



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

SEP 30 2016

Mr. Robert Kaplan
Acting Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Re: Ohio's Recommended Nonattainment Areas for the 2015 Ozone Standard

Dear Administrator Kaplan:

I am writing to submit Ohio's recommended designations within Ohio for the revised 2015 ozone standard. Ambient data for the period 2013 to 2015, along with preliminary ambient data through July 23, 2016, 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 ozone monitoring data along with U.S. EPA's guidance "Area Designations for the 2015 Ozone National Ambient Air Quality Standards" (February 25, 2016). 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 potential 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 2014 to 2016 ambient data, complete through July 23, 2016. 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 ozone and the identification of the specific counties which should be included in the area designations under this newly revised ozone standard:

Designation Area	Nonattainment Designation Counties for the 1997 Standard	Nonattainment Designation Counties for the 2008 Standard	Ohio EPA Recommended Nonattainment Counties for the 2015 Standard
(1) Canton-Massillon, OH	Stark		
(2) Cincinnati, OH-KY-IN¹	Butler Clermont Clinton Hamilton Warren	Butler Clermont Clinton Hamilton Warren	Butler Clermont Hamilton Warren
(3) Cleveland-Akron-Lorain, OH²	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit	Ashtabula Cuyahoga Geauga Lake Lorain Medina Portage Summit	Cuyahoga Geauga Lake Lorain Medina Portage Summit
(4) Columbus, OH³	Delaware Fairfield Franklin Knox Licking Madison	Delaware Fairfield Franklin Knox Licking Madison	Delaware Fairfield Franklin Licking
(5) Dayton-Springfield, OH	Clark Green Miami Montgomery		
(6) Huntington-Ashland, WV-KY-OH			
(7) Lima, OH	Allen		
(8) Parkersburg-Marietta, WV-OH	Washington		
(9) Steubenville-Weirton, OH-WV	Jefferson		
(10) Toledo, OH	Lucas Wood		
(11) Wheeling, WV-OH	Belmont		
(12) Youngstown-Warren-Sharon, OH-PA	Columbiana Mahoning Trumbull		

¹ Currently attaining the 2008 standard. Redesignation requested April 2016.

² Currently attaining the 2008 standard. Redesignation requested July 2016.

³ Currently attaining the 2008 standard. Redesignation requested June 2016.

2015 Ozone Standard Recommended Nonattainment Areas
Mr. Robert Kaplan

Ohio EPA held public hearings on these recommendations on September 8, September 12 and September 13, 2016. No testimony was provided at the public hearing and no comments were received during the public comment period.

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.

Sincerely,



Craig W. Butler
Director

Enclosures

ec: Jennifer Van Vlerah, DAPC