



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 General James M. Gavin Power Plant Area (including Kyger Creek Station) 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 (SO<sub>2</sub>) 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 SO<sub>2</sub>/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 General James M. Gavin Plant area. Due to proximity and emissions level, Ohio EPA also included Kyger Creek Station in this analysis and intends for this analysis to also fulfill the requirements for this facility under U.S. EPA's Data Requirements Rule. 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*.

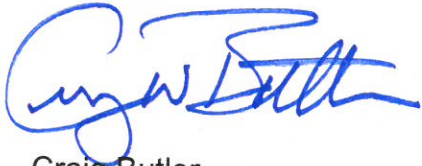
Based upon this analysis, Ohio EPA is recommending Gallia County and a portion of Meigs County be designated as attainment for the 2010 1-hour SO<sub>2</sub> standard. This recommendation encompasses the following townships in Meigs County: Bedford, Columbia, Rutland, Salem, Salisbury, and Scipio.

As detailed under Factor 1 in the attached submittal, Ohio EPA modeled actual SO<sub>2</sub> emissions from the General James M. Gavin Plant and Kyger Creek Station for years 2012 through 2014. No exceedances of the standard were modeled inclusive of a conservative 10 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,



Craig Butler  
Director

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

Enclosure