



State of Ohio Environmental Protection Agency

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OCT 05 2009

Mr. Bharat Mathur
Acting Regional Administrator
U.S. EPA Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Re: Ohio's Recommended Nonattainment Areas for the 2008 Lead Standard

Dear Administrator Mathur:

I am writing to submit Ohio's recommendations for lead nonattainment areas within Ohio for the revised 2008 lead standard. Ambient data for the period 2006-2008 have been evaluated to determine which areas within the State, where current monitors are available, are not attaining the revised standard.

The designation recommendations are based on the most current lead monitoring data along with the August 21, 2009 USEPA guidance, "Area Designations for the 2008 Revised Lead National Ambient Air Quality Standards." This guidance recommends states apply a presumptive county-level boundary associated with the violating monitor(s). However, the guidance does allow for additional area-specific analyses that could lead to a departure from the presumptive county boundary. Several approaches are suggested for the additional area-specific analysis, including an eight-factor analysis, spatial interpolation and dispersion modeling. Where appropriate, Ohio EPA has used a combination of these approaches in our recommendations. The guidance also suggests that where sufficient monitoring information is not available, States should identify such areas as "unclassifiable." Ohio EPA has also taken this into consideration, where appropriate. We believe that the attached documentation, including emission data, air quality data, and area-specific analysis, supports the recommended status for each particular area.

Below are the recommended lead unclassifiable and nonattainment areas:

Cuyahoga County

Ohio EPA is recommending a partial nonattainment area within the City of Cleveland. Specifically, the area enclosed on the west by Washington Park Boulevard/Crete Avenue/East 49th Street, on the east by East 71st Street, on the north by Fleet Avenue, and on the south by Grant Avenue. Ohio EPA is recommending the remainder of Cuyahoga County be unclassifiable. Additional monitoring will occur in Cuyahoga County as a part of the expanded monitoring

network. When monitoring data are available in the future Ohio EPA will be able to appropriately classify the remainder of Cuyahoga County.

Fulton County

Ohio EPA is recommending a partial nonattainment area encompassing the City of Delta. Specifically, the area enclosed by sections 12 and 13 of York Township and sections 7 and 18 of Swan Creek Township.

Logan County

Ohio EPA is recommending a partial nonattainment area encompassing an area south of, and part of, the City of Bellefontaine. Specifically, the area enclosed by sections 27, 28, 33 and 34 of Lake Township.

Additional Unclassifiable Areas

Additional monitoring will occur in several counties as a part of the expanded monitoring network. When monitoring data are available in the future, Ohio EPA will be able to appropriately classify these areas. Until that time, Ohio EPA is recommending the following Counties be identified as unclassifiable: Marion, Stark, Trumbull, Hamilton, Lucas, Mahoning, Montgomery, and Summit Counties.

Ohio EPA provided a public comment period and held a public hearing on these recommendations on September 23, 2009. There were no attendees at the public hearing and no comments were received at the close of the 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 Hunter of the Division of Air Pollution Control at (614) 644-3696.

Please call if you have any questions.

Sincerely,



Chris Korleski
Director

Enclosures
Xc: Jennifer Hunter, DAPC