

<b>Comments Received from Task Force Members and Interested Observers on Ozone SIP Voting, April 25, 2006</b>	
AR-1	Evans - AR-1: This should be expanded to all diesel area sources including construction sites, shopping districts and etc. This also can be made enforceable through appropriate state and/or local regulations. Overall this should be a cost savings.
AR-4	Dominak - AR-4: Extend free time to one hour. That should be more than enough time drop-offs and pick-ups. Thirty minutes is tight.
AR-5	Dominak - AR-5: Yes. Also advertise as part of the Public Education Program.
AR-8	Chuna - AR-8: According to EPA, possible N20 generation. Currently undergoing durability testing.
AR-9	Chuna - AR-9: Expensive, with increased PM noted by the EPA. Increased PM means clogged dpf filters and decreased oil life.
AR-10	Chuna - AR-10: Possible vanadium emissions and added cost of urea.
AR-14	Nemeth - AR_14: Voluntary effort would have no traction, it is best to create an incentive
AR-15	Dominak - AR 15, 16: Too costly to implement. Potential emission reduction extremely low
AR-15	Chuna - AR-15: According to EPA, possible N20 generation. Currently undergoing durability testing.
AR-16	Chuna - AR-16: Costly proposition for agriculture industry - diesels can be rebuilt many times for the same cost of a new engine.
AR-17	Evans - AR-17: Surprised this wasn't listed in the area sources. Given the number of towmotors utilized in industrial and warehousing operations this should be added to list.
MO-1	Dominak - MO-1: People will fill up their cars at gas stations that have the lower cost fuel, then drive thru the non-attainment area. So the collar counties would have to be included. Reformulated fuels should only be used as a last resort. Shortages of reformulated gasolines is also a major concern.
MO-1	Leidich - MO-1: API Work Group recommends 1-3 years lead time from date EPA approves SIP
MO-1	McCormack - MO-1: We recognize that vehicles (cars, trucks, busses, etc) are collectively the single largest source of VOC pollution- the second component of ground-level ozone formation- and therefore should also bear a large burden of responsibility. Regional studies show that the price differential for "summer fuel" is either nothing or very small compared to today's daily price jolts. Consumers are already growing accustomed to higher gas prices, and because certain types of behaviors (such as idling) are influenced by the price of gas, we strongly advocate a summer fuel blend. (5.25 VOC; 0.32 NOx)
MO-1	Newbacher - MO-1: This is the most realistic fuel option when factoring availability and price to consumers (5.25 VOCx .32 NOx)
MO-1	Chuna - MO-1: higher refining costs, passed to consumer. Potential supply issues. slight mileage penalty.
MO-1	Enty - MO-1: Of fuels, the easiest to implement.
MO-2	Leidich - MO-2: Feasibility questionable without 2 years lead time from date EPA approves SIP
MO-2	Chuna - MO-2: higher refining costs, passed to consumer. Slight mileage penalty, Potential supply issues
MO-2	Fagan - MO-2: If we cannot get federal RFG, this would be the next best summer fuel.
MO-3	Leidich - MO-3: Feasibility questionable without 4 years lead time from date EPA approves SIP
MO-3	Chuna - MO-3: higher refining costs & slight mileage penalty.. agribusiness is big winner as MTBE is replaced by ethanol in certain areas.
MO-3	Fagan - MO-3: Best of the 3 fuel alternatives.
MO-3	Hearne - MO-3: Politically challenging, but this option provides the best trade off for emissions versus costs. Expect resistance from petroleum suppliers as well as USEPA.

MO-4	Hearne - MO-4: Politically challenging, however, this is a low cost option that will provide credits needed for attainment.
MO-5	Chuna - MO-5: hardship for low income citizens who drive older cars.
MO-5	Trivison - MO-5: Here is the revised cost for adopting the ASM 2525 Final Standards for Older Vehicles - The costs would be those imposed on vehicle owners whose cars failed the more stringent test. Assuming a failure rate of 25%, and an average repair cost for pre-1996 vehicles of \$179, the incremental cost of this program would be \$2,898,321. No additional State of Ohio costs are anticipated. This is based on 16,192 cars failing the test due to the more stringent standards.
MO-6	Newbacher - MO-6: Seventy-eight percent of AAA members believe vehicles 5 years old or newer should be exempt from e-check.
MO-6	Chuna - MO-6: hardships for low income drivers.
MO-7	Chuna - MO-7: All cars should be E checked in the state.
MO-7	Hearne - MO-7: If a county falls within our moderate nonattainment area, they will need to have an I/M program.
MO-8	Chuna - MO-8: high costs will be passed to consumers, and rebuilds are cheaper.
MO-9	Chuna - MO-9: fuel mileage penalty would make this unacceptable to the fleet owner.
MO-10	Nemeth - MO-10: Multi-Statewide encompasses through traffic with huge benefit to concentrated urban areas and highway hubs
MO-10	Chuna - MO-10: According to EPA, possible N20 generation. Currently undergoing durability testing.
MO-11	Chuna - MO-11: Expensive, with increased PM noted by the EPA. Increased PM means clogged dpf filters and decreased oil life.
MO-12	Carey - MO-12: Replacement of diesel engines on older vehicles, not replacement of entire vehicle.
MO-12	Chuna - MO-12: Possible vanadium emissions and added cost of urea. Requires engine integration - very high cost.
MO-13	Hearne - MO-13: Government should lead by example.
MO-14	Carey - MO-14: Could provide enforcement mechanism with OH tax incentive & filing of mileage -- complex but possible . . . And Northeast Ohio will deserve a break after increased E-check
MO-14	Evans - MO-14: Engages the public in efforts to improve the environment
MO-14	Nemeth - MO-14: Reduce travel into NAA with added benefit of fuel savings
MO-14	Enty - MO-14: Combine with better incentives.
MO-14	Fagan - MO-14: Cost savings and significant reductions in NOx and VOCs.
MO-14	Hearne - MO-14: A relatively low cost mechanism to involve people in reaching attainment. This rewards people who change their behavior patterns to help the nonattainment area.
MO-15	Enty - MO-15: Accelerate; expand funding.
MO-15	Fagan - MO-15: Positive benefits for drivers and riders.
MO-16	Newbacher - MO-16: Both quantifiable and enforceable for VOCs
MO-16	Enty - MO-16: Helps transit a great deal.
MO-19	Hearne - MO-19: This should be a no-brainer across the U.S.
MO-20	Nemeth - MO-20: Includes added incentive with fuel savings
MO-21	Carey - MO-21: Has some savings, plus other benefits; part of cost is fedl & local communities want it.
MO-22	Dominak - MO-22, 23, 24: Need to make it easier for people to use public transit.
MO-22	Enty - MO-22, 23, 24: Accelerate implementation; fund more frequent service; these help make transit a more attractive option.
MO-25	Bower - MO-25: This is the number one target for our school bus fleet to reduce emissions.
MO-25	Carey - MO-25: Believe it could be enforced. Would be a great public education tool re mobile source problem & citizens would call for enforcement

MO-25	Evans - MO-25: Disagree with the statement that this is not enforceable. Many said seatbelt laws were unenforceable and yet seatbelt use now approaches 80+%. A state or local regulation would be enforceable with the proper commitment of resources.
MO-25	Fagan - MO-25: Cost savings; positive benefits to vulnerable populations nearby, such as school children.
MO-26	Newbacher - MO-26: Let's get super-polluting vehicles off the road. I believe the benefits are underestimated.
MO-26	Trepal - MO-26: Makes sense, but would require a figure that was appropriate to a down payment for a used vehicle that would pass echeck.
MO-26	Chuna - MO-26: Costs to repair may be less than cost to purchase. Purchased vehicles should be dismantled rather than scrapped.
MO-27	Bower - MO-27: We need to create other fuels that are clean and don't involve fossil fuel refinement
MO-27	Trepal - MO-27: E85/Stage II Considerations must be addressed in non-attainment areas; whether or not the waiver is necessary, or if there are appropriate dispensatory means in place to initiate a program immediate... this one is critical, given that there are so many vehicles on the road in the state of Ohio that area already E85 capable. Infrastructure would provide instantaneous results, even if initially the cost of the fuel was a wash or slightly higher than gasoline.
MO-27	Chuna - MO-27: Lower BTU than gasoline, resulting in mileage penalty. Subsidies required to keep industry afloat due to high production costs. .
MO-28	Dominak - MO-28: Start with buses. Need a reliable, close-by source. Public Education required
MO-28	Chuna - MO-28: Nox increase, poor cold weather performance, inconsistent production standards, needs mandates and subsidies to flourish
MO-29	Chuna - MO-29: injection system durability issues, mixing equipment must be purchased, and undergoing health effects testing, according to EPA
MO-32	Enty - MO-32: Awareness/ education are vital!
MO-33	Trepal - MO-33: Critical along with other public transportation issues that are listed as priorities on this form. Appeal of use of PT must increase, even as the cost of it decreases.
PT-1	Dominak - PT-1, 2: EGUs are subject to the NOx SIP Call and Clean Air Interstate Rule (CAIR) that will yield major reductions in NOx emissions. EGU 1 isn't feasible by 2009. EGUs are also making other changes to reduce NOx emissions (e.g., Reliant Energy's changes at the Avon Lake Plant).
PT-1	Evans - PT-1: FE modeling of Cleveland MSA EGU's shows little to no benefit in air quality (< 0.3 ppb) in the Cleveland MSA by going beyond CAIR for high level point sources (tall stacks). Capital expenditures would run between \$140 - 200/kwHr of installed capacity or potentially \$300 to 450 million for EGU's in the NAA.
PT-1	McCormack - PT-1: Existing Electric Generation Units (EGU's) are the single largest source of NOx pollution in our region. As such, these entities should bear the largest responsibility of emission reductions. EGU's should use the Best Available Control Technology for emission reductions and pollution prevention. While we recognize that this is a long-term solution, important strides must be made today in order to effect change by 2009 and beyond. According to the national campaign organization Clear the Air, addressing contaminants from these plants provides the most cost-effective option for meeting minimum public health standards. (0 VOC; 14 NOx)
PT-1	Nemeth - PT-1: The entire region is impacted by EGUs and this extensive requirement is the only way to ensure the benefits to NAA
PT-1	Fagan - PT-1: Second most significant NOx reducing option.

PT-2	Evans - PT-2: FE modeling of Cleveland MSA EGU's shows little to no benefit in air quality (< 0.3 ppb) in the Cleveland MSA by going beyond CAIR for high level point sources (tall stacks). Capital expenditures would run between \$140 - 200/kwHr of installed capacity or potentially \$300 to 450 million for EGU's in the NAA.
PT-2	McCormack - PT-2: New EGU's have the opportunity to incorporate the Best Available Control Technology from the start. We strongly believe that any new plants should also integrate green building technology into their design and systems. (0 VOC; 28 NOx)
PT-2	Fagan - PT-2: Most significant NOx reducing option.
PT-2	Hearne - PT-2: The chances of this option becoming reality are pretty slim, however, the technology is available at a relatively reasonable cost. The emissions from EGUs transport significantly, therefore, all EGUs in the region should be required to comply with the same control measures.
PT-3	Dominak - PT-3, 5: LADCO indicated that estimated emission reductions for ICIs are uncertain since they did not have data on boiler sizes. In addition, information from existing control devices/ measures (i.e., low-sulfur fuel, low-NOx burners, etc.) was missing from the MRPO database. As a result, they may have overestimated the emission reduction from sources that are already controlled.
PT-3	Evans - PT-3: These sources have not been subjected to stringent NOx reduction regulations. Low level sources have a greater impact on the local nonattainment area
PT-3	McCormack - PT-3: Based on emissions from the OEPA's Permit Fee Database, we know that mid-sized industrial, commercial and industrial (ICI) boilers emit significant volumes of NOx and VOC in Northeast Ohio. Requiring these facilities to install the Best Available Retrofit Technology (BART) is critically necessary to reducing toxic emissions. (0 VOC; 2.0 NOx)
PT-6	Evans - PT-6: NOx emissions from this sector are largely unregulated.
PT-7	Dominak - PT-7: LADCO indicated that emissions from area sources are substantial, but also highly uncertain and may potentially be overestimated. The methodology used for estimating area source emissions relies on per employee emission factors (based on data collected in the 1980s) and may not be representative of types of coatings and control technologies currently used.
PT-7	McCormack - PT-7: Reductions in area sources are a vital third component of improving our air quality. Reductions of industrial surface coatings are expected to provide <b>significant</b> VOC emissions benefits if the stringency of existing RACT rules are increased, applicability thresholds are lowered, and the geographic coverage of the rules is extended. (13 VOC; 0 NOx)
PT-7	Nemeth - PT-7: Transport issue associated with collar counties and possible migration of this activity.
PT-9	Dominak - PT-9: Ohio EPA is proposing a rule that would result in a 54% reduction in VOCs. Need to see what the rule says and when it may be implemented. LADCO indicated that the emission reductions, like for industrial coatings area sources, are uncertain since they are based on per employee emission factors that were collect in the 1980s. Further refinement of the inventory for cold cleaning operations is needed.
PT-9	Evans - PT-9: Provides other environmental benefits (reduction in hazardous waste and reduced operating costs)
PT-10	Dominak - PT-10: As with Industrial Coatings, the emissions from AIM coatings might have been overestimated. It should be noted that EPA, states, and stakeholders are currently reviewing the emission calculation procedures for AIM coatings, both in terms of the baseline emission levels (with and without Part 59) as well as the emission reductions from the OTC Model Rule (See Federal Register notice dated August 31, 2005, entitled Advance Notice to Solicit Comments, Data, and Information for Determining the Emission Reductions Achieved in Ozone Nonattainment Areas from the Implementation of Rules Limiting the VOC Content of AIM Coatings).

PT-12	Nemeth - PT-12: Needed at least statewide, preferred Multi-State region wide to reduce import and use of of alternate products.
PT-12	Roddy - PT-12: We feel there are other emission sources that will give greater reductions, so we are giving this a medium priority ranking. We do not support PT-13 as a reduction strategy due to the fact these are projected reductions (not realized) and we do not yet know if these limits will prove to be technologically and commercially feasible. We support consistency with the OTC Model Rule for consumer products. We do not feel this source/strategy would be part of the Top 5 options.
PT-14	Dominak - PT-14: Ohio EPA is proposing a rule that would result in a 28% reduction in VOCs. Need to see what the rule says and when it may be implemented. Also need to minimize back yard auto painting operations. Need to educate the public concerning emissions from these back yard operations.
PT-15	Nemeth - PT-15: Transport issue associated with collar counties and possible migration of this activity to avoid requirements.
PT-17	Nemeth - PT-17: Transport issue associated with collar counties and possible migration of this activity to avoid requirements.
PT-21	Dominak - PT-21: While it will not necessarily reduce generation of electricity and EGU emissions, it may result in reduced electricity consumption on peak load days (i.e., hot summer day).
PT-21	Nemeth - PT-21: Grant process and outside involvement discourages participation for most unless cost benefit is great.
PT-21	Fagan - PT-21: We must start funding energy efficiency.
PT-22	Nemeth - PT-22: Would not be effective unless applied Multi-state
PT-24	Nemeth - PT-24: Good, but complicated to measure and would require significant change in attitude and lifestyle, and could really discourage economic stbilty and growth.
PT-24	Fagan - PT-24: We need to make a commitment to energy reduction - this is a good way to start.
PT-25	Bower - PT-25: We need to consider environment over convenience.
PT-25	Nemeth - PT-25: Good idea, but who bears the cost of replacing serviceable equipment. Expect a very long time realize benefit.
PT-27	Bower - PT-27: We need to find other sources of power to replace fossil fuels.
PT-29	Dominak - PT-29: Very important. Also need to educate industry as to what the existing rules actually require, and to take enforcement action against the illegal dischargers. Public education also important.
PT-29	Beach - PT-29: High Priority if emphasis is on helping companies prevent pollution
PT-29	Nemeth - PT-29: Really needed if the cafeteria of programs expands
PT-30	Dominak - PT-30: Very important. It is a proven way of reducing emissions, while allowing other industries to move into the area.
PT-30	Chuna - PT-30: Trading banks are a great way to incentivize cooperation and implementation with industry.
	Nemeth: It is important to note that much of the voting decisions centered on known or projected defined information. There remain many strategies where the reductions have significant potential but at this point the amounts or possible implementation remain undefined. These votes reflect my own analysis and opinion, not necessarily the position of the City of Cleveland.
	Hearne: My votes do not represent the position of the City of Cleveland or the Division of Air Quality.
	David Beach, EcoCity Cleveland, Alternate for Task Force Member
	Michael Bower, Cleveland Municipal School District, Task Force Member
	Pat Carey, Greater Ohio, Task Force Member

	Tom Chuna, BND Automotive, Interested Observer
	Bob Dominak, Northeast Ohio Regional Sewer District, Task Force Member,
	Rich Enty, Greater Cleveland Regional Transit Authority, Alternate for Task Force Member
	Ray Evans, First Energy, Task Force Member
	Dr. Kathleen Fagan, physician, Task Force Member
	David Hearne, Cleveland Division of Air Quality, Alternate for Task Force Member
	Bob Leidich, BP, Task Force Member
	Tim McCormack, Cuyahoga County Planning Commission, Task Force Member
	Richard Nemeth, Cleveland Division of Air Quality, Task Force Member
	Brian Newbacher, AAA, Task Force Member
	Mary Ellen Roddy, Diversified Brands, Sherwin Williams, Interested Observer
	Chris Trepal, Earth Day Coalition, Task Force Member
	Tia Trivison, Envirotest, Interested Observer