



Common Sense Initiative

Mike DeWine, Governor
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Business Impact Analysis

Agency, Board, or Commission Name: Ohio Environmental Protection Agency

Rule Contact Name and Contact Information:

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Regulation/Package Title (a general description of the rules' substantive content):

Alternative RACT Cleanup

Rule Number(s): OAC Rules 3745-21-09 and 3745-21-26

Date of Submission for CSI Review: March 29, 2023

Public Comment Period End Date: May 2, 2023

Rule Type/Number of Rules:

New/___ rules

No Change/___ rules (FYR? ___)

Amended/ 2 rules (FYR? N)

Rescinded/___ rules (FYR? ___)

The Common Sense Initiative is established in R.C. 107.61 to eliminate excessive and duplicative rules and regulations that stand in the way of job creation. Under the Common Sense Initiative, agencies must balance the critical objectives of regulations that have an adverse impact on business with the costs of compliance by the regulated parties. Agencies should promote transparency, responsiveness, predictability, and flexibility while developing regulations that are fair and easy to follow. Agencies should prioritize compliance over punishment, and to that end, should utilize plain language in the development of regulations.

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Reason for Submission

1. **R.C. 106.03 and 106.031 require agencies, when reviewing a rule, to determine whether the rule has an adverse impact on businesses as defined by R.C. 107.52. If the agency determines that it does, it must complete a business impact analysis and submit the rule for CSI review.**

Which adverse impact(s) to businesses has the agency determined the rule(s) create?

The rule(s):

- a. ☐ **Requires a license, permit, or any other prior authorization to engage in or operate a line of business.**
- b. ☐ **Imposes a criminal penalty, a civil penalty, or another sanction, or creates a cause of action for failure to comply with its terms.**
- c. ☒ **Requires specific expenditures or the report of information as a condition of compliance.**
- d. ☐ **Is likely to directly reduce the revenue or increase the expenses of the lines of business to which it will apply or applies.**

Regulatory Intent

2. **Please briefly describe the draft regulation in plain language.**

Please include the key provisions of the regulation as well as any proposed amendments.

The rules in Ohio Administrative Code (OAC) chapter 3745-21 establish requirements for the control of emissions of volatile organic compounds (VOCs) and carbon monoxide (CO) from stationary emission sources. VOCs are a precursor compound from which ozone is formed. Ozone is one of the six criteria pollutants for which a National Ambient Air Quality Standard (NAAQS) has been established under the Clean Air Act. CO is also one of the six criteria pollutants for which a NAAQS has been established. The intent of these rules is to limit emissions of VOCs and CO to allow the state of Ohio to attain and maintain the NAAQS for ozone and CO.

Ohio EPA has drafted revisions to OAC Rules 3745-21-09 and 3745-21-26 to clarify Reasonably Available Control Technology (RACT) provisions which allow a facility to perform a detailed engineering study to support an alternate, source-specific emissions limit. Specifically, the drafted revisions to OAC rules 3745-21-09(U)(2)(f) and 3745-21-26(A)(3)(f) remove a restriction on the availability of this option based on the date of installation. Language revisions are also being made under OAC rules 3745-21-09(U)(2)(f) and 3745-21-26(A)(3)(f) to remove duplicative and unnecessary rule restriction language.

Ohio EPA is also amending OAC rule 3745-21-26(A)(3) to establish a facility specific RACT requirement for the Schlage Company LLC under new paragraph (A)(3)(h).

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3. Please list the Ohio statute(s) that authorize the agency, board or commission to adopt the rule(s) and the statute(s) that amplify that authority.

Rule Number	Authorizing Statute	Proposed Action
3745-21-09	3704.03(E)	Amended
3745-21-26	3704.03(E)	Amended

4. Does the regulation implement a federal requirement? Is the proposed regulation being adopted or amended to enable the state to obtain or maintain approval to administer and enforce a federal law or to participate in a federal program?

If yes, please briefly explain the source and substance of the federal requirement.

Section 110 of the Clean Air Act (CAA) requires all states to develop a plan for attaining and maintaining the NAAQS. The rules in OAC chapter 3745-21 establish reasonably available control technology (RACT) requirements for the control of VOC emissions from various industries and industrial processes. These rules are a part of Ohio's control strategies for the attainment and maintenance of the NAAQS for ozone and are a part of Ohio's state implementation plan (SIP) under Section 110 of the CAA.

5. If the regulation implements a federal requirement, but includes provisions not specifically required by the federal government, please explain the rationale for exceeding the federal requirement.

The rules in this chapter do not exceed federal requirements. These rules are based in part on federal requirements such as the federal "Control Techniques Guidance" (CTG) and "Alternative Control Techniques" (ACT) guidance documents and do not exceed the requirements therein. States are required, under the Clean Air Act, to adopt rules for a CTG document issued by U.S. EPA in moderate or worse non-attainment areas.

6. What is the public purpose for this regulation (i.e., why does the Agency feel that there needs to be any regulation in this area at all)?

The rules in OAC Chapter 3745-21 serve as part of Ohio's strategies for the control of VOC emissions and are a part of Ohio's strategy for the attainment and maintenance of the NAAQS for ozone and CO as required in the Clean Air Act. The public purpose of this rule is to assist in the attainment of the NAAQS.

7. How will the Agency measure the success of this regulation in terms of outputs and/or outcomes?

Ohio EPA measures the success of the rules in this chapter through the fact that ozone pollution in Ohio has been on the steady decline since the first of the rules in this chapter were promulgated in 1979. In fact, in 2011, Ohio achieved statewide attainment of the 1997 8-hr ozone NAAQS through reductions in the emission of VOCs attributed to the rules in this chapter.

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Additionally, the requirements in this chapter are utilized in environment permits issued to industry throughout the state. These permits identify the applicable air pollution control rules and regulations under which the source must operate and establishes monitoring, record keeping, testing and reporting requirements by which the sources can demonstrate compliance with the rules and regulations. Ohio EPA considers the rules a success when a source is issued a permit and can, thereby, commence operations in compliance with the applicable air pollution rules and regulations, including the rules and regulations in this chapter.

8. Are any of the proposed rules contained in this rule package being submitted pursuant to R.C. 101.352, 101.353, 106.032, 121.93, or 121.931?

If yes, please specify the rule number(s), the specific R.C. section requiring this submission, and a detailed explanation.

None of these rules are being proposed under these statutes.

Development of the Regulation

9. Please list the stakeholders included by the Agency in the development or initial review of the draft regulation.

If applicable, please include the date and medium by which the stakeholders were initially contacted.

Ohio EPA established an initial 30-day early stakeholder outreach period regarding the 5-year review ending March 7, 2023. Ohio EPA Division of Air Pollution Control (DAPC) sent the notices of our request for comments electronically to the 3,000+ members of Ohio EPA's electronic Interested Parties list for DAPC rulemaking. DAPC also posted the notice on our website and placed the notice in the Director's Weekly Review publication.

10. What input was provided by the stakeholders, and how did that input affect the draft regulation being proposed by the Agency?

Ohio EPA received comments from stakeholders during the Early Stakeholder Outreach comment period and made changes where appropriate. Upon the close of the interested parties draft comment period, Ohio EPA will consider any additional comments and prepare a "response to comments" document detailing Ohio EPA's response to the comments and outlining any changes made to the draft language as a result of the comments.

General Comments

Comment 1: The OMA appreciates the opportunity to comment on Ohio EPA's rules governing control of emissions of VOCs and carbon monoxide from stationary sources set forth in OAC 3745-21. The OMA understands that Ohio EPA is considering minor changes to the rules in OAC Chapter 3745-

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21 to clarify the provisions which allow a facility to perform a detailed engineering study to support an alternate, source-specific emissions limit. The OMA has members that are impacted by these rules and looks forward to reviewing any draft rule language that Ohio EPA promulgates. The OMA respectfully requests to be included in any meetings or future discussions pertaining to these rules. The OMA would like to thank Ohio EPA for the opportunity to comment and to participate in this matter. We look forward to working with Ohio EPA on this and any future related discussions or submittals.

(Lindsey Short, Director, Public Policy Services, Ohio Manufacturers' Association (OMA))

Response 1: The Ohio EPA will continue to include all interested stakeholders, including OMA, in our rulemaking processes.

3745-21-09(U)(2)(f) and 3745-21-26(A)(3)(f)

Comment 2: The older rule, at OAC 3745-21-09(U)(2)(f), contains an exemption from the VOC limits for surface coating of miscellaneous metal parts and products that meet five requirements:

- (1) The “coating line is a new source, as defined by [OAC] rule 3745-31-01” (*e.g.*, it was installed or modified after January 1, 1974);
- (2) “The construction or modification of the coating line commenced on or after March 27, 1981”;
- (3) “The director has determined that the otherwise applicable emission limitation ... is technically or economically infeasible and has established an alternative [RACT] emission limitation ... [that] is the lowest emission limitation that the coating line is capable of meeting by the application of control technology that is reasonably available considering technological and economic feasibility ...”;
- (4) “A final installation permit has been issued for the coating line ... containing terms and conditions that specify the control requirement or emission limitation that is the basis for the director’s alternative limitation determination”; and
- (5) “USEPA has approved the alternative limitation as a revision to the Ohio state implementation plan.”

The new rule, at OAC 3745-21-26(A)(3)(f)(ii), contains a similar exemption for metal parts coating operations that meet the same five requirements.

Ohio EPA’s Early Stakeholder Outreach notice states that Ohio EPA is considering revising the alternative VOC RACT limit exemptions in OAC 3745-21-09(U)(2)(f) and OAC 3745-21-26(A)(3)(f)(ii) “to remove the limitation on the availability of this option based on the date of installation.” Steelcraft would support such a revision. If it is technically or economically infeasible for a coating line or coating operation to comply with an

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otherwise applicable VOC RACT emission limitation in OAC 3745-21-09 or OAC 3745-21-26, there is no apparent reason that Ohio EPA should condition the availability of an alternative limit on whether the coating line or coating operation was installed or modified before or after January 1, 1974, or constructed or modified before or after March 27, 1981. **(Russell E. Eiler, Director, Global EHS Compliance, Schlage Lock Company LLC)**

Response 2: The Ohio EPA agrees with the commenter and the date specific limitation will be proposed for removal as suggested above.

Comment 3: Steelcraft would also ask Ohio EPA to consider an additional revision to the alternative VOC RACT limit exemption in OAC 3745-21-26(A)(3)(f)(ii). That clause is prefaced by another clause, (f)(i), which states, in part: “The coating line never uses more than three gallons per day.” Written this way, it is unclear whether Ohio EPA intended to condition the availability of the alternative VOC RACT limit exemption in (f)(ii) on compliance with the daily coating usage in (f)(i). Assuming Ohio EPA did not intend to limit the exemption in (f)(ii) to coating lines that “never use[] more than three gallons per day,” paragraph (A)(3)(f) should be revised to eliminate any ambiguity. Steelcraft would suggest the following revision to paragraph (A)(3)(f):
(f) Metal parts coating operations are exempt from paragraph I of this rule ~~where the following occurs if they meet the requirements described in either paragraph (A)(3)(f)(i) or paragraph (A)(3)(f)(ii) of this rule.:~~
(Russell E. Eiler, Director, Global EHS Compliance, Schlage Lock Company LLC)

Response 3: Ohio EPA agrees with your comment that paragraph (A)(3)(f)(i) and (A)(3)(f)(ii) are mutually exclusive and the current paragraph is interpreted as such. Instead of proposing changes consistent with the commenter’s suggestion, we have made additional changes, including incorporating facility specific RACT alternatives under OAC rule 3745-21-26(A)(3)(h).

3745-21-09(O), Solvent Metal Cleaning

Comment 4: Columbus DPU has begun to use an aqueous cleaning solvent for cold cleaning of metal parts instead of a traditional organic solvent in at least one of our maintenance facilities. We request that an express exemption be added to paragraph (O)(6) for emissions units making this environmentally friendly conversion. A copy of the safety data sheet for the aqueous product being used is attached for reference. The exemption can be accomplished by making the following change:

- Add the following subparagraphs into OAC 3745-21-09(O)(6):

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(e) Paragraphs (O)(2) and (O)(5) of this rule do not apply to cold cleaners that use an aqueous cleaning solvent, as defined in paragraph (AA)(12) of rule 3745-21-01 of the Administrative Code.

OR

- Add the following definition into OAC 3745-21-01(G) and renumber the remaining items in (G):
 - (1) “Aqueous cleaning solvent” means a solvent in which water is at least eighty per cent of the solvent is applied. Detergents, surfactants, and bioenzyme mixtures and nutrients may be combined with the water along with a variety of additives, such as organic solvents (e.g., high boiling point alcohols), builders, inhibitors, emulsifiers, pH buffers, and antifoaming agents. Aqueous solutions must have a flash point greater than ninety-three degrees Celsius (two hundred degrees Fahrenheit) (as reported by the manufacturer) and the solution must be miscible with water.

And add this exemption to OAC 3745-21-09(O)(6):

(e) Paragraphs (O)(2) and (O)(5) of this rule do not apply to cold cleaners that use an aqueous cleaning solvent, as defined in paragraph (G)(1) of rule 3745-21-01 of the Administrative Code.

(Janean R. Weber, Assistant Director, Regulatory Compliance and Sustainability, Columbus Department of Public Utilities (DPU))

Response 4:

The Ohio EPA will not be incorporating these changes at this time. The current rulemaking is limited in scope to expeditiously address the need to issue alternative RACT limitations for newly subject sources required to comply with the recently updated VOC RACT requirements as a part of Ohio’s ozone state implementation plan (SIP). These additional changes suggested by the commenter would necessitate a lengthier process, including discussions with U.S. EPA, and preparation of a SIP revision more expansive in scope than this current rulemaking. The Ohio EPA will be reaching out directly to the commenter to initiate discussions to further look into the validity of these requested changes and incorporate them in a subsequent rulemaking, if appropriate.

Comment 5:

Columbus DPU requests that the threshold for exemption from vapor balance or control at OAC 3745-21-09(R)(4)(a) be increased from 120,000 annual gallons of gasoline to 150,000 annual gallons of gasoline. DPU operates eight Gasoline Dispensing Facilities (GDF) at its facilities. All are permit exempt or covered by permit by rule, based on annual gasoline throughput. Only one GDF is currently required to practice vapor management upon delivery due to having exceeded the exemption threshold slightly with 127,571 gallons in 2019 and 126,512 gallons in 2022. The

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requested change would benefit Columbus DPU and many other cities and utilities with similar scale of fleet operations.

This exemption can be accomplished by making the following change:

- To provide clarification about the meaning of “annual throughput” as used in OAC 3745-21-09(R)(4), add: “per rolling twelve-month period” to the end of (R)(4)(a) and change the phrase “has an annual throughput” to “receives deliveries” to match the intent of (R)(5). (R)(5)(a) requires recordkeeping of “gasoline delivered...during each month” and (R)(5)(c) requires reporting within 45 days of any “rolling twelve-month” exceedance.
- Make the following change in OAC 3745-21-09(R)(4)(a): Any gasoline dispensing facility which ~~has an annual throughput~~ receives deliveries of less than one hundred ~~twenty~~ fifty thousand gallons of gasoline per rolling twelve-month period.
Make the following change in OAC 3745-21-09 (R)(5)(c) Notify the director within forty-five days after the exceedance occurs if the ~~annual gasoline throughput~~ deliveries for any rolling twelve-month period is equal to or greater than one hundred ~~twenty~~ fifty thousand gallons.

(Janean R. Weber, Assistant Director, Regulatory Compliance and Sustainability, Columbus Department of Public Utilities (DPU))

Response 5:

The Ohio EPA will not be incorporating these changes at this time. The current rulemaking is limited in scope to expeditiously address the need to issue alternative RACT limitations for newly subject sources required to comply with the recently updated VOC RACT requirements as a part of Ohio’s ozone state implementation plan (SIP). These additional changes suggested by the commenter would necessitate a lengthier process, including discussions with U.S. EPA, and preparation of a SIP revision more expansive in scope than this current rulemaking. The Ohio EPA will be reaching out directly to the commenter to initiate discussions to further look into the validity of these requested changes and incorporate them in a subsequent rulemaking, if appropriate.

11. What scientific data was used to develop the rule or the measurable outcomes of the rule? How does this data support the regulation being proposed?

The rules in this chapter are based upon CTG and ACT guidance documents prepared by U.S. EPA. U.S. EPA maintains a research and development facility at Research Triangle Park, North Carolina, where most of the CTG and ACT documents are developed. U.S. EPA considers not only the need for reduction of VOC emissions, but the emissions that can be achieved and the cost to the regulated parties on a cost per ton of VOC emissions reduced basis.

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- 12. What alternative regulations (or specific provisions within the regulation) did the Agency consider, and why did it determine that these alternatives were not appropriate? If none, why didn't the Agency consider regulatory alternatives?**
Alternative regulations may include performance-based regulations, which define the required outcome, but do not dictate the process the regulated stakeholders must use to comply.

The current rulemaking is intended to expand the availability of the alternative to perform a detailed engineering study to support an alternate, source-specific emissions limit by removing a restriction based on the date of installation.

- 13. What measures did the Agency take to ensure that this regulation does not duplicate an existing Ohio regulation?**

The Ohio EPA is the only agency having jurisdiction over the control of air pollution, and is specifically directed, under Section 3704.03 of the Revised Code to develop rules for the control of emissions of air pollutants. The rules in this chapter are unique within the Ohio EPA and do not duplicate the rules of this or any other agency.

- 14. Please describe the Agency's plan for implementation of the regulation, including any measures to ensure that the regulation is applied consistently and predictably for the regulated community.**

Ohio EPA's VOC RACT rules have been in place since the late 1970's. The VOC standards in this chapter are used in development of air pollution control permits issued under Ohio's New Source Review permitting program in OAC Chapter 3745-31 and Title V permitting program in OAC Chapter 3745-77. The permits list the emission standards that the facilities are required to achieve and the reporting and recordkeeping requirements to document that the standards are being achieved, all of which is included in OAC chapter 3745-21.

Adverse Impact to Business

- 15. Provide a summary of the estimated cost of compliance with the rule(s). Specifically, please do the following:**

- a. Identify the scope of the impacted business community, and
- b. Quantify and identify the nature of all adverse impact (e.g., fees, fines, employer time for compliance, etc.).

The adverse impact can be quantified in terms of dollars, hours to comply, or other factors; and may be estimated for the entire regulated population or for a representative business. Please include the source for your information/estimated impact.

OAC Chapter 3745-21 has been in the OAC since 1972. The rules have evolved over the years to address requirements in the Clean Air Act to develop regulations as part of an effort to

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achieve the NAAQS for CO and ozone within the state. These rules and additional technical support were submitted to U.S. EPA for review and approval as part of the SIP.

This Chapter has been modified over the years to incorporate requirements for categories of sources for which U.S. EPA has indicated that RACT should apply. In general, the levels of control that are available have been evaluated and presented in a series of CTGs issued by U.S. EPA. There are also rules based on information provided by U.S. EPA for other sources which were identified as non-CTG RACT.

Given the many and varied types of processes that are regulated under OAC chapter 3745-21, it is difficult to give an exact cost of compliance with the rules in this chapter in a limited space. The cost of compliance with these rules can range from zero cost for a control technology such as a work practice or raw material change, to a few million dollars for the installation and operation of a mechanical control device. As part of the permitting process, facilities can perform a RACT analysis which allows them to determine, based on all technologies available, the best and most cost-effective control strategy for their facility.

It should be noted that CTG based rules similar to Ohio's rules can also be found in Ohio's neighbor states and in any state containing a moderate ozone non-attainment area. Facilities wishing to locate in these types of areas will need to meet these requirements in all states.

The amendments made for this rulemaking should reduce costs of compliance for certain specified facilities by allowing them to request an alternative emissions limit. These specified facilities would receive an alternative emissions limitation when they are unable to comply with the presumptive emissions limitations contained within the rules due to technical or economical infeasibility.

16. Are there any proposed changes to the rules that will reduce a regulatory burden imposed on the business community? Please identify. (*Reductions in regulatory burden may include streamlining reporting processes, simplifying rules to improve readability, eliminating requirements, reducing compliance time or fees, or other related factors*).

As noted above, the amendments being made for this rulemaking will allow facilities to obtain alternate, facility-specific emission limits. These rules establish regulated emission limits for the VOC content of coatings and adhesives used in industrial processes. Occasionally, a facility cannot achieve an established limit in the rule and the amendments in this rulemaking will enable facilities to obtain an alternate VOC limit. This greatly reduces the burden on these facilities by allowing them to continue to use established coatings and adhesives, rather than switch to complaint, but substandard coatings or installing unnecessarily expensive control equipment.

17. Why did the Agency determine that the regulatory intent justifies the adverse impact to the regulated business community?

The state of Ohio is required by the Clean Air Act to enact rules based on CTG documents in moderate non-attainment areas. For this reason, most if not all of the rules in this chapter are applicable in the Cleveland/Akron/Lorain moderate ozone non-attainment area as part of the state's strategy for attaining and maintaining the 1997 ozone standard. For areas of the state which were designated basic non-attainment, such as the Cincinnati/Dayton non-attainment area, Ohio EPA adopted a smaller sub-set of these rules in order to achieve attainment and did not make new CTG based rules applicable in these areas once the standard had been achieved. In 2022, the applicability of the existing CTGs and ACTs was extended to nonattainment areas reclassified as moderate for the 2015 ozone standard, where they were not already in place, in order to meet mandatory requirements under the CAA.

Regulatory Flexibility

18. Does the regulation provide any exemptions or alternative means of compliance for small businesses? Please explain.

The rules in this chapter do provide some exemptions or alternatives, typically for de-minimis type emissions or to keep a facility from being subject to two rules for the same process. All facilities wishing to operate the regulated processes in the applicable areas must achieve the emission limits outlined in the rules as required by the Clean Air Act.

The specific amendments in this rulemaking provide an alternative for those facilities that demonstrate that they cannot technically or economically achieve emission limits contained in the rules.

19. How will the agency apply Ohio Revised Code section 119.14 (waiver of fines and penalties for paperwork violations and first-time offenders) into implementation of the regulation?

The Ohio EPA uses enforcement discretion regarding fines, and penalties for facilities committing a first-time paperwork violation are typically waived.

20. What resources are available to assist small businesses with compliance of the regulation?

The following resources are available:

- Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is a non-regulatory program that provides information and resources to help small businesses comply with environmental regulations. OCAPP also helps customers identify and implement pollution prevention measures that can save money, increase business performance and benefit the environment. Services of the office include a toll-free hotline, on-site compliance and pollution prevention assessments, workshops/training, plain-English publications library and assistance in completing

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permit application forms. Additional information is available at <http://www.epa.ohio.gov/ocapp>.

- Ohio EPA also has a permit assistance web page (http://www.epa.ohio.gov/dir/permit_assistance.aspx) that contains links to several items to help businesses navigate the permit process, including the Permit Wizard, Answer Place, Ohio EPA's Guide to Environmental Permitting and eBusiness Center.
- Ohio EPA maintains the Compliance Assistance Hotline 800-329-7518, weekdays from 8:00 a.m. to 5:00 p.m.
- US. EPA Small Business Gateway also has information on environmental regulations for small businesses available at <http://www.epa.gov/smallbusiness/> and a Small Business Ombudsman Hotline 800-368-5883.
- Ohio EPA's DAPC maintains a SIP Development section through which SIP related rulemaking is performed. DAPC rule writer Paul Braun, the primary contact for this rulemaking, is available to answer questions. He can be reached by calling 614-644-3734 or by e-mail at paul.braun@epa.ohio.gov.

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