



**Environmental
Protection Agency**

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

JUN 03 2011

Ms. Susan Hedman
Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Ohio's Recommended Designations for the 2010 1-hour SO₂ Standard

Dear Administrator Hedman:

I am writing to submit Ohio's designations recommendation for the new sulfur dioxide (SO₂) 1-hour primary standard of 75 ppb. Ambient data for the period 2008-2010 have been evaluated to determine which areas in the State are violating the standard and which areas are in compliance with the standard.

The designation recommendations are based on the most current SO₂ monitoring data along with the June 22, 2010 final rule (75 FR 33520), and March 24, 2011 memorandum entitled "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards." The final rule and memorandum directs states to submit their recommendations to U.S. EPA, designating all areas in the state as "attainment," "nonattainment" or "unclassifiable" based on a review of five factors: air quality data, emissions-related data, meteorology, geography/topography, and jurisdictional boundaries. The memorandum clarifies that dispersion modeling may be used to address many of these factors but recognizes that it would not be realistic or appropriate to expect States to complete such modeling and incorporate the results in these initial designation recommendations. Furthermore, the memorandum states that an area will be designated as:

- nonattainment when monitoring or modeling indicate a violation
- attainment when there are no monitored violations and any "needed" modeling analysis or other relevant information demonstrates no violations, or
- unclassifiable when there are no monitored violations and the area lacks any "needed" modeling or other information sufficient to support an alternative designation.

Ohio EPA did not have sufficient time to complete meaningful modeling upon receipt of U.S. EPA's recommended modeling protocol contained within the above-mentioned memorandum. Therefore, Ohio's submittal relies upon an analysis of the five factors as

discussed in the memorandum.

Ohio is recommending several nonattainment areas (eight partial nonattainment counties) based on six violating monitors. In addition, Ohio is recommending 36 counties be designated as attainment. In accordance with the second bullet above, these counties do not contain monitors showing violations and modeling analysis is not needed as all SO₂ emissions within these counties are minimal (less than 75 tons per year in total). Ohio is recommending unclassifiable designations for the remainder of the state.

Ohio EPA provided a public comment period and held three public hearings on these recommendations on May 17, 18 and 19, 2011 in Parma Heights, Steubenville, and Pomeroy, Ohio, respectively. The public comment period closed on May 19, 2011. There were attendees at all the public hearings although testimony was provided only at the Steubenville and Pomeroy hearings. Additional comments were received by the close of the comment period. After taking comments into consideration, Ohio EPA made several changes to the draft recommendations.

Lastly, Ohio EPA wishes to express concern with regard to the upcoming work that will be necessary to submit the Infrastructure State Implementation Plan (SIP) for unclassifiable and attainment areas and the Attainment Demonstration SIP for nonattainment areas. This work will necessitate significant resource allocation during a time when resources are limited and strained by other U.S. EPA actions. Ohio EPA urges U.S. EPA to provide practical, helpful guidance in a timely manner in order to assist States' in preparing meaningful submittals.

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

Please call if you have any questions.

Sincerely,



Scott Nally
Director

Cc: Robert F. Hodanbosi, Chief Division of Air Pollution Control