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[UNLEASHING THE POWER OF GREEN]

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Submitted to:

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Ohio Environmental Council's Comments on Proposed redesignation of central Ohio in meeting the 1997 national ozone standard

The Ohio Environmental Council (OEC) is a statewide, nonprofit environmental organization whose mission is to secure healthy air, land, and water for all who call Ohio home. On behalf of our over 100 environmental and conservation member organizations and thousands of members throughout the state of Ohio, the OEC respectfully submits the following comments on the proposed redesignation and maintenance plan of central Ohio in meeting the 1997 ozone standard of .08 parts per million (ppm).

It is our understanding that the redesignation request is based on data from the years 2006 through 2008. The data indicates that central Ohio does meet the attainment when rounding the third digit in the parts per million. The highest average occurred in Franklin County at .084ppm; which, when rounded, is .08ppm (thus meeting the standard). The OEC supports this redesignation.

Ozone, health and environmental impacts

Ozone pollution is formed when nitrogen oxides (NOx), and Volatile Organic Compounds (VOCs) cook in the long, hot days of summer. The formation of smog has plagued many regions of the state including central Ohio. It is critical that the state address ozone pollution in a way that reduces the harmful impacts of this pollution. The health impacts are well documented. According to the US EPA ozone can:

- Make it more difficult to breathe deeply and vigorously.
- Cause shortness of breath and pain when taking a deep breath.
- Cause coughing and sore or scratchy throat.
- Inflammate and damage the airways.
- Aggravate lung diseases such as asthma, emphysema, and chronic bronchitis.
- Increase the frequency of asthma attacks.
- Make the lungs more susceptible to infection.
- Continue to damage the lungs even when the symptoms have disappeared.

When someone is affected by ozone pollution it impacts our economy and quality of life. A sick person is missing time from work or school. If it is a child, a parent may have to take time off of work. Additionally, those suffering from respiratory ailments-like asthma-may have to spend more money to get medication, inhalers, or hospitalizations if the number of asthma attacks increases. This not only lowers the quality of life in central Ohio it impacts our economy. Those at greatest risk include the most vulnerable in our society-children, the elderly, and those with breathing problems. In essence, when we talk about the numbers of people directly impacted by ozone pollution, we need to realize that the actually number of people impacted (directly and indirectly) is much greater. Has the Ohio EPA researched how much money it costs central Ohio when our air is unhealthy?

In addition to health impacts, ozone pollution impacts our environment. It clouds the natural vistas of our parks and wildlife refuges and interrupts plant processes. Ozone has the same impact on other mammals-impacts to lung function as well as weakens the immune system. It can decrease the species diversity and change nutrient and water cycles. There is nothing good about smog.

Moving forward

While great strides have been made over the years to improve the air quality, and the OEC supports this redesignation request, the state should re-double its clean air efforts. Ohio has had poor air quality for too long and it is too costly, and too harmful to the public. According to the Mid-Ohio Regional Planning Commission (MORPC) central Ohio experienced a total of 69 air quality days from 2006-2008; with 2006 being the highest (30). This means it is recommended that sensitive groups reduce the amount of time they spend outside during the hottest part of the day. The Ohio EPA highlights several control measures and regulations starting on page 26 of the redesignation request document. While these are good measures with actually reductions able to be demonstrated, the majority are a result of federal regulation. The Ohio EPA does indicate many good contingency measures (starting on page 31) that it can pursue and they should. Furthermore, the Kasich Administration and the state should:

- Increase the underfunded Diesel Emission Reduction Grant program to \$100 million a year for five years. This level of funding will punch a big dent in dirty air and be a clear win for the economy, public health, and the environment;
- Adopt a no-idling law similar to the laws in Cleveland, Lakewood, and other cities in northeast Ohio;
- Require all large construction equipment working on public projects to meet tier 4 engine standards;
- Adopt an E-check-like program for on-road diesel trucks; and,
- Reinvest in truck stop electrification.
- Teaming up with metropolitan planning organizations and nonprofits to educate the public on ozone pollution prevention and steps to reduce residents' exposure.

Are these clean air measure actions the state has looked into? The Kasich Administration should do everything feasible to achieve maximum reductions in smog-forming pollutants. We know that the .08ppm is not the most protective of public health and that medical researchers recommend a standard between .06 and .07ppm.

Thank you again for this opportunity to comment on the Ohio EPA's redesignation request and maintenance plan for the Columbus, OH ozone nonattainment area.

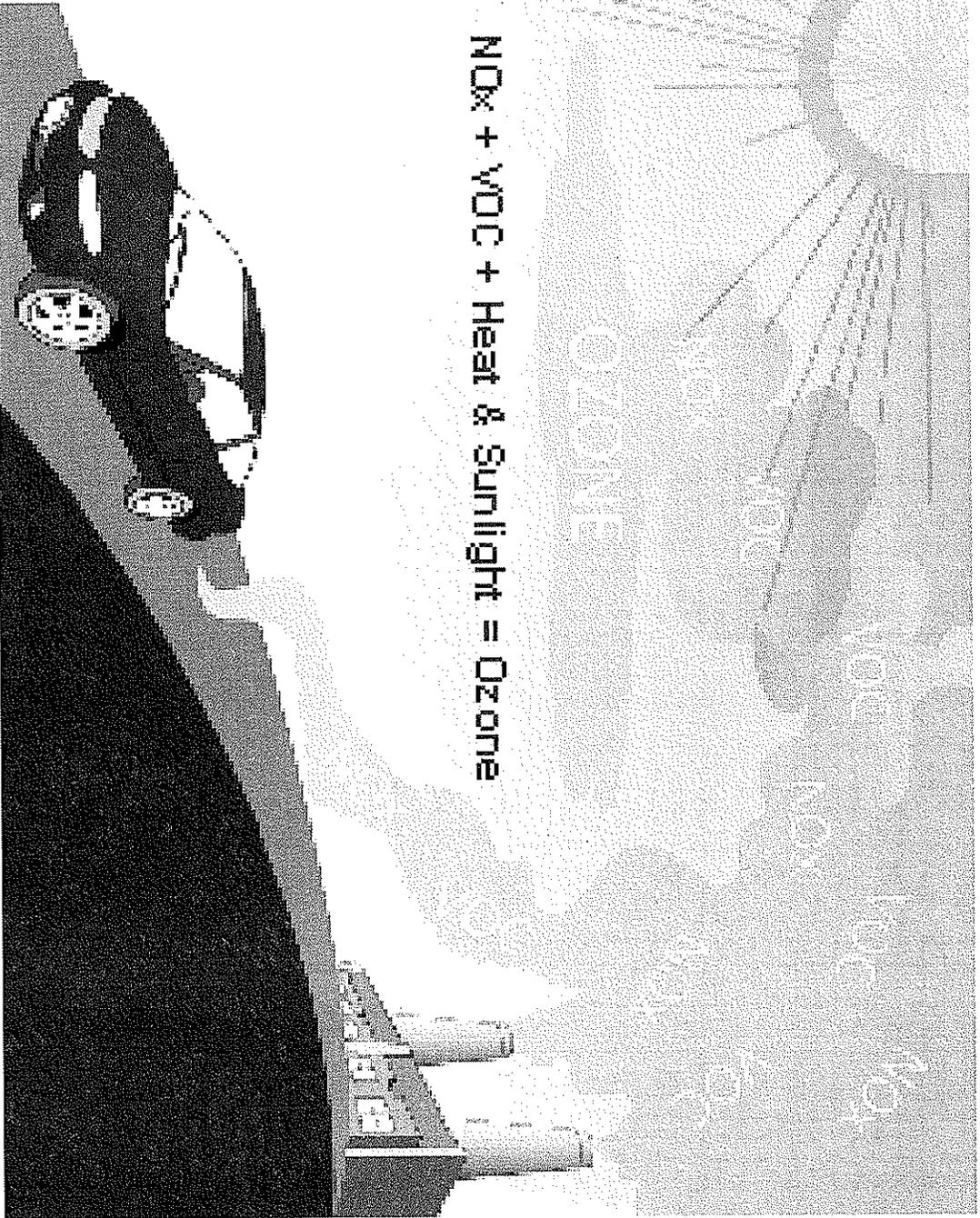
Sincerely,

David R. Celebrezze

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US EPA