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The reader is advised that the states' recommendations and Regional office initial reactions contained in this memorandum and attachment contain unresolved regional consistency and other issues that need to be addressed before EPA promulgates national air quality designations for the 8-hour ozone NAAQS. Further, EPA requested that states update the recommendations by July 2003 to reflect the most recent monitoring data. Therefore, the states' recommendations in this memo may change prior to EPA's final designations. The EPA intends to promulgate designations by April 15, 2004 to meet a consent decree proposed in November 2002.



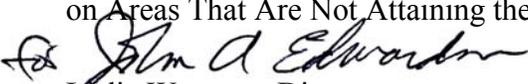
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

JAN 19 2001

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

MEMORANDUM

SUBJECT: Compilation of States' Recommendations and Initial Regional Office Responses on Areas That Are Not Attaining the 8-Hour Ground-Level Ozone NAAQS

FROM: 
Lydia Wegman, Director
Air Quality Strategies and Standards Division (MD-15)

TO: Air Division Directors, Regions I-X

The purpose of this memorandum is to forward the attached compilation of information sent to us from the Regions and States in response to the statutory requirement to submit recommended designations and EPA guidance regarding how to determine boundaries for nonattainment areas for the 8-hour ground level ozone national ambient air quality standards (NAAQS or standards).

The tables show a summary of recommendations sent to us by States identifying the boundaries of areas that are not attaining and/or are contributing to areas that are not attaining the standards. The second and third columns show a summary of the Regional offices' initial responses to the scope of the boundaries recommended by the States and their explanation of their responses. Where the State did not provide a recommendation, the tables contain only the Region's initial view, based on our guidance, on the boundaries for areas that are not attaining or are contributing to areas that are not attaining the 8-hour standards.

The reader is advised that the states' recommendations and Regional office initial reactions contained in this memorandum and attachment contain unresolved regional consistency and other issues that need to be addressed before EPA promulgates national air quality designations for the 8-hour ozone NAAQS. Further, EPA requested that states update the recommendations by July 2003 to reflect the most recent monitoring data. Therefore, the states' recommendations in this memo may change prior to EPA's final designations. The EPA intends to promulgate designations by April 15, 2004 to meet a consent decree proposed in November 2002.

There appear to be differences among the Regions and States in their application of the guidance. The tables indicate next to the name of each state whether further discussion is needed with the Regional office to assure that we apply the guidance nationally in a fair and equitable manner. We will work with you in the future to resolve these differences prior to responding formally to the States.

The States' recommendations and Regional office responses are based on air quality data collected during 1997-1999. When designations are promulgated, EPA will use the most recent 3 years of quality assured data.

This memorandum does not include tribal recommendations on boundaries for tribal land located in or near areas that are not attaining or contributing to areas that are not attaining the standard. In response to a request from several tribes, the EPA and tribal representatives are initiating a process to discuss the unique problems for tribes associated with implementing air quality designations and standards for tribal land. The EPA will address designations of tribal land after these discussions.

I expect each Director to review the entire table, looking again at your responses to your states' recommendations and at the other Regional offices' responses with respect to the guidance. I look forward to working with you as we proceed with the review of State recommendations prior to taking regulatory action.

Questions on this memorandum may be directed to Sharon Reinders at 919/541-5284.

Attachment

cc: Deputy Regional Administrators
Margo Oge

ATTACHMENT

Region 1

Connecticut

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>CT portion of New York-Northern New Jersey-Long Island, NY-NJ-CT-PA CMSA nonattainment area:</p> <p>Fairfield County, CT New Haven County, CT</p> <p>This area is recommended to included with the metropolitan NY and northern NJ portions of this nonattainment area.</p>	<p>CT portion of New York-Northern New Jersey-Long Island, NY-NJ-CT-PA CMSA nonattainment area:</p> <p>Fairfield County, CT New Haven County, CT</p> <p>This area should be joined in with the upwind portions of this nonattainment area.</p>	<p>CT recommended to expand the CT portion of the existing New York city one-hour ozone nonattainment area by adding New Haven county and Shelton city in Fairfield county. This follows the New Haven-Bridgeport-Stamford-Waterbury-Danbury, CT New England County Metropolitan Area (NECMA) boundaries and approximates the newly expanded CT portion of New York-Northern New Jersey-Long Island, NY-NJ-CT-PA CMSA. Some of the CMSA towns in Litchfield and Middlesex Counties were left out of this area, and added to Greater CT nonattainment area. Those towns which have been excluded and added to Greater CT area are Bethlehem town, Bridgewater town, New Milford town, Roxbury town, Thomaston town, Washington town, Watertown town, and Woodbury town in Litchfield County, CT, and Clinton town and Killingworth town in Middlesex County, CT.</p>

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Connecticut *(continued)*

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Greater Connecticut nonattainment area:</p> <p>Hartford County Litchfield County Middlesex County New London County Tolland County Windham County</p>	<p>Greater Connecticut nonattainment area: (Hartford MSA, New London-Norwich, MSA)</p> <p>Hartford County Litchfield County Middlesex County New London County Tolland County Windham County</p>	<p>The state recommendation for this area included all the non-MSA areas of the state and also includes a couple of towns from the newly expanded New York-Northern New Jersey-Long Island, NY-NJ-CT-PA CMSA. This results in entire state being covered by nonattainment areas. Connecticut excluded two Rhode Island towns (Hopkington and Westerly) from New London- Norwich, CT-RI MSA, and includes the town of Thompson, CT from the Boston-Worcester-Lawrence, MA-NH-ME-CT CMSA.</p>

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Rhode Island

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Rhode Island nonattainment area:</p> <p>Bristol County, RI Kent County, RI Newport County, RI Providence County, RI Washington County, RI</p>	<p>Rhode Island nonattainment area: (Providence- Fall River- Warwick MSA)</p> <p>Bristol County, RI Kent County, RI Newport County, RI Providence County, RI Washington County, RI</p>	<p>The state recommendation for this area included all the non-MSA areas of the state and also includes a couple of RI towns (Hopkington and Westerly) from New London- Norwich, CT-RI MSA. The state recommendation for this area excludes several Massachusetts cities and towns from the Providence-Fall River-Warwick, RI-MA MSA. Those Massachusetts cities and towns have been included in the eastern Massachusetts nonattainment area. They are Attleboro city, Fall River city, North Attleborough town, Rehoboth town, Seekonk town, Somerset town, Swansea town, and Westport town.</p>

Massachusetts

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Eastern Massachusetts nonattainment area</p> <p>Barnstable County, MA Bristol County, MA Dukes County, MA Essex County, MA Middlesex County, MA Nantucket County, MA Norfolk County, MA Plymouth County, MA Suffolk County, MA Worcester County, MA</p>	<p>Eastern Massachusetts nonattainment area: (Boston- Worcester-Lawrence CMSA)</p> <p>Barnstable County, MA Bristol County, MA Dukes County, MA Essex County, MA Middlesex County, MA Nantucket County, MA Norfolk County, MA Plymouth County, MA Suffolk County, MA Worcester County, MA</p>	<p>The state recommendation for this area included all of the Massachusetts portion of the Boston-Worcester-Lawrence, MA-NH-ME-CT CMSA (except the town of Holland, MA in Hamden County), the Barnstable-Yarmouth, MA MSA, and all of non-MSA portions of eastern MA. MA specifically says that the NH and ME portions of the CMSA should be excluded as long as they are covered by a separate nonattainment area. It also includes the Massachusetts cities and towns from the Providence-Fall River-Warwick, RI-MA MSA that Rhode Island excluded from its recommendation. Lastly, the Massachusetts recommendation excludes Thompson, CT, which is part of the Boston-Worcester- Lawrence, MA-NH-ME-CT CMSA, and included by Connecticut in its recommendation for the Greater Connecticut nonattainment area.</p>

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Massachusetts *(continued)*

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Western Massachusetts nonattainment area:</p> <p>Berkshire County Franklin County Hampden County Hampshire County</p>	<p>Western Massachusetts nonattainment area: (Springfield MSA, Pittsfield MSA)</p> <p>Berkshire County Franklin County Hampden County Hampshire County</p>	<p>The state recommendation for this area included all of the Pittsfield, MA MSA, and Springfield, MA MSA, as well as all of the non-MSA portions of western Massachusetts. This results in entire state being covered by nonattainment areas.</p>

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pre-decisional materials

New Hampshire - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Southern New Hampshire nonattainment area:</p> <p>Hillsborough County: Amherst town, Bedford town, Brookline town, Goffstown town, Hollis town, Hudson town, Litchfield town, Manchester city, Merrimack town, Milford town, Nashua city, Pelham town.</p> <p>Merrimack County: Hookset town.</p> <p>Rockingham County: Atkinson town, Auburn town, Brentwood town, Candia town, Chester town, Danville town, Derry town, East Kingston town, Epping town, Exeter town, Fremont town, Greenland town, Hampstead town, Hampton town, Hampton Falls town, Kensington town, Kingston town, Londonderry town, New Castle town, Newfields town, Newington town, Newmarket town, Newton town, North Hampton town, Plaistow town, Portsmouth city, Raymond town, Rye town, Salem town, Sandown town, Seabrook town, South Hampton town, Stratham town, Windham town.</p> <p>Strafford County: Dover city, Durham town, Rochester city, Rollinsford town, Sommersworth city.</p>	<p>Southern New Hampshire nonattainment area: (NH portion of Boston- Worcester-Lawrence CMSA)</p> <p>Hillsborough County: Amherst town, Bedford town, Brookline town, Goffstown town, Hollis town, Hudson town, Litchfield town, Manchester city, Merrimack town, Milford town, Nashua city, Pelham town.</p> <p>Merrimack County: Hookset town.</p> <p>Rockingham County: Atkinson town, Auburn town, Brentwood town, Candia town, Chester town, Danville town, Derry town, East Kingston town, Epping town, Exeter town, Fremont town, Greenland town, Hampstead town, Hampton town, Hampton Falls town, Kensington town, Kingston town, Londonderry town, New Castle town, Newfields town, Newington town, Newmarket town, Newton town, North Hampton town, Plaistow town, Portsmouth city, Raymond town, Rye town, Salem town, Sandown town, Seabrook town, South Hampton town, Stratham town, Windham town.</p> <p>Strafford County: Dover city, Durham town, Rochester city, Rollinsford town, Sommersworth city.</p> <p>-----</p> <p>Counties/ Towns Excluded by EPA and State</p> <p>The following 12 CMSA towns were excluded: Greenville, Mason, Mt. Vernon, New Ipswich, Weare, and Wilton in Hillsborough County; Allenstown in Merrimack County; and Barrington, Farmington, Lee, Madbury, and Milton in Strafford County.</p> <p>In addition, relative to the 1- hour nonattainment areas, there are 45 additional towns excluded (Parts of Hillsborough, Rockingham, Strafford, and Merrimack Counties).</p>	<p>The state recommended the NH portion of the Boston- Worcester-Lawrence, MA-NH- ME-CT CMSA be joined with the adjacent nonattainment area in southern Maine and be separate from the eastern MA nonattainment area. (This CMSA has expanded since 1990 designations.) The rationale was based on a lack of contribution to the southern part of the eastern MA area, which include areas outside of the CMSA and has the highest ozone readings in the nonattainment area.</p> <p>New Hampshire recommended to include 52 cities and towns in their portion of the CMSA as their nonattainment area. They exclude 12 small towns in the CMSA- from this newly expanded CMSA. The 12 towns have low population, growth and emissions. The total excluded is less than 50,000 persons, and represents about 7% of the NH portion of the CMSA.</p> <p>This area includes more geographic area than covered by the two serious one-hour ozone nonattainment areas in southern NH, but does not include the four full counties that were previously covered by the combination of the serious one-hour areas and the Manchester marginal one-hour area. The Manchester 1-hour area, not fully covered by the 8-hour recommendation, has been in attainment of the 1- hour ozone standard since at least 1991. (For areas in the OTR, there has been little incentive to redesignate 1- hour areas back to attainment since all the “control requirements” remain unchanged.)</p>

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Maine - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Southern Maine Coast nonattainment area:</p> <p>York County: Arundel town, Biddeford town, Elliot town, Kennebunk town, Kennebunkport town, Kittery town, Ogunquit town, Old Orchard Beach town, Saco town, South Berwick town, Wells town, York town.</p> <p>Cumberland County: Brunswick town, Cape Elizabeth town, Cumberland town, Falmouth town, Freeport town, Harpswell town, Long Island town, Portland city, Scarborough town, South Portland city, Westbrook city, Yarmouth town.</p> <p>Sagadahoc County: Arrowsic town, Bath town, Georgetown town, Phippsburg town, Topsham town, West Bath town.</p>	<p>Southern Maine Coast nonattainment area: (Portland MSA, ME portion of Boston-Worcester- Lawrence CMSA)</p> <p>York County: Arundel town, Biddeford town, Elliot town, Kennebunk town, Kennebunkport town, Kittery town, Ogunquit town, Old Orchard Beach town, Saco town, South Berwick town, Wells town, York town.</p> <p>Cumberland County: Cape Elizabeth town, Brunswick town, Cumberland town, Falmouth town, Freeport town, Harpswell town, Long Island town, Portland city, Scarborough town, South Portland city, Westbrook city, Yarmouth town.</p> <p>Sagadahoc County: Arrowsic town, Bath town, Georgetown town, Phippsburg town, Topsham town, West Bath town.</p> <p>-----</p> <p>Counties/ Towns Excluded by EPA and State</p> <p>The town of Berwick in the Boston CMSA , and some towns in the Portland MSA, which are: Casco, Gorham, Gray, Raymond, Standish and Windham in Cumberland County; and Hollis and Limington in York County are excluded.</p> <p>In addition, relative to the 1- hour nonattainment areas, there are 29 additional towns excluded (Parts of Cumberland, Sagadahoc, and York Counties)</p>	<p>The state recommended that southern coastal Maine be its own nonattainment area, separate from any nonattainment areas in NH and MA. (This CMSA has expanded since 1990 designations- it never went into Maine.) The state recommendation for this area includes part of the Maine portion of the Boston- Worcester- Lawrence, MA-NH-ME-CT CMSA, part of the Portland, ME MSA, and some non-MSA portions along the southern coast. The recommendation excludes the town of Berwick in the Boston CMSA, and excludes some towns in the Portland MSA. The towns excluded have low population, growth and emissions.</p> <p>The total population of the recommended nonattainment area is larger than the population in the Portland MSA and Maine portion of the Boston CMSA. The recommended nonattainment area represents the geographic areas violating the 8-hour ozone standard based on 1997-1999 data and include the most heavily populated areas in southern Maine.</p> <p>The recommended nonattainment area is smaller than the one-hour Portland nonattainment area, which is presently meeting the 1-hour ozone standard.</p>

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Maine (continued)

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Central Maine Coast nonattainment area:</p> <p>Hancock County: Bar Harbor town, Cranberry Isles town, Frenchboro town, Mount Desert town, Southwest Harbor town, Swans Island town, Tremont town, Winterharbor town.</p> <p>Knox County: Isle au Haut town.</p>	<p>Central Maine Coast nonattainment area: (Hancock- Waldo Counties- non- MSA area)</p> <p>Hancock County: Bar Harbor town, Cranberry Isles town, Frenchboro town, Mount Desert town, Southwest Harbor town, Swans Island town, Tremont town, Winterharbor town.</p> <p>Knox County: Isle au Haut town.</p>	<p>The state recommended that the central Maine coast nonattainment area be a small area representing geographic areas violating the 8-hour ozone standard based on 1997-1999 data. This is a non-MSA area. The recommended area include all of Acadia National Park, which is where the violating monitors are located.</p> <p>There is no current one-hour nonattainment area in this area. The Hancock and Waldo counties one-hour area that used to exist has been redesignated to attainment and the area remains in attainment. The recommended nonattainment area is smaller than this old one-hour area.</p>

**EPA Region 2's Initial Response to State's Recommendations
for 8-hour Ozone Nonattainment Areas**

This is not the Region Office's nor EPA's recommendation of 8-hour ozone nonattainment areas to the States.

The attached tables list the areas recommended by the States as nonattainment of the 8-hour ozone standard, with the Regional Office's initial response and any comments.

Generally, EPA's policy is to include the entire CMSA or MSA as nonattainment if a monitor in the C/MSA is violating the standard. This is based on the latest three years of data available to the States and EPA, 1997 - 1999.

For any State that did not recommend specific counties, EPA's initial response is to include the entire C/MSA where a violation occurred and any adjacent counties that are appropriate.

For States that recommended specific counties, we have noted the reason for changes from the C/MSA boundaries, with more explanation in the Notes section of this memo.

Region 2

New Jersey - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Philadelphia Area – NJ recommended the entire state as nonattainment. NJ moved Mercer Co. (Trenton) and Ocean Co. from NYC CMSA into Philadelphia area.</p> <p>Atlantic Co. Burlington Co. Camden Co. Cape May Co. Cumberland Co. Gloucester Co. Mercer Co. Ocean Co. Salem Co.</p>	<p>NJ's part of the Philadelphia-Wilmington-Atlantic City PA-NJ-DE-MD CMSA</p> <p>Atlantic Co. Burlington Co. Camden Co. Cape May Co. Cumberland Co. Gloucester Co. Mercer Co. Ocean Co. Salem Co.</p>	<p>.</p> <p>[1] [2]</p>
<p>New York Area - NJ recommended the entire state as nonattainment. NJ moved Mercer Co. (Trenton) and Ocean Co. from NYC CMSA into Philadelphia area.</p> <p>Bergen Co. Essex Co. Hudson Co. Hunterdon Co. Middlesex Co. Monmouth Co. Morris Co. Passaic Co. Somerset Co. Sussex Co. Union Co. Warren Co.</p>	<p>NJ's part of the New York-Northern New Jersey-Long Island NY-NJ-CT-PA CMSA</p> <p>Bergen Co. Essex Co. Hudson Co. Hunterdon Co. Middlesex Co. Monmouth Co. Morris Co. Passaic Co. Somerset Co. Sussex Co. Union Co. Warren Co.</p>	<p>[See notes 1 and 2 for Philadelphia area.]</p>

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Notes

Region 2

New Jersey

Philadelphia-Wilmington-Atlantic City PA-NJ-DE-MD CMSA

Note [1] - Mercer Co., NJ - This county is in the latest NYC CMSA, but is part of the existing Philadelphia ozone nonattainment area for the 1-hour standard. EPA will consider including Mercer Co. in the Philadelphia area.

Note [2] - Ocean Co, NJ - This county has the highest 8-hour average design value downwind of Philadelphia.

New York - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>New York area – NY recommended an area that “would encompass the area along the eastern seaboard” as nonattainment.</p>	<p>CMSA containing violating monitors: NY’s part of the New York-Northern New Jersey-Long Island NY-NJ-CT-PA CMSA</p> <p>Bronx Co. Dutchess Co. Kings Co. Nassau Co. New York Co. Orange Co. Putnam Co. Queens Co. Richmond Co. Rockland Co. Suffolk Co. Westchester Co.</p>	<p>Until NY provides a more specific recommendation, EPA’s initial response is the nonattainment area(s) should be the C/MSA with violating monitors. EPA would consider a wider area if NY specifically requests additional counties.</p>

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New York (continued)

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Upstate New York - New York State recommended “the areas boarding the Great Lakes” as nonattainment</p>	<p>MSAs and Counties containing violating monitors:</p> <ul style="list-style-type: none"> - Jamestown MSA - Buffalo-Niagara Falls MSA - Rochester MSA - Jefferson Co. <p>Jamestown MSA: Chautauqua Co.</p> <p>Buffalo-Niagara Falls MSA: Erie Co. Niagara Co.</p> <p>Rochester MSA: Genesee Co. Livingston Co. Monroe Co. Ontario Co. Orleans Co. Wayne Co.</p> <p>Jefferson Co.</p>	<p>Until NY provides a more specific recommendation, EPA's initial response is the nonattainment area(s) should be the C/MSA or counties with violating monitors. EPA would consider a wider area if NY specifically requests additional counties.</p>

Region 3

8-Hour Ozone Nonattainment Area Boundaries - EPA Initial Response to State Submittals

General Description of EPA Response: Based on state submittals and our initial county-level evaluation of the criteria from the March 28, 2000 guidance memorandum issued by John Seitz, Director, Office of Air Quality Planning and Standards, U.S. EPA, the counties below have the greatest nonattainment attributes in Region III. The criteria include: 1997-99 air quality values, NOx and VOC emissions, VMT growth and population growth, whether they belong to the CMSA/MSA, whether they are part of an existing 1 hour ozone nonattainment area, their expected emission reductions due to implementation of the NOx regulatory requirement and Tier 2 requirements, their NOx emissions contributions to downwind nonattainment based on OTAG modeling. We have also considered the state's preference for attainment or nonattainment in our initial response. When 2000 air quality data becomes available, reevaluation of these counties will be warranted.

Note: State submittals which recommended counties to be added to existing CMSA/MSAs or "stand alone" counties are in ***BOLD and ITALICS***.

DELAWARE - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Dover, DE MSA Kent, DE	Dover, DE MSA - 1 hour ozone nonattainment Philadelphia, PA-NJ PMSA Kent, DE	This county was originally part of the 1 hour Philadelphia nonattainment area. Based on the criteria in the 3/28/00 Seitz memo, the state should consider whether this county should be grouped together with the Philadelphia, PA-NJ PMSA or whether there are compelling facts to support it as a separate nonattainment area.
Philadelphia, PA-NJ PMSA New Castle, DE	Philadelphia, PA-NJ PMSA New Castle, DE	
<i>Sussex, DE</i>	Sussex, DE—Adjacent to a C/MSA	The State should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area.

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DISTRICT OF COLUMBIA - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Washington DC, MD, VA, WV PMSA District of Columbia	Washington DC, MD, VA, WV PMSA District of Columbia	

pre-decisional pre-designation materials

MARYLAND - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Baltimore, MD PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Anne Arundel, MD Baltimore, MD Carroll, MD Harford, MD Howard, MD Queen Anne's, MD Baltimore City, MD</p> <p><i>Not part of Baltimore PMSA but recommended by MDE to be included: Kent, MD</i></p>	<p>Baltimore, MD PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Anne Arundel, MD Baltimore, MD Carroll, MD Harford, MD Howard, MD Queen Anne's, MD Baltimore City, MD</p> <p>Kent, MD—Adjacent to more than one C/MSA</p>	<p>In order for EPA to consider granting MDE's request to keep the Baltimore, MD PMSA as a separate ozone nonattainment area from the Washington DC, MD, VA, WV CMSA, MDE should submit a more detailed rationale.</p>
<p>Philadelphia, PA-NJ PMSA Cecil, MD</p>	<p>Philadelphia, PA-NJ PMSA Cecil, MD</p>	

<p>MARYLAND - Further Discussion with Regional Office Warranted</p>	<p>EPA Initial Response</p>	<p>Comments</p>
<p>Washington DC, MD, VA, WV PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Calvert, MD Charles, MD Frederick, MD Montgomery, MD Prince George's, MD</p> <p><i>Part of Hagerstown, MD PMSA but MDE requests it be included with the Washington DC, MD, VA, WV PMSA: Washington, MD</i></p>	<p>Washington DC, MD, VA, WV PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Calvert, MD Charles, MD Frederick, MD Montgomery, MD Prince George's, MD</p> <p>Washington, MD-Adjacent to more than one C/MSA</p>	<p>In order for EPA to consider granting MDE's request to keep the Washington DC, MD, VA, WV PMSA as a separate ozone nonattainment area from the Baltimore-Washington DC, MD, VA, WV CMSA, MDE should submit a more detailed rationale.</p>
	<p>St. Mary's, MD*-Adjacent to a C/MSA</p>	<p>Relatively significant Mobile NOx emissions, population, VMT growth, interpolated air quality is poor. The State should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>
	<p>Wicomico, MD*</p>	<p>Relatively significant Mobile NOx emissions, population, VMT growth, interpolated air quality is poor. The State should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>

Pennsylvania - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Pittsburgh, PA MSA Allegheny, PA Beaver, PA Butler, PA Fayette, PA Washington, PA Westmoreland, PA Additional counties to add to the Pittsburgh nonattainment area: Armstrong, PA Greene, PA</p>	<p>Pittsburgh, PA MSA Allegheny, PA Beaver, PA Butler, PA Fayette, PA Washington, PA Westmoreland, PA Plus the following counties: Armstrong, PA Greene, PA</p>	
<p>Reading, PA MSA – Transitional Nonattainment Area Berks, PA</p>	<p>Reading, PA MSA Berks, PA</p>	
<p>Altoona, PA MSA – Transitional Nonattainment Area Blair, PA</p>	<p>Altoona, PA MSA Blair, PA</p>	
<p>Philadelphia, PA-NJ PMSA Bucks, PA Chester, PA Delaware, PA Montgomery, PA Philadelphia, PA</p>	<p>Philadelphia, PA-NJ PMSA Bucks, PA Chester, PA Delaware, PA Montgomery, PA Philadelphia, PA</p>	<p>Other R3 counties in this MSA: Cecil, MD New Castle, DE</p> <p>Additional counties outside R3 in this PMSA: Atlantic, NJ Burlington, NJ Camden, NJ Cape May, NJ Cumberland, NJ Gloucester, NJ Salem, NJ</p>

<p>Johnstown, PA MSA – Transitional Nonattainment Area Cambria, PA Somerset, PA</p>	<p>Johnstown, PA MSA Cambria, PA Somerset, PA</p>	
<p>Allentown-Bethlehem-Easton, PA MSA – Transitional Nonattainment Area Carbon, PA Lehigh, PA Northampton, PA</p>	<p>Allentown-Bethlehem-Easton, PA MSA Carbon, PA Lehigh, PA Northampton, PA</p>	
<p>State College, PA MSA – Transitional Nonattainment Area Centre, PA</p>	<p>State College, PA MSA Centre, PA</p>	

pre-decisional pre-designational materials

Pennsylvania - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Harrisburg-Lebanon- Carlisle, PA MSA – Transitional Nonattainment Area Cumberland, PA Dauphin, PA Lebanon, PA Perry, PA	Harrisburg-Lebanon- Carlisle, PA MSA Cumberland, PA Dauphin, PA Lebanon, PA Perry, PA	
Scranton-Wilkes Barre, Hazelton, PA MSA – Transitional Nonattainment Area Columbia, PA Lackawanna, PA Luzerne, PA Wyoming, PA	Scranton-Wilkes Barre, Hazelton, PA MSA Columbia, PA Lackawanna, PA Luzerne, PA Wyoming, PA	Note: See criteria considered in the General Description section for definition of NA attributes.
Erie, PA MSA – Transitional Nonattainment Area Erie, PA	Erie, PA MSA Erie, PA	

Pennsylvania - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Lancaster, PA MSA – Transitional Nonattainment Area Lancaster, PA	Lancaster, PA MSA Lancaster, PA	The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area.
Sharon, PA MSA – Transitional Nonattainment Area Mercer, PA	Sharon, PA MSA - 1 hour ozone nonattainment theYoungstown- Warren- Sharon MSA Mercer, PA	Regarding Mercer County, Pennsylvania, this county was originally part of the same 1-hour ozone nonattainment area, theYoungstown-Warren- Sharon Area, as Trumbull and Mahoning Counties, OH. Based on the criteria in the 3/28/00 Seitz memo, the Commonwealth should consider whether this county should be grouped together with the Youngstown-Warren MSA or whether there are compelling facts to support it as a separate nonattainment area.

<p>Pennsylvania - Further Discussion with Regional Office Warranted</p>	<p>EPA Initial Response</p>	<p>Comments</p>
<p>Newburgh, NY-PA PMSA – Transitional Nonattainment Area Pike, PA</p>	<p>Newburgh, NY-PA PMSA Pike, PA</p> <p>The Newburgh, NY-PA MSA is part of the New York-Northern New Jersey-Long Island, NY-NJ-CT-PA CMSA together with these other PMSAs: Bergen-Passaic, NJ PMSA Bridgeport, CT PMSA Danbury, CT PMSA Dutchess County, NY PMSA Jersey City, NJ PMSA Middlesex-Somerset-Hunterdon, NJ PMSA Monmouth-Ocean, NJ PMSA Nassau-Suffolk, NY PMSA New Haven-Meriden, CT PMSA New York, NY PMSA Newark, NJ PMSA Stamford-Norwalk, CT PMSA Trenton, NJ PMSA Waterbury, CT PMSA</p>	<p>Additional counties outside R3 in the Newburgh, NY-PA PMSA: Orange, NY</p> <p>The Commonwealth should consider whether this county should be grouped together with another PMSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>

Pennsylvania - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
York, PA MSA – Transitional Nonattainment Area York, PA	York, PA MSA - 1 hour ozone nonattainment York- Adams, PA area York, PA	This county was originally part of the 1 hour York-Adams, PA nonattainment area. Based on the criteria in the 3/28/00 Seitz memo, the state should consider whether this county should be grouped together with Adams County as one nonattainment area or whether there are compelling facts to support it as a separate nonattainment area.
	Adams, PA* (Adjacent to more than one C/MSA) - 1 hour ozone nonattainment York-Adams, PA area	Relatively significant Area VOC and Mobile Nox emissions, population, interpolated air quality is poor, and location (surrounded by counties monitoring nonattainment). This county was originally part of the 1 hour York-Adams, PA nonattainment area. Based on the criteria in the 3/28/00 Seitz memo, the state should consider whether this county should be grouped together with the York MSA or whether there are compelling facts to support it as a separate nonattainment area.
Clearfield, PA – Transitional Nonattainment Area	Clearfield, PA*–Adjacent to more than one C/MSA	Monitored Nonattainment. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.

Pennsylvania - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
	Crawford, PA*–Adjacent to more than one C/MSA	Relatively significant Area VOC and Mobile NOx emissions, population, interpolated air quality is poor. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.
Franklin, PA – Transitional Nonattainment Area	Franklin, PA*–Adjacent to more than one C/MSA	Monitored Nonattainment. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.

<p>Pennsylvania - Further Discussion with Regional Office Warranted</p>	<p>EPA Initial Response</p>	<p>Comments</p>
	<p>Indiana, PA*—Adjacent to more than one C/MSA</p>	<p>Very high NOx Point emissions, relatively significant Mobile NOx emissions, population, interpolated air quality is poor. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>
	<p>Monroe, PA* (Adjacent to more than one C/MSA) - 1 hour ozone nonattainment Scranton-Wilkes Barre, PA area</p>	<p>County has relatively significant Mobile NOx emissions, population, and monitored violation. This county was originally part of the 1 hour Scranton-Wilkes Barre, PA nonattainment area. Based on the criteria in the 3/28/00 Seitz memo, the state should consider whether this county should be grouped together with the Scranton-Wilkes Barre MSA or whether there are compelling facts to support it as a separate nonattainment area.</p>
	<p>Northumberland, PA* —Adjacent to more than one C/MSA</p>	<p>Relatively significant Area VOC and NOx emissions, Mobile NOx emission, population. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>

	<p>Schuylkill, PA* –Adjacent to more than one C/MSA</p>	<p>Very high Area NOx emissions, relatively significant Mobile NOx emissions, large population, interpolated air quality is poor. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution and other factors or whether there are compelling facts to support it as an independent nonattainment area.</p>
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pre-decisional materials

Virginia Submittal - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Washington DC, MD, VA, WV PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Alexandria, VA Arlington, VA Fairfax (including Fairfax City, Falls Church), VA Fauquier, VA Loudoun, VA Prince William (including Manassas, Manassas Park), VA</p> <p><i>VADEQ recommends joining Spotsylvania, VA, Fredericksburg, VA, Stafford, VA and Caroline, VA as a nonattainment area separate from the Baltimore-Washington DC, MD, VA, WV CMSA</i></p>	<p>Washington DC, MD, VA, WV PMSA, Baltimore-Washington DC, MD, VA, WV CMSA Alexandria, VA Arlington, VA Fairfax (including Fairfax City, Falls Church), VA Fauquier, VA Loudoun, VA Prince William (including Manassas, Manassas Park), VA</p> <p>Spotsylvania, VA Stafford, VA Fredericksburg, VA Caroline, VA</p> <p>----- Counties in this CMSA/MSA which exhibited relatively few NA attributes: Clarke, VA Culpepper, VA King George, VA Warren, VA Berkeley, WV Jefferson, WV</p>	<p>In order for EPA to consider granting VADEQ's request to divide the Washington DC, MD, VA, WV PMSA further into 2 separate ozone nonattainment areas from the Baltimore-Washington DC, MD, VA, WV CMSA, VADEQ should submit a more detailed rationale.</p> <p>Note: See criteria considered in General Description section for definition of NA attributes.</p>

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Virginia Submittal - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Roanoke, VA MSA Botetourt, VA Roanoke (including Salem), VA Roanoke City, VA</p>	<p>Roanoke, VA MSA Botetourt, VA Roanoke (including Salem), VA Roanoke City, VA</p>	
<p>Richmond-Petersburg, VA MSA <i>Charles City, VA</i> Chesterfield, VA Hanover, VA Henrico, VA Colonial Heights, VA Hopewell, VA Richmond City, VA</p> <p><i>VADEQ recommends only the portion of Charles City containing the violating O3 monitor as NA.</i></p>	<p>Richmond-Petersburg, VA MSA Charles City, VA Chesterfield, VA Hanover, VA Henrico, VA Colonial Heights, VA Hopewell, VA Richmond City, VA</p> <hr/> <p>Counties in this CMSA/MSA which exhibited relatively few NA attributes: Goochland, VA New Kent, VA Powhatan, VA Petersburg, VA Dinwiddie, VA Prince George, VA</p>	<p>Due to Charles City's violating monitor, its location (surrounded by other counties also monitoring nonattainment), VADEQ should submit a more detailed rationale that supports its request.</p> <p>Note: See criteria considered in General Description section for definition of NA attributes.</p>

Virginia Submittal - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Norfolk-Virginia Beach-Newport News, VA-NC MSA Chesapeake, VA Hampton, VA Newport News, VA Norfolk, VA Portsmouth, VA Suffolk, VA Virginia Beach, VA Williamsburg, VA</p> <p><i>VADEQ recommends joining James City, VA, Poquoson, VA and York, VA together with the Norfolk-Virginia Beach-Newport News, VA-NC MSA</i></p>	<p>Norfolk-Virginia Beach-Newport News, VA-NC MSA Chesapeake, VA Hampton, VA Newport News, VA Norfolk, VA Portsmouth, VA Suffolk, VA Virginia Beach, VA Williamsburg, VA</p> <p>James City, VA Poquoson, VA York, VA</p> <p>Counties in this CMSA/MSA which exhibited relatively few NA attributes: Gloucester, VA Isle of Wight, VA Mathews, VA</p>	<p>Additional counties outside R3 in this MSA: Currituck, NC</p> <p>Note: See criteria considered in General Description section for definition of NA attributes.</p>

Virginia Submittal - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
<p>Shenandoah National Park Area Madison, VA Page, VA</p> <p><i>VADEQ recommends only the portions of Madison, VA and Page, VA that is the Shenandoah National Park as NA.</i></p>	<p>Shenandoah National Park Area Madison, VA Page, VA</p>	<p>Monitored NA (high terrain) in Madison, VA but otherwise relatively insignificant emissions, population, growth, etc. when compared with other R3 counties. EPA will consider whether available data justifies partial county NA (Shenandoah National Park portions)</p>
<p>Frederick (including Winchester), VA</p>	<p>Frederick (including Winchester), VA</p>	
	<p>Charlottesville, VA MSA Albemarle (including Charlottesville), VA* Counties in this CMSA/MSA which exhibited relatively few NA attributes: Fluvanna, VA Greene, VA</p>	<p>Relatively significant Mobile NOx emissions, VMT growth, large population, interpolated air quality is poor.</p> <p>Note: See criteria considered in General Description section for definition of NA attributes.</p>
	<p>Danville, VA MSA Pittsylvania (including Danville), VA*</p>	<p>Relatively significant Mobile NOx emissions, population (> pop. mean in R3), interpolated air quality is poor.</p>

Virginia Submittal - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
	Augusta (including Staunton, Waynesboro), VA*-Adjacent to a C/MSA	Relatively significant Mobile NOx emissions, population, VMT growth, interpolated air quality is poor.
	Rockingham, VA*-Adjacent to more than one C/MSA	Relatively significant Mobile NOx emissions, VMT growth, interpolated air quality is poor. The Commonwealth should consider whether this county should be grouped together with another MSA or CMSA based on air quality contribution or other factors or whether there are compelling facts to support it as an independent nonattainment area..
		<p>Johnson City-Kingsport-Bristol TN-VA MSA NOTE: There is a violating monitor in Sullivan, TN, which is part of this MSA.</p> <p>R3 Counties in this CMSA/MSA which exhibited relatively few NA attributes: Bristol, VA Scott, VA Washington, VA</p> <p>Additional Counties outside R3 in the MSA: Carter, TN Hawkins, TN Sullivan, TN Unicoi, TN Washington, TN</p>

WEST VIRGINIA - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Huntington-Ashland, WV-KY-OH MSA Cabell, WV Wayne, WV	Huntington-Ashland, WV-KY-OH MSA Cabell, WV Wayne, WV	
Steubenville- Weirton, OH-WV MSA Hancock, WV Brooke, WV	Steubenville- Weirton, OH-WV MSA Hancock, WV Brooke, WV	Additional counties outside R3 in this MSA: Jefferson, OH Note: See criteria considered in the General Description section for definitions of NA attributes.
Charleston, WV MSA Kanawha, WV Putnam, WV	Charleston, WV MSA Kanawha, WV Putnam, WV	

WEST VIRGINIA - Further Discussion with Regional Office Warranted	EPA Initial Response	Comments
Wheeling, WV-OH MSA Marshall, WV Ohio, WV	Wheeling, WV-OH MSA Marshall, WV Ohio, WV	Additional counties outside R3 in this MSA: Belmont, OH
Parkersburg-Marietta, WV-OH MSA Wood, WV	Parkersburg-Marietta, WV-OH MSA Wood, WV	Additional counties outside R3 in this MSA: Washington, OH
<i>Greenbrier, WV</i>	Greenbrier, WV	
	Harrison, WV*	Very high Point Nox emissions, relatively significant Mobile NOx emissions, population, interpolated air quality is poor. (County characteristics very similar to Monongalia, WV)
	Monongalia, WV*-Adjacent to a C/MSA	Very high Point NOx emissions, relatively significant Mobile NOx emissions, population, interpolated air quality is poor. (County characteristics very similar to Harrison, WV)

Region 4**Alabama - Further Discussion with Regional Office Warranted**

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Birmingham, AL Area -AL recommended 2 of 4 MSA counties</p> <p>Jefferson County Shelby County</p>	<p>Jefferson County Shelby County Tuscaloosa Co - Adjacent*</p>	<p>EPA believes AL should add Tuscaloosa County</p> <p>See Note 1</p>
	<p>Counties Excluded by EPA and State** Blount County* St. Clair County*</p>	<p>See Note 1</p>
<p>Huntsville, AL Area - AL recommended 1 of the 2 MSA counties</p> <p>Madison County</p>	<p>Madison County Limestone Co*</p>	<p>EPA believes AL should add the other MSA county</p> <p>See Note 2</p>
<p>Mobile, AL Area - AL recommended 1 of the 2 MSA counties</p> <p>Mobile County</p>	<p>Mobile County Baldwin County*</p>	<p>EPA believes AL should add one additional MSA county</p> <p>See Note 3</p>
<p>Clay County - AL recommended this violating non-MSA county</p> <p>Clay County</p>	<p>Clay County</p>	
<p>Columbus, GA-AL Interstate Area - GA recommended Bibb County, AL did not recommend any county in this violating MSA</p>	<p>Russell County*</p>	<p>EPA believes AL should add Russell County to their recommendation</p> <p>See Notes 4 and 8</p>

Alabama

Birmingham, AL Area

Note 1 - The State recommended two of the four MSA counties as nonattainment. Alabama submitted supporting information based on the 11 criteria that purport to demonstrate that Blount and St. Clair Counties have very low population densities and low VMT, and the State believes that they most likely are not contributing to the ozone problem in the Birmingham area. There is one large NO_x source located in St. Clair County, however, this is a cement kiln that will be controlled by Alabama's NO_x SIP rules. However, EPA believes that the State should also consider the adjacent one county MSA of Tuscaloosa which has emissions due to a number of stationary sources and significant VMT or provide supporting documentation that addresses the 11 factors to show why it should not be included. The State's boundary recommendation is identical to the 1-hour ozone nonattainment area.

Huntsville, AL Area

Note 2 - The State recommended one of the two MSA counties as nonattainment. Alabama submitted supporting information based on the 11 criteria that purport to demonstrate that Limestone County has very low population density and low VMT, and the State believes that they are probably not contributing to the ozone problem in the Huntsville area. However, preliminary 2000 air quality data indicates that Lawrence County in the adjacent Decatur MSA is violating the 8-hour ozone NAAQS (see note 44). Furthermore, Lawrence County, TN, a non-MSA county just to the northwest of the Huntsville MSA, is also violating the 8-hour zone NAAQS. EPA believes that Alabama should reconsider the northern area of Alabama or provide justification as to why both the Huntsville and Decatur MSAs should not be designated as nonattainment.

Mobile, AL Area

Note 3 - The State recommended one of the two MSA counties as nonattainment. Alabama submitted supporting information based on the 11 criteria that purport to demonstrate that Baldwin County is likely not contributing to the ozone problem in the Mobile area. However, EPA believes that the State should include Baldwin County. Although the Baldwin County monitor has less than three years of quality assured monitoring data, the available data shows levels above 85 ppb and indications are that this monitor is likely to show violations once three years of data are available. Additionally, Baldwin County is adjacent to the Pensacola, FL MSA which is also violating the 8-hour ozone NAAQS which has been recommended to be nonattainment by the State of Florida. EPA believes the State should either add Baldwin County to its recommendation for the Mobile area or provide additional information to justify designating it attainment.

Columbus, GA-AL Interstate Area

Note 4 - This MSA is an interstate area. The State of Alabama did not recommend the Columbus MSA

county that is in Alabama. EPA believes Alabama should add Russell County to their recommendation or submit supporting information based on the 11 factors as to why Russell County should not be included.

Note 5 - Reserved

Florida - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Tribes		The Miccosukee Indian Tribe submitted a letter to the Regional Office supporting the State's recommendation
Pensacola, FL Area - FL recommended the full MSA for this area Escambia County Santa Rosa County	Escambia County Santa Rosa County	
Tampa-St. Petersburg, FL Area - FL recommended 2 of the 4 counties in this MSA Hillsborough County Pinellas County	Hillsborough County Pinellas County	See Note 6
	<i>Counties Excluded by EPA and State**</i> Hernando County Pasco County	See Note 6

Florida

Tampa-St. Petersburg, FL Area

Note 6 - The State recommended that EPA wait until after the 2001 ozone season to make a determination on this area, at which time the State believes that air quality trends indicate the area will have three years of data showing attainment. They further believe that the high ozone values in 1998 were caused by the Mexican fires. However, the State has not submitted data for the days in question that meet EPA's guidance for excluding these days due to fires. The State's recommendation indicated that if EPA should proceed to designate the area as nonattainment that only Hillsborough and Pinellas Counties should be designated nonattainment. (This is the area that is identical to the 1-hour ozone nonattainment area.) Pasco and Hernando Counties have population, emissions and VMT that may contribute to ozone formation in the area. Their very low design values for the one violating monitor and significant NOx reductions will be achieved from the Tampa Electric Company (TECO) power plant due to the settlement agreement.

Georgia - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Atlanta, GA Area - GA recommended 19 of 20 MSA counties, one adjacent non- MSA county and one adjacent MSA		
Barrow County Bartow County Carroll County Cherokee County Clayton County Cobb County Coweta County DeKalb County Douglas County Fayette County Forsyth County Fulton County Gwinnett County Henry County Newton County Paulding County Rockdale County Spalding County Walton County Dawson County - Adjacent Hall County - Adjacent MSA	Barrow County Bartow County Carroll County Cherokee County Clayton County Cobb County Coweta County DeKalb County Douglas County Fayette County Forsyth County Fulton County Gwinnett County Henry County Newton County Paulding County Rockdale County Spalding County Walton County Dawson County - Adjacent Hall County - Adjacent MSA	See Note 7
	<i>Counties Excluded by EPA and State**</i> Pickens County*	See Note 7

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<p>Columbus, GA-AL (Interstate) Area - GA recommended one of the three MSA counties located within GA</p>		<p>EPA believes the State of Alabama should add Russell County to their recommendation (see Alabama portion of table)</p>
<p>Muscogee County</p>	<p>Muscogee County Russell County, AL*</p>	<p>See Note 8</p>
	<p><i>Counties Excluded by EPA and State**</i> Chattahoochee County* Harris County*</p>	<p>See Note 8</p>
<p>Macon, GA Area - GA submitted one of the four MSA counties in this area</p>		<p>EPA believes the State should add 1 MSA county (Houston) to their recommendation</p>
<p>Bibb County</p>	<p>Bibb County Houston County*</p>	<p>See Note 9</p>
	<p><i>Counties Excluded by EPA and State**</i> Jones County* Peach County* Twiggs County*</p>	<p>See Note 9</p>
<p>Augusta-Aiken, GA-SC (Interstate) Area - GA recommended 1 of 3 MSA counties.</p>		<p>EPA believes the State should add one additional MSA county (Columbia) to their recommendation.</p>
<p>Richmond County</p>	<p>Richmond County Columbia County*</p>	<p>See Notes 10 and 36</p>
	<p><i>Counties Excluded by EPA and State**</i> McDuffie County*</p>	<p>See Notes 10 and 36</p>

<p>Chattanooga, TN-GA (Interstate) Area -GA did not recommend any of the three GA MSA counties. Chattanooga recommended one of three TN MSA counties (See TN table)</p>		<p>EPA believes the State should add 2 additional MSA counties (Catoosa and Walker) to their recommendation</p>
<p>No GA Counties</p>	<p>Catoosa County* Walker County*</p>	<p>See Note 11</p>
	<p><i>Counties Excluded by EPA and State**</i> Dade County*</p>	<p>See Note 11</p>

Georgia

Atlanta, GA Area

Note 7 - The State recommended 20 of the 21 MSA counties (which includes the 13 county 1-hour ozone nonattainment area) plus a non-MSA adjacent violating county (Dawson County) and the adjacent MSA of Gainesville (Hall County). Georgia submitted supporting information based on the 11 criteria that purport to demonstrate that Pickens County, a county within the MSA that has very low population density and low VMT, is likely not contributing to the nonattainment problem.

Columbus, GA-AL (Interstate) Area

Note 8 - This area is an interstate area including counties in Georgia and Alabama. The State of Georgia recommended Muscogee County, which is one of the three Georgia counties in the Columbus MSA. Georgia submitted supporting information based on the 11 criteria that purport to demonstrate that the counties of Chattahoochee and Lee are likely not contributing to the nonattainment problem. EPA believes Alabama should add Russell County to their recommendation.

Macon, GA Area

Note 9 - The State recommended that one of the five MSA counties (Bibb), which contains the violating ozone monitor, be designated nonattainment. Georgia submitted supporting information based on the 11 criteria that purport to demonstrate that Jones, Peach, and Twiggs Counties are likely not contributing to the nonattainment problem. In addition, the State's technical assessment based on the 11 criteria presented at several public meetings, prior to submitting its recommendation to EPA, supports the inclusion of Houston County in the nonattainment area. EPA believes the State should add Houston County to their nonattainment recommendation, or provide documentation to support omitting Houston

County from the Macon nonattainment area.

Augusta-Aiken, GA-SC (Interstate) Area

Note 10 - The State recommended that one of the three Georgia MSA counties (Richmond), which contains the violating monitor, be designated nonattainment. Georgia submitted supporting information based on the 11 criteria that purport to demonstrate that McDuffie County is likely not contributing to the nonattainment problem. In addition, the State's technical assessment based on the 11 criteria presented at several public meetings, prior to submitting its recommendation to EPA, supports the inclusion of Columbia County in the nonattainment area. EPA believes the State should add Columbia County to their nonattainment recommendation or provide supporting documentation for excluding it from the nonattainment area. (See South Carolina for discussion regarding the SC counties within the MSA.)

Chattanooga, TN-GA (Interstate) Area

Note 11 - The State of Georgia did not recommend any of the Georgia counties in the Chattanooga MSA as nonattainment. The State's technical assessment based on the 11 criteria presented at several public meetings, prior to submitting its recommendation to EPA, supports the inclusion of Catoosa County and possibly Walker County in the nonattainment area. EPA believes the State should add these counties to their nonattainment recommendation or provide supporting documentation for excluding them from the nonattainment area.

Kentucky

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Cincinnati-Hamilton, OH-KY-IN (Interstate) Area - KY recommended 3 of the 6 KY counties in this MSA</p> <p>Boone County Campbell County Kenton County</p>	<p>Boone County Campbell County Gallatin County* Grant County* Kenton County Pendleton County*</p>	<p>EPA believes the Commonwealth should consider adding 3 MSA counties (Gallatin, Grant and Pendleton) to their recommendation</p> <p>See Note 12</p>
<p>Louisville, KY-IN (Interstate) Area - KY recommended all three of the KY counties in this MSA</p> <p>Bullitt County Jefferson County Oldham County</p>	<p>Bullitt County Jefferson County Oldham County</p>	
<p>Evansville-Henderson, IN-KY (Interstate) Area - KY recommended the only KY county in this MSA</p> <p>Henderson County</p>	<p>Henderson County</p>	
<p>Owensboro, KY Area - KY recommended the only county in this MSA, plus one adjacent non-MSA county</p> <p>Daviess County Hancock County</p>	<p>Daviess County Hancock County McLean County*</p>	<p>EPA believes the Commonwealth should add 1 adjacent county (McLean) to their recommendation</p> <p>See Note 13</p>

<p>Paducah (non-MSA) Area - KY recommended 2 counties</p> <p>McCracken County Marshall County</p>	<p>McCracken County Marshall County Graves County* Livingston County*</p>	<p>EPA believes the Commonwealth should add 2 counties (Livingston and Graves) to their recommendation</p> <p>See Note 14</p>
<p>Bowling Green (non-MSA) Area - KY recommended 2 counties</p> <p>Simpson County Warren County</p>	<p>Simpson County Warren County Edmonson County*</p>	<p>EPA believes the Commonwealth should add 1 county (Edmonson) to their recommendation</p> <p>See Note 15</p>
<p>Lexington, KY Area - KY recommended 2 of the 7 counties in the MSA</p> <p>Fayette County Scott County</p>	<p>Fayette County Scott County Bourbon County* Clark County* Jessamine County* Madison County* Woodford County*</p>	<p>EPA believes the Commonwealth should consider adding 5 MSA counties (Bourbon, Clark, Jessamine, Madison, and Woodford) to their recommendation</p> <p>See Note 16</p>
<p>Huntington-Ashland, WV-KY-OH (Interstate) Area - KY recommended 2 of the 3 KY counties in the MSA</p> <p>Boyd County Greenup County</p>	<p>Boyd County Greenup County Carter County*</p>	<p>EPA believes the Commonwealth should add 1 MSA county (Carter) to their recommendation</p> <p>See Note 17</p>

<p>Clarksville-Hopkinsville, TN-KY (Interstate) Area - KY recommended the KY county in the MSA</p> <p>Christian County</p>	<p>Christian County Montgomery County, TN*</p>	<p>See Note 38</p>
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Kentucky

Cincinnati-Hamilton, OH-KY-IN (Interstate) Area

Note 12 - The Commonwealth recommended that EPA designate three of the six counties in the MSA. These counties are the same as those in the 1-hour ozone maintenance area.. Kentucky did not provide justification based on the 11 factors to exclude the three additional counties from the nonattainment designation in their June 12, 2000, submittal. Therefore, EPA believes these three counties should be included in the nonattainment area or else the Commonwealth should provide the justification to support their original recommendation

Owensboro, KY Area

Note 13 - The Commonwealth recommended Daviess County (the one MSA county) and Hancock County (adjacent to the MSA) as nonattainment. Daviess County and a portion of Hancock County comprise the Owensboro 1-hour ozone maintenance area. However, McLean County, which is adjacent to the Owensboro MSA and contains a violating ozone monitor, was not included in the Commonwealth's recommendation as nonattainment. EPA believes McLean County should be included in the Owensboro nonattainment area.

Paducah, KY (non-MSA) Area

Note 14 - The Commonwealth recommended Marshall County which is in the 1-hour ozone maintenance area and McCracken County as nonattainment. However, the recommendation did not include Livingston and Graves Counties, both of which contain violating monitors. Furthermore, a portion of Livingston County is included in the 1-hour ozone maintenance area. EPA believes that Livingston and Graves Counties should be included in the Paducah nonattainment area. At a minimum, the portion of Livingston County in the 1-hour ozone maintenance area must be included in the 8-hour ozone nonattainment area.

Bowling Green (non-MSA) Area

Note 15 - The Commonwealth recommended that Simpson and Warren Counties be included in an area that they designated as South Central rather than Bowling Green. However, EPA also believes that

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Kentucky should add the adjacent county of Edmonson which contains a violating monitor. Additionally, Edmonson County is a 1-hour ozone maintenance area. The Commonwealth may submit documentation as to why Edmonson County should be a separate nonattainment area.

Lexington, KY Area

Note 16 - The Commonwealth recommended that EPA designate two of the six counties in the MSA. These counties are the same as those in the 1-hour ozone maintenance area. Kentucky did not provide justification based on the 11 factors to exclude the four additional counties from the nonattainment designation in their June 12, 2000, submittal. Therefore, EPA believes these four counties should be included in the nonattainment area or the Commonwealth should provide the justification to support their original recommendation.

Huntington-Ashland, WV-KY-OH (Interstate) Area

Note 17 - The Commonwealth recommended that EPA designate two of the three Kentucky counties in the MSA. This recommendation includes the Kentucky portion of the 1-hour ozone maintenance area. However, Carter County, which is also in the MSA, contains a violating monitor. Therefore, EPA believes this county should be added to the recommendation.

Mississippi

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Biloxi-Gulfport-Pascagoula, MS Area - MS made no recommendation	Hancock County* Harrison County* Jackson County*	EPA believes all three MSA counties should be included in the nonattainment designation See Note 18
Lee County - MS made no recommendation	Lee County*	EPA believes Lee County should be designated as nonattainment See Note 19
Memphis, TN-AR-MS (Interstate) Area - MS made no recommendation	DeSoto County*	EPA believes DeSoto County should be added to the Memphis nonattainment area See Note 20

Mississippi

Biloxi-Gulfport-Pascagoula, MS Area

Note 18 - The State did not make any recommendation for nonattainment designations with respect to the 8-hour ozone NAAQS. EPA believes that all three counties in the MSA should be designated nonattainment. Hancock and Jackson Counties contain monitors that are violating the 8-hour ozone NAAQS. Harrison County, which is between Hancock and Jackson Counties, contains an ozone monitor with less than three years of data. However, the available data shows levels above 85 ppb and indications are that this monitor is likely to show violations once three years of data are available.

Lee County

Note 19 - The State did not make any recommendation for nonattainment designations with respect to the 8-hour ozone NAAQS. Lee County contains a violating monitor in a non-MSA area. Therefore, EPA believes that Lee County should be designated as nonattainment for the 8-hour ozone NAAQS.

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Memphis, TN-AR-MS (Interstate) Area

Note 20 - The State did not make any recommendation for nonattainment designations with respect to the 8-hour ozone NAAQS. However, DeSoto County which is part of the Memphis, Tennessee MSA, contains a violating monitor. Therefore, EPA believes that DeSoto County should be included in the Memphis nonattainment area.

North Carolina - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Charlotte-Gastonia-Rock Hill, NC-SC (Interstate) Area - NC recommended all of the NC MSA Counties and a portion of an adjacent county as well as the SC county in the MSA and a portion of an adjacent SC county</p> <p>Cabarrus County Gaston County Lincoln County Mecklenburg County Rowan County Union County Portion of Iredell - adjacent</p> <p>York County County - SC Portion of Lancaster County - adjacent - SC</p>	<p>Cabarrus County Gaston County Lincoln County Mecklenburg County Rowan County Union County Portion of Iredell - adjacent</p> <p>Portion of Lancaster County - adjacent - SC Chester County - SC York County County - SC</p>	<p>See Note 31</p>

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<p>Greensboro-Winston-Salem-High Point, NC Area - NC recommended 5 full counties and 2 partial counties of the 9 MSA counties and a portion of 1 adjacent county</p> <p>Alamance County Davidson County Forsyth County Guilford County Randolph County Portion of Davie County Portion of Rockingham County Portion of Caswell County - adjacent</p>	<p>Alamance County Davidson County Davie County* Forsyth County Guilford County Randolph County Rockingham County* Caswell County - adjacent*</p>	<p>EPA believes that NC should reconsider the partial county recommendations for Davie, Rockingham and Caswell Counties</p> <p>See Note 21</p>
	<p><i>Counties Excluded by EPA and State**</i></p> <p>Stokes County* Yadkin County*</p>	
<p>Raleigh-Durham-Chapel Hill, NC Area -NC recommended 3 full counties and 3 partial counties of the 6 MSA counties and a portion of 2 adjacent counties</p> <p>Durham County Orange County Wake County Portion of Chatham County Portion of Franklin County Portion of Johnston County Portion of Person County - adjacent Portion of Granville County - adjacent</p>	<p>Durham County Orange County Wake County Chatham County* Franklin County* Johnston County* Person County - adjacent* Granville County - adjacent*</p>	<p>EPA believes that NC should reconsider the partial county recommendations for Chatham, Franklin, Johnstn, Person, and Granville Counties</p> <p>See Note 22</p>

<p>Asheville, NC Area - NC recommended only the mountain top areas in one county in the MSA and 1 adjacent county</p> <p>Portion of Buncombe County above 4000 ft Portion of Haywood County above 4000 ft - adjacent</p>	<p>Buncombe County* Madison County* Haywood County - adjacent*</p>	<p>2000 data indicates that Buncombe County is now violating and EPA believes the State should reconsider the designation for Buncombe, Madison and Haywood Counties</p> <p>See Notes 23 and 46</p>
<p>Hickory-Morganton-Lenoir, NC Area - NC recommended 1 full county of the 4 MSA counties and a portion of the other 3 counties</p> <p>Catawba County Portion of Alexander County Portion of Burke County Portion of Caldwell County</p>	<p>Alexander County* Burke County* Caldwell County* Catawba County</p>	<p>EPA believes the State should reconsider the recommendation for Alexander, Burke, and Caldwell Counties</p> <p>See Note 24</p>
<p>Fayetteville, NC Area -NC recommended the MSA county and 1 adjacent county</p> <p>Cumberland County Harnett County - adjacent</p>	<p>Cumberland County Harnett County - adjacent</p>	
<p>Rocky Mount, NC Area - NC recommended a portion of 1 of the 2 counties in the MSA</p> <p>Portion of Edgecombe County</p>	<p>Edgecombe County* Nash County*</p>	<p>EPA believes that the State should consider including both MSA counties</p> <p>See Note 25</p>

<p>Goldsboro, NC Area - NC recommended portions of 2 adjacent counties and did not recommend the 1 MSA county</p> <p>Portion of Duplin County Portion of Lenoir County</p>	<p>Wayne County* Duplin County - adjacent* Lenoir County - adjacent*</p>	<p>EPA believes that the State should consider designating the MSA and the 2 adjacent counties</p> <p>See Note 26</p>
<p>Greenville, NC Area - NC recommended only a portion of the MSA county</p> <p>Portion of Pitt County</p>	<p>Pitt County*</p>	<p>EPA believes the State should consider recommending all of Pitt County</p> <p>See Note 27</p>
<p>Norfolk-Virginia Beach-Newport News, VA-NC (Interstate) Area - NC recommended that the 1 NC MSA county be designated as attainment</p>	<p><i>Counties Excluded by EPA and State**</i></p> <p>Currituck County*</p>	<p>See Note 28</p> <p>See Note 28</p>
<p>Northampton County - NC recommended a portion of the county</p> <p>Portion of Northampton County</p>	<p>Northampton County*</p>	<p>EPA believes the State should consider recommending the entire county</p> <p>See Note 29</p>
<p>Other Mountain Areas - NC recommended the county in the Great Smoky National Park and portions of three other counties</p> <p>Swain County Portion of Jackson County Portion of McDowell County Portion of Yancy County</p>	<p>Swain County Portion of Jackson County Portion of McDowell County Portion of Yancy County</p>	<p>See Note 30</p>

North Carolina

Greensboro-Winston-Salem-High Point, NC Area

Note 21 - The State recommended that 5 full counties and 2 partial counties of the 9 MSA counties and a portion of 1 adjacent county be designated as nonattainment for the 8-hour ozone NAAQS. This recommendation includes the 1-hour ozone maintenance area. North Carolina submitted supporting information based on the 11 criteria that purport to demonstrate that Yadkin County has very low population density and low VMT and the State believes it is probably not contributing to the ozone problem in the Greensboro/Winston-Salem/High Point area. Similar information was submitted for Stokes County except that a large power plant is located in that county. The State also provided information that Davie and Rockingham Counties in the MSA and Caswell County adjacent to the MSA have very low population densities and low VMT, and the State believes that they are probably not contributing to the nonattainment problem of the area. Each of these counties contains a violating monitor and the State recommended a small area around the monitor as nonattainment. Although the State addressed the 11 factors on a county basis, they did not provide adequate information to justify the specific nonattainment boundary. EPA believes that the State should recommend the entire county or provide additional information regarding the specific area recommend. Additionally, the portions of Caswell and Rockingham Counties are not contiguous with the rest of the recommended nonattainment boundary. EPA believes even if the State could justify designating only a portion of these counties that the portion should be contiguous to the rest of the nonattainment area. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Raleigh-Durham-Chapel Hill, NC Area

Note 22 - The State recommended that three full counties and three partial counties of the seven MSA counties and a portion of two adjacent counties be designated as nonattainment for the 8-hour ozone NAAQS. This recommendation includes the 1-hour ozone maintenance area. North Carolina submitted supporting information based on the 11 criteria that purport to demonstrate that the portion of Johnston County proposed is appropriate. Similar information was submitted for Chatham, Franklin, Person, and Granville Counties. However, each of these counties contains a violating monitor and the State recommended a small area around the monitor as nonattainment. Although the State addressed the 11 factors on a county basis, they did not provide adequate information to justify the specific nonattainment boundary. EPA believes that the State should recommend the entire county or provide additional information regarding the specific area recommend. Additionally, the portions of Franklin and Person Counties are not contiguous with the rest of the recommended nonattainment boundary. EPA believes even if the State is able to justify designating only a portion of these counties that the portion should be contiguous to the rest of the nonattainment area. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Asheville, NC Area

Note 23 - The State recommended only the areas of one of the two MSA counties and one adjacent county above 4000 feet be designated as nonattainment. However, preliminary 2000 air quality data indicates that Buncombe County is in violation of the 8-hour ozone NAAQS. Therefore, EPA believes that the State should re-evaluate their recommendation for the Asheville area including the MSA counties of Buncombe and Madison and the adjacent county of Haywood.

Hickory-Morganton-Lenoir, NC Area

Note 24 - The State recommended Catawaba County and portions of Alexander, Burke, and Caldwell Counties be designated as nonattainment for the 8-hour ozone NAAQS. Although the State submitted information purporting to demonstrate the rural nature of the three partial counties, they did not provide information supporting the specific portion of these counties recommended. Additionally, portions of Alexander and Caldwell Counties recommended by the State are not contiguous to the rest of the proposed nonattainment area. EPA believes that the area should be contiguous and that even if the State can justify a portion of these counties that the entire nonattainment area should be contiguous. The State should either recommend the entire MSA or provide additional justification for the partial county recommendations. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Rocky Mount, NC Area

Note 25 - The State recommended only the municipal boundary of Leggett where the violating monitor is located. EPA believes the entire MSA should be designated as nonattainment or the State should provide information based on the 11 criteria for excluding Nash County and to justify the portion of Edgecombe County recommended. The State did provide information regarding the low population density and low VMT in Edgecombe County but did not provide any information to support the exclusion of Nash County or to support the specific part of Edgecombe County recommended for nonattainment. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Goldsboro, NC Area

Note 26 - The State recommended only portions of two adjacent counties with violating monitors. The State provided information based on the 11 criteria purporting to demonstrate that Duplin and Lenoir Counties 1) have very low population densities and low VMT and 2) are probably not contributing to the monitored violation, but they did not provide information supporting the specific portion of the two counties recommended for nonattainment. Additionally, other than to state that there is no monitor in the MSA county of Wayne, the State did not provide any supporting information for not recommending this county as nonattainment. Wayne County is adjacent to the Raleigh/Durham/Chapel Hill area and the two violating counties. EPA believes the State should recommend all three of these counties as

nonattainment or provide additional information to support their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Greenville, NC Area

Note 27 - The State recommended only a portion of the MSA county around the violating monitor. The State provided information based on the 11 criteria purporting to demonstrate that Pitt County 1) has very low population density and low VMT and 2) is probably not contributing to the monitored violation, but they did not provide information supporting the specific portion of the county recommended for nonattainment. EPA believes the State should recommend Pitt County as nonattainment or provide additional information to support their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Norfolk-Virginia Beach-Newport News, VA-NC (Interstate) Area

Note 28 - The State provided information based on the 11 criteria that purport to demonstrate that Currituck County, the only North Carolina county in the MSA from the nonattainment area, should be excluded.

Northampton County

Note 29 - The State recommended only a portion of the Northampton County around the violating monitor. The State provided information based on the 11 criteria purporting to demonstrate that Northampton County has very low population densities and low VMT and is probably not contributing to the monitored violation, but they did not provide information supporting the specific portion of the county recommended for nonattainment. EPA believes the State should recommend Northampton County as nonattainment or provide additional information to support their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Other Mountain Areas

Note 30 - The State recommended Swain County which is the North Carolina portion of the Great Smoky National Park as nonattainment although the county does not contain a violating monitor. They also recommended portions of Jackson, McDowell, and Yancey counties above 4000 feet. The mountain top monitors in these counties are violating the 8-hour ozone NAAQS. The State provided information purporting to demonstrate that the violations were due to transport.

South Carolina - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Charlotte-Gastonia-Rock Hill, NC-SC (Interstate) Area - SC recommended part of 1 of the 2 MSA counties in their State.</p> <p>York County (Partial)</p>	<p>York County Chester County* Lancaster County (Partial)*</p>	<p>EPA believes the State should include York, a part of Lancaster and Chester Counties in their recommendation</p> <p>See Note 31</p>
<p>Columbia, SC Area - SC recommended parts of both MSA counties and part of 1 adjacent county</p> <p>(Partial Counties)</p> <p>Lexington County Richland County Calhoun County - adjacent</p>	<p>Lexington County Richland County Calhoun County - adjacent</p>	<p>EPA believes the State should revise their recommendation to include these counties in whole.</p> <p>See Note 32</p>
<p>Florence, SC Area - SC recommended parts of both MSA counties</p> <p>(Partial Counties) Darlington County Florence County</p>	<p>(Whole Counties) Darlington County Florence County</p>	<p>EPA believes the State should revise their recommendation to include these 2 counties in whole.</p> <p>See Note 33</p>

<p>Greenville-Spartanburg-Anderson, SC Area - SC recommended 4 partial MSA counties and 2 partial adjacent counties. SC did not recommend any part of 2 adjacent violating counties</p> <p>(Partial Counties)</p> <p>Anderson County Greenville County Pickens County Spartanburg County Abbeville County -adjacent Laurens County - adjacent</p>	<p>(Whole Counties)</p> <p>Anderson County Cherokee County* Greenville County Pickens County Spartanburg County Abbeville County - adjacent Laurens County - adjacent Oconee County - adjacent*</p>	<p>EPA believes the State should change their recommendation to contiguous areas which consist of the whole counties recommended, plus Cherokee and Oconee Counties</p> <p>See Note 34</p>
<p>Augusta-Aiken, GA-SC (Interstate) Area</p> <p>(Partial Counties)</p> <p>Aiken County Edgefield County</p>	<p>(Whole Counties)</p> <p>Aiken County Barnwell County* Edgefield County</p>	<p>EPA believes the State should add Barnwell County to their recommendation and should revise Aiken and Edgefield Counties to whole counties.</p> <p>See Notes 10 (GA) and 36</p>

South Carolina

Charlotte-Gastonia-Rock Hill, NC-SC (Interstate) Area

Note 31 - The State recommended a portion of York County (the MPO area) but did not recommend the adjacent violating county of Chester. The State of North Carolina included a request in their recommendation that York County and the portion of Lancaster County that is between Mecklenburg County, North Carolina and York County, South Carolina, be included in the Charlotte/Gastonia/Rock Hill nonattainment area. EPA also believes that Chester County should be added to South Carolina's recommendation.

Columbia, SC Area

Note 32 - The State recommended parts of both MSA counties (Lexington and Richland) and a part of an adjacent county (Calhoun). The State recommended parts of both MSA counties (Lexington and Richland Counties) based on the MPO boundaries. Although the State included information based on the 11 criteria, the information was not adequate to support the partial county recommendation. Also, the MPO boundaries in Richland County only encompass 0.7 percent of the NOx emissions in Richland County, and do not include two large NOx sources. EPA believes the State should revise their recommendation to include the entire MSA or provide additional information to support their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Florence, SC Area

Note 33 The State recommended parts of both MSA counties (Darlington and Florence) based on the MPO boundaries. Although the State included information based on the 11 criteria, the information was not adequate to support the partial county recommendation. EPA believes the State should revise their recommendation to include the entire MSA or provide additional information to support their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Greenville-Spartanburg-Anderson, SC Area

Note 34 - The State recommended portions of four of the six MSA counties based on the MPO boundaries. They also recommended portions of two adjacent counties (Abbeville and Laurens). Although the State included information based on the 11 criteria, the information was not adequate to support the partial county recommendation. Furthermore, the recommendation for this area is not contiguous. Additionally, South Carolina did not recommend a violating MSA county (Cherokee) which is a 1-hour maintenance area or an adjacent violating county (Oconee). EPA believes that South Carolina should revise their recommendation to include all six of the MSA counties plus the adjacent counties, or provide documentation supporting their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance.

Augusta-Aiken, GA-SC (Interstate) Area

Note 36 - The State recommended the partial County of Aiken and a very small part of Edgefield based on the MPO boundaries. They did not recommend any part of Barnwell which is an adjacent violating county. EPA believes that South Carolina should revise their recommendation to include the MSA counties plus the adjacent violating county, or provide documentation supporting their recommendation. Additionally, the State should define the boundary of the partial county recommendation consistent with EPA's March 28, 2000, guidance. See Note 10 under Georgia for additional information on this area.

Tennessee - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Chattanooga, TN-GA (Interstate) Area - TN recommended 1 of 2 MSA counties in TN. GA did not recommend any MSA counties in GA.</p> <p>Hamilton County</p>	<p>Hamilton County</p>	<p>See Notes 11 and 37</p>
	<p>Counties Excluded by EPA and State**</p> <p>Marion County*</p>	<p>See Notes 11 and 37</p>
<p>Clarksville-Hopkinsville, TN-KY (Interstate) Area - TN did not recommend the 1 TN county in this MSA. KY recommended the 1 KY county</p>	<p>Montgomery County*</p>	<p>EPA believes the State should add Montgomery County to their recommendation</p> <p>See Note 38</p>
<p>Johnson City-Kingsport-Briston, TN-VA (Interstate) Area - TN recommended 1 of 5 counties in this MSA</p> <p>Sullivan County</p>	<p>Sullivan County</p>	<p>See Note 39</p>
	<p>Counties Excluded by EPA and State**</p> <p>Carter County* Hawkins County* Unicoi County* Washington County*</p>	<p>See Note 39</p>

<p>Knoxville, TN Area - TN recommended 4 of the 6 MSA counties, and 1 adjacent county</p> <p>Anderson County Blount County Knox County Sevier County Jefferson County - adjacent</p>	<p>Anderson County Blount County Loudon County* Knox County Sevier County Jefferson County - adjacent</p>	<p>EPA believes the State should add Loudon County to their recommendation</p> <p>See Note 40</p>
<p>Memphis, TN-AR-MS (Interstate) Area - TN recommended 1 of 3 TN MSA counties</p> <p>Shelby County</p>	<p><i>Counties Excluded by EPA and State**</i></p> <p>Union County*</p>	<p>EPA believes the State should add Tipton County to their recommendation</p> <p>See Note 41</p>
<p>Haywood County - TN recommended this county as nonattainment</p> <p>Haywood County</p>	<p><i>Counties Excluded by EPA and State**</i></p> <p>Fayette County*</p>	<p>EPA believes this county should be included in the Memphis nonattainment area</p> <p>See Note 41</p>

<p>Nashville, TN Area- TN recommended 5 of 8 MSA counties</p> <p>Davidson County Rutherford County Sumner County Williamson County Wilson County</p>	<p>Davidson County Rutherford County Sumner County Williamson County Wilson County</p>	<p>See Note 42</p>
	<p><i>Counties Excluded by EPA and State**</i></p> <p>Chatham County* Dickson County* Robertson County*</p>	<p>See Note 42</p>
<p>Lawrence County - TN recommended this non-MSA violating county</p> <p>Lawrence County</p>	<p>Lawrence County</p>	
<p>Putnam County - TN recommended this non-MSA violating county</p> <p>Putnam County</p>	<p>Putnam County</p>	

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Tennessee

Chattanooga, TN-GA (Interstate) Area

Note 37 - The State recommended one county (Hamilton) of the two counties in this MSA. Tennessee submitted supporting information based on the 11 criteria that purport to demonstrate that Marion County 1) has very low population density and low VMT and 2) is probably not contributing to the ozone problem in the Chattanooga area. See Note 11 for discussion related to the Georgia portion of the MSA.

Clarksville-Hopkinsville, TN-KY (Interstate) Area

Note 38 - The State did not recommend the Tennessee county in this MSA (Montgomery). EPA believes the State should add Montgomery County to their recommendation, or provide documentation that supports not including this county. Kentucky recommended the Kentucky County (Christian) in the MSA.

Johnson City-Kingsport-Bristol, TN-VA (Interstate) Area

Note 39 - The State recommended one (Sullivan) of the five Tennessee counties in this MSA. Tennessee submitted supporting information based on the 11 criteria that purport to demonstrate that Carter, Hawkins, Unicoi and Washington Counties 1) have very low population densities and low VMT and 2) are probably not contributing to the ozone problem in the area.

Knoxville, TN Area

Note 40 - The State recommended four of the six MSA counties (Anderson, Blount, Knox and Sevier) and one adjacent violating county (Jefferson). This recommendation includes the 1-hour ozone maintenance area. Tennessee submitted supporting information based on the 11 criteria that purport to demonstrate that Union County 1) has very low population density and low VMT and 2) is probably not contributing to the ozone problem in the area. However, EPA believes although Loudon County contains a non-violating monitor, the emissions in the county are sufficient to contribute to the nonattainment problem in the area. Therefore, Tennessee should add Loudon County to their recommendation or the State should provide additional justification to support their original recommendation.

Memphis, TN-AR-MS (Interstate) Area

Note 41 - The State recommended one of two MSA counties (Shelby) and recommended an adjacent violating county (Haywood) as a separate nonattainment area. This recommendation includes the 1-hour ozone maintenance area. Tennessee submitted supporting information based on the 11 criteria that purport to demonstrate that Fayette County 1) has very low population density and low VMT and 2)

is probably not contributing to the ozone problem in the area. However, the State did not provide adequate documentation to exclude the MSA county of Tipton which is located between Shelby and Haywood Counties, both of which are violating counties. EPA believes that Tipton County and the adjacent county of Haywood should be added to the nonattainment recommendation or provide additional justification to support their original recommendation. Neither Mississippi nor Arkansas recommended the counties of DeSoto or Crittenden County, respectively. Both of these counties are in the Memphis MSA and contain violating monitors. EPA believes these counties should be included in the Memphis nonattainment area.

Nashville, TN Area

Note 42 - The State recommended five of the eight counties (Davidson, Rutherford, Sumner, Williamson, and Wilson). This recommendation is the same as the 1-hour ozone maintenance area. Tennessee submitted supporting information based on the 11 criteria that purport to demonstrate that Cheatham, Dickson, and Robertson Counties 1) have very low population densities and low VMT and 2) are probably not contributing to the ozone problem in the area.

**Region 5's Initial Response
Regarding Designations for the 8-hour ozone NAAQS**

Illinois - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Chicago-Gary-Kenosha, IL-IN-WI Area	Chicago-Gary-Kenosha, IL-IN-WI Area	
Cook Co	Cook Co	
Du page Co	Du Page Co	
Lake Co	Lake Co	
McHenry Co	McHenry Co	
Kane Co	Kane Co	
Will Co	Will Co	
Kendall Co - part	Kendall Co - part	Consistent with 1 -hr NA area
Grundy Co - part	Grundy Co - part	Consistent with 1- hr NA area
	<i>Counties Excluded from the CMSA by EPA and State</i>	
	De Kalb Co	Relatively Low Emissions See Note 1.
	Kankakee Co	Relatively Low Emissions See Note 2.
		EPA's initial response is that Kenosha Co., Wisconsin is nonattainment as part of the Milwaukee-Racine, WI C/MSA. However, the Chicago area can not be redesignated unless the ozone monitoring data recorded in Kenosha County also supports attainment. See Note WI - 1.

US EPA ARCHIVE DOCUMENT

<p>St. Louis, MO-IL Area</p> <p>Madison Co Monroe Co St. Clair Co Jersey Co. State recommended attainment or separate nonattainment area.</p>	<p>St. Louis, MO-IL Area</p> <p>Madison Co Monroe Co St. Clair Co Jersey Co</p>	<p>Violating monitor and our analysis of the factors in the designation guidance shows relatively low emissions. However, our analysis is not conclusive that the area should be separated from the St. Louis area. See Note 3.</p>
	<p><i>Counties Excluded from the MSA by EPA and State</i></p> <p>Clinton Co**</p>	<p>Relatively Low Emissions. See Note 4.</p>
<p>Janesville - Beloit, WI Area</p> <p>State did not recommend county.</p>	<p>Janesville - Beloit, WI Area</p> <p>Winnebago Co* adjacent to Janesville- Beloit, WI MSA</p>	<p>See Note 5.</p>

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Illinois Notes

Chicago-Gary-Kenosha, IL-IN-WI CMSA

The presumptive boundaries in our 8-hour designation guidance include all of the counties in the CMSA including the entirety of 10 counties in the Illinois portion of the CMSA. Illinois recommended 6 of those counties as nonattainment and parts of two of the other counties. These notes explain EPA's initial response to the justification provided for excluding counties. It should also be noted that Kenosha County is part of the Chicago-Gary-Lake County CMSA. Wisconsin and Illinois agreed under the 1-hour designations that Kenosha County be part of the Milwaukee-Racine area. Under that agreement, the Chicago area cannot be redesignated for the 1-hour NAAQS unless the ozone monitoring data recorded in Kenosha County also supports attainment. EPA's initial response is that a similar agreement for the 8-hour ozone designations is needed and that with that agreement, Kenosha Co, WI

can be added to the Milwaukee-Racine area.

Note IL - 1 - De Kalb Co., IL - EPA's initial response is to consider Dekalb County, Illinois as attainment. The State submitted information which appears to support that the County has relatively low emissions, has low population density and degree of urbanization, and low growth. The State believes that urbanization information when coupled with mobile source information shows that the area is not substantially connected to the Chicago urban area.

Note IL - 2 - Kankakee Co., IL - EPA's initial response is to consider Kankakee County, Illinois as attainment. The State submitted information which appears to support that the County has relatively low to medium emissions, has low population density and low growth. The State believes that urbanization information when coupled with mobile source information shows that the county is not substantially connected to the Chicago urban area.

St. Louis, MO-IL MSA

Note IL - 3 - Jersey Co., IL - EPA's initial response is to consider Jersey County, Illinois as nonattainment as part of the St. Louis area. Jersey county has a monitor with a 1997 - 1999 8-hour ozone design value of 91 ppb and is in the St. Louis MSA. The State recommended attainment for the area and also added that if EPA decided it should be nonattainment, it should be a separate area from St. Louis. While, in a relative sense, the State believes that the County has very low emissions, has low population density and degree of urbanization, and low growth, our analysis to date does not conclusively indicate that Jersey County should be split from the nonattainment area as the State requested. The State believes that controls in the county may not be necessary and may not help this area achieve attainment faster and that the area will only be able to attain through regional controls. Based on the criteria in the 3/28/00 Seitz memo, Illinois should give further consideration to whether this county should be grouped together with the St. Louis MSA or whether there are compelling facts to support it as a separate nonattainment area.

Note IL - 4 - Clinton Co., IL - EPA's initial response is to consider Clinton County, Illinois as attainment. The State submitted information which appears to support that the County has relatively low emissions, has low population density and degree of urbanization, and low growth. The State believes that urbanization information when coupled with mobile source information shows that the county is not substantially connected to the St. Louis urban area.

Janesville - Beloit, WI Area

Note IL - 5 - Winnebago Co., IL - EPA's initial response is to consider adding this adjacent county to the Janesville-Beloit, WI MSA. Under the Clean Air Act, an area is nonattainment if the area is either not attaining the standard or the area is contributing to nonattainment in a downwind area. Winnebago is currently monitoring attainment, so it would not be designated nonattainment for that reason. However,

based on Region 5's analysis of the 11 criteria, it was found that Winnebago county has relatively high VMT and relatively moderate population density, population growth, VMT growth, total population, VOC emissions and meteorology. However, if it is shown that Rock County, Wisconsin will attain with NOx regulatory controls, then Winnebago County may be eligible to be designated attainment.

Indiana - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Chicago-Gary-Kenosha, IL-IN-WI CMSA</p> <p>Lake Co</p> <p>Porter Co</p>	<p>Chicago-Gary-Kenosha, IL-IN-WI CMSA</p> <p>Lake Co</p> <p>Porter Co</p>	
<p>Cincinnati-Hamilton, OH-KY-IN Area</p> <p>None</p>	<p>Cincinnati-Hamilton, OH-KY-IN Area</p> <p>None</p>	<p>Relatively low emissions. See Note 1.</p>
	<p><i>CMSA Counties Excluded by EPA and State**</i></p> <p>Dearborn Co</p> <p>Ohio Co</p>	<p>Part of Cincinnati-Hamilton, OH-KY-IN CMSA. Relatively low emissions See note 1.</p> <p>Part of Cincinnati-Hamilton, OH-KY-IN CMSA. Relatively very low emissions, low population, low population density, low commuting, and very low growth. See Note 1.</p>
<p>Evansville-Henderson, IN-KY MSA</p> <p>Vanderburgh Co</p> <p>Posey Co</p> <p>Warrick Co</p>	<p>Evansville-Henderson, IN-KY MSA</p> <p>Vanderburgh Co</p> <p>Posey Co</p> <p>Warrick Co</p>	

<p>Fort Wayne, IN Area</p> <p>Allen Co</p>	<p>Fort Wayne, IN Area</p> <p>Allen Co</p>	
	<p><i>MSA Counties Excluded by EPA and State**</i></p> <p>Adams Co</p> <p>De Kalb Co</p> <p>Huntington Co</p> <p>Wells Co</p> <p>Whitley Co</p>	<p>Relatively low emissions, low population, low density, and low growth.</p> <p>Relatively low emissions, low population, low density, and low growth.</p> <p>Relatively low emissions, low population, low density, and low growth.</p> <p>Relatively low emissions, low population, low density, and low growth.</p> <p>Relatively low emissions, low population, low density, and low growth.</p>
<p>Indianapolis, IN MSA</p> <p>Marion Co</p> <p>Boone Co</p> <p>Hamilton Co</p> <p>Madison Co</p> <p>Hancock Co</p> <p>Shelby Co</p> <p>Johnson Co</p> <p>Morgan Co</p> <p>Hendricks Co</p>	<p>Indianapolis, IN MSA</p> <p>Marion Co</p> <p>Boone Co</p> <p>Hamilton Co</p> <p>Madison Co</p> <p>Hancock Co</p> <p>Shelby Co</p> <p>Johnson Co</p> <p>Morgan Co</p> <p>Hendricks Co</p>	

La Porte Co Area La Porte Co	La Porte Co Area La Porte Co	1998-2000 AQ data may show area attaining.
Louisville, KY-OH Area Clark Co Floyd Co	Louisville, KY-OH Area Clark Co Floyd Co	
	<i>MSA Counties Excluded by EPA and State**</i> Harrison Co Scott Co	Relatively low emissions, low to moderate density, low volume of growth. Relatively low emissions, low to moderate density, low volume of growth.
Perry Co and Spencer Co Area None	Perry Co and Spencer Co Area None	State will provide additional analysis after 2000 data is available. Could be nonattainment based on 1998 - 2000 data. See Note 2.
South Bend, IN MSA & Elkhart Goshen, IN MSA St. Joseph Co Elkhart Co	South Bend, IN MSA & Elkhart Goshen, IN MSA St. Joseph Co Elkhart Co	

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Indiana Notes

Cincinnati-Hamilton, OH-KY-IN CMSA

Note IN - 1 - Dearborn Co. and Ohio Co., IN - EPA's initial response is to consider Dearborn and Ohio Counties, Indiana as attainment. The State submitted information which appears to support that

Dearborn County has relatively low VOC emissions, that NOx emissions will be controlled with NOx regulatory requirements, has relatively low population density, and low volume of growth. They also submitted information that Ohio County appears to have relatively very low emissions, low population, low population density, low commuting, and very low growth.

Perry and Spencer County Area

Note IN - 2 - Perry and Spencer Co., IN - Perry County has two years of ozone data for 1998 and 1999. EPA's initial response is to consider Perry County as attainment. However, after receipt of the quality assured data for 2000, Perry County will likely have three years of data showing nonattainment. EPA will use the most current quality assured data when making designations. If it is determined that Perry County is nonattainment, Spencer County may also be nonattainment. There are not any monitors in Spencer County, however, the monitor located in Perry County was sighted based on a Spencer County source and, if Perry County is nonattainment, Spencer County will be bordered on three sides by counties with monitors with design values above the standard. Indications are that both Spencer and Perry Counties are relatively rural areas and that the majority of their problem is caused by transport. Indiana has indicated that they will address this issue after the 2000 data has been quality assured.

Michigan - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
None	Detroit-Ann Arbor-Flint, MI C/MSA	Full C/MSA. Note 1 and 2.
	Genesee Co	
	Lapeer Co	
	Lenawee Co	
	Livingston Co	
	Macomb Co	
	Monroe Co	
	Oakland Co	
	St. Clair Co	
	Washtenaw Co	
	Wayne Co	
None	Grand Rapids-Muskegon-Flint, MI C/MSA	Full C/MSA. Note 1 and 2.
	Allegan Co	
	Kent Co	
	Muskegon Co	
	Ottawa Co	
None	Kalamazoo-Battle Creek, MI C/MSA	Full C/MSA. 1998-2000 AQ data may show area attaining. Note 1 and 2.
	Calhoun Co	
	Kalamazoo Co	
	Van Buren Co	

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None	Benton Harbor, MI MSA	Full MSA. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.
	Berrien Co	
None	Cass Co, MI	Full County. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.
None	Huron Co, MI	Full County. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. 1998-2000 AQ data may show area attaining. Note 1 and 2.
None	Mason Co, MI	Full County. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.

None	Benzie Co, MI	Full County. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.
None	Missaukee Co, MI	Full County. MDEQ may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. 1998-2000 AQ data may show area attaining. Note 1 and 2.

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Michigan Notes

Note MI - 1 - The full C/MSA and/or Counties are the presumed nonattainment area boundaries. EPA does not believe that it has enough information to exclude counties from the C/MSAs or portions of counties. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county or portion of county.

Note MI - 2 - EPA's initial response is to consider this area as nonattainment. However, if it can be shown that the area will attain with NOx regulatory requirements, then the area may be eligible for a classification that may not require implementation of controls beyond those already implemented in the county.

Ohio

<i>State Recommendation***</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Canton Area</p> <p>Stark Co</p>	<p>Canton - Massillon MSA</p> <p>Stark Co</p> <p>Carol Co*</p>	<p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. See note 1.</p>
<p>Cincinnati-Hamilton, OH-KY Area</p> <p>Butler Co</p> <p>Hamilton Co</p> <p>Clermont Co</p> <p>Warren Co</p> <p>Clinton Co - Adjacent</p>	<p>Cincinnati-Hamilton IN - OH-KY CMSA+</p> <p>Butler Co</p> <p>Hamilton Co</p> <p>Clermont Co</p> <p>Warren Co</p> <p>Brown Co*</p> <p>Clinton Co - Adjacent</p>	<p>Added adjacent down wind Clinton County.</p> <p>EPA does not believe that it has enough information to exclude counties from the CMSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. See note 2.</p>

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<p>Cleveland-Akron-Lorain CMSA</p> <p>Cuyahoga Co</p> <p>Lorain Co</p> <p>Medina Co</p> <p>Summit Co</p> <p>Portage Co</p> <p>Geauga Co</p> <p>Lake Co</p> <p>Ashtabula Co</p>	<p>Cleveland-Akron-Lorain CMSA</p> <p>Cuyahoga Co</p> <p>Lorain Co</p> <p>Medina Co</p> <p>Summit Co</p> <p>Portage Co</p> <p>Geauga Co</p> <p>Lake Co</p> <p>Ashtabula Co</p>	
<p>Columbus, Ohio MSA+</p> <p>Franklin Co</p> <p>Delaware Co</p> <p>Licking Co</p> <p>Madison Co</p> <p>Pickaway Co</p> <p>Fairfield Co</p> <p>Knox Co - Adjacent to MSA</p>	<p>Columbus, Ohio MSA+</p> <p>Franklin Co</p> <p>Delaware Co</p> <p>Licking Co</p> <p>Madison Co</p> <p>Pickaway Co</p> <p>Fairfield Co</p> <p>Knox Co - Adjacent to MSA</p>	<p>Added adjacent downwind Knox County.</p>
<p>Dayton-Springfield, Ohio MSA</p> <p>Miami Co</p> <p>Montgomery Co</p> <p>Clark Co</p> <p>Greene Co</p>	<p>Dayton-Springfield, Ohio MSA</p> <p>Miami Co</p> <p>Montgomery Co</p> <p>Clark Co</p> <p>Greene Co</p>	
<p>Huntington-Ashland, OH-KY-WV MSA</p> <p>Lawrence Co</p>	<p>Huntington-Ashland, OH-KY-WV MSA</p> <p>Lawrence Co</p>	

<p>Lima, OH Area</p> <p>Allen Co</p>	<p>Lima, OH MSA</p> <p>Allen Co</p> <p>Auglaize Co*</p>	<p>1998-2000 AQ data may show area attaining. See Note 3.</p> <p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. See Note 4.</p>
<p>Parkersburg-Marietta, WV-OH MSA</p> <p>Washington Co</p>	<p>Parkersburg-Marietta, WV-OH MSA</p> <p>Washington Co</p>	
<p>Steubenville Weirton, OH-WV</p>	<p>Steubenville Weirton, OH-WV MSA</p> <p>Jefferson Co*</p>	<p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. See Note 5.</p>
<p>Toledo, OH Area</p> <p>Lucas Co</p> <p>Wood Co</p>	<p>Toledo, OH MSA</p> <p>Lucas Co</p> <p>Wood Co</p> <p>Fulton Co*</p>	<p>1998-2000 AQ data may show area attaining. See Note 6.</p> <p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. See Note 7.</p>

<p>Wheeling, WV-OH Area</p>	<p>Wheeling, WV-OH MSA</p> <p>Belmont Co*</p>	<p>1998-2000 AQ data may show area attaining.</p> <p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.</p> <p>See Note 8.</p>
<p>Youngstown-Warren, OH Area</p> <p>Trumbull Co</p> <p>Mahoning Co</p>	<p>Youngstown-Warren, OH MSA</p> <p>Trumbull Co</p> <p>Mahoning Co</p> <p>Columbiana Co*</p>	<p>1 hour nonattainment area included Mercer County, PA.</p> <p>See note 9.</p> <p>EPA does not believe that it has enough information to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.</p> <p>See Note 9.</p>

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

****Ohio did not recommended designating any of their areas nonattainment. However they did provide us with an analysis based on air quality monitoring.

Ohio Notes

Canton-Massillon, OH MSA

Note OH - 1 - Carroll Co., OH - EPA's initial response is to consider Carroll County as nonattainment. The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, the CMSA is the larger of the two and includes Carroll County. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information

at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.

Cincinnati-Hamilton OH-KY CMSA+

Note OH - 2 - Brown Co., OH - EPA's initial response is to consider Brown County as nonattainment. The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, the CMSA is the larger of the two and includes Brown County. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the CMSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.

Lima, OH MSA

Note OH - 3 - Lima MSA - The Lima MSA may have attained with consideration of 1998 - 2000 data. If designations are based on 1998 - 2000 data, and the MSA did indeed attain, both Auglaize and Lima Counties would be designated attainment.

Note OH - 4 - Auglaize Co., OH - The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, since the area was never nonattainment for the 1-hour NAAQS, the CMSA counties, including Auglaize County, need to be considered. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. However, if designations are based on 1998 - 2000 data, the MSA may have attained with that data, in which case Auglaize would be designated attainment.

Steubenville Weirton, OH-WV MSA

Note OH - 5 - Jefferson Co., OH - The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, both areas include Jefferson County. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.

Toledo, OH MSA

Note OH - 6 - Toledo MSA - The Toledo MSA may have attained with consideration of 1998 - 2000 data. If designations are based on 1998 - 2000 data, and the MSA did indeed attain, Fulton, Lucas and Wood Counties would be designated attainment.

Note OH - 7 - Fulton Co., OH - The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, the CMSA is the larger of the two and includes Fulton County. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.

Wheeling, WV-OH MSA

Note OH - 8- Belmont Co., OH - The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, since the area was never nonattainment for the 1-hour NAAQS, the MSA counties, including Belmont County, need to be considered. The guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county. However, if designations are based on 1998 - 2000 data, the MSA may have attained with that data, in which case Belmont County would be designated attainment.

Youngstown-Warren, OH MSA

Note OH - 9 - Columbiana Co., OH - The 8-hour designation guidance establishes the C/MSA or 1 hour nonattainment area, whichever is larger as the presumptive nonattainment area. In this case, the MSA includes Trumbull, Mahoning and Columbiana County. The previous 1-hour nonattainment area includes Trumbull and Mahoning Counties, OH and Mercer County, Pennsylvania. Regarding Columbiana County, the guidance continues to explain that if it is appropriate to make an area smaller, 11 specific factors need to be considered. EPA does not believe that it has enough information at this time to exclude counties from the MSA. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county.

Regarding Mercer County, Pennsylvania, this county was originally part of the same 1-hour ozone nonattainment area, the Youngstown-Warren- Sharron Area, as Trumbull and Mahoning Counties, OH. Based on the criteria in the 3/28/00 Seitz memo, the State and Commonwealth should consider whether this county should be grouped together with the Youngstown-Warren MSA or whether there are compelling facts to support it as a separate nonattainment area.

Wisconsin - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
None	<p>Milwaukee-Racine, WI C/MSA</p> <p>Kenosha Co</p> <p>Milwaukee Co</p> <p>Ozaukee Co</p> <p>Racine Co</p> <p>Washington Co</p> <p>Waukesha Co</p>	<p>Full C/MSA. Note 1 and 2.</p> <p>Part of Chicago-Gary-Lake County, IL-IN CMSA. See Note 3.</p>
None	<p>Sheboygan, WI MSA</p> <p>Sheboygan Co</p>	<p>Full MSA. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.</p>
None	<p>Janesville - Beloit, WI Area</p> <p>Rock Co</p>	<p>Full MSA and adjacent/nearby counties. WDNR may want to consider whether these counties should be grouped together with adjacent or nearby counties or a MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.</p>

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	<p>Winnebago Co, IL - adjacent/nearby*</p> <p>Dane Co, WI - adjacent/nearby*</p>	<p>Relatively high VMT. relatively moderate population density, population growth, VMT growth, total population, VOC emissions. Meteorology implications. See Note IL - 5.</p> <p>Relatively high total population, VMT, population growth, and VMT growth. Relatively moderate VOC emissions. Meteorology implications for June and July 1995 days. See Note 4.</p>
<p>None</p>	<p>Manitowoc Co, WI</p>	<p>Full County. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.</p>
<p>None</p>	<p>Kewaunee Co, WI</p>	<p>Full County. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.</p>

None	Walworth Co, WI	<p>Full County. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area.</p> <p>1998-2000 AQ data may show area attaining. Note 1 and 2.</p>
None	Jefferson Co, WI	<p>Full County. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area.</p> <p>Note 1 and 2.</p>

None	<p>Door Co, WI</p> <p>Brown Co, WI - adjacent/nearby*</p> <p>Outagamie Co, WI - adjacent/nearby*</p> <p>Winnebago Co, WI - adjacent/nearby*</p>	<p>Full County. WDNR may want to consider whether this county should be grouped together with another adjacent or nearby county or MSA/CMSA or whether there are compelling facts to support it as an independent nonattainment area. Note 1 and 2.</p> <p>Relatively high VMT, and population growth. Relatively moderate population density, VOC emissions, VMT growth. Meteorology implications. See Note 5.</p> <p>Relatively moderate population growth. Meteorology implications. See Note 6.</p> <p>Relatively moderate VOC emissions, population growth. Meteorology implications. See Note 7.</p>
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*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

Wisconsin Notes

Note WI - 1 - The full C/MSA and/or Counties are the presumed nonattainment area boundaries. EPA does not believe that it has enough information to exclude counties from the C/MSAs or portions of counties. The State may want to consider analyzing information relevant to the 11 criteria to support exclusion of a county or portion of county.

Note WI - 2 - EPA's initial response is to consider this area as nonattainment. However, if it can be shown that the area will attain with NOx regulatory requirements, then the area may be eligible for a classification that may not require implementation of controls beyond those already implemented in the county.

Milwaukee-Racine, WI C/MSA

Note WI - 3 - Kenosha Co., WI - EPA's initial response is to consider adding this county to the Milwaukee-Racine area. Kenosha County is officially part of the Chicago-Gary-Lake County CMSA. However, Wisconsin and Illinois agreed under the 1-hour designations that Kenosha County be part of the Milwaukee-Racine area. Under that agreement, the Chicago area cannot be redesignated for the 1-hour NAAQS unless the ozone monitoring data recorded in Kenosha County also supports attainment. EPA's initial response is that a similar agreement for the 8-hour ozone designations is needed and that with that agreement, Kenosha Co, WI be added to the Milwaukee-Racine area.

Janesville-Beloit, WI Area

Note WI - 4 - Dane Co. - Relatively high total population, VMT, population growth, and VMT growth. Relatively moderate VOC emissions. Meteorology implications for June and July 1995 days. However, if it is shown that Rock County, Wisconsin will attain with NOx regulatory controls, then Dane County may be eligible to be designated attainment.

Door County, WI

Note WI - 5 - Brown Co., WI - EPA's initial response is to consider adding this adjacent county to the Door County area. Based on Region 5's analysis of the 11 criteria, it was found that Brown county has relatively high VMT and population growth and relatively moderate population density, VOC emissions, VMT growth and meteorology which indicates a potential impact on Door County, WI. However, if it is shown that Door County will attain with NOx regulatory requirements, then Brown County may be eligible to be designated attainment.

Note WI - 6 - Outagamie Co., WI - EPA's initial response is to consider adding this adjacent county to the Door County area. Based on Region 5's analysis of the 11 criteria it was found that Outagamie County has relatively moderate population growth and meteorology which indicates a potential impact on Door County, WI. However, if it is shown that Door County will attain with NOx regulatory requirements, then Outagamie County may be eligible to be designated attainment.

Note WI - 7 - Winnebago Co., WI - EPA's initial response is to consider adding this adjacent county to the Door County area. Based on Region 5's analysis of the 11 criteria it was found that Winnebago County, WI has relatively moderate VOC emissions, population growth and meteorology which indicates a potential impact on Door County, WI. However, if it is shown that Door County will attain with NOx regulatory requirements, then Winnebago County may be eligible to be designated attainment.

Region 6

Arkansas

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>All areas in State except Crittenden County = unclassifiable/attainment</p> <p>Crittenden County = Designation is inappropriate at this time</p>	<p>Memphis, TN-AR-MS MSA</p> <p>Crittenden County*</p>	<p>See Note 1</p> <p>See also TN and MS state tables</p>

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

Arkansas Notes

Memphis Area

Note 1 - Crittenden County, which is part of the Memphis, TN-AR-MS MSA, was violating the 8-hour ozone NAAQS based on 1997-1999 air quality data. Therefore, consistent with EPA's March 28, 2000, guidance on ozone designations, our initial response is to include Crittenden County in the nonattainment boundary for the Memphis area. (See the Region 4 tables for EPA's initial response regarding Memphis area counties located in Tennessee and Mississippi.)

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Louisiana

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
All areas in the State unclassifiable		
	<p>Baton Rouge (1-Hour) Nonattainment Area</p> <p>East Baton Rouge Parish*</p> <p>West Baton Rouge Parish*</p> <p>Ascension Parish*</p> <p>Iberville Parish*</p> <p>Livingston Parish*</p> <p>Pointe Coupee Parish - Adjacent*</p>	<p>Large NOx emissions (See Note 1)</p>
	<p>New Orleans MSA</p> <p>Orleans Parish*</p> <p>St. Bernard Parish*</p> <p>St. James Parish*</p> <p>St. Charles Parish*</p> <p>Jefferson Parish*</p> <p>Plaquemines Parish*</p> <p>St. John-the-Baptist Parish*</p> <p>St. Tammany Parish*</p>	
	<p>Shreveport-Bossier City MSA</p> <p>Bossier Parish*</p> <p>Caddo Parish*</p> <p>Webster Parish*</p>	
	<p>Lake Charles MSA</p> <p>Calcasieu Parish*</p>	

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<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
	<p>Houma MSA</p> <p>Lafourche Parish*</p> <p>Terrebonne Parish*</p>	

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

Louisiana Notes

The presumptive nonattainment area boundary outlined in EPA's March 28, 2000, 8-hour ozone designations guidance is the larger of the MSA/CMSA or the current 1-hour ozone nonattainment boundary, plus any additional counties that contribute to nonattainment in a nearby area. Because Louisiana recommended all areas in the State as "unclassifiable" and did not address the 11 factors outlined in the guidance, our initial response is to include the larger of the MSA/CMSA or current 1-hour ozone nonattainment area, as well as any surrounding counties we believe are contributing to the area's nonattainment problem. However, we may consider a smaller boundary if the State provides supporting information addressing the 11 factors outlined in the guidance.

Baton Rouge Area

Note 1 - Pointe Coupee Parish - In addition to the 5 parishes comprising the current 1-hour ozone nonattainment area, EPA's initial response is to recommend adding Pointe Coupee Parish to the Baton Rouge 8-hour ozone nonattainment area based on significant stationary source NOx emissions, meteorology which indicates a potential impact on the Baton Rouge area, and no regional NOx control program.

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Oklahoma

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
All areas in the State unclassifiable/attainment		
	Tulsa MSA Tulsa County* Rogers County* Wagoner County* Creek County* Osage County* Muskogee County - Adjacent*	Large NOx emissions (see Note 1)
	Oklahoma City MSA Oklahoma County* Cleveland County* McClain County* Pottawatomie County* Canadian County* Logan County*	Attaining based on prelim. 1998-2000 data (see Note 2)

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

Oklahoma Notes

The presumptive nonattainment area boundary outlined in EPA's March 28, 2000, 8-hour ozone designations guidance is the larger of the MSA/CMSA or the current 1-hour ozone nonattainment boundary, plus any additional counties that contribute to nonattainment in a nearby area. Because Oklahoma recommended all areas in the State as "unclassifiable/attainment" and did not address the 11 factors outlined in the guidance, our initial response is to include the larger of the MSA/CMSA or current 1-hour ozone nonattainment area, as well as any surrounding counties we believe are contributing to the

area's nonattainment problem. However, we may consider a smaller boundary if the State provides supporting information addressing the 11 factors outlined in the guidance.

Tulsa Area

Note 1 – Muskogee County – In addition to the 5 counties comprising the Tulsa MSA, EPA's initial response is to recommend adding Muskogee County to the Tulsa 8-hour ozone nonattainment area based on significant stationary source NOx emissions, meteorology which indicates a potential impact on the Tulsa area, and no regional NOx control program.

Oklahoma City Area

Note 2 – Although the Oklahoma City area was violating the 8-hour ozone NAAQS based on 1997-1999 data, preliminary 1998-2000 data indicate that the area may now be in compliance with the standard. If designations are based on 1998-2000 data and the area did, indeed, attain, the Oklahoma City area may be eligible to be designated attainment.

Texas

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Dallas-Ft. Worth Area</p> <p>Dallas, Tarrant, Denton, Collin Counties-nonattainment</p> <p>Ellis, Parker, Johnson, Kaufman, Rockwall Counties-unclassifiable</p> <p>Hood, Hunt, Henderson Counties-attainment</p>	<p>Dallas-Ft. Worth C/MSA</p> <p>Dallas County</p> <p>Tarrant County</p> <p>Denton County</p> <p>Collin County</p> <p>Ellis County*</p> <p>Parker County*</p> <p>Johnson County*</p> <p>Kaufman County*</p> <p>Rockwall County*</p> <p>Hood County*</p> <p>Henderson County*</p> <p>Hunt County*</p>	
<p>Tyler and Longview Areas unclassifiable</p>	<p>Northeast Texas Area</p> <p>Smith County*</p> <p>Upshur County*</p> <p>Gregg County*</p> <p>Harrison County*</p> <p>Rusk County - Adjacent*</p>	<p>EPA suggests combining the Tyler and Longview-Marshall MSAs (see Note 1)</p> <p>Large NOx emissions (see Note 2)</p>

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<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
San Antonio Area unclassifiable	San Antonio MSA Bexar County* Comal County* Wilson County* Guadalupe County*	
Austin Area unclassifiable	Austin MSA Travis County* Hays County* Caldwell County* Bastrop County* Williamson County* Milam County - Adjacent* Fayette County - Adjacent*	Large NOx emissions (see Note 3) Large NOx emissions (see Note 4)
Houston/Galveston Area Harris County Montgomery County Brazoria County Fort Bend County Waller County Chambers County Galveston County Liberty County	Houston-Galveston-Brazoria C/MSA Harris County Montgomery County Brazoria County Fort Bend County Waller County Chambers County Galveston County Liberty County	

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<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Beaumont-Port Arthur Area	Beaumont-Port Arthur MSA	
Hardin County	Hardin County	
Jefferson County	Jefferson County	
Orange County	Orange County	

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

Texas Notes

The presumptive nonattainment area boundary outlined in EPA's March 28, 2000, 8-hour ozone designations guidance is the larger of the MSA/CMSA or the current 1-hour ozone nonattainment boundary, plus any additional counties that contribute to nonattainment in a nearby area. Because Texas recommended either "unclassifiable" or "attainment" for several areas (i.e., Dallas-Ft. Worth (in part), Longview, Tyler, San Antonio and Austin) and did not address the 11 factors outlined in the guidance, our initial response is to include the larger of the MSA/CMSA or current 1-hour ozone nonattainment area, as well as any surrounding counties we believe are contributing to the area's nonattainment problem. However, we may consider a smaller boundary if the State provides supporting information addressing the 11 factors outlined in the guidance.

Northeast Texas Area

Note 1 - EPA's initial response is to consider combining the Longview-Marshall and Tyler MSAs. This larger boundary would coincide with the Flexible Attainment Region (FAR) boundary currently being followed for air quality planning purposes.

Note 2 - Rusk County - EPA's initial response is to consider adding this county to the Northeast Texas nonattainment area based on significant stationary source NOx emissions, meteorology which indicates a potential impact on the Longview area, and uncertainty as to whether the large NOx emitter in the county (an electric generating unit) will be controlling its emissions under Texas' regional NOx strategy.

Austin Area

Note 3 - Milam County - EPA's initial response is to consider adding this county to the Austin nonattainment area based on significant stationary source NOx emissions and meteorology which indicates a potential impact on the Austin area. (EPA recognizes that the aluminum smelter/electric generating unit in the county is targeted to achieve a 30% emission reduction pursuant to a TNRCC board order; however, the facility will still have substantial (post-control) emissions.)

Note 4 - Fayette County - EPA's initial response is to consider adding this county to the Austin nonattainment area based on significant stationary source NOx emissions, meteorology which indicates a potential impact on the Austin area, and uncertainty as to whether the large NOx emitter in the county (an electric generating unit) will be controlling its emissions under Texas' regional NOx strategy.

pre-decisional
pre-designation
materials

Region 7

Missouri

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Kansas City Area - MO recommended the three counties which are part of the maintenance area</p> <p>Platte County Clay County Jackson County</p>	<p>Kansas City, MO-KS MSA</p> <p>Platte Co. Clay Co. Jackson Co. Clinton Co.*</p> <p>Ray Co.*</p> <p>Lafayette Co.*</p> <p>Cass Co.*</p>	<p>See Note 1.</p> <p>Within a transport corridor. See Note 2</p> <p>Within a transport corridor. See Note 3.</p> <p>Within a transport corridor. See Note 4.</p> <p>Emissions, growth, within a transport corridor. See Note 5.</p>
<p>See Kansas for recommendations regarding the counties in the rest of the MSA.</p>		
<p>St. Louis Area - MO recommended the current 1-hour ozone nonattainment area</p> <p>Franklin County Jefferson County St. Charles County St. Louis County St. Louis City</p>	<p>St. Louis, MO-IL MSA</p> <p>Franklin Co. Jefferson Co. St. Charles Co. St. Louis Co. St. Louis City Lincoln Co.*</p> <p>Warren Co.*</p> <p>Ste. Genevieve Co.* - adjacent St. Francois Co.* - adjacent</p>	<p>See Note 1.</p> <p>Within a transport corridor. See Note 6.</p> <p>Within a transport corridor. See Note 7.</p> <p>Monitored violation ('97-'99 & '99-'00). See Note 8.</p> <p>Representative air quality data. See Note 9.</p>
<p>See Illinois for recommendations regarding the counties in the rest of the MSA.</p>		

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*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Note 1 - In general, the geographic extent of areas experiencing elevated levels of ozone with respect to the revised ozone standard is greater than that under previous standard. This requires a more comprehensive examination of the factors influencing ozone concentrations over these broad areas. EPA is carefully considering the information the states have submitted in support of their recommendations, but has reached no firm conclusions with regard to areas which will be designated nonattainment. EPA emphasizes that the information in this report represents the Agency's preliminary views based on the information that has been gathered to date. EPA will continue to discuss this and any additional information that becomes available which may better define those for which a nonattainment designation is appropriate. At least 120 days prior to publication in the Federal Register, we will notify the states of the designations we intend to promulgate. During that time the states may further comment on the designations proposed by the Agency.

The notes below summarize the data pertaining those counties, or portions thereof, that EPA is considering designating nonattainment in addition to those recommended by the states. In general, EPA's initial responses for the Region 7 states are consistent with the presumptive nonattainment boundaries discussed in our March 28, 2000 guidance, i.e., Metropolitan Statistical Areas (MSA). Under current standards, an MSA includes at least one city with 50,000 or more inhabitants, or a Census Bureau-defined urbanized area (of at least 50,000 inhabitants), and a total metropolitan population of at least 100,000 (75,000 in New England).

Under the standards, the county (or counties) that contains the largest city becomes the "central County" (counties), along with any adjacent counties that have at least 50 percent of their population in the urbanized area surrounding the largest city. Additional "outlying counties" are included in the MSA if they meet specified requirements of commuting to the central counties and other selected requirements of metropolitan character (such as population density and urban percentages).

Note 2 - Clinton County, MO - Clinton County is part of the Kansas City MSA. The data submitted by Missouri indicate Clinton County contributes few ozone precursor emissions to the airshed. However, a review of local wind data and air quality modeling results suggest that Clinton County may occasionally experience ozone concentrations near the level of the standard as a result of transport. Currently, there are no ozone measurements available for Clinton County to confirm or disprove such a hypothesis. EPA and Missouri are exploring monitoring options which would be representative of air quality in Clinton and the surrounding counties.

Note 3 - Ray County, MO - Ray County is part of the Kansas City MSA. The data submitted by Missouri indicate Ray County contributes few ozone precursor emissions to the airshed. However, a review of local wind data and air quality modeling results suggest that Ray County may occasionally

experience ozone concentrations near the level of the standard as a result of transport. Currently, there are no ozone measurements available for Ray County to confirm or disprove such a hypothesis. EPA and Missouri are exploring monitoring options which could obtain data that would be representative of air quality in Ray and the surrounding counties.

Note 4 - Lafayette County, MO - Lafayette County is part of the Kansas City MSA. According to Missouri, there are few industrial emissions sources in the County and the area is largely unpopulated. However, over 1.5 million vehicle miles are traveled in Lafayette County on a daily basis. Accordingly, motor vehicles contribute approximately 5 tons of ozone precursor emissions to the area's daily pollutant load. In addition, wind, air quality, and modeling data suggest that Lafayette County may be the recipient of transported ozone and ozone precursors.

Note 5 - Cass County, MO - Cass County is part of the Kansas City MSA, has a population of 83,099, and nearly 2.5 million vehicles miles are traveled on the County's roads each day. The northern portion of the County is part of the contiguous metropolitan area. Its population is estimated to have increased by 30 percent between 1990 and 1999. Continued growth is expected, particularly in the northern portion of the county. Wind, air quality, and modeling data suggest that Cass County may be the recipient of transported ozone and ozone precursors.

Note 6 - Lincoln County, MO - Lincoln County is part of the St. Louis MSA. It is a largely rural county located to the northwest of the urban core. Its population represents three percent of the MSA's. Precursor emissions within the County amount to approximately 10 tons per day. No ozone monitoring is currently conducted in Lincoln County. However, air quality modeling results suggest that ozone concentrations in the area are occasionally elevated to levels near the standard which suggests further analysis of transport is warranted.

Note 7 - Warren County, MO - Warren County is part of the St. Louis MSA. It is a largely rural county located due west of the urban core. Its population represents one percent of the MSA's. Precursor emissions within the county amount to approximately 10 tons per day. No ozone monitoring is currently conducted in Warren County. However, air quality modeling results suggest that ozone concentrations in the area are occasionally elevated to levels near the standard which suggests further analysis of transport is warranted.

Note 8 - Ste. Genevieve County, MO - Ste. Genevieve County is adjacent to the St. Louis MSA. It is a largely rural county located south of the urban core. Violations of the ozone standard have been recorded near the Ste. Genevieve/St. Francois border. Further investigation of transport corridors is warranted.

Note 9 - St. Francois County, MO - St. Francois County is adjacent to the St. Louis MSA. It is a largely rural county located south of the urban core. Violations of the ozone standard have been recorded near the Ste. Genevieve/St. Francois border. Further investigation of transport corridors is warranted.

Kansas

<i>State recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Kansas City Area - KS recommended the two counties which are part of the maintenance area</p> <p>Johnson County Wyandotte County</p>	<p>Kansas City, MO-KS MSA</p> <p>Johnson Co. Wyandotte Co. Leavenworth Co.*</p> <p>Miami Co.*</p> <p>Douglas Co. - Adjacent*</p>	<p>See Note 1.</p> <p>Within a transport corridor. See Note 2.</p> <p>Within a transport corridor. See Note 3.</p> <p>Emissions contribution, projected growth, possible VMT linkage. See Note 4.</p>
<p>See Missouri for recommendations regarding the counties in the rest of the MSA.</p>		

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

Note 1 - In general, the geographic extent of areas experiencing elevated levels of ozone with respect to the revised ozone standard is greater than that under previous standard. This requires a more comprehensive examination of the factors influencing ozone concentrations over these broad areas. EPA is carefully considering the information the states have submitted in support of their recommendations, but has reached no firm conclusions with regard to areas which will be designated nonattainment. EPA emphasizes that the information in this report represents the Agency's preliminary views based on the information that has been gathered to date. EPA will continue to discuss this and any additional information that becomes available which may better define those for which a nonattainment designation is appropriate. At least 120 days prior to publication in the Federal Register, we will notify the states of the designations we intend to promulgate. During that time the states may further comment on the designations proposed by the Agency.

The notes below summarize the data pertaining those counties, or portions thereof, that EPA is considering designating nonattainment in addition to those recommended by the states. In general, EPA's initial responses for the Region 7 states are consistent with the presumptive nonattainment boundaries discussed in our March 28, 2000 guidance, i.e., Metropolitan Statistical Areas (MSA).

Under current standards, an MSA includes at least one city with 50,000 or more inhabitants, or a Census Bureau-defined urbanized area (of at least 50,000 inhabitants), and a total metropolitan population of at least 100,000 (75,000 in New England).

Under the standards, the county (or counties) that contains the largest city becomes the "central County" (counties), along with any adjacent counties that have at least 50 percent of their population in the urbanized area surrounding the largest city. Additional "outlying counties" are included in the MSA if they meet specified requirements of commuting to the central counties and other selected requirements of metropolitan character (such as population density and urban percentages).

Note 2 - Leavenworth County, KS - Leavenworth County is part of the Kansas City MSA. It is a largely rural county to the west of the urban core. Its population and industrial centers are primarily situated in the northeast corner of the county. Although no ozone monitoring is currently conducted in Leavenworth County, air quality modeling results suggest at least portions of the County experience ozone levels which violate the 8-hour ozone standard. These modeling results suggest that further investigation is warranted. EPA plans to further evaluate transport corridors and is exploring monitoring options in conjunction with the State which would obtain data that would be representative of air quality in Leavenworth and the surrounding counties.

Note 3 - Miami County, KS - Miami County is part of the Kansas City MSA. It is a largely rural county south of the urban core. About one million vehicle miles are traveled in Miami County each day. Ozone precursor emissions amount to approximately 25 tons per day and summer winds often exhibit southerly flow. This suggests there is some linkage between emissions in Miami County and ozone levels in the Kansas City MSA. In addition, there is some evidence that Miami County is in a transport corridor which receives ozone and ozone precursors from sources farther to the south. Ozone concentrations near the standard are occasionally recorded in Linn County, Kansas, which is the next county south of Miami.

Note 4 - Douglas County, KS - Douglas County is the sole county within the Lawrence, Kansas, MSA. It is adjacent to the Kansas City MSA. Its population increased by 20 percent between 1990 and 1999. From 1995 through 1999, new housing construction averaged 1,013 units per year. Approximately 2.3 million vehicle miles are traveled in Douglas County each day. Approximately 83 tons of ozone precursors are emitted within the County each day. More than half of these emissions come from elevated sources. Wind data suggest that further analysis of potential impacts of emissions from Douglas County on downwind air quality is warranted.

Region 9

California - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Los Angeles Area</p> <p>South Coast Air Basin</p> <p>Los Angeles Co (including Catalina and San Clemente Islands) (Part)</p> <p>Orange Co</p> <p>San Bernardino Co (Part)</p> <p>Riverside Co (Part)</p>	<p>South Coast Air Basin</p> <p>Los Angeles Co (including Catalina and San Clemente Islands) (Part)</p> <p>Orange Co</p> <p>San Bernardino Co (Part)</p> <p>Riverside Co (Part)</p>	<p>Remaining portion of Los Angeles County is included in the Antelope Valley nonattainment area. Boundary is consistent with the 1-hour ozone standard.</p> <p>Central San Bernardino County is included in the Western Mojave nonattainment area. Boundary is consistent with the 1-hour ozone standard.</p> <p>Central Riverside County is included in the Coachella Valley nonattainment area. Boundary is consistent with the 1-hour ozone standard.</p>
<p>Western Mojave Desert</p> <p>San Bernardino Co (Part)</p>	<p>Western Mojave Desert***</p> <p>San Bernardino Co (Part)</p>	
<p>Antelope Valley</p> <p>Los Angeles County (Part)</p>	<p>Antelope Valley***</p> <p>Los Angeles County (Part)</p>	<p>Remaining portion of Los Angeles County is included in the South Coast Air Basin nonattainment area.</p>

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California - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Coachella Valley Riverside County (Part)</p>	<p>Coachella Valley*** Riverside County (Part as proposed) Plus all of Joshua Tree National Park.*</p>	<p>National Park. See Note 1.</p>
<p>Ventura Ventura Co</p>	<p>Ventura Ventura Co (Part)</p>	<p>Includes the continental portion of Ventura County.</p>
	<p><i>Counties Excluded by EPA and State**</i> San Bernardino (Part)* Riverside (Part)* Ventura (Part)*</p>	<p>Low emissions. See Note 2. Low emissions. See Note 1. Excludes Anacapa and San Nicolas Islands.</p>
<p>Sacramento Region Sacramento Co Yolo Co. Solano Co (Part) El Dorado Co (Part) Placer Co (Part)</p>	<p>Sacramento Region Sacramento Co Yolo Co. Solano Co (Part) El Dorado Co (Part) Placer Co (Part)</p>	<p>Partial counties are consistent with the 1-hour ozone boundaries. Remaining portion of Solano Co is part of the SF Bay Area nonattainment area.</p>
	<p><i>Counties Excluded by EPA and State**</i> El Dorado Co (Part)* Placer Co (Part)*</p>	<p>Topography. See Note 3. Topography. See Note 3.</p>

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California - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>Western Nevada Co Nevada Co (Part)</p>	<p>Western Nevada Co Nevada Co (Part) <i>Counties Excluded by EPA and State**</i> Nevada Co (Part)*</p>	<p>Topography. See Note 3.</p>
<p>San Joaquin Valley San Joaquin Co Stanislaus Co Merced Co Madera Co Fresno Co Kings Co Tulare Co Kern Co (Part)</p>	<p>San Joaquin Valley San Joaquin Co Stanislaus Co Merced Co Madera Co Fresno Co Kings Co Tulare Co Kern Co (Part)</p>	<p>Most of the remaining portion of Kern County is included in the Eastern Kern County nonattainment area. See Note 4.</p>
<p>Eastern Kern County Kern Co (Part)</p>	<p>Eastern Kern County Kern Co (Part) <i>Counties Excluded by EPA and State**</i> Kern Co (Part—China Lake Portion) *</p>	<p>Topography. See Note 4.</p>

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California - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
<p>San Francisco Bay Area</p> <p>Marin Co</p> <p>Sonoma Co (Part)</p> <p>Napa Co</p> <p>Solano Co (Part)</p> <p>Contra Costa Co</p> <p>Alameda Co</p> <p>Santa Clara Co</p> <p>San Francisco Co</p> <p>San Mateo Co</p>	<p>San Francisco Bay Area</p> <p>Marin Co</p> <p>Sonoma Co (Part)</p> <p>Napa Co</p> <p>Solano Co (Part)</p> <p>Contra Costa Co</p> <p>Alameda Co</p> <p>Santa Clara Co</p> <p>San Francisco Co</p> <p>San Mateo Co</p> <p><i>Counties Excluded by EPA and State**</i></p> <p>Sonoma (Part)*</p>	<p>Remaining portion of Solano County is part of the Sacramento Region nonattainment area. Boundary is consistent with the 1-hour ozone boundary.</p> <p>Population density. See Note 5.</p>
<p>San Diego County</p> <p>San Diego Co</p>	<p>San Diego County</p> <p>San Diego Co</p>	
<p>Imperial County</p> <p>Imperial Co</p>	<p>Imperial County</p> <p>Imperial Co</p>	
<p>Shasta County</p> <p>Shasta Co</p>	<p>Shasta County</p> <p>Shasta Co</p>	
<p>Tehama Co</p> <p>Tehama Co</p>	<p>Tehama Co</p> <p>Tehama Co</p>	

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California - Further Discussion with Regional Office Warranted

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Central Mountain Counties Amador Co Calaveras Co	Central Mountain Counties Amador Co Calaveras Co	
Southern Mountain Counties Tuolumne Co Mariposa Co	Southern Mountain Counties Tuolumne Co Mariposa Co	
	Sutter Buttes Sutter Co (Part)*	Violating monitor at elevation. See Note 6.
	Counties Excluded by EPA and State** Sutter Co (Part)* Yuba Co (Part)*	Violating monitor at elevation. See Note 6. Violating monitor at elevation. See Note 6.

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Splitting C/MSAs - California recommended splitting a number of violating C/MSAs into multiple nonattainment areas because of circumstances unique to the State. California is a state large in size with numerous air basins separated by deserts and mountain ranges. The geography and meteorology of the air basins is substantially varied. The location and types of emission sources, transportation corridors, and commute patterns do not fit well within the C/MSA boundaries. In order to effectively address air quality problems that differ in type and degree, the State relies on local air pollution control districts to implement State and Federal air pollution control laws. The boundaries for the air pollution control districts were established by the State in the 1960's precisely to address the unique air quality problems in California and are more consistent with air quality planning factors such as population centers, industrial development, stationary and mobile emission control programs, and pollutant transport than the C/MSA boundaries. For these reasons, the State gave more deference to the air district boundaries than the C/MSA boundaries when establishing the existing 1-hour ozone nonattainment areas and recommending the new 8-hour ozone nonattainment areas.

Another situation unique to California is that the State has adopted and is implementing its own ozone air quality standard, and air quality implementation plans are already required to be developed by the local air districts every three years. Therefore, as a practical matter, it makes more sense to default to the State preference for air district boundaries where possible rather than the C/MSA boundaries.

Finally the State is developing a Memorandum of Agreement with EPA committing to package development of the local air districts' attainment SIPs into Northern and Southern California modeling domains for purposes of examining transport and attainment planning. The State has responsibility for intrastate ozone and ozone precursor transport in California and will ensure that the individual air district SIPs demonstrate attainment in all areas.

Notes

Region 9

Note 1 - Riverside Co., CA - EPA believes that Joshua Tree National Park should be designated nonattainment for a number of reasons, including recorded exceedances in the western portion of the park by a regional scale monitor, the park's classification as a Class II Area, the lack of geographic features in the Park that would justify dividing the park in any way, and a request by the Department of the Interior to designate the park nonattainment. At this time, EPA is not moving the boundary all the way to the county's eastern border, as the eastern portion of Riverside Co has low population density, few emissions sources, little growth, and no monitoring data.

Note 2 - San Bernardino Co., CA - EPA will consider the State's recommendation for a partial county since it is consistent with the 1-hour nonattainment boundary and because the eastern and northern portions of San Bernardino Co have low population density, few emissions sources, little growth, and no monitoring data.

Note 3 - El Dorado Co., Placer Co., Nevada Co., CA - EPA will consider the State's recommendation for partial counties since the three counties are divided by the Sierra Nevada Mountains, and the eastern portions have low population density, few emissions sources, little growth, and no monitored exceedances.

Note 4 - Kern Co., CA - EPA will consider the State recommendation that it is appropriate to divide Kern Co along the Tehachapi Mountains. EPA will consider whether it is appropriate to exclude the Indian Wells Valley portion of Kern Co. from the Eastern Kern Co nonattainment area given the geographic features of the area.

Note 5 - Sonoma Co., CA - EPA will consider the State's recommendation for a partial county because the northern portion of Sonoma Co has low population density, is beyond the commuting area, and has no monitored exceedances.

Note 6 - Sutter Co., CA - A monitor located at Sutter Buttes has recorded violations of the 8-hour ozone standard at approximately a 2000' elevation. Monitors at lower elevation (valley floor) are showing compliance. This is a unique mountain peak in the middle of a large valley. Because the exceedances are due to upwind transport, EPA recommends that the nonattainment area be limited in size around the Sutter Buttes monitor.

Nevada

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
Entire State either attainment or unclassifiable.	Entire State either attainment or unclassifiable. See Note 1.	

Notes

Region 9

Nevada

Note 1 - Clark Co., NV - EPA will consider the State's recommendation in the context of 1997-1999 air quality data. However, when preliminary air quality data for 2000 are taken into account, Clark Co appears to be in violation of the 8-hour ozone standard. EPA believes that Nye Co, NV and Mohave Co, AZ, which are part of the presumptive CMSA boundary, may be excluded from the nonattainment area due to the size of the area, population density, low emissions, and commute patterns.

Arizona

<i>State Recommendation</i>	<i>RO Initial Response</i>	<i>Comments</i>
None	Maricopa Co*	Presumptive MSA. Excludes Indian lands. See Note 1.
	Pinal Co*	Presumptive MSA. Excludes Indian lands. See Note 1.

Notes

Region 9

Arizona

Note 1 - Maricopa and Pinal Cos, AZ - Additional data are needed from the State to determine whether the boundaries should remain as the default MSA or made either larger or smaller in accordance with EPA guidance. Designations on Indian lands is being addressed through a separate process.

*County or part county not recommended by State in the C/MSA and any adjacent county added by EPA.

**Counties or part counties EPA and State excluded from C/MSA or significant adjacent counties excluded.

***Western Mojave Desert, Antelope Valley, and Coachella Valley comprise the SE Desert 1-hour nonattainment area.