



State of Ohio Environmental Protection Agency

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**AUG 02 2010**

Ms. Susan Hedman  
Regional Administrator  
Attn.: R-19J  
U.S. EPA, Region 5  
77 West Jackson Blvd.  
Chicago, Illinois 60604

Re: Comments on US EPA's proposal on the intended air quality designations in Ohio for the revised National Ambient Air Quality Standards (NAAQS) for lead

Dear Administrator Hedman:

Ohio EPA received your June 14, 2010 letter and draft technical support documents indicating US EPA's response to Ohio's designation recommendations. Your letter also included information indicating your approach for completing the designations for the revised lead NAAQS.

Ohio EPA understands that after carefully considering our October 5, 2009, recommendation letter and all the associated technical information for the 2008 lead NAAQS, including the most recent air quality data from 2007-2009, US EPA is proposing to adopt Ohio's recommended nonattainment designations and boundaries for Bellefontaine, Cleveland and Fulton areas.

Thank you for your timely response and your proposed adoption of our recommended designations for the new lead standards.

Ohio EPA does have concerns regarding the second round of lead designations. As stated in your letter, you are extending designations based on the newly deployed lead monitors for one year, as allowed under the Clean Air Act. You are providing states with the ability to submit recommendations for second round designations by December 15, 2010 with US EPA completing those designations by October 15, 2011. These newly deployed lead monitors will have collected less than one year of monitoring data yet the designation process is based upon rolling three-month averages over a three-year period. US EPA has not provided any guidance regarding how the designations should be based upon the available data. Ohio EPA

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

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urges US EPA to provide this needed guidance quickly so that states may begin to prepare for this process.

Again, Ohio EPA thanks you for your proposed adoption of Ohio's first round of recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Korleski', enclosed within a large, loopy oval shape.

Chris Korleski  
Director  
Ohio EPA