



**Environmental  
Protection Agency**

*John R. Kasich, Governor*  
*Mary Taylor, Lt. Governor*  
*Scott J. Nelly, Director*

**DEC 13 2013**

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

**Re: Ohio's Recommended Nonattainment Areas for the 2012 Annual PM2.5 Standard**

Dear Administrator Hedman:

I am writing to submit Ohio's recommendations for nonattainment areas within Ohio for the revised 2012 annual PM2.5 standard. Preliminary ambient data for the period 2011 to 2013 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 preliminary PM2.5 monitoring data along with U.S. EPA's guidance "Initial Area Designations for the 2012 Revised Primary Annual Fine Particle National Ambient Air Quality Standard" (April, 16, 2013). This guidance recommends states use the five-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.

Ohio is evaluating nonattainment status based upon preliminary, incomplete 2011 to 2013 ambient data. 2013 data is complete through the 3<sup>rd</sup> quarter. Ohio EPA does not believe the data will change significantly enough to affect Ohio's recommendations. However, in the event final certified data does indicate other areas necessitate nonattainment recommendations, Ohio EPA will be submitting a revised

recommendation to U.S. EPA prior to U.S. EPA making proposed recommendations of your own.

Several counties within and adjacent to previous nonattainment boundaries were evaluated to determine what, if any, adjustments needed to be made to the recommendations. Below are the historical nonattainment areas for PM<sub>2.5</sub> and the identification of the specific counties which should be included in the area designations under this newly revised annual PM<sub>2.5</sub> standard:

<b>Designation Area</b>	<b>Historical Annual PM<sub>2.5</sub> Nonattainment Designation Counties</b>	<b>Ohio EPA Recommended Nonattainment Counties</b>
<b>(1) Canton-Massillon, OH</b>	Stark	Stark
<b>(2) Cincinnati-Hamilton, OH-KY-IN</b>	Butler Clermont Hamilton Warren	Butler Clermont Hamilton
<b>(3) Cleveland-Akron-Lorain, OH</b>	Cuyahoga Lake Lorain Medina Portage Summit Ashtabula (P)	Cuyahoga
<b>(4) Columbus, OH</b>	Delaware Fairfield Franklin Licking Coshocton (P)	
<b>(5) Dayton-Springfield, OH</b>	Clark Greene Montgomery	
<b>(6) Huntington-Ashland, WV-KY-OH</b>	Lawrence Scioto Adams (P) Gallia (P)	
<b>(7) Parkersburg-Marietta, WV-OH</b>	Washington	

<b>(8) Steubenville-Weirton, OH-WV</b>	Jefferson	
<b>(9) Toledo, OH</b>		
<b>(10) Wheeling, WV-OH</b>	Belmont	
<b>(11) Youngstown-Warren-Sharon, OH-PA</b>		

Ohio EPA held public hearings on these recommendations on December 4 and December 5, 2013. Comments were received and testimony was provided at one of the hearings. Ohio EPA has included the comments/testimony and Ohio's responses in this package.

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 Van Vlerah of the Division of Air Pollution Control at (614) 644-3696.

Please call if you have any questions.

Sincerely,



Scott Nally  
Director

Enclosures

Xc: Jennifer Van Vlerah, DAPC