



State of Ohio Environmental Protection Agency

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December 17, 2007

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

Re: Ohio Recommended PM_{2.5} Designations

Dear Administrator Gade:

I am writing to submit Ohio's recommendations for PM_{2.5} nonattainment areas within Ohio. Ambient data for the periods 2004-2006 have been evaluated to determine which areas within the state are not attaining the revised standard. We understand that U.S. EPA will review the state recommendations and include information derived from the 2007 ambient data in their responses to the state recommendations. Ohio also will review 2007 data when it is available and modify our recommendations if necessary. Ohio also will evaluate the 2008 data as it becomes available and assess if that data may alter the ultimate designations. A similar process was used in the original PM_{2.5} designations.

The original guidance for nonattainment boundaries for the initial (existing) PM_{2.5} designations was based on the metropolitan statistical areas (MSA). The Clean Air Fine Particle Implementation Rule, effective May 29, 2007 [72 CFR 20586], provides states more flexibility in boundary recommendations by allowing area assessment on a case-by-case basis. However, a nonattainment area must include not only the area that is violating the standard but also nearby areas that contribute to a violation. We believe that the attached documentation, including emission and air quality data, population density and degree of urbanization, traffic and commuting patterns and growth rates and patterns supports the recommended status for each particular area.

The nonattainment levels of PM_{2.5} in Ohio consist of two major components. First there is a regional component associated primarily, but not entirely, with sulfur dioxide and oxides of nitrogen from coal-fired electric generating utilities. The second component is an urban/industrial component which is not as well defined at this time, but is impacting air quality in the urban cores.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

The recommended PM_{2.5} boundaries for the revised standard are not based on MSAs but rather the existing federal designations for those areas currently designated nonattainment. The counties within and adjacent to the existing nonattainment boundaries were evaluated to determine what, if any, adjustments needed to be made to the existing nonattainment boundaries. Areas previously designated attainment were evaluated in accordance with the current PM_{2.5} boundary determination guidance. All 88 counties in the state were evaluated. Below are the current recommended PM_{2.5} nonattainment areas and the identification of the specific counties which should be included in the area designations:

Area	Current PM_{2.5} Nonattainment Designation	Ohio EPA Recommended Nonattainment Counties
Canton-Massillon, OH	Stark	Stark
Cincinnati-Hamilton, OH-KY-IN	Butler Clermont Hamilton Warren	Butler Clermont Hamilton Warren
Cleveland-Akron-Elyria, OH	Cuyahoga Lake Lorain Medina Portage Summit Ashtabula (P)	Cuyahoga Lake Lorain Medina Portage Summit
Columbus, OH	Delaware Fairfield Franklin Licking Coshocton (P)	Delaware Fairfield Franklin Licking
Dayton-Springfield, OH	Clark Greene Montgomery	Greene Montgomery
Huntington-Ashland, WV-KY-OH	Lawrence Scioto Adams (P) Gallia (P)	
Parkersburg-Marietta, WV-OH	Washington	Washington
Steubenville-Weirton, OH-WV	Jefferson	Jefferson
Wheeling, WV-OH	Belmont	
Youngstown-Warren-Sharon, OH-PA		Mahoning Trumbull

Ohio EPA will be holding a public hearing on these recommendations on January 22, 2008, and will forward the results of that public involvement process once the information is available. Ohio EPA also will be proactive during this process by providing U.S. EPA updated ambient data (e.g., 2007) as it becomes available. We understand that there also will be the opportunity to provide 2008 ambient data prior to the final effective date of these designations to ensure that areas that will be attaining the revised standard when considering data for 2006-2008 will not be designated nonattainment.

At this time, we would also urge that the process of designating these areas under the revised standards would render the current designations obsolete. The potential approach whereby the existing designations would continue to apply even though the most current reanalysis indicates that they are attaining the standards would result in unnecessary efforts by staff at Ohio EPA as well as the Regional Offices. A more reasonable approach should be followed.

I appreciate the opportunity to provide these initial recommendations and will work cooperatively with U.S. EPA Region 5 staff as we both review new ambient data and U.S. EPA prepares their comments which are due 120 days prior to promulgation of the actual designations. If you have any questions concerning this submittal, please feel free to contact Sam MacDonald of the Division of Air Pollution Control at (614) 644-2270.

Please call if you have any questions.

Sincerely,



Chris Korleski
Director

Enclosures