



State of Ohio Environmental Protection Agency

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MAR 09 2009

Ms. Lynn Buhl
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio's Recommended Nonattainment Areas for the 2008 8-hour Ozone Standard

Dear Administrator Buhl:

I am writing to submit Ohio's recommendations for ozone nonattainment areas within Ohio for the revised 2008 8-hour standard. Ambient data for the period 2006-2008 have been evaluated to determine which areas within the State are not attaining the revised standard.

The designation recommendations are based on the most current ozone monitoring data along with the December 4, 2008 USEPA guidance, "Area Designations for the 2008 Revised Ozone National Ambient Air Quality Standards." This guidance recommends states use the nine-factor analysis for designations taking into consideration the Core Based Statistical Area (CBSA) or Combined Statistical Area (which includes two or more adjacent CBSA's) associated with the violating monitor(s). Under this guidance, these areas would serve as the starting point or "presumptive" boundary for evaluating each nonattainment area. Ohio EPA is using this approach in our recommendations. 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 counties within and adjacent to the existing nonattainment boundaries were evaluated to determine what, if any, adjustments needed to be made to the recommendations. Areas previously designated attainment were evaluated in accordance with the current ozone boundary determination guidance. All 88 counties in the State were evaluated. Below are the current recommended ozone nonattainment areas and the identification of the specific counties which should be included in the area designations:

Eight-Hour Ozone Designation Area	Metropolitan Statistical Area (MSA) and, if applicable, Combined Statistical Area (CSA)	Current Nonattainment Designation Counties for 1997 Standard	Ohio EPA Recommended Nonattainment Counties for 2008 Standard
(A) Canton-Massillon, OH	Stark Carroll		Stark
(B) Cincinnati-Middletown, OH-KY-IN¹	Brown Butler Clermont Clinton Hamilton Warren Indiana: Dearborn, Franklin and Ohio Kentucky: Boone, Bracken, Campbell, Gallatin, Grant, Kenton and Pendleton	Butler Clermont Clinton Hamilton Warren	Butler Clermont Clinton Hamilton Warren
(C) Cleveland-Akron-Lorain, OH²	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit
(D) Columbus, OH²	Delaware Fairfield Fayette Franklin Knox Licking Madison Marion Morrow Pickaway Ross Union	Delaware Fairfield Franklin Knox Licking Madison	Delaware Fairfield Franklin Knox Licking Madison

¹ Currently attaining the 1997 standard. Ohio EPA is preparing a redesignation request.

² Currently attaining the 1997 standard. Ohio EPA is preparing a redesignation request.

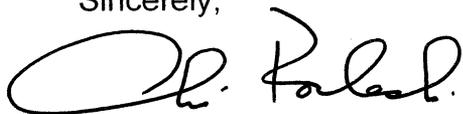
(E) Dayton-Springfield, OH	Champaign Clark Darke Greene Miami Montgomery Preble		Clark Greene Montgomery
(F) Huntington-Ashland, WV-KY-OH	Lawrence Kentucky: Boyd and Greenup West Virginia: Cabell and Wayne		Lawrence
(G) Lima, OH	Allen Auglaize Van Wert		
(H) Parkersburg-Marietta, WV-OH	Washington West Virginia: Pleasants, Wirt and Wood		Washington
(I) Steubenville-Weirton, OH-WV	Jefferson West Virginia: Brooke and Hancock		Jefferson
(J) Toledo, OH	Fulton Lucas Ottawa Wood		
(K) Wheeling, WV-OH	Belmont West Virginia: Marshall and Ohio		Belmont
(L) Youngstown-Warren-Sharon, OH-PA	Columbiana Mahoning Trumbull Pennsylvania: Mercer		Mahoning Trumbull

Ohio EPA held a public hearing on these recommendations on February 12, 2009. Comments were minimal during the public comment period.

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 Jennifer Hunter of the Division of Air Pollution Control at (614) 644-3696.

Please call if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Korleski". The signature is fluid and cursive, with a large initial "C" and "K".

Chris Korleski
Director

Enclosures

Xc: Jennifer Hunter, DAPC