



State of Ohio Environmental Protection Agency

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**MAR 17 2009**

Lynn Buhl  
Regional Administrator  
U.S. EPA, Region 5  
77 West Jackson Blvd. R-19J  
Chicago, Illinois 60604-3507

Re: Request for Cleveland-Akron- Lorain Area 1997 Eight-Hour Ozone  
Redesignation and Maintenance Plan Approval

Dear Administrator Buhl:

I am writing to formally request a redesignation to attainment for the Cleveland-Akron-Lorain, Ohio area (Ashtabula, Cuyahoga, Geauga, Lake, Lorain, Medina, Portage, and Summit Counties) with respect to the 1997 eight-hour ozone standard. The enclosed submittal combines the redesignation request and the required maintenance plan for this area.

Monitoring of existing air quality indicates that the National Ambient Air Quality Standard (NAAQS) for ozone has been attained throughout this area based on 2006-2008 air quality data. Emissions projections indicate that current controls, existing State rules (including VOC RACT), the Federal Motor Vehicle Program, the Clean Air Interstate Rule and Ohio's PSD Program will be more than sufficient to maintain the NAAQS indefinitely into the future. These programs will therefore constitute the attainment and maintenance plan for the Columbus area.

The enclosed information, compiled by Ohio EPA, Ohio DOT, and the associated planning organization, shows significant reductions in point and mobile sources since violations occurred. A significant portion of the improved air quality can be attributed to the Federal Motor Vehicle Control Program and regional reductions associated with the NO<sub>x</sub> Trading Program.

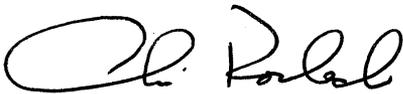
Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

As part of this request, Ohio EPA is also submitting a request for an exemption from the Section 182(f) NOx requirements in the Cleveland-Akron-Lorain 8-hour ozone area. The NOx exemption is necessary for the interim period between approval of this redesignation request and approval of Ohio's NOx RACT rules. Ohio currently has regulations in place and intends to fully adopt and implement NOx RACT beginning in December 2009. These regulations were submitted for approval as a revision to Ohio's SIP on January 10, 2008. Ohio has also included the NOx RACT program as a contingency measure in this redesignation request. The attached letter explains the request in detail.

The public hearing for this package was held on March 3, 2009, in Twinsburg, Ohio. There were five people in attendance. One comment was received from Lake County General Health District. It required a minor change referring to the monitor they operate. Another comment was received in support of the document.

If you have any questions, please contact Jennifer Hunter in the Division of Air Pollution Control at (614) 644-3696.

Sincerely,



Chris Korleski  
Director

enclosures

cc: Bob Hodanbosi, DAPC  
Jennifer Hunter, DAPC