



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

SEP 16 2015

Ms. Susan Hedman
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Designation Recommendation for the William H. Zimmer Power Plant Area for the 2010 Sulfur Dioxide National Ambient Air Quality Standard

Dear Administrator Hedman:

On March 20, 2015, U.S. EPA notified states regarding a settled consent decree with Sierra Club that affects sources in certain areas yet to be designated under the 2010 1-hour sulfur dioxide (SO₂) national ambient air quality standard (NAAQS). This affects sources with 2012 emissions greater than 16,000 tons, or sources with emissions greater than 2,600 tons and an emission rate of at least 0.45 lbs SO₂/mmbtu; unless a retirement from burning coal was announced by March 2, 2015. The letter identified the General James M. Gavin Power Plant and the William H. Zimmer Power Plant as subject to the consent decree requirements.

U.S. EPA is allowing states an opportunity to submit recommendations on the designations of the areas around the subject facilities by September 18, 2015. The attached is Ohio's recommendation regarding the William H. Zimmer Power Plant area. Ohio's recommendation is based upon the 5-factor analysis outlined in U.S. EPA's March 20, 2015 memorandum *Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standard*.


Based upon this analysis, Ohio EPA is recommending the portion of Clermont County, excluding Pierce Township, be designated as attainment for the 2010 1-hour SO₂ standard. This recommendation encompasses the following townships in Clermont County: Batavia, Franklin, Goshen, Jackson, Miami, Monroe, Ohio, Stonelick, Tate, Union, Washington, Wayne, and Williamsburg.

As detailed under Factor 1 in the attached submittal, Ohio EPA modeled actual SO₂ emissions from the William H. Zimmer Power Plan for years 2012 through 2014. No exceedances of the standard were modeled inclusive of a conservative 11 ppb background concentration.

This submittal consists of one (1) hard copy of the required documentation. An exact duplicate electronic version of the submittal in PDF format is available at <http://www.epa.ohio.gov/dapc/SIP/so2.aspx> under the heading "Nonattainment Area Recommendation."

If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,

A handwritten signature in blue ink, appearing to read "Craig Butler", with a stylized flourish at the end.

Craig Butler
Director

Cc: Bob Hodanbosi, Chief, Division of Air Pollution Control, Ohio EPA

Enclosure