Ohio | Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

JAN 0 5 2011

Ms. Susan Hedman
To the Attention of R – 19J
Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Ohio's Recommended Designations for the 2010 1-hour NO_2 Standard

Dear Administrator Hedman:

I am writing to submit Ohio's designations recommendation for the new nitrogen dioxide (NO_2) supplemental 1-hour primary standard of 100 ppb. Ambient data for the period 2007-2009 have been evaluated to determine which areas in the State are attaining the standard based on currently available monitors.

The designation recommendations are based on the most current NO_2 monitoring data along with the February 9, 2010 (75 FR 6474) USEPA's new NO_2 short-term standard proposal. The proposal directs states to submit their recommendations to U.S. EPA, designating all areas in the state as "attainment," "nonattainment" or "unclassifiable."

All Ohio NO_2 monitors (three) currently meet the 2010 primary 1-hour NO_2 standard. The highest 2007-2009 design value is 58.3 ppb at the monitor located in Cuyahoga County (39-035-0060)[1]. Therefore, all monitoring sites are showing attainment of the supplemental 1-hour NO_2 standard. Please refer to the attached documentation for further detail.

However, the final NO_2 rule requires the installation of additional new near-road and community (area wide) NO_2 monitors around Ohio. The new monitoring network requirements with near-road and community monitors will not be operating until January 1, 2013, and three years of data will not be complete until 2016.

The U.S. EPA also stated in the final rulemaking that intends to promulgate initial NO_2 designations by January 22, 2012 and intends to designate all areas that are not currently violating the new standard as unclassifiable, absent data from the newly

[1] The highest 2007-2009 design value for the annual NO_2 primary standard (53 ppb) is 18 ppb at the monitor located in Cuyahoga County (39-035-0060). Therefore, all monitoring sites are showing attainment for the annual NO_2 standard.

50 West Town Street, Suite 700
P.O. Box 1049
Columbus, OH 43216-1049

614 | 644 3020
614 | 644 3184 (fax)
www.epa.ohio.gov

(additional) required monitors. Once the additional monitors are in place, the U.S. EPA intends to redesignate areas as appropriate from unclassifiable to attainment or nonattainment. Ohio EPA agrees with this procedure and recommends all Counties in Ohio with applicable NO_2 monitoring data be designated unclassifiable until new-additional NO_2 monitoring data is available.

Ohio EPA provided a public comment period and held a public hearing on these recommendations on December 27, 2010. There were no attendees at the public hearing. One letter of support was received at the close of the comment period and is included in the submittal.

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,

Chris Korleski
Director

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