



REGIONAL AIR POLLUTION CONTROL AGENCY

Serving Clark, Darke, Greene, Miami, Montgomery, and Preble Counties
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January 23, 2008

Ms. Sam MacDonald
Ohio EPA, DAPC
Lazarus Government Center
P. O. Box 1049
Columbus, Ohio 43216-1049

Dear Ms. MacDonald:

The Regional Air Pollution Control Agency (RAPCA) appreciates the opportunity to submit comments on Ohio's preliminary recommendations for attainment/nonattainment counties within Ohio for the revised PM_{2.5} standard. RAPCA personnel appreciate very much the time and work effort Ohio EPA personnel have put into the preparation of these recommendations. However, we have several comments and questions regarding the supporting documentation and hope to be given the opportunity to meet with Ohio EPA personnel to discuss our identified issues in greater detail.

In December 2007, Ohio EPA solicited comments regarding the extent of Ohio's nonattainment areas for the revised PM_{2.5} NAAQS. The annual PM_{2.5} standard remains at 15.0 ug/m³ and the 24-h standard was tightened to 35 ug/m³. The revised PM_{2.5} standards became effective on December 18, 2006.

Following U.S. EPA guidance, Ohio EPA assessed potential nonattainment areas in Ohio based on nine designation factors:

- Air quality
- Emissions
- Population and urbanization
- Traffic & commuting
- Growth
- Current emission controls
- Political and other boundaries
- Topography

- Meteorology

Applying these factors to the Dayton-Springfield designation area, Ohio EPA plans to propose nonattainment designations for Greene and Montgomery counties alone, designating Clark County as attainment for the PM_{2.5} NAAQS.

RAPCA does not at this time support the designation of Clark County as attainment. Based on the air quality monitoring data for PM_{2.5} in RAPCA jurisdiction, as presented in Appendix B (filename: B_PM2.5Summary.pdf) to the Ohio EPA Proposed Designations document, it is clear that air quality issues persist in Clark County. Appendix B lists the Clark County monitored 3-year average of the 24-h 98th percentile value as 34.73 ug/m³ (2004 – 2006). While it is true that this value is (barely) in attainment of the 24-h standard of 35 ug/m³, we note that the data for 2005 – 2007 presented in Appendix B show a 3-year average of the 24-h 98th percentile value of 36.43 ug/m³, which clearly does not attain the NAAQS. RAPCA analysis of the complete 2007 dataset also shows that the 3-year monitored value does not attain the NAAQS. Therefore we do not believe that designating Clark County as attainment is justified or protective of public health.

RAPCA notes the presentation of emissions data in tons per day for counties in and near the Dayton-Springfield designation area on page 84 of 177 of the document. There appears to be a large increase of PM_{2.5} and PM_{2.5} precursor emissions in Miami County between 2005 and 2009. No other county in our area shows such a dramatic increase in emissions; in fact, in most cases decreases are shown. We wish to discuss with Ohio EPA the basis for the predicted increases in emissions in Miami County. Furthermore, Miami County has never been equipped with a PM_{2.5} monitor, so its air quality status is truly not known. Allowing this lack of knowledge to persist, without examination of kDVMT and commuting patterns (Factor 4) for Miami County, does not seem to be prudent. This situation should be explicitly addressed in the PM_{2.5} designation recommendation document.

The document describes emissions in Montgomery County as “not high” (page 82). RAPCA questions the informational value of this statement, and we wonder how 40.69 tons per day of sulfur dioxide emissions can be construed this way.

We also question the rationale behind listing major employers such as school districts, hospitals, universities and banks in Clark, Greene and Montgomery counties in a document addressing air quality issues, while neglecting large emitters of PM_{2.5} and PM_{2.5} precursors in our area such as CEMEX, Cargill and Appleton Papers. Listing top ten emitters would make more sense.

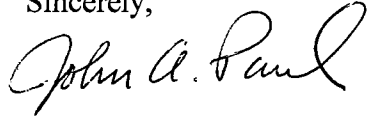
Figure on page 83 does not list the AIRS Site ID number for the Greene County PM_{2.5} monitoring site (Yellow Springs).

Final comment: On page 92, “several coal-fired electronic utilities” should be “several coal-fired electric utilities.”

We repeat our appreciation of the time and effort that Ohio EPA personnel put into the

preparation of these preliminary recommendations for attainment/nonattainment counties within Ohio for the revised PM_{2.5} standard. We look forward to the opportunity to discuss our comments in a future meeting. Please address any questions on these comments to either this writer or Andy Roth.

Sincerely,

A handwritten signature in black ink that reads "John A. Paul". The signature is written in a cursive style with a large, looping initial "J".

John A. Paul, RAPCA Administrator