



REGIONAL AIR POLLUTION CONTROL AGENCY

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August 22, 2008

John Mooney, Chief
Criteria Pollutant Section (AR-18)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention Docket ID No. EPA-R05-OAR-2007-1100

Dear Mr. Mooney:

The following are comments of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio on the U.S. Environmental Protection Agency's (EPA's) Proposed Rule to approve the Ohio State Implementation plan to allow the state to discontinue the vehicle inspection and maintenance (I/M) program in the Dayton-Springfield Area. This proposal was published in the *Federal Register* on July 14, 2008 (73 *Federal Register* 43180). RAPCA is a six-county local air pollution control agency serving the citizens of the Southwest Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble.

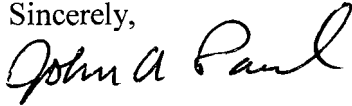
RAPCA was fully supportive of the I/M program which operated in our area for ten years. We feel that in that 10-year period the program was effective in helping to reduce air pollution to levels sufficient to meet the National Ambient Air Quality Standard for ozone (both the former 1-hr standard and the 1997 8-hr standard). The Dayton-Springfield Area was redesignated attainment for the 1-hr standard in 1995 and the 8-hr standard in 2007. When the Ohio Legislature rescinded the I/M program for the Dayton-Springfield Area, they did so contrary to our technical recommendation. However, Ohio EPA identified additional reductions and adopted rules to secure those reductions in a timely manner. We feel that especially the low volatility gasoline requirement is sufficient to provide emissions reductions equivalent to those which would have occurred should the I/M program have continued. Therefore, we support this proposal to move the I/M program requirements to the contingency measures portion of the Dayton-Springfield ozone maintenance plan.

RAPCA personnel are fully aware that new issues are in play which may affect our ability to meet EPA's newest standards for ozone and PM_{2.5}. The recent court vacature of EPA's Clean Air Interstate Rule (CAIR) is significant, but the solution to this problem involves the adoption of new rules to control emissions from electric generating units (EGUs), not the re-establishment

of a vehicle emissions control program. We will work closely with Ohio EPA, USEPA, and our National Association of Clean Air Agencies (NACAA) on solutions.

Thank you for this opportunity to comment. Please contact this writer with any questions or concerns.

Sincerely,

A handwritten signature in black ink that reads "John A. Paul". The signature is written in a cursive style with a large, looped "P" and a long, sweeping underline.

John A. Paul, Administrator
Regional Air Pollution Control Agency