

Ohio EPA responses to NOACA's request for information on its SIP recommendations:

RESOLUTION NO. 2006-031

EXHIBIT A

RECOMMENDATIONS FOR 8-HOUR OZONE STATE IMPLEMENTATION PLAN FOR NORTHEAST OHIO

I. CLEAN FUEL RECOMMENDATION TO BE IMPLEMENTED BY THE OHIO ENVIRONMENTAL PROTECTION AGENCY

NOACA recommends that Ohio Environmental Protection Agency (Ohio EPA) institute a clean fuel requirement for the eight nonattainment counties in Northeast Ohio as follows:

Low-Reid Vapor Pressure (RVP) gasoline of 7.8 psi (emitting fewer Volatile Organic Compounds - VOCs) for the summer of 2009, followed by a Low-RVP gasoline of 7.0 psi (emitting fewer VOCs than 7.8 psi) for the summer of 2010 and for every summer thereafter until the standard is attained.

OEPA1/09: This is still being evaluated. We have not yet determined the impacts 7.8 and 7.0 gas will have on ambient ozone concentrations in the non-attainment area. Also, this would not appear to be necessary for the 1997 standard because we are going to ask to redesignate the area to attainment of the 1997 standard in the near future.***

OEPA1/10: This ended up not being necessary for the 1997 standard because Cleveland was redesignated to attainment in the summer of 2009 (74 FR 47414). This may be looked at for the 2008 standard, but the proceedings are slow because USEPA is rethinking the standard (i.e. will likely lower it to .070 or .065 from the proposed .075).***

II. MOBILE SOURCE PROGRAM RECOMMENDATIONS TO BE IMPLEMENTED BY NOACA AND OTHER LOCAL AUTHORITIES

The programs listed below will improve air quality. These program recommendations include activities that can be undertaken locally; promoted regionally and pursued via a legislative agenda through the Ohio General Assembly and through Congress.

1. Anti-idling policies should be adopted for cars, trucks, buses, and off-road equipment at the state policy level and the local level through the adoption of policies and regulations. Anti-idling policies improve air quality by eliminating unnecessary emissions of VOCs, oxides of nitrogen (NOx) and particulate matter (PM) from both gasoline and diesel engines. The policies generally require that fleet engines be turned off when not needed for work or emergency purposes.

OEPA *1/09: Despite the "State policy level" in the suggestion, this will be a local effort.**

2. Voluntary trip reduction programs by all employers throughout Northeast Ohio should be encouraged through education and outreach to promote increased use of mass transit, carpooling and RideShare, compressed work weeks, telecommuting, alternative practices such as conference calls and other "virtual meetings," trip combining, and promotion of commuting alternatives such as bicycling and walking. These programs improve air quality by reducing automobile emissions through the reduction of single occupancy vehicle trips undertaken by commuters.

OEPA *1/09: Local**

3. Stricter enforcement of existing speed limits by local authorities should be pursued through the hiring of additional personnel and the collection of ticket revenue. This improves air quality by reducing air emissions, particularly NOx, associated with higher speeds.

OEPA *1/09: Local**

4. State legislative authority should be pursued for all counties, through their county auditors, to verify gasoline content at gas pumps in order to determine that the gasoline sold meets the specifications stated for it. This will allow Northeast Ohio to verify specifications on any clean fuel sold during the summer months, as well as to check for excess sulfur throughout the year.

OEPA *1/09: If the RVP rules go statewide, there will be requirements for refiners and terminals to document this information.**

OEPA *1/10: This remains true.....although it is not guaranteed that RVP would automatically be statewide. The extent of expansion of RVP would be based on its need in an area as a way to attain/maintain a standard.**

5. Federal and state retrofit technology legislation should be pursued to providing funding for both public and private fleets to install NOx retrofit technology on diesel engines or to replace them. This measure would have a direct NOx reduction effect for diesel trucks and off-road construction equipment, thereby reducing both ozone formation and particulate emissions.

OEPA *1/09: Ohio EPA is continuously exploring and evaluating diesel emission reduction alternatives. Currently, there are:**

- **OEPA school bus fund: funding school bus retrofit in O3 and PM2.5 non-attainment areas**
- **USEPA funding through the Midwest Clean Diesel Initiative**
- **Diesel Emission Reduction Grant (DERG) program: 2nd round has been launched on 12/18/08 = \$11.2 million**

OEPA *1/10: In 2009, Ohio EPA applied for and received \$1.73 million in Stimulus Fund monies which were awarded to 22 grantees to upgrade 422 buses. More info is available on our website at: <http://epa.ohio.gov/oeef/stimulus.aspx>**

III. MOBILE SOURCE PROJECT RECOMMENDATIONS TO BE ENCOURAGED BY NOACA

It is believed that identifying CMAQ funding priority for the following types of projects will encourage project sponsors to submit projects to

NOACA for funding consideration. Projects submitted would be evaluated for their air quality impact potential for attaining the federal ozone standard by Northeast Ohio's Ozone SIP attainment demonstration deadline.

1. Truck stop / rest area electrification should be pursued at the three large private truck stops in Northeast Ohio (two in Medina County near Seville and one in Cuyahoga County at Broadway in Cleveland), to provide heat, A/C, power, etc., to truck drivers when the engines are turned off thereby reducing diesel air emissions. In addition, the Ohio Department of Transportation and the Ohio Turnpike Commission are strongly encouraged to implement truck stop electrification at public rest areas along Interstate Corridors throughout Northeast Ohio and the remainder of the state.

OEPA *1/09: No action at state level that we are aware of, OEC does have some truck electrification projects.**

OEPA *1/10: Still no action at the state level for 2009**

2. ODOT's Intelligent Transportation System (ITS) in the Cleveland area and the Akron area is currently programmed in the NOACA and Akron Metropolitan Area Transportation Study (AMATS) Transportation Improvement Programs (TIPs). This is a commendable project that will improve the region's air quality by increasing the efficiency of motor vehicle traffic.

OEPA *1/09: Apparently it is being implemented now.**

3. Bus replacement programs, currently programmed in the TIP, should be accelerated and augmented, if feasible, to maximize the air quality benefit resulting from fleet turnovers to cleaner engines.

OEPA *1/09: Local, no OEPA involvement**

4. Transit incentives to encourage bus and train ridership on high air pollution days, thereby reducing automobile commuting traffic and its associated air emissions, should be pursued.

OEPA *1/09: Local, no OEPA involvement**

5. Transit centers, Park-&-Ride lots and expansions, and enhanced waiting environments that help to make transit more attractive to riders should be pursued as a means of encouraging greater use of transit, eliminating single-occupancy-vehicle trips by commuters who would otherwise drive.

OEPA *1/09: Local, no OEPA involvement**

6. Traffic signal synchronizations should be pursued and prioritized for funding along regional corridors where the air quality benefit will be the greatest. This measure improves air quality by relieving traffic congestion and allowing vehicles to move at their most efficient speeds, which are generally 30 m.p.h. and above.

OEPA *1/09: Local, no OEPA involvement**

7. NOx retrofits and replacements for diesel vehicles should be encouraged as a means to decrease emissions of oxides of nitrogen. In addition, legislation, both state and federal, should be supported to provide funding for such initiatives. The new technology also warrants

education and outreach programs for fleet owners to build awareness of the benefits and costs associated with the technology.

OEPA *1/09: Ohio EPA has available it's school bus retrofit program and DERG and USEPA have available funds for diesel fleet retrofit and replacements. Ohio EPA continues to support and encourage both of these programs whenever possible.**

OEPA *1/10: See answer above about Stimulus Money and Bus Grants**

8. Replacement of ground-support vehicles at Cleveland-Hopkins International Airport with electric, compressed natural gas (CNG), or hydrogen vehicles is recommended.

OEPA *1/09: Local, no OEPA involvement**

IV. MODIFICATION TO NOACA'S REGIONAL TRANSPORTATION INVESTMENT POLICY

The following amendment to NOACA's Regional Transportation Investment Policy would act as a mechanism for advancing the mobile source program and project recommendations listed above:

"Congestion Mitigation and Air Quality (CMAQ) funding priority shall be given to mobile source programs and projects identified in NOACA's recommendations to the Ohio Environmental Protection Agency for the State Implementation Plan for attainment of the 8-Hour Ozone National Ambient Air Quality Standards (NAAQS)."

OEPA *1/09: Local, no OEPA involvement**

V. STATEWIDE CONTROLS ON POINT AND AREA SOURCES OF AIR POLLUTION TO BE IMPLEMENTED BY OHIO EPA

Ohio EPA is encouraged to incorporate the following controls on point and area sources throughout the entire state of Ohio as part of its rulemaking for the 8-Hour Ozone SIP:

OEPA *1/10: Note: As part of the reconsideration of the 8-hr ozone standard by USEPA, OEPA is investigating the need for additional control strategies in problem areas and statewide beyond those discussed below.**

1. Further controls statewide on cold cleaning/degreasing operations.

OEPA *1/09: These are in the Phase II VOC RACT rulemaking package that was proposed on January 5, 2009, but only for the Cleveland/Akron (Cle/Akr) non-attainment area. A good number of these are already implemented in the Cincinnati/Dayton (Cin/Day) non-attainment area**

OEPA *1/10: The Phase II RACT rules were promulgated and became effective on April 2, 2009. Ohio EPA is also currently working on a Phase III set of rules to implement the 2008 CTG's in the Cleveland area (misc metal/plastic parts coating, misc industrial adhesives, fiberglass boat manufacturing, and automotive parts coating). These rules are available for public comment through January 8, 2010. Ohio EPA is trying to get the rules final and effective by early Summer, 2010.**

2. More stringent limits statewide for formulation of industrial surface coatings.

OEPA *1/09: In Phase II, but only for Cle/Akr**

OEPA *1/10: See above**

3. More stringent limits statewide for formulation of consumer and commercial products.

OEPA *1/09: Already Statewide, Ch 112 "consumer Products", and Ch 113 'AIM Coatings' Rule compliance date was January 1, 2009.**

OEPA *1/10: No changes**

4. Switch to California-design portable fuel containers (gas cans) statewide.

OEPA *1/09: Already statewide, rule 3745-21-17, "Portable Fuel Containers"**

OEPA *1/10: No changes**

5. Further controls statewide on mid-size industrial boilers.

OEPA *1/09: OAC Chapter 3745-110, "NOx RACT", is currently effective in the Cle/Akr area, not statewide**

OEPA *1/10: Additional boilers controls may be a consideration to help meet the 2008 Ozone and PM2.5 standards, however, there will be no proposals until final standards are set.**

6. The Director of Ohio EPA, working with the other states in the Midwest, should pursue a multistate approach to controls greater than federal on electric utilities (coal-fired power plants).

OEPA *1/09: Not being pursued at this time**

7. Enhancement of underground gasoline storage tank pressure-valve vents at gas stations in Northeast Ohio and statewide implementation of Stage I vents at all gas stations.

OEPA *1/09: p/v vents already being used at all stage II facilities; New MACT will require Stage I controls at all large GDFs statewide**

8. Enhancement of vapor recovery nozzles at gas pumps in the nonattainment area and statewide implementation of Stage II nozzles at all gas stations larger than the current threshold limit.

OEPA *1/09: Not sure what "enhancement" means, but Stage II not planned statewide.**

OEPA *1/10: Stage II statewide may be a consideration to help meet the 2008 Ozone and PM2.5 standards, however, there will be no proposals until final standards are set.**

9. High Volume Low Pressure (HVLP) spray guns statewide for auto body paint sprayers.

OEPA *1/09: Same answer as #1 above, included in Phase II, already effective in Cin/Day**

OEPA *1/10: Same update as #1 above. Extended to Cleveland with Phase II VOC RACT rules in April, 2009.**

10. More stringent limits statewide for formulation of paints and

varnishes (architectural and industrial maintenance coatings).

OEPA *1/09: Already done, Ch 3745-113, "AIM Coatings" effective statewide, compliance date was January 1, 2009**

OEPA *1/10: No changes. Still in effect**

11. NOx Credit Trading Bank to be implemented at the Ohio EPA, for the trading of NOx allowances and offsets within any nonattainment area.

OEPA *1/09: Ch 3745-111, "ERC Banking" was just adopted on December 29, 2008 and is effective on January 8, 2009. Also, due to court remand, CAIR is back on so we now have statewide, annual control requirements again specifically for NOx (at major electric producers)**

OEPA *1/10: Ohio EPA finalized our CAIR rules in September, 2009 and USEPA has granted OEPA full approval of our CAIR program as of November 24, 2009 (74 FR 48857). This means that we now can distribute allowances to non-EGU sources as well as EGU sources.**

VI. REGIONAL LONG-TERM STRATEGIES FOR SUSTAINABLE AIR QUALITY

A regional energy conservation strategy should be pursued with member communities and other stakeholders that addresses reduction in demand for electricity, more efficient public structures and more efficient transportation systems as a means of reducing air emissions long term. NOACA should work with the Ohio Office of Energy Efficiency, the U.S. Department of Energy, the foundation community and the business community on program development and funding mechanisms for this purpose.

OEPA *1/09: Local effort, no OEPA involvement**

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APPENDIX A

RECOMMENDATIONS FOR ANNUAL FINE PARTICLE (PM2.5)

STATE IMPLEMENTATION PLAN FOR NORTHEAST OHIO

I. MOBILE SOURCE PROGRAM and PROJECT RECOMMENDATIONS to be implemented by NOACA and other local entities, assisted by state and federal entities and funding streams

The programs and projects listed below include activities that can be undertaken locally, promoted regionally, funded through local, state or federal funds, and pursued via a legislative agenda through the Ohio

General Assembly and Congress.

OEPA *1/09: Local effort, however, Ohio EPA has available it's school bus retrofit program and DERG and USEPA have available funds for diesel fleet retrofit and replacements. Ohio EPA continues to support and encourage both of these programs whenever possible.**

OEPA *1/10: See above answer about School Bus retrofit program.**

OEPA *1/09: None of the following strategies (#1-9) are being pursued at the state level with a few exceptions.**

1. Diesel On-Road Strategies

a. Best Available Retrofit Technology (BART) on Government-Owned Vehicles, with Funding (Requiring "clean diesel" replacements and retrofits, but only when a dedicated funding source has been identified)

b. Diesel Emissions Reduction Programs for Private Vehicles (Grant or loan programs, with educational component)

OEPA *1/09: As noted above, the is DERG money available for upgrade/replacement of private fleets. Ohio EPA continues to support and encourage these programs whenever possible as well as evaluate new programs and scenarios.**

2. Diesel Non-Road Strategies - Retrofit Financing

a. Combining Private Financing with Government Grants (Innovative funding for public and private non-road diesel retrofits)

b. Low Interest Financing (Funding for state and local governments)

c. Technical Assistance to Construction Equipment Owners (Education outreach)

d. Information on Grant Programs (State clearinghouse of information)

3. Reduce Idling from Public Fleets

a. Implementation of the Ohio Mandatory Statewide School Bus Idling Regulation (Idling time limits)

b. Idling Reduction Regulations for Transit and Other Public Fleets (Voluntary idling time limits, eventually followed by mandatory limits)

c. Loan Program to Reduce Idling (Funding for cab heaters, auxiliary power units, etc., that allow engines to be turned off when the vehicle is stationary)

4. Reduce Idling from Private Fleets

a. Voluntary Anti-Idling Program with Educational Outreach (Voluntary idling time limits, eventually followed by mandatory requirements)

b. Contract Requirements for Public Projects Using Private Fleets (Limit idling time for construction equipment)

5. Truck Stop Electrification (TSE)

a. Identify Key Sites for TSE (Providing electric hook-up power at truck stops, rest areas, Turnpike locations, etc.)

b. Financing Program for TSE (Public and private funding)

c. Require New Truck Stops to Include TSE Infrastructure (ODOT to ensure hook-ups at all new rest areas, etc.)

6. Alternative Fuels and Electric Vehicles for Public and Private Fleets

a. Increased Use of Ethanol (E85)

b. Increased Use of Biodiesel

c. Increased Use of Natural Gas

d. Increased Use of Propane

e. Increased Use of Electric Vehicles, both plug-in and hybrid

7. Ports

a. Truck Traffic Anti-Idling Policy at the Port of Cleveland/Cuyahoga County (Limit idling time while waiting for (un)loading)

8. Airports

a. Ground Support Equipment (GSE) Replacement with Electric, CNG, or Other Clean Technology (Low-emission baggage carts, fuel trucks, etc., with potential funding available through the federal Voluntary Airport Low Emissions (VALE) Program)

9. Road Salt

a. Use of Liquefied Brine to Reduce Total Applied Road Salt (with such additives as may be needed to reduce corrosion)

- b. Strict Adherence to Local Salt Minimization Policies

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OEPA *1/09: Local effort, no OEPA involvement**

III. MOBILE SOURCE EMISSION REDUCTION STRATEGIES to be implemented by the STATE OF OHIO

1. Public Transit - by ODOT

- a. Increased Funding by the State of Ohio for Public Transit in Northeast Ohio.

OEPA *1/09: Not OEPA, no info**

2. Diesel Non-Road Strategies - Public Works Projects - by Ohio EPA and ODOT

OEPA *1/09: No state involvement except DERG for 2a and 2b**

- a. Emissions Performance Specifications in Contracts for Public Works Projects (Ohio EPA and ODOT to create diesel emissions limits and/or equipment requirements and/or contract bonus points for construction equipment on all large public works projects)
- b. Accelerated Use of Ultra-Low Sulfur Diesel Fuel or Biodiesel (Required use of low-emitting fuels on all public works projects)

3. Reduce Idling from Private Fleets - by Ohio EPA and federal agencies

- b. Revolving Loan or Lease-to-Own Program for Anti-Idling

Equipment (Funding for cab heaters, auxiliary power units, etc.)
c. Reduce Idling from Switchyard and Line-Haul Locomotives
(State or federal law to limit railroad idling time)

OEPA *1/09: No action by OEPA**

4. Truck Stop Electrification (TSE) - by Ohio EPA

d. Require New Truck Stops to Include TSE Infrastructure
(ODOT to ensure hook-ups at all new rest areas, etc.)

OEPA *1/09: No Action by OEPA**

5. Roadside Diesel Opacity Testing - by Ohio EPA

e. Statewide Roadside Diesel Opacity Testing - "Smoke Checks" for
Public and Private Fleets (Exhaust "smoke" testing for trucks, buses,
etc., with (1) warning and (2) fine, to improve emissions from local
fleets and those passing through)

OEPA *1/09: No Action by OEPA**

6. Transportation Projects - by ODOT

f. Evaluation of Cleveland Innerbelt Project Nonroad Emissions
(Comprehensive study of diesel construction equipment emissions)

OEPA *1/09: Not OEPA, no information**

7. Fuel Testing - Emission Reduction Strategies - by Ohio EPA

g. Statewide Testing of Gasoline and Diesel Fuel Specifications
(Check for excess sulfur, water, etc., at distribution points)

OEPA *1/09: This item is not necessary**

8. Statewide Car Standards - by ODOT

h. Adopt a Safety/Anti-Tampering Inspection Program (Prevent
"dumping" of poorly functioning cars and trucks in Ohio)

OEPA *1/09: Not OEPA, no information**

IV. STATEWIDE CONTROLS ON STATIONARY SOURCES OF AIR POLLUTION to be
implemented by the OHIO EPA

1. Steel Mills

a. NOx Reasonably Available Control Technology (RACT) for
Industrial Boilers (Reduced NOx limits according to size)

OEPA *1/09: NOx RACT rules (ch 3745-110) in place for Cle/Akr area only**

2. NOx Credits

a. NOx Credit Trading Bank with Partial Credit Retirement
(Ability to buy and sell NOx reductions; 5% annual removal of credits from the Ohio EPA bank)

OEPA *1/09: Ch 3745-111, "ERC Banking" was just adopted on December 29, 2008 and is effective on January 8, 2009. Also, due to court remand, CAIR is back on so we now have statewide, annual control requirements again specifically for NOx (at major electric producers)**

OEPA *1/10: Ohio EPA finalized our CAIR rules in September, 2009 and USEPA has granted OEPA full approval of our CAIR program as of November 24, 2009 (74 FR 48857). This means that we now can distribute allowances to non-EGU sources as well as EGU sources.**

3. Diesel Generators

- a. Retrofit or Replace Large (Stationary) Diesel Gen-Sets
- b. Retrofit or Replace Medium (Portable) Diesel Gen-Sets
- c. Public Education Regarding Purchases of Small (Home) Diesel Generators

OEPA *1/09: No activity on this by OEPA at this time.**

4. Residential Combustion

a. Adoption of the NESCAUM Model Rule for Outdoor Hydronic Heaters
(Emission limits on new wood-fired boilers; gradual regulation of existing boilers)

OEPA *1/09: Ohio EPA working on OWB rules (Ch 3745-115). Attempting to get a second draft package prepared for public review during spring 2009.**

OEPA *1/10: Second draft still in review. Hoping to submit for public comments this spring.**

b. Mandatory "No Burn" Days When Ozone or PM2.5 is Elevated
(Affecting fireplaces, outdoor burning, etc.)

OEPA *1/09: Contained in Emergency Episode rules (Ch 3745-25), but only for open burning and incinerators, not fireplaces**

c. Voluntary Wood Stove Change-Out Program (Subsidized USEPA-approved clean-burning inserts)

OEPA *1/09: No action on this by OEPA at this time.**

5. Hot Mix Asphalt Plants

a. Reasonably Available Control Technology (RACT) for Hot Mix Asphalt Plants (Combination of flexible controls)

OEPA *1/09: No action on this by OEPA at this time**

6. Restaurants

- a. Food-Service Catalytic Oxidizer for Chain-Driven Charbroilers
(Air pollution controls on grilling and frying equipment)

OEPA *1/09: Currently being studied, but no action yet by OEPA.**

OEPA *1/10: No change.**

7. Enforcement Practices

- a. Adjust to an Appropriate Level of Staffing to Enhance
Compliance with Existing Law (Additional staff for OEPA and local air
agencies)

OEPA *1/09: Ohio EPA does not plan to add any additional staff, but enforcement will continue to be an on-going, priority effort.**

OEPA *1/10: Ohio EPA continues to make enforcement a high priority effort.**

V. REGIONAL LONG-TERM STRATEGIES FOR SUSTAINABLE AIR QUALITY

A regional energy conservation strategy should be pursued with member communities and other stakeholders that addresses long-term energy strategies. Specifically, the strategies should include Renewable Portfolio Standards (RPS) for electricity generation using solar, wind, geothermal, and other renewable sources. In addition, it should address energy audits for businesses and municipalities as well as the local manufacturing of components related to energy efficiency.

OEPA *1/09: No action on this by OEPA at this time.**