



REGIONAL AIR POLLUTION CONTROL AGENCY

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

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May 3, 2011

Ms. Carolina Prado
Ohio EPA
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

Dear Ms. Prado:

The Regional Air Pollution Control Agency (RAPCA) appreciates the opportunity to submit comments on Ohio EPA's preliminary Redesignation Request and Maintenance Plan for the Dayton-Springfield Annual PM-2.5 Nonattainment Area. RAPCA personnel appreciate very much the time and work effort Ohio EPA personnel have put into the preparation of these recommendations.

Following U.S. EPA guidance document *Procedures for Processing Requests to Redesignate Areas to Attainment*, Ohio EPA has assessed the following criteria to determine if redesignation of the Dayton-Springfield Area to attainment for the annual PM-2.5 National Ambient Air Quality Standard (NAAQS) is warranted:

1. Attainment of the standard
2. Approved State Implementation Plan
3. Determination that air quality improvement is due to permanent and enforceable reductions in emissions
4. A fully approved maintenance plan
5. Determination that Section 110 and Part D requirements have been met.

Applying these criteria to the Dayton-Springfield area, Ohio EPA is proposing that the counties of Montgomery, Greene, and Clark be redesignated to attainment for the annual PM-2.5 NAAQS.

While RAPCA fully supports Ohio EPA's decision to propose redesignation of the Dayton-Springfield to attainment for the annual PM-2.5 NAAQS, a detailed review of emissions data and monitoring data indicate that the evidence supporting the redesignation request is even stronger than has been stated by Ohio EPA.

In the main document, tables 17 and 21 list current and projected emission inventories for NO_x and SO₂ in Clark, Greene, and Montgomery Counties. These data in tons per year, along with the STARS2 Title 5 SO₂ emission inventory for RAPCA jurisdiction are summarized in the following table.

	2005	2008	2015	2022
Total NOx	39,234	32,624	20,905	14,390
Total SO2	11,232	9,849	9,829	9,556
Title 5 SO2	9,074	6,576	---	---

Approximately 75% of the total NOx reduction is attributable to onroad mobile source controls. However, the SO2 inventory is dominated by large stationary sources, and since projections evidently are based on modeling conducted by staff at the Lake Michigan Air Directors Consortium (LADCO), very little reductions in SO2 emissions are projected. However, Title 5 data show that large decreases in SO2 are occurring in RAPCA jurisdiction.

The LADCO modeling technical support document is attached as Appendix D to the redesignation request. It is dated September 12, 2008 and has projected inventories and modeled ozone and PM-2.5 concentrations for 2009, 2012, and 2018. The modeled concentrations can be compared to the actual monitored values for 2009.

Annual PM-2.5 at Dayton Library

	2005	2009	2012	2018
LADCO model (w/CAIR)	15.5	13.2	12.9	12.4
RAPCA monitor	17.4	12.4	---	---

Daily PM-2.5 at Dayton Library

	2005	2009	2012	2018
LADCO model (w/CAIR)	37.8	30	30	30
RAPCA monitor	45.0	26.8	---	---

While all of the LADCO modeling scenarios (there are three other scenarios less stringent than the (w/CAIR) scenario) show PM-2.5 design values below the NAAQS in 2009 and into the future for the Dayton Area, the modeling doesn't appear to capture all of the reductions in PM-2.5 concentrations that are occurring in the Midwest. This issue may be much more important in larger metropolitan areas such as Cleveland and Chicago.

We repeat our appreciation of the time and effort that Ohio EPA personnel put into the preparation of these preliminary recommendations and we look forward to the opportunity to discuss our comments in a future meeting. Please address any questions on these comments to either the writer or Andy Roth

Sincerely,



John A. Paul, RAPCA Administrator