

**Environmental
Protection
Agency**

Hearing Summary

Rule Package: Serious RACT SIP and Proposed Rulemaking Package

Original filing date: 01/06/2025

Public comment start date: 01/06/2025

Public comment end date: 02/13/2025

Public hearing date: 2/13/2025

List of Rules: 3745-21-(01, 04, 09, 11, 12, 14, 16, 21, 22, 24-28), 3745-31-(01, 21), and 3745-110-(02, 03, 04)

Were there any participants in this public hearing beyond Ohio EPA staff or JCARR staff?

☒ Yes

☐ No

Were there comments received during the public comment period outside of those presented at this hearing?

☐ Yes

☒ No

This hearing summary has been compiled to meet the requirements of Section 119.03 of the Revised Code.

This hearing summary includes this cover sheet and the following attachments:

1. **Attachment A** - A copy of the public notice for this hearing.
2. **Attachment B** - A copy of the sign-in sheet for this hearing.
3. **Attachment C** - A copy of the script read into the record to begin and end the hearing.
4. **Attachment D** - Response to comments.

Ohio EPA's response to comments document includes the comments received, who commented, the agency response to comments, and a statement of whether or not the rule was changed due to the comments.

Ohio EPA digitally records all public hearings for rules. The digital recordings are available upon request. These recordings may be sent out for transcription if necessary.

Public Notice and Public Hearing
Ohio Environmental Protection Agency

**Serious Ozone Reasonably Available Control Technology (RACT) State Implementation Plan (SIP) and Ohio Administrative Code (OAC) Chapters 3745-110, 3745-21, and 3745-31
Cleveland Nonattainment Area Reclassification to Serious Ozone Nonattainment**

Notice is hereby given that the Ohio Environmental Protection Agency, Division of Air Pollution Control (DAPC) is planning to amend rules in Ohio Administrative Code (OAC) Chapter 3745-110, “Nitrogen Oxides – Reasonably Available Control Technology”, OAC Chapter 3745-21, “Carbon Monoxide, Ozone, Hydrocarbon Air Quality Standards, and Related Emission Requirements”, and OAC Chapter 3745-31, “Permit-to-Install New Sources and Permit-to-Install and Operate Program” for the Cleveland 2015 ozone nonattainment area.

Ohio EPA has drafted revisions to OAC Chapters 3745-110, 3745-21, and 3745-31 to revise mandatory Reasonably Available Control Technology (RACT) and permitting requirements for the Cleveland 2015 ozone nonattainment area. As a part of the RACT requirements, Ohio EPA has also prepared a RACT state implementation plan (SIP) assessing RACT requirements necessary under the serious reclassification.

The Cleveland nonattainment area (Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit counties) was initially classified as moderate nonattainment and then subsequently bumped-up to moderate nonattainment for the 2015 ozone standard. The area was required to meet the ozone moderate classification standard by August 3, 2024, based on ozone monitoring data collected during the 2021-2023 ozone monitoring seasons, which extends from March 1 to October 31 each year. Based on certified ozone monitoring data, this area failed to meet the ozone standard by August 3, 2024, and has been reclassified to serious nonattainment by U.S. EPA in accordance with the Clean Air Act (CAA). Reclassification to serious nonattainment triggers additional CAA requirements for major stationary sources located in the serious nonattainment area. Ohio EPA has also included other clarifications and corrections to the RACT and permitting rules in OAC Chapters 3745-110, 3745-21 and 3745-31, including removing or updating outdated provisions.

In addition, Ohio EPA is rescinding the existing source-specific VOC RACT for Formica Corporation in OAC 3745-21-09(PP). These sources are now subject to OAC 3745-21-09(F), which is based on U.S. EPA’s 2007 “Control Techniques Guidelines for Paper, Film, and Foil Coatings.” This is supported by a Clean Air Act (CAA) Section 110(l) anti-backsliding demonstration.

Pursuant to Section 121.39 of the Ohio Revised Code, DAPC was required to consult with interested parties affected by the rules before the Division formally adopts them. On February 2, 2024, these rules went out for a 30-day review by interested parties. Please see the rule synopsis, available electronically at the web address below, for a complete summary of the proposed rule amendments. The CAA 110(l) demonstration and RACT SIP are also available electronically at the web address below.

Pursuant to Part D of Title I of the Clean Air Act, Ohio EPA is required to establish a state implementation plan (SIP) for the attainment and maintenance of the National Ambient Air Quality Standards (NAAQS). The above-mentioned rules and documents are a part of Ohio’s SIP and the proposed amendments will be submitted to USEPA as a modification of the SIP.

The public comment period will run until February 13, 2025. A public hearing on this proposed rulemaking

will be held to consider public comments in accordance with Section 119.03 of the Ohio Revised Code. Ohio EPA will hold an in-person and virtual public hearing on the rules on February 13, 2025, at 10:30am. The in-person hearing will be held at the same time and date and will be located at Ohio EPA, 50 W. Town St, Suite 700, Columbus, OH 43215. During the hearing, the public may submit written comments on the record about the proposed rules. If participating virtually, comments may be submitted electronically and may be submitted verbally if participating in person.

Citizens who want to participate virtually must register in advance for the meeting at:

<https://attendee.gotowebinar.com/register/9134187794103897178>

Registration for the in-person hearing is not required. Citizens intending to give testimony at the hearing should notify the Ohio EPA Public Interest Center, P.O. Box 1049, Columbus, Ohio 43216-1049, (614) 644-2160 or by emailing mary.mccarron@epa.ohio.gov. Prior registration will ensure that registrants are heard ahead of those individuals who register at the hearing. Oral testimony may be limited to five minutes, depending on the number of persons testifying. All interested persons are entitled to attend or be represented and to present oral and/or written comments concerning the proposed rule making.

Written testimony should be sent to the attention submitted to the Smart Comment system at <https://ohioepa.commentinput.com?id=BPWgirtZM> or to Graham Johnson at the Division of Air Pollution Control, P.O. Box 1049, Columbus Ohio 43216-1049. Written comments may also be submitted to the Hearing Officer at the public hearing. Written testimony will receive the same consideration as oral testimony. All testimony received at the hearing or by close of business on February 13, 2025, will be considered by Ohio EPA prior to final action on this rulemaking proposal. Written comments submitted after this date may be considered as time and circumstances permit.

These rules and associated documents are available on DAPC's website for electronic viewing and downloading at: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/regulations/proposed-rules/dapc-proposed-rules>. The RACT SIP and associated documents are available on DAPC's website for electronic viewing and downloading at: <https://epa.ohio.gov/divisions-and-offices/air-pollution-control/state-implementation-plans>.

Questions regarding accessing the web site should be directed to Chris Brown at Ohio EPA at (614) 705-1148; other questions about these rules or SIP revisions should be directed to Reyna Knight at Ohio EPA, (614) 644-1961, reyna.knight@epa.ohio.gov.

To request a reasonable accommodation due to a disability, visit <https://epa.ohio.gov/ada>.

Registration Report

Generated
02/13/2025 01:12 PM EST

General Information

Webinar Name
Public Hearing: Serious Ozone RACT State Implementation Plan Rules (Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit)

Scheduled Start Date
02/13/2025

Scheduled Start Time
10:30:00 AM EST

Scheduled Duration (minutes)
30

Registrants

First Name

Ross
Honor
Jennifer
Ryan
Greg
Graham
Craig
M
Abigail
Jennifer
Gary
Carysanne
Lamoll
Regina

GoTo Webinar

Webinar ID
609-318-691

Registered
14

Opened Invitation
0

Clicked Registration Link
40

Last Name	Email	Registration Date	Registrant's Status	Unsubscribed
Weirich	ross.weirich@lubrizol.com	02/13/2025 10:40 AM EST	Approved	No
Billmaier	honor.billmaier@jcarr.state.oh.us	02/13/2025 10:16 AM EST	Approved	No
Van Vlerah	jenvanvlerah@gmail.com	02/13/2025 10:01 AM EST	Approved	No
Degnim	ryan.p.degnim@dominionenergy.com	02/13/2025 09:44 AM EST	Approved	No
Fouche	greg.fouche@jcarr.state.oh.us	02/13/2025 09:37 AM EST	Approved	No
Johnson	graham.johnson@epa.ohio.gov	02/10/2025 01:20 PM EST	Approved	No
Laubacher	claubacher@e-c-e.org	02/10/2025 10:52 AM EST	Approved	No
Strain	mstrain@all4inc.com	01/27/2025 10:12 AM EST	Approved	No
Miller	abigail.miller@bsigroup.com	01/13/2025 09:03 AM EST	Approved	No
Tharp	jennifer.tharp@sqirepb.com	01/08/2025 04:37 PM EST	Approved	No
Jones	gjones@printing.org	01/08/2025 11:12 AM EST	Approved	No
North	carysanne@ayerquality.com	01/06/2025 07:44 PM EST	Approved	No
Thompson	lamollthompson55@gmail.com	01/06/2025 06:37 PM EST	Approved	No
Large	rlarge@dinecomply.com	01/06/2025 04:24 PM EST	Approved	No

SIGN-IN SHEET

Subject: Ozone RACT Implementation Rules
County: Statewide **Date:** 2-13-25

PLEASE PRINT **PLEASE PRINT** **PLEASE PRINT** **PLEASE PRINT**

NAME: SHARA WILCOX **EMAIL:** SKDINE@DINECOMPLY.COM

NAME: Patrick Blubaugh **EMAIL:** pblubaugh@dinecomply.com

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

NAME: _____ **EMAIL:** _____

Hello and welcome to Ohio EPA's public hearing regarding the proposed rulemaking for the Serious Ozone RACT State Implementation Plan Rules.

My name is Lisa Cochran and I'm hosting today's public hearing. My co-workers also attending are:

1. Jennifer Van Vlerah
2. Chris Beekman
3. Graham Johnson
4. Max Moore

I'll begin by reviewing the format of this meeting. This meeting is occurring online with in-person option.

FOR OUR ONLINE ATTENDEES

On the first slide, you will see a screenshot of the Attendee interface. It is typically on the right side of your screen.

You will see a narrow column with the GoTo logo at top, and then

You will use this to interact with myself and my co-workers.

Online Attendees are listening using computer audio. If you are having sound issues, try refreshing your browser. If that doesn't work, try logging off and logging back in.

Online Attendees may submit comments by clicking on the question mark icon and typing them into the Questions pane on your attendee interface. All comments submitted will be read aloud for the whole audience to hear.

You can also click on the document icon to view included handouts.

FOR OUR IN-PERSON ATTENDEES

My co-worker Max Moore is in the conference room to facilitate in-person participation. During the meeting, I will ask Max if any in-person attendees would like to provide comments.

We will now begin the hearing.

On behalf of Ohio EPA, I would like to thank everyone for taking time to attend today's hearing and for participating in the Agency's decision-making process.

The purpose of this hearing is to receive comments from the public on the proposed rulemaking for the **Serious Ozone RACT State Implementation Plan Rules**. Ohio EPA announced the hearing and public comment period regarding **this proposed rulemaking**. This notice was published in Ohio EPA's Weekly Review, a publication that lists all Agency activities and actions taking place in the state of Ohio.

Comments received as part of the official record are reviewed by Ohio EPA prior to finalizing the **rulemaking**. To be included in the official record, comments must be received by Ohio EPA by the close of business today, Feb 13, 2025. Comments received after this date may be considered as time and circumstances permit but will not be part of the official record for this hearing.

I ask that all exhibits including written speeches used in your testimony be submitted to Ohio EPA today as part of the official record. If you choose not to submit the information, Ohio EPA cannot ensure the accuracy of your testimony.

There is no cross examination of the speaker or Ohio EPA representatives in public hearings of this type.

It is important for you to know that all comments submitted are given the same consideration.

YOU MAY NOW SUBMIT COMMENTS IN WRITING. I will read aloud any comments we receive in the Questions pane. I will keep the meeting open until 11:00AM. to provide time for participants to type in comments.

CLOSING

After the hearing closes, we will accept written comments through 5:00 p.m. today. You may submit comment using the email address on the slide or the Smart Comment QR code.

Thank you for your comments, cooperation, and participation in Ohio EPA's decision-making process. The time is now _____ and this hearing is concluded.

0:06

Good morning.

0:08

Hello and welcome to Ohio EPA's public hearing regarding the proposed rulemaking to the Serious Ozone Racked State Implementation Rules.

0:19

My name is Lisa Cochran and I'm hosting today's public hearing. My co-workers also...

0:25

Lisa, we're not able to hear you in the conference room now. Oh, I apologize. I admit I'm not sure how to address that audio issue.

0:42

Well, I will go ahead, I'll chat with Max and see if we can address this.

0:46

I will move forward, but Max, thank you for letting me know.

0:51

My coworkers also attending are Jennifer VanValera, Chris Beekman, Graham Johnson, and Max Moore.

1:02

I'll begin by reviewing the format of this hearing.

1:05

This meeting is occurring online with an in-person option.

1:10

For our online attendees, on the slide, you will see a screenshot of the attendee interface.

1:17

It is typically on the right side of your screen.

1:20

You'll see a narrow column with the go-to logo at the top and then options underneath.

1:26

You can use this interface to interact with myself and my coworkers.

1:31

Online attendees are listening using their computer audio, so if any of the online attendees or having sound issues, please try refreshing your browser.

1:43

And if that doesn't work, try logging off and logging back in.

1:47

The online attendees may submit comments by clicking that question mark icon and typing them into the questions pane on your attendee interface.

1:57

All comments submitted will be read aloud by me for the whole audience to hear.

2:04

You can also click on the document icon view any included handouts.

2:11

For our in-person attendees, my co-worker Max Moore is in the conference room to facilitate any in-person participation.

2:20

During the meeting, I will ask Max if any in-person attendees would like to provide comments. We will now begin the hearing.

2:29

On behalf of Ohio EPA, I would like to thank everyone for taking the time to attend today's hearing and for participating in the agency decision-making process.

2:41

The purpose of this hearing is to receive comments from the public on their proposed rulemaking to the Serious Ozone Racked State Implementation Plan rules.

2:53

Ohio EPA announced the hearing and public comment period regarding this proposed rulemaking.

2:59

This notice was published in Ohio EPA's Weekly Review, a publication that lists all agency activities and actions taking place in the state of Ohio.

3:10

Comments received as part of the official hearing, or excuse me, comments received as part of the official record are reviewed by Ohio EPA prior to finalizing the rulemaking.

3:21

To be included in the official record, comments must be received by Ohio EPA by the close of business today, February 13th, 2025.

3:31

Comments received after the state may be considered as time and circumstances permit, but will not be part of the official record for this hearing.

3:40

I ask that any exhibits, including written speeches, used in your testimony, be submitted to Ohio EPA today as part of the official record.

3:53

If you choose not to submit that information, Ohio EPA cannot ensure the accuracy of your testimony.

3:58

There is no cross-examination of the speaker or Ohio EPA representative in public hearings of this type.

4:06

It is important for all attendees to know that all comments submitted are given the same consideration regardless of format.

4:15

At this time you may now submit comments in writing.

4:20

Using the question pane I will read aloud any comments we receive and I'll keep the meeting open until 11 am to provide time for participants to type in comments.

4:32

And while I wait for any online attendees to type in their comments, I'll check in with Max.

4:40

Max, I know we were having some audio issues earlier.

4:43

Are there any in-person attendees who would like to provide a comment at this time?

4:50

Would any of you like to make a statement on the record? Yes, I would. Very good, thank you.

4:58

If you I don't mind stating your name prior to your comment and providing your comment.

5:05

Just state and spell your name.

5:07

Say it, right?

5:09

Yeah.

5:09

Shara, S-H-A-R-A, Wilcox, W-I-L-C-O-X.

5:18

Thank you.

5:18

Please proceed.

5:20

Lisa, did you catch that?

5:22

Yes, I did.

5:27

Please proceed.

5:30

I don't know, should I unmute mine then?

5:32

Yeah.

5:33

Well then, let's see.

5:42

When we're getting feedback from like, oh my god, if it's easier, I could just email Okay My name is Shara Wilcox wil clx and I have comments on OAC 3745-2125, as it pertains to the reinforced plastic composites.

6:28

Section of the rule, I know this is a serious ozone-wracked zip update, but these rules have a change in it, a couple changes in it, and I just want to make a comment on D11.

6:45

Ohio EPA removed the previous four paragraphs that were exemptions from D1 through D9 and replaced it with one paragraph that says that the exemption, yeah, that the D1 through D10 are not applicable to any admission unit where the director has established and USEPA has approved source-specific RACT.

7:27

My only comment is how many facilities does this affect, and can the rule be clarified or guidance issued on exactly how the exemption applies?

7:41

How could we take advantage of it?

7:44

Is there a database that has USEPA-approved source-specific RACT?

7:57

Very good. Thank you for that comment.

8:00

We appreciate your patience as we work through the audio issues. Thank you.

8:05

I'm going to look back to the question pane to see if we have any online comments and we do not at this moment.

8:12

So what I will do is I will put myself on mute and I will keep the hearing open until 11 a.m.

8:20

if and we receive any online comments, I will read those aloud at that time.

8:28

Max, do you recommend checking back with you in a few minutes to find out if we have any additional in-person attendees?

8:35

Sure. That would be great. Thank you.

8:37

Very good. All right. For all attendees, then I will put myself on mute.

8:41

And once again, we will keep the hearing open until 11 a.m.

10:02

Good morning again. We just received a comment online.

10:07

The comment is, how will facilities Please be notified if they are required to make amendments to their existing permits.

10:16

That comment was submitted by Craig Lauchbacher.

10:23

Thank you.

20:00

Good morning again, everyone.

20:01

We just received a online comment, and I'll read that.

20:07

How do I obtain more information about the ozone wrecked?

20:11

I see they say limit how much you go outside, but I have to work to be able to afford to pay bills and for food.

20:19

How much time exposed is too much and how much is not harmful.

20:26

I am new to this hearing and reading the information.

20:31

That comment was submitted by Lamal Thompson.

20:35

Thank you.

24:44

Good morning again.

24:45

Max, we have just five minutes remaining in the hearing, so I wanted to check just one more time.

24:52

Do we have any in-person attendees who would like to provide a comment?

25:00

No, we are good.

25:01

Wonderful.

25:02

Thank you.

25:03

All right.

25:03

I will mute myself one more time.

25:05

And as always, if we receive any incoming comments online, I will read those.

25:12

And at 11 o'clock, I will wrap up the hearing with the final statement.

29:44

Good morning for a final time.

29:46

As the hearing closes, I'd like to remind all attendees we will accept written comments through 5 p.m. today.

29:53

You may submit those comments using the email address on the slide or the Smart Comment QR code also on the slide.

30:04

Thank you for your comments, cooperation, and participation in Ohio EPA's decision-making process.

30:11

The time is now 11 a.m. and the hearing is concluded.

30:15

Thank you.

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**Environmental
Protection
Agency**

**Division
Response to Comments**

Rules: Ohio Administrative Code (OAC) Chapter 3745-21, OAC Chapter 3745-31, OAC Chapter 3745-110

Agency Contact for this Package

Reyna Knight, DAPC, (614) 644-1961, Reyna.Knight@epa.ohio.gov

Ohio EPA held a 30-day public comment period on January 6, 2025, regarding changes to Ohio EPA's VOC RACT rules, air permitting rules, and NO_x RACT rules. This document summarizes the comments and questions received during the associated comment period, which ended on February 13, 2025. No written comments were received but three questions were submitted during the hearing.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. The name of the commenter follows the comment in parentheses.

General Concerns

Comment 1: How do I obtain more information about the ozone RACT? I see they say limit how much you go outside but I have to work to be able to bills and for food. How much time exposed is too much and how much is not harmful? I am new to this hearing and reading the information.

(Lamoll Thompson, hearing attendee)

Response 1: Ohio EPA maintains a website with all the plans and activities conducted by Ohio EPA related ozone in the State of Ohio. It can be found here:
<https://epa.ohio.gov/divisions-and-offices/air-pollution-control/state-implementation-plans/division-of-air-pollution-control-sip-2015>.

We also suggest U.S. EPA's website that discusses ground-level ozone basics, including, among other things, topics such as "what is good vs bad ozone", "what are the harmful effects of ozone", and "what are the ozone standards". This website can be found here: <https://www.epa.gov/ground-level-ozone-pollution>.

U.S. EPA sets air quality standards for ozone that are intended to be adequate to protect health and the environment. Currently, Ohio EPA meets the ozone standards throughout the state except in the following counties where ambient air monitors indicate air quality is above the standard based on last year's data: Hamilton, Warren, Lucas, Lake, and Cuyahoga counties. These updated regulations and RACT plan are part of Ohio EPA's strategy to help bring ozone levels down in these areas.

Meeting U.S. EPA's air quality standard for ozone is based on averaging data over a three-year period. Most ozone ambient monitors only operate from March 1 to October 31.

The best resource to understand what your air quality is on a daily basis is the U.S. EPA Air Now website: <https://www.airnow.gov>.

AirNow provides real-time data across the entire country from ambient air monitors operated by entities like Ohio EPA. It uses the Air Quality Index (AQI) to report air quality. The AQI is a tool for communicating about outdoor air quality and health. The AQI includes six color-coded categories, each corresponding to a range of index values. The higher the AQI value, the greater the level of air pollution and the greater the health concern.

For each pollutant, an AQI value of 100 generally corresponds to an ambient air concentration that equals the level of the air quality standard for protection of public health. AQI values at or below 100 are generally thought of as satisfactory. When AQI values are above 100, air quality is unhealthy: at first for certain sensitive groups of people, then for everyone as AQI values get higher.

The AQI is divided into six categories. Each category corresponds to a different level of health concern. Each category also has a specific color. The color coding makes it easy for people to quickly determine whether air quality is reaching unhealthy levels in their communities. U.S. EPA also provides information on this website on precautions that should be taken depending on the AQI level.

Lastly, depending on where you live in the state, you can sign up for air quality alerts which will tell you in advance if your area is expected to have unhealthy air quality.

Comment 2: How will facilities be notified if they are they are required to make amendments to their existing permits?

(Craig Laubacher, hearing attendee)

Response 2: Ohio EPA has been doing outreach in the Cleveland nonattainment area where entities are impacted by the serious ozone reclassification. This outreach has been occurring for several years. With respect to these rule changes that lower thresholds for required permitting, Ohio EPA has been working at the district and local levels to identify those sources that will be impacted and begin outreach. Ohio EPA has also notified various trade organizations and businesses that represent industry of all types and sizes. Ohio EPA has also sent out mailers to all regulated entities in the air program across the entire state so they are aware of the changes and can reach out to their local office for more information.

Specific Language Concerns

Comment 3: The commentor has comments on OAC 3745-21-25 as it pertains to the reinforced plastics composites. This is a serious ozone RACT SIP update but these rules have a change in it and the commentor wants to make a comment on (D)(11). Ohio EPA removed the previous four paragraphs that were exemptions from (D)(1) through (D)(10) and replaced with one paragraph that says the exemption are not applicable to any emissions unit where the Director has established and U.S. EPA has approved a source specific RACT. How many facilities does this affect and can the rule be clarified or guidance issued on how the exemption applies? How to take advantage of it? Is there a database that has U.S. EPA approved source specific RACT?

(Shara Wilcox, hearing attendee)

Response 3: As described in the rule synopsis included in the record, paragraph (D)(11) of OAC 3745-21-25 is being revised to reference the new definition of ‘source-specific RACT’. This provides for additional flexibility as it will allow other options besides BAT to be considered in establishing source-specific RACT. Many of Ohio EPA’s RACT rules have options for a source-specific RACT to be approved. Generally, this is because when the original RACT category requirements were written, a particular type of source or coating wasn’t considered. Often in that case the source would have to comply with the “other” category emission requirement. And sometimes that limitation may be technically or economically infeasible.

There could be a wide variety of reasons or scenarios where a source believes they fall into this category; therefore, we do not believe guidance would be helpful. If a source believes they fall into this category they should reach out to their permitting contact and Ohio EPA DAPC’s State Implementation Team. We will work with them

individually and provide direct guidance on what is needed for their unique circumstance.

As noted, any source-specific RACT must be approved by U.S. EPA as a revision to the SIP. It typically will require the facility to prepare a technical analysis that looks at economic and technical feasibility, evaluate similar sources within and out of the state of Ohio for how they comply with similar requirements, and work with vendors to determine if lower, for example, VOC coatings can be developed that would be in compliance with requirements. If a source is already in compliance with the rule and can meet the emission requirements at this time, a source-specific RACT would not be applicable. Therefore, this option would likely not apply to many sources.

Once a source-specific RACT is developed and U.S. EPA concurs that it is an approvable approach, Ohio EPA will issue the requirements in a federally enforceable SIP. At that point, Ohio EPA would submit it to U.S. EPA as a SIP revision request. After this submittal, U.S. EPA would have up to 18 months to approve it under the CAA.

End of Response to Comments