



Ohio EPA
Division of Air Pollution Control
P.O. Box 1049
Columbus, Ohio 43216-1049

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**Ohio Environmental Council's Comments on the Ohio EPA Fine Particulate
(PM 2.5) SIP for Ohio's Nonattainment Counties**

Ohio Environmental Council's (OEC) comments on the Ohio EPA's proposed fine particulate state implementation plan for Ohio's nonattainment counties. On behalf of nearly 100 environmental and conservation member organizations, and thousands of individual members throughout the State of Ohio, the Ohio Environmental Council (OEC) respectfully submits these comments on this implementation plan.

Background

PM 2.5 is a serious health, environment, and economic problem in Ohio. Particle pollution comes from a variety of sources such as power plants, foundries, diesel powered engines, and even prescribed burns.

Particulate matter emitted from Ohio's many power plants have the dubious distinction of ranking near the top in pollutants spewed from their smoke stacks. According to the U.S. EPA data, fine particles from coal-fired power plants contribute to an estimated 1,743 preventable deaths, 212 lung cancer deaths, and 2,873 non-fatal heart attacks in Ohio annually.

Prescribed burns also contribute to poor air quality. Every year over 3,000 acres of Ohio lands are burned after OEPA permits have been issued for the activity. As Ohio looks to lower its emission profile to bring regions into compliance with federal clean air requirements, this prescribed burn activity must be assessed as a possible contributor to the problem. Experts have established that forest fires are a significant source of PM 2.5 across the country; the OEPA should determine the impact of current permitted prescribed burns on regional non-compliance for PM 2.5.

Diesel exhaust is especially deadly as it is emitted at street level which makes people especially vulnerable to its ill-effects. Despite the new diesel rules that require all 2007 and newer, on road, heavy duty, diesel engines to have diesel particulate filters on them (which reduce emissions by up to 90%) there are still anywhere from 11 million to 13 million legacy diesels that are still heavily polluting. Nationwide, the cancer risk from diesel exhaust is 7.5 times higher than the combined total cancer risk from all other air toxics. Diesel exhaust has been linked to eye irritation, asthma attacks, respiratory and neurological ailments, heart and lung disease, and preventable death. A study by the Clean Air Task Force, using US EPA-based methodology, predicts that by 2010 we will see the following due to diesel exhaust (in the U.S.):

**3,000 lung cancers

- **27,000 non fatal heart attacks
- **410,000 asthma attacks
- **14,000,000 “restricted activity days”
- **15,000 hospital admissions
- **15,00 asthma related visits to the emergency room

OEC’s Diesel Hot Spots reports reveal that many Ohioans in major cities live with in a “diesel hot spot.” A “diesel hot spot” is defined as areas that are within one quarter mile of a roadway with PM emission levels of at least 675 grams per mile per day (g/mi/day). In our cities this translates to:

- **Cleveland: 38% (nearly 183,000 people) within a diesel hot spot
- **Columbus: 28% (nearly 200,000 people) within a diesel hot spot
- **Cincinnati: 45% (nearly 150,000 people) within a diesel hot spot
- **Akron: 32.3% (nearly 71,000 people) within a diesel hot spot
- **Canton: 26.5% (nearly 22,000 people) within a diesel hot spot

Additionally, according to the Clean Air Task Force report “Diesel and Health in America” fine particles from diesel engines contribute to 769 preventable deaths, 14,464 asthma attacks, and nearly 84,000 lost work days in Ohio annually. This ranks Ohio 8th in the country for health impacts from diesel fine particles.

If we do not meet attainment on time, according to the Mid-Ohio Regional Planning Commission study, in central Ohio alone, lost business due to poor air quality could cost us over \$100 million each year the manufacturing and services sectors. This translates into over 800 job losses and nearly \$50 million lost in workers wages for the manufacturing and services sectors.

Moreover, there are environmental damages cause by particle pollution to our already impacted water ways, streams, wildlife, and climate. Black carbon is a basis for particulate matter. Several probable and known toxics cling to this carbon when released. Early studies have revealed that the same amount of black carbon is 300,000 times more instantaneous heating than the same amount of carbon dioxide. Reason is black carbon generates heat when in the sun while carbon dioxide acts like a blanket. Additionally, when black carbon returns to earth, if it lands on a glacier or ice cap, it quickens the melting of that ice. Diesels also contribute to the deadening of our waterways, smog, and crop damage.

Ohio EPA SIP proposal

PM2.5 is wreaking havoc on our health and our economy. As the Ohio EPA proposed SIP reveals that Ohio has 27 counties—nearly a third—failing to meet the federal standard.

It is understood that the national ambient air quality standards are met when the three year average of the annual average is less than 15.0ug/m³ and the three year average of the 98th percentile of the 24-hour concentration is less than 35ug/m³. According to the data by this proposal it appears that Ohio will met the annual standard by 2010 for all but one of the current nonattainment counties.

Certainly Ohio EPA has made good strides in efforts to address the PM 2.5 issue. As indicated in the proposal, the Agency’s Clean School Bus Retrofit Fund, the Department of Development’s Diesel Emission Reduction Grant Program, and the US EPA’s diesel clean up grant program have made a difference. The Agency also points to enforcement action that

will contribute to reaching attainment such as the Mittal Inc. Iron and steel mill in Cleveland. Large polluters such as St. Tikhon and GT Craig have closed or scaled back their operations.

The Agency's proposal also indicates federal action being taken to reach attainment. These actions include the Tier 2 emission standards for mobile sources; the new diesel rule, clean air non-road diesel rule; low sulfur gasoline and diesel fuel; and the Clean Air Interstate Rule (CAIR).

These actions are commended and encouraged. However, the data is close in meeting the standard and one grant program not funded and an up tick in manufacturing could have us back in nonattainment. In particular, CAIR was recently vacated by the federal courts and the funding for the Ohio Diesel Emission Reduction Grant Program is slated to expire in June 2008.

Recommendations

The Ohio EPA should consider listing the following in the State Implementation Plan as actions they will undertake to get us in attainment:

Diesel on road reductions:

- Promote truck stop electrification.
- The State should install anti-idling devices on all new fleet purchases by Ohio Department of Administrative Services.
- Develop a low interest revolving loan fund for private fleets to apply to retrofit their fleets with diesel particulate filters and cleaner fuels.
- Encourage the state of Ohio to adopt a no idle policy for state vehicles and the public.
- Educate the legislature on the importance of funding the Ohio Diesel Emission Reduction Grant Program to \$30 million next fiscal year.
- Educate private fleets about the importance of cleaning up their diesel fleets.
- Continuation of the Ohio EPA's Clean School Bus Retrofit Grant Program.
- Urge Congress to fully fund the Diesel Emission Reduction Act to \$200 million a year.

Diesel off road reductions:

- Promote internally among state agencies emission control requirements in contract language for public projects \$2 million and above.
- Work with airports to replace ground support equipment with electric, compressed natural gas, or retrofit existing diesel equipment with diesel particulate filters.
- Work with the ports to adopt no idling policies as well as encouraging fleets to apply for grants to retrofit or replace their diesel fleets.
- Work with the rail companies to develop clean up strategies and replace old, dirty, switcher cars with Genset technology.

The funding for these recommendations must come a variety of sources. These sources include: The US EPA's Midwest Clean Diesel Initiative, OEPA Clean School Bus Program, Ohio Diesel Emission Reduction Grant Program, Congestion Mitigation and Air Quality (CMAQ), Diesel Emission Reduction Act, and Supplemental Environmental Projects. Other avenues can be tax incentives for fleets to retrofit and purchase cleaner fuels. Keep in mind that a few of the funding sources mentioned are set to expire and therefore, the Agency should do everything in its power to ensure these programs continue.

The good news is that the state will teeter towards making attainment. But the Agency must not rest until PM 2.5 is not an issue. In turn, OEC will continue our efforts of working with

fleets and educating law makers on the importance of diesel emission clean up. Thank you for this opportunity to comment on this important State Implementation Plan.

Sincerely,

David R. Celebrezze
Director of Air & Water
Special Projects