

**PUBLIC HEARING  
OHIO ENVIRONMENTAL PROTECTION AGENCY**

Proposed action concerning  
recommended PM 2.5 (fine particulate) designations

U.S. EPA has stated their intent to initiate the implementation of the revised fine particulate standard (PM 2.5) by December, 2004. Each state is to submit recommended boundaries by February 15, 2004. Ohio EPA is seeking comments on the State's current recommendations.

Background

U.S. EPA has issued guidance on the development of boundaries for PM 2.5 nonattainment areas. Each state is to develop boundaries and submit the recommended boundaries to U.S. EPA by February 15, 2004.

U.S. EPA has issued guidance and has also provided monitoring and modeling data on the internet to assist in the development of these boundaries. The guidance identifies the boundaries of the metropolitan statistical area (MSA) or combined metropolitan statistical area (CMSA) as the initial size of their recommended boundary and full counties as the basic unit. Information such as population, industry (or lack of industry), location relative to the urban core (upwind or downwind) and modeling information can be used as justification for deviations from a MSA or CMSA boundary. The Ohio EPA has reviewed this guidance and has developed a preliminary recommendation.

The State of Ohio is releasing two options for public comment. The first option would recommend only those counties with monitors actually measuring nonattainment be designated nonattainment for PM 2.5. This is based on our belief that PM 2.5 concentrations above the standard are not pervasive in the manner that ozone is. Significant amount of information exists which demonstrates that, while there is an elevated regional component to PM 2.5, there is an urban excess which appears to be limited to the urban core. The counties recommended as nonattainment under this option include:

Cuyahoga, Portage, Summit, Trubull, Mahoning, Stark, Lucas, Franklin, Montgomery, Clark, Hamilton, Butler, Jefferson, Lawrence and Scioto

Ohio EPA's current recommendations for each urban area within the state includes each

Ohio County within the MSA or CMSA , with exceptions noted:

**Canton/Massillon MSA;** The MSA includes Stark and Carroll Counties. Ohio EPA is recommending to exclude Carroll County, a rural area with a population less than 30,000.

**Cincinnati/Hamilton CMSA;** The interstate CMSA includes Butler, Warren, Hamilton, Clermont and Brown Counties in Ohio, Boone, Campbell, Ohio, Grant, Gallatin and Pendelton Counties in Kentucky and Dearborn County in Indiana. In Ohio, Ohio EPA is recommending to exclude Brown County, a rural upwind area with a population less than 50,000.

**Cleveland/Akron CMSA:** The CMSA includes Lorain, Medina, Cuyahoga, Summit, Lake, Portage, Geauga and Ashtabula Counties. Ohio EPA is recommending to exclude Ashtabula and Geauga Counties, rural counties with minimal commuting in or out of the Counties.

**Columbus MSA;** The MSA includes Franklin, Delaware, Licking, Fairfield, Pickaway and Madison Counties. Ohio EPA is recommending to exclude Madison and Pickaway Counties rural counties with minimal population and emissions.

**Dayton/Springfield MSA:** The MSA includes Miami, Clark, Greene and Montgomery Counties. Ohio EPA is recommending to exclude Miami County, a rural county with minimal population and emissions.

**Huntington/Ashland MSA:** The interstate MSA includes Lawrence County in Ohio, Greenup, Carter and Boyd Counties in Kentucky and Wayne and Cabell Counties in West Virginia. Ohio EPA is recommending that Scioto County be included as part of this area due to monitored violations.

**Lima MSA;** The classification should be **attainment**. The MSA includes Allen and Auglaize Counties.

**Mansfield MSA:** The classification should be **attainment**. The MSA includes Crawford and Richland Counties. Ohio EPA is recommending that these counties be designated attainment.

**Parkersburg/Marietta MSA:** The interstate MSA includes Washington County in Ohio and Wood County in West Virginia. Ohio EPA is proposing to exclude Washington County.

**Steubenville/Weirton MSA,** The interstate MSA includes Jefferson County in Ohio and Hancock and Brook Counties in West Virginia.

**Toledo MSA;** The MSA includes Lucas, Wood and Fulton Counties. Ohio EPA is recommending to exclude Fulton County, a rural upwind area with population less than 50,000.

**Youngstown/Warren MSA;** The MSA includes Trumbull, Mahoning and Columbiana Counties. Ohio EPA is recommending to exclude Columbiana County, a rural upwind area with a population less than 115,000.

**Wheeling MSA;** The interstate MSA includes Belmont County in Ohio and Ohio and Marshall Counties in West Virginia. Ohio EPA is recommending the exclusion of Belmont County, a rural upwind county with a population less than 75,000.

A public meeting is being scheduled for 2 p.m. on March 24, 2004 in conference room 5b of the Lazarus Government Building, 122 South Front Street, Columbus, Ohio 43215. All interested persons are entitled to attend or be represented and to present oral and/or written comments concerning the proposed boundaries. All oral comments presented at the hearing, and all written statements submitted at the hearing or by the close of business on March 30, 2004 will be considered by the Ohio EPA prior to final submittal; of the state recommended boundaries. Written statements submitted after March 30, 2004 may be considered as time and circumstances allow.

To obtain information concerning this request, contact Bill Spires of the Division of Air Pollution Control, Ohio EPA, 122 South Front Street, Columbus, Ohio 43215 (telephone 614-644-3618). Written comments on the proposed action should be submitted to Bill Spires of the Division of Air Pollution Control, Ohio EPA, 122 South Front Street, Columbus, Ohio 43215 (telephone: 614-644-3618) or to the presiding officer at the public meeting.



State of Ohio Environmental Protection Agency

STREET ADDRESS

Lazarus Government Center  
122 S. Front Street  
Columbus Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184

MAILING ADDRESS

P.O. Box 1049  
Columbus, OH 43216-1049

FEB 13 2004

Thomas V. Skinner  
Regional Administrator  
U.S. EPA, Region V  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: Ohio Recommended PM 2.5 Designations

Dear Mr. Skinner:

I am writing to submit Ohio's recommendations for PM 2.5 nonattainment boundaries for the metropolitan areas within Ohio. Ambient data for the periods 2000-2002 has been evaluated to determine which urban areas within the state are not attaining the revised standard. This evaluation also addressed the interstate metropolitan areas with only a rural portion of the metropolitan statistical area (MSA) within Ohio.

These recommendations were initially based on the metropolitan statistical areas as they existed prior to June 9, 2003. These areas have been redefined in some cases. Our recommendations identify where changes have occurred. The changes, though, do not significantly change our overall recommendations. We believe that the information on population, emissions and air quality supports the recommended status for a county whether or not it is part of the old or new metropolitan area definitions.

The State of Ohio is releasing two options for public comment. The first option would recommend only those counties with monitors actually measuring nonattainment be designated nonattainment for PM 2.5. This is based on our belief that PM 2.5 concentrations above the standard are not pervasive in the manner that ozone is. A significant amount of information exists which demonstrates that, while there is an elevated regional component to PM 2.5, there is an urban excess which appears to be limited to the urban core. The counties recommended as nonattainment under this option include:

Cuyahoga, Portage, Summit, Trumbull, Mahoning, Stark, Lucas, Franklin, Montgomery, Clark, Hamilton, Butler, Jefferson, Lawrence and Scioto

In the alternative, the state would recommend a portion of the MSA or combined MSA (CMSA) be designated nonattainment. Counties experiencing nonattainment air quality at one or more monitors, and the counties with population and emissions that could

Bob Taft, Governor  
Jennette Bradley, Lieutenant Governor  
Christopher Jones, Director

contribute to the nonattainment are being recommended to be designated nonattainment.

The areas and their specific counties are as follows:

**Canton/Massillon MSA;** The MSA includes Stark and Carroll Counties. Ohio EPA is recommending to exclude Carroll County, a rural area with a population less than 30,000.

**Cincinnati/Hamilton CMSA;** The interstate CMSA includes Butler, Warren, Hamilton, Clermont and Brown Counties in Ohio, Boone, Campbell, Ohio, Grant, Gallatin and Pendleton Counties in Kentucky and Dearborn County in Indiana. In Ohio, Ohio EPA is recommending to exclude Brown County, a rural upwind area with a population less than 50,000.

**Cleveland/Akron CMSA:** The CMSA includes Lorain, Medina, Cuyahoga, Summit, Lake, Portage, Geauga and Ashtabula Counties. Ohio EPA is recommending to exclude Ashtabula and Geauga Counties, rural counties with minimal commuting in or out of the Counties.

**Columbus MSA;** The MSA includes Franklin, Delaware, Licking, Fairfield, Pickaway and Madison Counties. Ohio EPA is recommending to exclude Madison and Pickaway Counties rural counties with minimal population and emissions.

**Dayton/Springfield MSA:** The MSA includes Miami, Clark, Greene and Montgomery Counties. Ohio EPA is recommending to exclude Miami County, a rural county with minimal population and emissions.

**Huntington/Ashland MSA:** The interstate MSA includes Lawrence County in Ohio, Greenup, Carter and Boyd Counties in Kentucky and Wayne and Cabell Counties in West Virginia. Ohio EPA is recommending that Scioto County be included as part of this area due to monitored violations.

**Lima MSA;** The classification should be **attainment**. The MSA includes Allen and Auglaize Counties.

**Mansfield MSA:** The classification should be **attainment**. The MSA includes Crawford and Richland Counties. Ohio EPA is recommending that these counties be designated attainment.

**Parkersburg/Marietta MSA:** The interstate MSA includes Washington County in Ohio and Wood County in West Virginia. Ohio EPA is proposing to exclude Washington County.

**Steubenville/Weirton MSA,** The interstate MSA includes Jefferson County in Ohio and Hancock and Brook Counties in West Virginia.

**Toledo MSA;** The MSA includes Lucas, Wood and Fulton Counties. Ohio EPA is

recommending to exclude Fulton County, a rural upwind area with population less than 50,000.

**Youngstown/Warren MSA;** The MSA includes Trumbull, Mahoning and Columbiana Counties. Ohio EPA is recommending to exclude Columbiana County, a rural upwind area with a population less than 115,000.

**Wheeling MSA;** The interstate MSA includes Belmont County in Ohio and Ohio and Marshall Counties in West Virginia. Ohio EPA is recommending the exclusion of Belmont County, a rural upwind county with a population less than 75,000.

Attached are tables summarizing ambient data for the period 2000-2002 and year 2000 population data for counties in the State of Ohio. In addition, maps summarizing population, population change, manufacturing population and manufacturing population change have been attached to assist in describing the nature of counties excluded from nonattainment designations.

Please call if you have any questions.

Sincerely,



Christopher Jones  
Director

enclosures

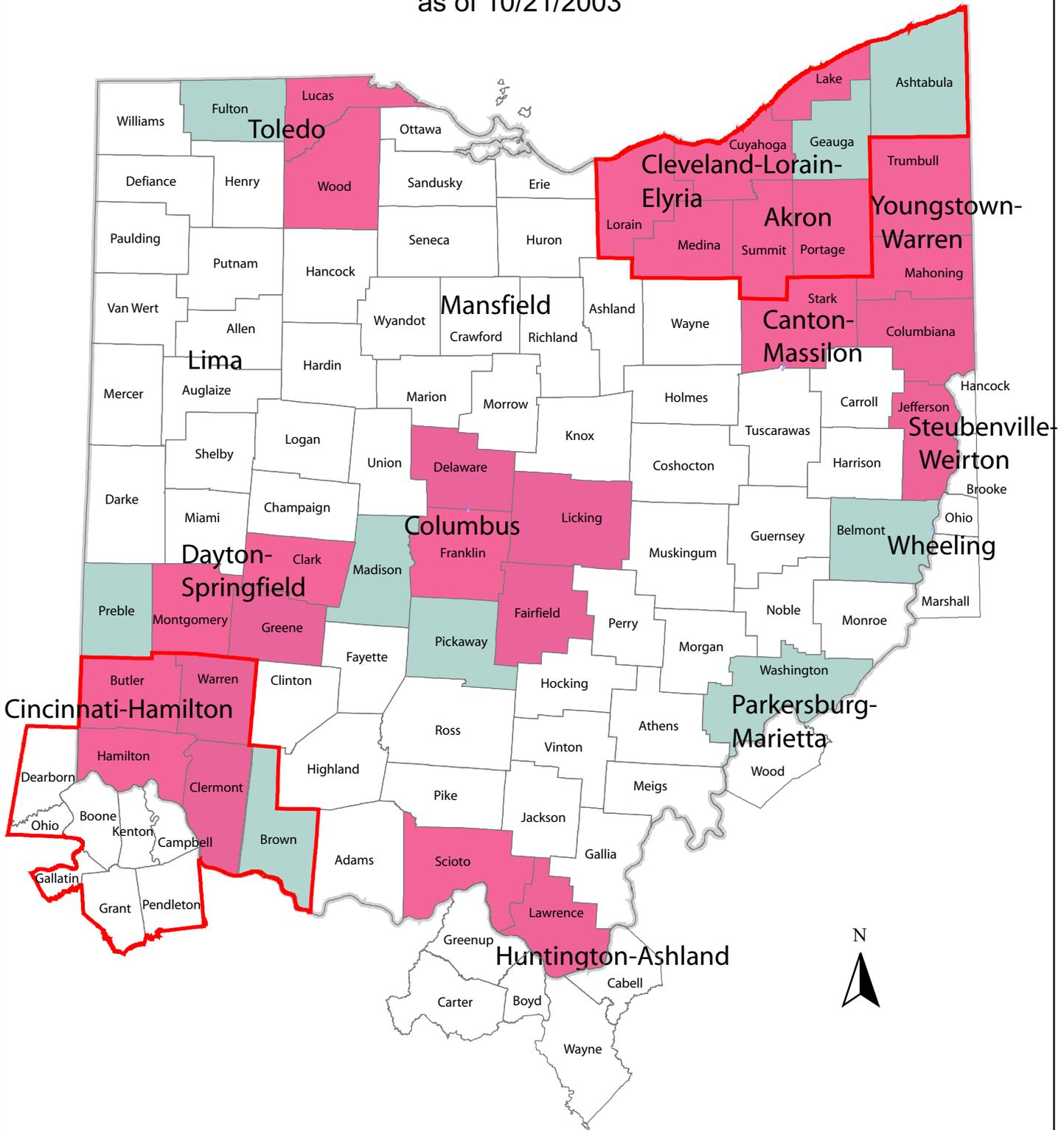
js

Recommended PM 2.5 Nonattainment Counties				Monitor	Monitor
		MSA/CMSA	Option	Option	Option
County		Attainment	Nonattainment	Attainment	Nonattainment
Adams		X		X	
Allen		X		X	
Ashland		X		X	
Ashtabula		X		X	
Athens		X		X	
Auglaize		X		X	
Belmont		X		X	
Brown		X		X	
Butler			X		X
Carroll		X		X	
Champaign		X		X	
Clark			X		X
Clermont			X	X	
Clinton		X		X	
Columbiana			X	X	
Coshocton		X		X	
Crawford		X		X	
Cuyahoga			X		X
Darke		X		X	
Defiance		X		X	
Delaware			X	X	
Erie		X		X	
Fairfield			X	X	
Fayette		X		X	
Franklin			X		X
Fulton		X		X	
Gallia		X		X	
Geauga		X		X	
Greene			X	X	
Guernsey		X		X	
Hamilton			X		X
Hancock		X		X	
Hardin		X		X	
Harrison		X		X	
Henry		X		X	
Highland		X		X	
Hocking		X		X	
Holmes		X		X	
Huron		X		X	
Jackson		X		X	
Jefferson			X		X
Knox		X		X	
Lake			X	X	
Lawrence			X		X
Licking			X	X	
Logan		X		X	
Lorain			X	X	

Lucas			X		X
Madison		X		X	
Mahoning			X		X
Marion		X		X	
Medina			X	X	
Meigs		X		X	
Mercer		X		X	
Miami		X		X	
Monroe		X		X	
Montgomery			X		X
Morgan		X		X	
Morrow		X		X	
Muskingum		X		X	
Noble		X		X	
Ottawa		X		X	
Paulding		X		X	
Perry		X		X	
Pickaway		X		X	
Pike		X		X	
Portage			X		X
Preble		X		X	
Putnam		X		X	
Richland		X		X	
Ross		X		X	
Sandusky		X		X	
Scioto			X		X
Seneca		X		X	
Shelby		X		X	
Stark			X		X
Summit			X		X
Trumbull			X		X
Tuscarawas		X		X	
Union		X		X	
Van Wert		X		X	
Vinton		X		X	
Warren			X	X	
Washington		X		X	
Wayne		X		X	
Williams		X		X	
Wood			X		
Wyandot		X		X	
			26		15



# Alternative Draft Recommended PM2.5 Nonattainment Areas as of 10/21/2003



Recommended nonattainment counties  
 Counties to be excluded from MSA nonattainment area



## **Additional Information Concerning the Counties Recommended to be Excluded from Nonattainment Boundaries**

One common assumption in the following discussions is that PM 2.5 is a problem on an annual basis. There are no violations of the PM 2.5 24-hour standard.

PM 2.5 monitors were placed in areas of high population and elevated levels of PM 10. The urban/industrial portion of an MSA generally exhibits higher concentrations than the surrounding monitors. There is an acknowledged 'urban excess' of PM 2.5.

The following counties are part of MSAs which have at least one monitor exceeding the annual PM 2.5 standard. These counties, in general, are low in both population and emissions relative to the remainder of the MSA. Unlike ozone the effect of the urban core does not appear to extend beyond the central urban/industrial portion of the MSA. While there is a regional component to PM 2.5, the extent of the areas experiencing levels above the standard appears to be limited in areal extent when compared to ozone nonattainment areas.

**Fulton:** Fulton County is part of the Toledo MSA. The MSA also includes Lucas and Wood Counties. Fulton County should be excluded from this nonattainment area due to:

- Proximity to the source region/nonattainment area: Fulton County is located west of the Toledo urban/industrial area.
- Population: The population of Fulton County is less than 45,000 which is less than 7% of the total MSA (618,000).
- Emissions: Fulton County emissions of VOC and NOX are both less than 5,000 tons per year while Lucas and Wood Counties combine for nearly 50,000 ton per year of each. SO2 emissions are less than 1000 ton per year. The surrounding area is rural/agricultural.
- Land use: Fulton County is over 96% wooded or agricultural.
- Commuters: Between 12,000 and 13,000 workers commute in or out of the county.

**Brown:** Brown County is part of the Cincinnati/Hamilton interstate CMSA. The CMSA includes four additional counties in Ohio as well as counties in Kentucky and Indiana. Brown County should be excluded from this CMSA nonattainment area due to:

- Proximity to the source region/nonattainment area: The majority of Brown County is located south/southeast of the Cincinnati urban/industrial area. The area would not be expected to be significantly impacted by, nor should it be considered a receptor for, the Cincinnati area.
- Population: The population of Brown County is less than 45,000, which is less than 3% of the total CMSA (1,979,202)

- Emissions: Brown County emissions of VOC and NOx are both less than 2,500 tons per year. CMSA emissions from the remaining Ohio counties are over 90,000 tons per year of VOC and over 150,000 tons per year of NOx. SO2 emissions are less than 1000 tons per year. The surrounding area is rural/agricultural.
- Land use: Brown County is over 97% wooded or agricultural.
- Commuters: Between 11,000 and 12,000 workers commute in or out of the county.

**Carroll:** Carroll County is part of the Canton MSA. The MSA also includes Stark County. Carroll County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Carroll County is south of the Canton urban/industrial area. The area would not be expected to be impacted by, nor should it be considered a receptor for, the Canton area.
- Population: The population of Carroll County is less than 30,000 while Stark County has over 375,000.
- Emissions: Carroll County emissions of VOC and NOx are both less than 2,000 tons per year. Stark County has over 20,000 tons per year of each. SO2 emissions are less than 1000 tons per year. The surrounding area is rural/agricultural.
- Land use: Carroll County is over 96% wooded or agricultural.
- Commuters: Between 7,000 and 8,000 workers commute in or out of the county.

**Belmont:** Belmont County is part of the Wheeling West Virginia interstate MSA. The MSA also includes Ohio and Marshall Counties in West Virginia. Belmont County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Belmont County is located west of the Wheeling urban/industrial area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Wheeling area.
- Population: The population of Belmont County is just over 70,000. The MSA total is 153,172. Population in both Belmont County and the MSA is decreasing (-3.8% 1990-2000).
- Emissions: Belmont County emissions of VOC and NOx are 4,750 and 14,342 tons per year, respectively. It should be noted that the primary NOx source in Belmont County is subject to the NOx transport rules and will be significantly reduced. MSA total emissions of VOC and NOx are 11,572 and 72,905 tons per year, respectively. SO2 emissions are approximately 50,000 tons per year, primarily due to a power plant subject to acid rain provisions and future regional controls. The surrounding area is rural/agricultural.
- Land use: Belmont County is over 95% wooded and agricultural.
- Commuters: Between 11,000 and 12,000 workers commute in or out of the county.

**Pickaway:** Pickaway County is part of the Columbus MSA. The revised MSA also includes Franklin, Delaware, Fairfield, Licking, Madison, Union and Morrow Counties. Pickaway County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Pickaway County is located south of the Columbus area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Columbus area.

- Population: The population of Pickaway County is just over 52,000. The MSA total is 1,540,157. Pickaway County grew by less than 5,000 since 1990.
- Emissions: Pickaway County emissions of VOC and NOx are 3,736 and 5,914 tons per year, respectively. MSA total emissions of VOC and NOx are 90,632 and 109,802 tons per year, respectively. SO2 emissions are less than 10,000 tons per year. The surrounding area, other than Columbus is predominantly rural/agricultural.
- Land use: Pickaway County is over 97% agriculture and wooded.
- Commuters: Between 14,000 and 15,000 workers commute in or out of the county.

**Madison:** Madison County is part of the Columbus MSA. The revised MSA also includes Franklin, Delaware, Fairfield, Licking, Pickaway, Union and Morrow Counties. Madison County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Madison County is located west of the Columbus area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Columbus area.
- Population: The population of Madison County is just over 40,000. The MSA total is 1,540,157. Madison County grew by less than 3,000 since 1990.
- Emissions: Madison County emissions of VOC and NOx are 2,700 and 3,400 tons per year, respectively. SO2 emissions are less than 300 tons per year. MSA total emissions of VOC and NOx are 90,632 and 109,802 tons per year, respectively. The surrounding area, other than Columbus is predominantly rural/agricultural.
- Land use: Madison County is over 98% agriculture and wooded.
- Commuters: Between 13,000 and 14,000 workers commute in or out of the county.

**Geauga:** Geauga County is part of the Cleveland/Akron CMSA. The CMSA also includes Cuyahoga, Summit, Lake, Lorain, Ashtabula, Medina and Portage Counties. Geauga County should be excluded from the CMSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Geauga County is located north and east of Akron and Cleveland. The area would not expect to be impacted by, nor should it be considered a receptor for, the Cleveland or Akron areas.
- Population: The population of Geauga County is just under 91,000. The CMSA total is 2,945,831. Geauga County grew by less than 10,000 since 1990.
- Emissions: Geauga County emissions of VOC and NOx are 5,000 and 4,300 tons per year, respectively. SO2 emissions are less than 700 tons per year. CMSA total emissions of VOC and NOx are 161,866 and 187,512 tons per year, respectively. The surrounding area, other than Cleveland and Akron is predominantly rural/agricultural.
- Land use: Geauga County is 85% agricultural and wooded and 7% shrub and scrub.
- Commuters: Between 33,000 and 34,000 workers commute in or out of the county.

**Ashtabula:** Ashtabula County is part of the Cleveland/Akron CMSA. The CMSA also includes Cuyahoga, Summit, Lake, Lorain, Geauga, Medina and Portage Counties. Geauga County should be excluded from the CMSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Ashtabula County is located two counties east of Akron and Cleveland. The area would not expect to be impacted by, nor should it be considered a receptor for, the Cleveland or Akron areas.
- Population: The population of Ashtabula County is just under 103,000. The CMSA total

is 2,945,831. Geauga County grew by less than 3,000 since 1990.

- Emissions: Ashtabula County emissions of VOC and NOx are 11,400 and 15,000 tons per year, respectively. SO2 emissions are less than 28,000 tons per year. CMSA total emissions of VOC and NOx are 161,866 and 187,512 tons per year, respectively. The surrounding area, other than Cleveland and Akron is predominantly rural/agricultural.
- Land use: Ashtabula County is 83% agricultural and wooded and 7.5% shrub and scrub.
- Commuters: Between 13,000 and 14,000 workers commute in or out of the county.

**Washington:** Washington County is part of the Parkersburg MSA. The MSA also includes Wood County, West Virginia. Washington County should be excluded from the MSA nonattainment area due to:

- Proximity: Washington County is located north of the Parkersburg urban area. The area would not expect to be impacted by, nor should it be considered a receptor area.
- Population: The population of Washington County is under 64,000. The MSA total is 151,237. Washington County grew by 1000 since 1990.
- Emissions: Washington County emissions of VOC and NOx are 5,355 and 34,233 tons per year. SO2 emissions are 181,787 tons per year.
- Land use: Washington County is 94% agricultural and wooded.
- Commuters: Between 13,000 and 14,000 workers commute in or out of the county.

The Counties below were included as part of the redefined MSA's but should be excluded from the nonattainment areas.

**Union:** Union County is part of the revised Columbus MSA. The revised MSA also includes Franklin, Delaware, Fairfield, Licking, Madison, Pickaway and Morrow Counties. Union County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Union County is located west of the Columbus area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Columbus area.
- Population: The population of Union County is just over 40,000. The MSA total is 1,540,157. Union County grew by less than 10,000 since 1990.
- Emissions: Union County emissions of VOC and NOx are 2,533 and 2,325 tons per year, respectively. MSA total emissions of VOC and NOx are 90,632 and 109,802 tons per year, respectively. SO2 emissions are less than 1000 tons per year. The surrounding area, other than Columbus and southern Delaware Counties is predominantly rural/agricultural.
- Land use: Union County is over 95% agriculture and wooded.
- Commuters: Between 16,000 and 17,000 workers commute in or out of the county.

**Morrow:** Morrow County is part of the revised Columbus MSA. The revised MSA also includes Franklin, Delaware, Fairfield, Licking, Madison, Pickaway and Union Counties. Morrow County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Morrow County is located north of the

Columbus area beyond the expected peak Columbus impact area.

- Population: The population of Morrow County is under 40,000. The MSA total is 1,540,157. Morrow County grew by less than 1,000 since 1990.
- Emissions: Morrow County emissions of VOC and NOx are 2,049 and 2,611 tons per year, respectively. MSA total emissions of VOC and NOx are 90,632 and 109,802 tons per year, respectively. SO2 emissions are less than 300 tons per year. The surrounding area, other than Columbus and southern Delaware Counties is predominantly rural/agricultural.
- Land use: Morrow County is over 98% agricultural and wooded.
- Commuters: Between 8,000 and 9,000 workers commute in or out of the county.

**Ottawa:** Ottawa County is part of the revised Toledo MSA. The revised MSA also includes Lucas, Wood and Fulton Counties. Ottawa County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Union County is located east-southeast of the Toledo area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Toledo area.
- Population: The population of Ottawa County is just over 40,000. The MSA total is 618,203. Ottawa County grew by less than 1,000 since 1990.
- Emissions: Ottawa County emissions of VOC and NOx are 5,815 and 4,974 tons per year, respectively. MSA total emissions of VOC and NOx are 55,000 tons of each. SO2 emissions are less than 1000 tons per year. The surrounding is predominantly rural/agricultural.
- Land use: Ottawa County is over 93% agricultural, wooded, open water (excluding Lake Erie) and wetlands.
- Commuters: Between 12,000 and 13,000 workers commute in or out of the county.

**Preble:** Preble County is part of the revised Dayton MSA. The revised MSA also includes Montgomery, Greene, Clark and Miami Counties. Preble County should be excluded from this MSA nonattainment area due to:

- Proximity to the source region/nonattainment area: Preble County is located west of the Dayton area. The area would not expect to be impacted by, nor should it be considered a receptor for, the Dayton area.
- Population: The population of Preble County is just under 43,000. The MSA total is 950,558. Preble County grew by less than 3,000 since 1990.
- Emissions: Preble County emissions of VOC and NOx are 2,711 and 2,960 tons per year, respectively. MSA total emissions of VOC and NOx are 63,092 and 52,756 tons per year, respectively. SO2 emissions are less than 500 tons per year. The surrounding area, other than Dayton is predominantly rural/agricultural.
- Land use: Preble County is over 97% agriculture and wooded.
- Commuters: Between 11,000 and 12,000 workers commute in or out of the county.