



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

December 29, 2017

David Foerter
Ozone Transport Commission and MANE-VU
444 N. Capital St. NW
Washington DC 20001

RE: MANE-VU Regional Haze Round 2 Ask – Ohio EPA Data Corrections

Dear Mr. Foerter:

The Ohio Environmental Protection Agency (Ohio EPA) is providing information to correct data inaccuracies regarding Ohio sources identified in technical documentation used to develop MANE-VU's August 25, 2017 "Statement of the Mid-Atlantic/Northeast Visibility Union (MANE-VU) States Concerning a Course of Action in Contributing States Located Upwind of MANE-VU Toward Assuring Reasonable Progress for the Second Regional Haze Implementation Period (2018-2028)" (herein "MANE-VU Ask"). This letter and accompanying documentation should not be construed to incorporate all of Ohio EPA's comments or concerns regarding the MANE-VU Ask, but rather only responds to MANE-VU's request to provide any updates to Electric Generating Unit (EGU) and non-EGU industrial source data used by MANE-VU in their analysis.

Ohio EPA does wish to submit the following comments, especially pointing out corrections to some of the information in the EGU data and non-EGU data MANE-VU referenced on December 18th, 2017 as part of the 4-factor preliminary work completed by MANE-VU for your Ask. Ohio EPA performed a review of two files provided by MANE-VU: "EGU Data for Four-Factor Analyses - Only CALPUFF Units 170928" (herein "EGU data") and "Industrial_Source_Data_for_Four-Factor_Analyses_20170330" (herein "non-EGU data"). Our comments are limited to the Ohio sources identified in these files. Ohio EPA notes the very short timeframe for this particular opportunity to respond with technical feedback on analyses used to support the MANE-VU Regional Haze consultative process. The third MANE-VU consultation call on December 18, 2017 was the first time Ohio EPA was made aware of MANE-VU's opportunity for providing feedback, and that it should be received by December 31, 2017. This provided only eight business days to respond to this request.

1. Ohio EPA notes that multiple units for Ohio in MANE-VU's EGU data do not contain up-to-date information. Ohio EPA is including the EGU data spreadsheet with this letter which contains updated information in column M (State Staff Operation Notes), column AM (State Staff SO₂ Control Notes) and column BG (State Staff NO_x Control Notes), all contained in the tab labeled "EGU Data – UPDATE." The following information is contained within:
 - a. Walter C. Beckjord Generating Station units 1 and 2 permanently shutdown on October 1, 2014.
 - b. Miami Fort Generating Station Units 5-1 and 5-2 permanently shutdown on December 31, 2007; Unit 6 permanently shutdown on June 1, 2015.
 - c. Avon Lake Power Plant Unit 12 has not been retired and Ohio EPA is not aware of any plans to retire. However, this facility was recently subject to U.S. EPA's Data Requirements Rule and the following federally enforceable sulfur dioxide (SO₂) emissions limits were imposed effective November 23, 2016:
 - i. Sulfur dioxide (SO₂) emissions from all SO₂-emitting sources at the facility (i.e., emissions units B010, B012, B013, B015, and B016, combined) shall not exceed 9,600 lbs/hr (1-hour average basis).
 - ii. SO₂ emissions from emissions units B010 and B012, combined, shall not exceed 1.59 lb/mmBtu (as a rolling, 30-day average).
 - d. Eastlake Units 1, 2, 3, and 4 permanently shutdown on April 16, 2015.
 - e. Eastlake Unit 6 has a 469 MMBtu/hr max heat input limit.
 - f. W.H. Sammis Units 1, 2, 3 and 4 – First Energy has indicated plans to permanently retire this facility in May 2020. Ohio EPA does not incorporate planned shutdowns into ERTAC data unless it is enforceable, or the company has indicated it is definitive. In this case, the company has indicated it is definitive.
 - g. Muskingum River Power Plant Units 1, 2, 3, 4 and 5 permanently shutdown on May 31, 2015.
2. Ohio EPA notes that multiple units for Ohio in MANE-VU's non-EGU data do not contain up-to-date information. Ohio EPA is including the non-EGU data spreadsheet with this letter which contains updated information in column I of the "TOP 50 UPDATE" tab, column J of the "Morton Salt UPDATE" tab, column J of the "Kraton UPDATE" tab, column J of the "P H Glatfelter UPDATE" tab, and column J of the "MedCtr UPDATE" tab. It should be noted that of the 11 facilities MANE-VU identified, 10 have either permanently shutdown the significant sources or converted to natural gas and/or taken restrictions to be limited use boilers.

While Ohio EPA understands MANE-VU's intent is only to update these sources as a part of their remedy analyses, Ohio EPA believes it is imperative that the correct data should have been used to develop MANE-VU's contribution analyses and develop the Ask since the modeling overestimates Ohio's contribution. As can be seen, significant discrepancies exist in the data used by MANE-VU regarding the actual operating status of Ohio's sources used to develop the MANE-VU Ask.

Lastly, Ohio EPA wishes to express support for the content of the letter sent to MANE-VU by LADCO on December 20, 2017 regarding this same technical feedback request. We look forward to continuing dialogue and ensuring accurate information is reflected in our analyses as we progress towards preparing our Round 2 Regional Haze State Implementation Plans. If you have any further questions, please feel free to contact Jennifer Van Vlerah at Jennifer.vanvlerah@epa.ohio.gov or 614-644-3696.

Sincerely,

A handwritten signature in cursive script that reads "Robert Hodanbosi".

Robert Hodanbosi
Chief, Ohio EPA Division of Air Pollution Control

Cc: Jennifer Van Vlerah, SIP Manager, Ohio EPA Division of Air Pollution Control