



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JAN 20 2005

THE ADMINISTRATOR

Robert Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Dear Mr. Hodanbosi:

Thank you for your letter of February 22, 2005, concerning fine particulate matter (PM<sub>2.5</sub>) designations in Ohio. In your letter, you provided 2004 monitoring data for the Toledo and Youngstown areas as well as for Lawrence and Scioto Counties in Huntington-Ashland area. Your letter further urges that EPA exclude Adams and Gallia Counties from the Huntington-Ashland nonattainment area, so that this nonattainment area would include no portions of Ohio. Finally, your letter urges that the Agency view Scioto County and relevant portions of Adams County as a Portsmouth area, separate from the Huntington-Ashland area.

We have already acted to designate the Toledo and Youngstown areas as attainment. With respect to the Huntington-Ashland area, we view your letter as a petition for reconsideration. For the reasons discussed herein, EPA is denying this petition.

In EPA's January 5, 2005, Final Designation Notice (at 70 FR 944), EPA stated that it would change an area's designation from nonattainment to attainment if inclusion of 2004 data showed that every county in the area was neither monitoring a violation of the standards nor contributing to a violation of the standards in a nearby area. EPA noted that it would not change the boundaries of nonattainment areas to exclude portions of such areas that EPA had already determined contributed to the violation of the standards in the nonattainment area. So long as there is nonattainment in an area, those nearby areas that contribute to the violations of the air quality standards need to be designated part of the nonattainment area.

In accordance with our stated approach, in EPA's Supplemental Designations Notice published April 14, 2005 (at 70 FR 19844), EPA revised the designation of the Toledo and Youngstown areas to attainment/unclassifiable because all previously violating monitors in each area were attaining based on 2002-2004 data. However, the Agency made no change to the boundaries or designation of the Huntington-Ashland nonattainment area. EPA concluded that it is appropriate to treat the counties as a single

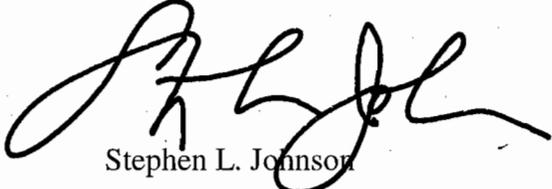
area, and a monitor in the designated area continued to violate the PM2.5 standards based on evaluation of 2002-2004 data. The April notice referenced the technical support document, available on EPA's web site at <http://epa.gov/pmdesignations/documents/final/TSD/Ch6.pdf>, which provides further discussion of EPA's decision regarding this area.

The Agency has reviewed the requests and the information provided in your February 22, 2004, letter concerning the Huntington-Ashland nonattainment area. After careful evaluation, EPA continues to believe that Lawrence and Scioto counties and portions of Adams and Gallia counties belong in a single nonattainment area, and continues to believe that these counties contribute to a violation of the PM2.5 standards in the Huntington-Ashland area based upon a consideration of the relevant information EPA has previously discussed. The emissions data and other data supporting EPA's rationale are described further in the technical support document referenced above.

Your letter specifically repeated the request that we treat Scioto County and relevant portions of Adams County as a separate area from the Huntington-Ashland area. However, we believe that emissions in both Scioto County and the relevant portions of Adams County contribute to violations in the Huntington-Ashland area. Our original definition of the Huntington-Ashland nonattainment area included these areas in part because we judged these areas to be contributing to violations in Huntington. This judgment in turn reflected EPA's review of emissions in Scioto and Adams Counties, their proximity to violations in the area, and the other factors identified in our guidance. We continue to believe that these counties contribute to violations in the Huntington-Ashland area. Therefore, we have concluded that these counties, along with Lawrence County and portions of Gallia County, should remain part of the Huntington-Ashland nonattainment area.

EPA appreciates your input and assistance in developing PM2.5 designations, and looks forward to working with you to assure achievement of the PM2.5 air quality standards in Ohio.

Sincerely,



Stephen L. Johnson