



State of Ohio Environmental Protection Agency

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Ms. Cheryl Newton
Director Air and Radiation Division
U.S. Environmental Protection Agency, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

FEB 13 2009

Re: Comments on final nonattainment area designations for the 2006 revised 24-hour PM_{2.5} standard and request for revised area designations based on 2006 – 2008 air quality data.

Dear Ms. Newton:

On December 22, 2008, Ohio EPA received U.S. EPA's letter with the final nonattainment area designations for the 2006 revised 24-hour PM_{2.5} air quality standard. In the letter, U.S. EPA advised states to review and certify their 2008 24-hour PM_{2.5} monitoring data to allow U.S. EPA to consider changes to area designations based on 2006 - 2008 data in lieu of 2004-2006 data. Accordingly, Ohio EPA has submitted the 2006 - 2008 SLAMS certified monitoring data (January 30, 2009) and would like to take the opportunity to suggest changes to area designations before the final determinations take effect.

Ambient data for 2006 – 2008 have been evaluated to determine which areas within the State are still not attaining the revised standard. Based on the 2006-2008 24-hour PM_{2.5} monitoring data certified and submitted, there has been an overall reduction in the State's PM_{2.5} monitored emissions. The Ohio Air Monitoring Network has 47 PM_{2.5} federal reference monitors (FRM). The following table identifies the significant changes in monitored PM_{2.5} emissions from Ohio's FRMs:

	2005-2007 Data		2006-2008 Data	
	# of monitors exceeding standard	Average of all monitors (ug/m ³)	# of monitors exceeding standard	Average of all monitors (ug/m ³)
24-hr revised standard (35 ug/m ³)	25	38.00	4	36.83
Annual standard (15.0 ug/m ³)	17	16.13	4	15.34

In general, Ohio EPA believes that the non-attainment area boundaries U.S. EPA is proposing are too broad, especially in light of the newest monitoring data. U.S. EPA is incorporating counties into the nonattainment areas that are not

experiencing nonattainment air quality and do not include sources that will need to be controlled by the State to resolve the nonattainment air quality problem. The addition of these areas will unnecessarily subject several counties to new source review requirements that could further impact growth in areas which are already economically depressed.

The PM_{2.5} emissions in Ohio are composed mainly of two major components. First there is a regional component associated primarily, but not entirely, with sulfur dioxide and nitrogen oxides emissions from coal-fired electric generating utilities. The second component is an urban/industrial component which is impacting air quality in urban areas.

The first component has been significantly reduced by Title IV of the 1990 Clean Air Act Amendments and the NO_x SIP Call rules. Monitors throughout the State and the region have shown measurable reductions as utilities implemented sulfur dioxide and nitrogen oxides emission controls programs to comply with the phase two acid rain requirements. Beginning in 2009, the reinstatement of the Clean Air Interstate Rule (CAIR) and the NO_x SIP Call rules will begin to result, as anticipated, in significant additional air quality improvements throughout the region. U.S. EPA has previously indicated that several of Ohio's nonattainment areas will begin to attain the new standard as a result of the implementation of CAIR.

Ohio EPA's concern regarding the second component is with the identification and control of sources associated with the urban excess in areas where the CAIR requirements will not be sufficient to attain the new standard. U.S. EPA has made certain assumptions about the sources of the urban excess concentrations that have been found at the violating monitors. U.S. EPA's weighted emissions analysis assumes that all emissions within and adjacent to metropolitan areas have equal potential to contribute to the urban excess. Ohio EPA believes this fundamental assumption underlying the weighted emission analysis is flawed.

The distribution of monitored concentrations in Midwestern metropolitan cities, as was presented in the "PM_{2.5} in Urban Areas in the Upper Midwest Study" (Lake Michigan Air Directors Consortium, 2004) clearly shows the limited aerial extent of the PM_{2.5} urban excess. A significant component of these emissions is likely to be primary and secondary organic carbon from local industrial sources and nearby on-road and off-road diesel emissions. Ohio EPA does not believe we should rely on suburban controls to reduce these urban concentrations.

Below you will find specific discussions for each of the eight areas U.S. EPA has recommended as nonattainment for the revised 24-hour PM_{2.5} standard. With respect to the remaining areas that U.S. EPA has recommended for attainment status, Ohio EPA did not find any changes necessary based on the 2006-2008 data.

Cleveland-Akron-Lorain Area

U.S. EPA recommended nonattainment Counties: Cuyahoga, Lake, Lorain, Medina, Portage, and Summit.

Ohio EPA recommended nonattainment Counties: Cuyahoga.

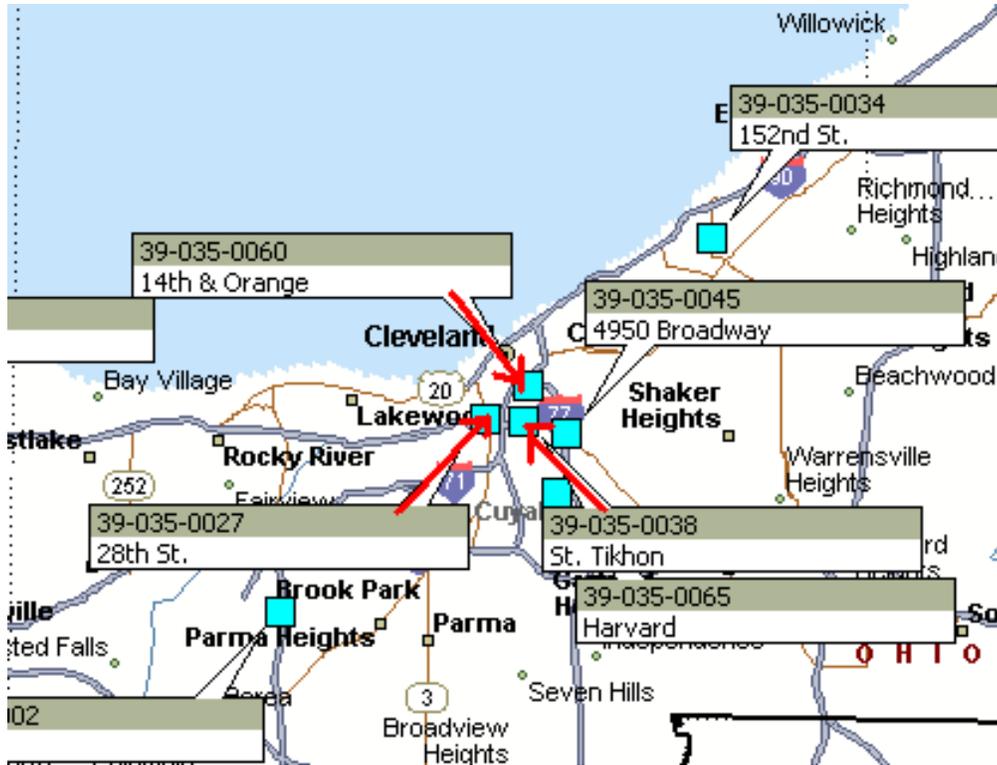
24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Cleveland-Akron-Lorain Nonattainment Area:

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-035-0027	Cuyahoga	31.5	39.0	37.7	36.07	13.0	14.5	13.0	13.50
39-035-0034		29.1	37.5	31.5	32.70	11.5	13.6	10.9	12.00
39-035-0038		36.1	39.7	39.4	38.40	14.9	16.3	14.1	15.10
39-035-0045		29.5	37.0	35.3	33.93	14.1	15.3	13.7	14.37
39-035-0060		31.0	38.7	38.1	35.93	15.0	15.9	13.8	14.90
39-035-0065		27.8	39.1	33.8	33.57	13.1	15.8	14.6	14.50
39-035-1002		27.7	35.2	30.1	31.00	11.6	14.6	12.0	12.73
39-085-3002	Lake	32.9	39.2	28.0	33.37	11.5	13.9	11.5	12.30
39-093-0016	Lorain	24.9	21.2			11.5	10.1		10.80
39-093-3002		27.4	34.0	32.1	31.17	11.4	12.9	11.4	11.90
39-103-0003	Medina	28.5	28.7	30.3	29.17	11.9	12.7	11.8	12.13
39-133-0002	Portage	30.5	31.0	29.4	30.30	12.0	13.7	12.1	12.60
39-153-0017	Summit	31.5	33.3	37.6	34.13	13.5	14.5	13.8	13.93
39-153-0023		30.4	27.9	32.7	30.33	12.8	13.7	12.9	13.13

Less than 75% capture in at least one quarter
 Exceeds standard

Based on the three-year averages for the 2006-2008 period, only one County, Cuyahoga, in U.S. EPA's six-county recommended area is not attaining the revised 24-hour standard or the annual standard. The adjacent Canton-Massillon and Youngstown-Mercer areas are also attaining the standards. There has been an average reduction in the entire area since our original recommendation (December 12, 2007, based on 2004-2006 data) of 3.1 µg/m³ for the revised 24-hour standard and 1.6 µg/m³ for the annual standard. Moreover, the design value (three-year average) for the 2006-2008 period does not show any monitor violations in Lake, Lorain, Medina, Portage, or Summit Counties for the revised 24-hour standard nor for the annual standard. Three of seven monitors in Cuyahoga County show a design value exceeding the revised 24-hour standard: 36.07 µg/m³, 38.40 µg/m³, and 35.93 µg/m³. Only one of these monitors exceeds the annual standard by a very small amount: 15.10 µg/m³. As depicted in the image below, the three monitors are all located geographically in the heart of the Cleveland metropolitan/industrial area and near major highways. It is Ohio's belief that violations at these

monitors can be attributed to local industrial sources and nearby on-road and off-road emissions. The monitors are positioned in close proximity to one of the largest steel producing facilities in the country.



Cuyahoga County has the highest population in the area, although it is projected to steadily decline in the future. Although some of the Counties in the MSA have emissions comparable to Cuyahoga County, some of those emissions can be attributed to electric generating units which will see significant reductions beginning in 2009 as a result of CAIR.

Cuyahoga County has by far the highest vehicle miles traveled (VMT) for 2005 (11,017 compared to the next highest at 4,929). Of the 748,630 workers in Cuyahoga county, 171,582 (22.9%) commute in from surrounding Counties and 56,682 (9.1%) commute out from Cuyahoga County to surrounding counties. 15.5% of those workers come from the four other counties within the MSA while 7.4% come from six counties outside of the MSA.

At the time of U.S. EPA's August 18, 2008 proposed recommendation letter to Ohio EPA, Summit County contained a violating monitor based on 2005-2007 data. Summit County is no longer violating the revised standard. The three-year average (2006-2008) for all three monitors located in the Akron MSA show no exceedances of the 24-hour standard

nor for the annual standard (one monitor in Portage County and two monitors in Summit County). Summit and Portage Counties have low and stagnant populations, projecting to steadily decrease. The commuting patterns to Cuyahoga County, from Summit and Portage Counties, are also very low. Summit County contributes 4.6% and Portage County contributes 1.6% of the total commuters to Cuyahoga County. The highest commuting patterns are between Summit and Portage Counties, with 16.1% coming from Summit County (to Portage County) and 7% coming from Portage County (to Summit County). Ohio EPA believes the Akron MSA and Cleveland-Elyria-Mentor MSA should be viewed separately.

As for the Cleveland-Elyria-Mentor MSA, the three-year average (2006-2008) for both the Medina and Lorain Counties monitors, have no exceedances for the 24-hour standard nor for the annual standard (one monitor in Medina County and one monitor in Lorain County)¹. In general, the population in this entire MSA is almost constant, with a slight trend upward. Commuting patterns from and to Lorain and Medina Counties are relatively low considering the population sizes of these Counties. The highest commuting pattern for both Counties is to Cuyahoga County, but consists of less than 8.7% of Cuyahoga County's workforce, combined.

Ohio EPA believes it is appropriate to designate only Cuyahoga County as nonattainment for this area. Ohio EPA believes that the improvements in monitored emissions already seen throughout the area combined with Cuyahoga County's local industrial base and lack of apparent contribution from the neighboring Counties warrants only Cuyahoga County being designated nonattainment.

Canton-Massillon Area

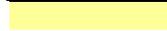
U.S. EPA recommended nonattainment Counties: Stark.

Ohio EPA recommended nonattainment Counties: None

24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Canton-Massillon Nonattainment Area:

¹ Medina and Lorain Counties monitors have not had any air quality exceedances, for neither PM_{2.5} standard, during 2004-2006 and 2005-2007.

Site	County	24-Hour standard				Annual standard			
		Year			Average	Year			Average
		2006	2007	2008	'06-08	2006	2007	2008	'06-08
39-151-0017	Stark	33.1	33.4	37.9	34.80	14.6	16.2	13.9	14.90
39-151-0020		26.1	32.8	29.8	29.57	11.9	14.4	12.4	12.90

 Less than 75% capture in at least one quarter

 Exceeds standard

For the Canton-Massillon area, the three-year average (2006-2008) for both monitors in Stark County show no exceedances for the 24-hour standard nor for the annual standard². Although the Stark County monitors had less than 75% capture for much of the 2006-2008 period, the only year exceeding the standard was 2008 for one monitor, i.e., 37.9 $\mu\text{g}/\text{m}^3$. It was during the first quarter that data was not collected at these monitors, causing the < 75% capture. The first quarter is generally a low concentration quarter. Had data been recorded for that quarter, the 2008, and combined 2006-2008, design value would have been lower. In Ohio's original recommendation, this monitor was shown to be a violating monitor primarily because of an unusually high design value during the 2005 year, i.e., 51.0 $\mu\text{g}/\text{m}^3$. In addition, emissions in Stark County and the adjacent counties are not significant. Moreover, even though Stark County has the highest population in the Canton-Massillon MSA (Stark and Carroll Counties) and adjacent counties, the population is projected to steadily decrease. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for the Canton-Massillon area, specifically for Stark County, to attainment.

Cincinnati-Hamilton Area

U.S. EPA recommended nonattainment Counties: Butler, Hamilton, Clermont, and Warren.

Ohio EPA recommended nonattainment Counties: None

24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Cincinnati-Hamilton Nonattainment Area:

² Compared to the 2004-2006 and the 2005-2007 periods where one monitor exceeded the 24-hour PM_{2.5} standard and the other exceeded the annual standard, respectively.

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-017-0003	Butler	30.2	37.1	31.2	32.83	14.1	15.4	13.8	14.43
39-017-0016		35.2	34.5	31.5	33.73	14.0	14.9	13.8	14.23
39-017-1004		32.7	36.4			13.4	14.6		
39-025-0022	Clermont	31.6	33.5	23.6	29.57	12.7	14.0	11.8	12.83
39-061-0006	Hamilton	33.3	34.7	27.0	31.67	13.3	14.6	12.5	13.47
39-061-0014		35.2	38.1	33.0	35.43	15.5	16.5	15.1	15.70
39-061-0040		32.8	34.7	25.5	31.00	13.6	15.1	12.6	13.77
39-061-0042		34.5	35.9	27.5	32.63	14.9	15.9	14.4	15.07
39-061-0043		34.9	34.0	28.2	32.37	14.5	14.9	13.3	14.23
39-061-7001		34.0	33.7	30.3	32.67	14.4	15.1	13.7	14.40
39-061-8001		36.1	35.4	31.0	34.17	15.9	16.1	14.4	15.47
39-165-0007	Warren		33.6	24.2			14.0	11.9	

Less than 75% capture in at least one quarter
 Exceeds standard

Ohio EPA initially recommended Butler, Clermont, Hamilton, and Warren Counties (Cincinnati-Hamilton area) as nonattainment Counties for the revised 24-hour PM_{2.5} standard; however, since that time air quality has improved in these Counties and in the overall area (including the Kentucky monitors). There has been an average reduction in the entire Ohio area of 4.9 µg/m³ for the revised 24-hour standard and 1.6 µg/m³ for the annual standard. Moreover, the design value for the 2006-2008 period does not show any monitor violations in Butler, Clermont, Hamilton, or Warren Counties in Ohio or Kenton or Campbell³ Counties in Kentucky for the revised 24-hour standard (highest monitor 35.43 µg/m³). Data from the Ohio's 2005 emission inventory shows high SO₂ and NOx emissions in Hamilton County and high SO₂ emissions in Clermont County; however, the projected 2009 emission inventory shows emission reductions (for both pollutants) on the order of 50% for SO₂ and 10% for NOx. Warren and Butler Counties have no significant SO₂ and NOx emissions. In terms of population growth, Hamilton County has the highest population in the area, but it is projected a steady decrease will occur and the population in the surrounding counties is projected to minimally increase. Ohio EPA, based on the 2006-2008 air quality data and the projected emission decreases, is requesting U.S. EPA to change the nonattainment designation status for the entire Cincinnati-Hamilton area to attainment.

³ The Campbell County monitor had less than 75% capture for years 2006 and 2007; however, the 2008 design value was at 26.1µg/m³ and the 2004-2006 design value was 30.2µg/m³. Therefore, Ohio EPA does not believe the lack of a 2006-2008 design value for this County should be a factor in this area's designation.

Dayton-Springfield Area

U.S. EPA recommended nonattainment Counties: Clark, Greene, and Montgomery.

Ohio EPA recommended nonattainment Counties: None

24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Dayton-Springfield Nonattainment Area:

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-023-0005	Clark	30.5	37.2	29.1	32.27	13.1	14.3	12.7	13.37
39-057-0005	Greene	26.5	32.6	26.8	28.63	11.9	13.3	11.6	12.27
39-113-0032	Montgomery	30.3	36.9	30.5	32.57	13.6	15.6	13.2	14.13

 Less than 75% capture in at least one quarter

 Exceeds standard

Based on the latest three-year average (2006-2008) data, Ohio EPA is requesting a change in status of the entire Dayton-Springfield area (Clark, Greene, and Montgomery Counties). Since Ohio EPA submitted its nonattainment designation recommendations, air quality has improved in the entire area. There has been an average reduction of 2.9 µg/m³ for the revised 24-hour standard and 0.9 µg/m³ for the annual standard. The three-year average from the 2006 - 2008 period does not show any monitor violation (highest monitor 32.57 µg/m³ and 14.1 3µg/m³ for the 24-hour and annual standards, respectively). In addition, even though Montgomery County has the highest population in this area, it is projected to steadily decrease, and Clark County's population is projected to remain fairly constant with only a slight increase. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for the entire Dayton-Springfield area to attainment.

Columbus Area

U.S. EPA recommended nonattainment Counties: Delaware, Fairfield, Franklin, Licking, and Coshocton (partial).

Ohio EPA recommended nonattainment Counties: None

24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Columbus Nonattainment Area:

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-049-0024	Franklin	34.0	34.2	27.8	32.00	13.6	14.5	12.8	13.63
39-049-0025		34.0	35.5	27.1	32.20	13.8	14.7	12.4	13.63
39-049-0081		31.2	33.5	25.3	30.00	12.9	13.1	11.1	12.37

 Less than 75% capture in at least one quarter

 Exceeds standard

Since Ohio EPA submitted its nonattainment designation recommendations, the air quality in the Columbus area has seen improvement. The design value for the 2006-2008 period does not show any monitor violations for either the revised 24-hour standard or annual standard. The highest design value in the area is 32.20 $\mu\text{g}/\text{m}^3$ for the revised 24-hour standard and 13.63 $\mu\text{g}/\text{m}^3$ for the annual standard (both in Franklin County). Ohio EPA initially recommended Delaware, Licking, Fairfield, and Franklin Counties as nonattainment Counties for the revised 24-hour $\text{PM}_{2.5}$ standard; however, there has been an average reduction since the 2004 - 2006 period of 4.1 $\mu\text{g}/\text{m}^3$ for the revised 24-hour standard and 1.3 $\mu\text{g}/\text{m}^3$ for the annual standard. Ohio EPA also recommended Coshocton County as an attainment County. As mentioned before, the existence of an electric generating unit in a township should not be the sole factor in determining designation for nonattainment status. Emissions from the Conesville power plant located in Franklin Township (Coshocton County) have long been controlled with efficient control equipment, and additional controls resulting from CAIR will begin in 2009. Currently there are four operating units, and two units were shut down permanently during 2006. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for the entire Columbus area to attainment.

Youngstown-Warren Area

U.S. EPA recommended nonattainment Counties: Mahoning and Trumbull.

Ohio EPA recommended nonattainment Counties: None

24-Hours $\text{PM}_{2.5}$ Standard Data (2006 – 2008) in the Youngstown-Warren Nonattainment Area:

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-099-0005	Mahoning	28.6	34.4	31.3	31.43	13.0	14.2	13.1	13.43
39-099-0014		31.1	33.5	30.9	31.83	13.5	14.1	13.1	13.57
39-155-0007	Trumbull	28.7	31.5	33.8	31.33	12.9	14.2	12.8	13.30

 Less than 75% capture in at least one quarter
 Exceeds standard

Ohio EPA initially recommended Mahoning and Trumbull Counties as nonattainment Counties for the revised 24-hour PM_{2.5} standard; however, since that time air quality has improved in the area. Since the 2004-2006 period, there has been an average reduction in monitored emissions of 4.2 µg/m³ for the revised 24-hour standard and 1.2 µg/m³ for the annual standard. The design value for the 2006-2008 period does not show any monitor in Mahoning and Trumbull Counties violating either the revised 24-hour standard or the annual standard. The highest design value in the area is 31.83 µg/m³ for the revised 24-hour standard and 13.57 µg/m³ for the annual standard. Even though Mercer County (Pennsylvania) is not part of the Youngstown-Warren MSA, it is important to mention that the monitor in Mercer County also shows no exceedances and was not originally considered for incorporation by U.S. EPA into this nonattainment area. In addition, SO₂ emissions are projected to decline, particularly in Trumbull County. In terms of population, Mahoning County has the highest population in the area; however, it is projected to steadily decrease. The population in Trumbull County is also projected to decrease. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for Mahoning and Trumbull Counties to attainment.

Parkersburg-Marietta Area

U.S. EPA recommended nonattainment Counties: Washington.

Ohio EPA recommended nonattainment Counties: None

**Ohio does not have any monitors in this area.*

Ohio EPA recommended Washington County as nonattainment for the revised 24-hour PM_{2.5} standard; however, since that time air quality has improved in the area. Currently there are no air quality monitors in Washington County. U.S. EPA's nonattainment determination was based on exceedances of the revised 24-hour standard in neighboring West Virginia's Wood County (2004-2006 design value). The 2006-2008 design value at the Wood County (West Virginia) monitor is now showing attainment with a design value of 34.0 µg/m³ for the revised 24-hour standard and 14.6 µg/m³ for the annual standard. In addition, SO₂

emissions in Washington County (Ohio) are projected to significantly decline by 2009 (50% decrease) and the population is projected to steadily decrease. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for Washington County to attainment.

Huntington-Ashland Area

U.S. EPA recommended nonattainment Counties: Lawrence, Scioto, Adams (partial), and Gallia (partial).

Ohio EPA recommended nonattainment Counties: None

24-Hours PM_{2.5} Standard Data (2006 – 2008) in the Huntington-Ashland Nonattainment Area:

Site	County	24-Hour standard				Annual standard			
		Year			Average '06-08	Year			Average '06-08
		2006	2007	2008		2006	2007	2008	
39-087-0010	Lawrence	30.8	35.2		33.00	14.4	15.0	10.8	13.40
39-087-0012				27.6				13.1	
39-145-0013	Scioto	30.5	37.5	24.4	30.80	14.3	14.0	12.2	13.50

 Less than 75% capture in at least one quarter

 Exceeds standard

Ohio EPA also would like to reiterate its recommendation to change the status of the Huntington-Ashland area from nonattainment to attainment. As mentioned in earlier correspondence, Ohio EPA believes that the existence of an electric generating unit in a township should not be the sole factor in determining nonattainment status. Emissions from the electric generating units located in Monroe and Sprigg Townships (Adams County) and Cheshire Township (Gallia County) are already controlled with highly efficient control equipment, and additional reductions from controls resulting from CAIR are expected to begin in 2009. Lawrence and Scioto Counties have low populations and insignificant commuter traffic. Due to the location of the monitor in Lawrence County, it is likely the PM_{2.5} levels being detected are coming from sources across the Ohio River in West Virginia and Kentucky. The low emissions from sources in Lawrence and Scioto Counties are not a significant source of PM_{2.5}.

Since Ohio EPA submitted its nonattainment designation recommendations, the air quality in the Huntington-Ashland area has seen improvement. The original recommendation for nonattainment in this area was based on a violating monitor in Scioto County, Ohio and Cabell County, West Virginia during the 2005-2007 period. The design value from the 2006-2008 period does not show any monitor violations for the revised 24-hour standard or annual standard. The highest design value for the

revised 24-hour standard is 33.0 $\mu\text{g}/\text{m}^3$ ³⁴ and 13.5 $\mu\text{g}/\text{m}^3$ for the annual standard (for Lawrence County and Scioto County, respectively). All Counties in Kentucky and West Virginia that are a part of this designation area are also attaining the standard. As depicted in the table below, the overall data shows that air quality has been improving steadily in Lawrence and Scioto Counties since 2002.

Site	County	Year						Average	Average	Average	Average	Average	
		2002	2003	2004	2005	2006	2007	2008	'02-'04	'03-'05	'04-'06	'05-'07	'06-'08
39-087-0010	Lawrence	42.4	29.3	31.2	38.5	30.8	35.2		34.30	33.00	33.50	34.83	33.00
39-087-0012								27.6					
39-145-0013	Scioto	42.1	32.8	29.4	40.3	30.5	37.5	24.4	34.77	34.17	33.40	36.10	30.80
Annual PM2.5 Standard													
Site	County	Year						Average	Average	Average	Average	Average	
		2002	2003	2004	2005	2006	2007	2008	'02-'04	'03-'05	'04-'06	'05-'07	'06-'08
39-087-0010	Lawrence	15.5	14.3	13.7	17.0	14.4	15.0	10.8	14.50	15.00	15.03	15.47	13.40
39-087-0012								13.1					
39-145-0013	Scioto	16.7	14.7	13.0	16.2	14.3	14.0	12.2	14.80	14.63	14.50	14.83	13.50

Less than 75% capture in at least one quarter
 Exceeds standard

During 2008, monitoring data from both Lawrence County sites had less than 75% capture. However, the Ohio EPA believes that this should not be a negative factor in demonstrating attainment. The site was moved approximately one mile away, from 39-87-0010 to 39-87-0012, in early February 2008, making both sites incomplete for 2008 when viewed separately. However, if the sites were considered one site and data combined, it would meet the 75% capture requirement. There are no significant industrial sources in Ohio where this monitor is located (Ironton, Ohio). The closest significant source is AK Steel in Ashland, Kentucky. Prior to relocation of this monitor, it was approximately 1.58 miles from AK Steel. The new site is approximately 0.85 miles from AK Steel. Notice, the new site collected data from February 2008 on and achieved a 2008 design value of 27.60 $\mu\text{g}/\text{m}^3$, significantly lower than previous year design value even though it is now closer to the largest industrial source. Both monitors show attainment of the standard separately (27.6 $\mu\text{g}/\text{m}^3$ based on 2008 only and 33.0 $\mu\text{g}/\text{m}^3$ based on average of 2006-2007) and combined (31.2 $\mu\text{g}/\text{m}^3$ average for 2006-2008). Of the previous five three-year average periods (spanning 2002 to 2008), Lawrence County has never violated the revised 24-hour standard.

Ohio EPA would like to recommend the entire Huntington-Ashland area as attainment for the new 24-hour PM_{2.5} standard. Ohio EPA, based primarily on the 2006-2008 air quality data, is requesting U.S. EPA to change the nonattainment designation status for Adams (partial), Gallia (partial), Scioto and Gallia Counties to attainment.

⁴ Based on average of 2006 and 2007 data due to relocation of a monitor in the first quarter of 2008. This is further explained in the discussion.

Ohio EPA is not requesting any changes to U.S. EPA's December 22, 2008 nonattainment designation of the Steubenville-Weirton area.

In closing, Ohio EPA reiterates that air quality trends for the entire state have clearly shown improvement and warrant the designations of several Counties to be changed from nonattainment to attainment, as discussed above.

We appreciate the opportunity to provide additional recommendations and will work cooperatively with U.S. EPA Region 5 staff as we both review ambient data and U.S. EPA announces their final decisions on their designations. If you have any questions concerning these recommendations, please contact Jennifer Hunter of the Division of Air Pollution Control at (614) 644-3696.

Sincerely,

A handwritten signature in cursive script that reads "Robert Hodanbosi".

Robert Hodanbosi, P.E.
Chief Division of Air Pollution Control
Ohio Environmental Protection Agency

cc. John Summerhays, Region 5
Jim Orlemann, Ohio EPA, DAPC
Jennifer Hunter, Ohio EPA, DAPC

Final Nonattainment Area Recommendations

Area Name	Nonattainment Counties USEPA Recommendation	Nonattainment Counties Ohio Final Recommendation
Canton-Massillon	Stark	
Cincinnati-Hamilton, OH-KY-IN	Butler Clermont Hamilton Warren	
Cleveland-Lorain-Elyria, OH	Cuyahoga Lake Lorain Medina Portage Summit	Cuyahoga
Columbus, OH	Coshocton (p) Delaware Fairfield Franklin Licking	
Dayton-Springfield, OH	Clark Greene Montgomery	
Huntington-Ashland, WV-OH-OH	Adams (p) Gallia (p) Lawrence Scioto	
Parkersburg-Marietta, WV-OH	Washington	
Steubenville-Weirton, OH-WV	Jefferson	Jefferson
Youngstown-Warren, OH	Mahoning Trumbull	