



Anne Vogel
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio's State Implementation Plan (SIP) Request for Removal of the Ohio SIP Approved Inspection and Maintenance (I/M) Program

Dear Administrator Vogel

I am writing to submit a revision to Ohio's State Implementation Plan (SIP) to request Ohio's Inspection and Maintenance (I/M) program, otherwise known as "E-Check", be approved for discontinuation and remove from Ohio's SIP.

Specifically, Ohio EPA formally requests that the United States Environmental Protection Agency (U.S. EPA) remove the Cleveland area Inspection and Maintenance (I/M) program from Ohio's State Implementation Plan (SIP) as an actively implemented control measure.

Ohio EPA is requesting U.S. EPA approval of this Clean Air Act (CAA) Section 110(l) noninterference demonstration included in Appendix A. CAA section 110(l) provides that U.S. EPA cannot approve a SIP revision if the revision would interfere with any applicable requirement concerning attainment or reasonable further progress. States are obligated to provide this demonstration to show that such modification will not interfere were aforementioned requirements.

Ohio EPA further requests approval of a limited amendment to the ozone maintenance plan for the Cleveland area, revising the contingency provisions to designate the I/M program as a potential contingency measure rather than an active component of the SIP (see Attachment A of Appendix A).

Finally, Ohio EPA requests that U.S. EPA retain all previously approved elements of the Cleveland area maintenance plan, except for the limited revisions specifically identified in this submission. Ohio EPA proposes to retain the existing numerical 2032 and 2038 motor vehicle emissions budgets (MVEBs) based on this demonstration. Ohio's request is not intended to revise the broader maintenance demonstration already approved by U.S. EPA.

As demonstrated within Ohio EPA noninterference demonstration, the Cleveland area can maintain all NAAQS without relying on reductions from the I/M program.

Ohio held a public comment period and held a hearing on this revision request and CAA section 110(l) demonstration and the revisions to Ohio's contingency measures list from October 5 to November 5, 2026.

The public hearing was held on November 5, 2026. The response to comments received during the comment period (when applicable) is included in Attachment C of Appendix A along with the public notice issued by Ohio EPA.

At this time, Ohio EPA is requesting U.S. EPA approve the request as outlined above by no later than July 1, 2027. Ohio EPA is submitting this SIP via U.S. EPA's State Planning Electronic Collaboration System (SPeCS). If you have questions, please contact Jennifer Van Vlerah in our Division of Air Pollution Control at (614) 644-3696.

Sincerely,

John Logue
Director

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

Enclosures