. Mooney, Chief  
Criteria Pollutant Section  
Air Programs Branch (AR-18)  
U.S. EPA  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Re: Docket ID No. EPA-R05-OAR-2006-0976

Mr. Mooney:

The following comments are provided on behalf of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio in response to EPA's proposed rule for the "*Approval and Promulgation of Air Quality Implementation Plans; Ohio; Control of Gasoline Volatility*" as appeared in the *Federal Register* on March 29, 2007. RAPCA is one of nine local agencies in Ohio and is responsible for air quality activities in the six Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble. We support the proposed rule for the following reasons.

The Dayton-Springfield Area has a long history of nonattainment for ozone, both the previous one-hour standard and the current 8-hour standard. A major strategy for the reduction in ozone forming emissions and attainment of the standard was the implementation of an inspection-maintenance (I/M) program for light-duty vehicles. This program was implemented in the area for a period of ten years and contributed greatly to the emission reductions necessary to attain the standard. Unfortunately, the Ohio Legislature voted to end the program in the Dayton-Springfield Area as of December 31, 2005, and did not specify in the legislation control replacement programs. Thus, it was left to Ohio EPA to identify and adopt emissions control programs which would be at least as effective as was the I/M program. RAPCA personnel worked closely with Ohio EPA on the identification of VOC emissions control measures to replace the I/M program. The measures identified and adopted require controls for auto refinishing operations, portable fuel containers, industrial solvent degreasing, and 7.8 RVP gasoline. VOC emissions reductions from these measures are calculated to equate to those of the I/M program. Because we feel these measures are necessary for attainment of the 8-hour

ozone standard, we recommend that EPA approve the Ohio plan to implement the low RVP gasoline requirement in the Dayton-Springfield 8-hr ozone nonattainment area.

Thank you for this opportunity to offer comment. Please contact this writer with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John A. Paul". The signature is written in a cursive, flowing style.

John A. Paul  
Administrator