

US EPA ARCHIVE DOCUMENT

Sharon Reinders  
USEPA Mailroom  
Research Triangle Park, NC 27711

August 19, 2003

Dear Ms. Reinders,

As organizations representing Ohio citizens, we urge the US EPA to significantly expand Ohio EPA's recommended non-attainment designations for the 8-hour ozone standard. The Ohio EPA has taken a short-sighted, narrow approach to non-attainment designations within the state that undermines efforts to reduce ozone pollution. Our recommended non-attainment designations are listed in Attachment 1.

The most striking omission is Ohio EPA's recommendations to exclude Fulton, Brown, Carroll, Auglaize, and Belmont counties from designation. This is directly contrary to US EPA's long-standing boundary guidance. Specifically, these five counties are all part of MSA (Metropolitan Statistical Areas) with one or more counties with monitors that indicate unacceptable ozone levels. Based on EPA's March 28, 2003 Boundary Guidance, these counties should be included unless the state provides scientifically sound justification for exclusion. Ohio EPA's recommendations fail to provide that justification.

In addition, the state has long overlooked air quality problems in Champaign County. The county is located between several non-attainment areas, but because Champaign County has no monitors, it is considered to be 'unclassifiable' by the Ohio EPA. The town of Urbana, Ohio is within the limits of Champaign County and is home to many heavily polluting facilities that emit pollutants that contribute to ozone formation. In addition, Champaign County is adjacent to and downwind of Miami, Montgomery, and Clark counties that are known to have high ozone levels. Based on this information, Champaign County should be included in the Dayton/Springfield MSA.

Lastly, by narrowly drawing non-attainment lines, the state of Ohio is putting the entire burden for ozone reductions on a few areas. Under Ohio's proposal, all of the costs and inconvenience of emission reduction measures necessary to bring these areas into attainment will be borne by the residents and businesses of these over burdened areas. Surrounding areas that are likely contributing to the problem can avoid any responsibility for cutting pollution. Moreover, having a few counties within the MSA not designated as non-attainment might encourage businesses to move into those unregulated areas to escape tighter controls while still continuing to aggravate air quality problems.

We urge the US EPA to expand on Ohio's recommendations by listing Fulton, Brown, Carroll, Auglaize, Belmont, and Champaign counties as being in non-attainment for ozone.

We have attached a letter that we, along with other Ohio groups, sent earlier this year to the Ohio EPA on this issue. We would like to discuss this issue with you prior to your making any decisions on this issue. Please contact Carol Andress at Environmental Defense at 202-387-3500 or via email at [candress@environmentaldefense.org](mailto:candress@environmentaldefense.org).

Sincerely,

Jane Forrest Redfern  
Environmental Projects Director

Carol Andress  
Economic Development Specialist

Ohio Citizen Action  
P.O. Box 473  
Dayton, Ohio 45405  
937-277-7194

Environmental Defense  
1875 Connecticut Ave, NW, Suite 600  
Washington, DC 20009  
202-387-3500

**Ohio Counties That Should Be Designated  
Non-Attainment Under the 8-Hour Ozone NAAQS**

<b>Area</b>	<b>Counties (within Ohio)</b>	<b>Comment</b>
Canton/Massillon	Stark, Carroll	entire MSA should be designated
Cincinnati/Hamilton	Butler, Warren, Hamilton, Clermont, Brown	entire CMSA should be designated
Cleveland/Akron	Lorain, Medina, Cuyahoga, Summit, Lake, Portage, Geauga, Ashtabula	same as proposed
Columbus	Franklin, Delaware, Licking, Fairfield, Pickaway, Madison, Morrow, Union	same as proposed
Dayton/Springfield	Miami, Clark, Greene, Montgomery, Preble	Add Champaign County
Huntington/Ashland	Lawrence	same as proposed
Lima	Allen, Auglaize	entire MSA should be designated
Mansfield	Crawford, Richland	same as proposed
Parkersburg/Marietta	Washington	same as proposed
Steubenville/Weirton	Jefferson	same as proposed
Toledo	Lucas, Wood, Fulton	entire MSA should be designated
Youngstown/Warren	Trumbull, Mahoning, Columbiana	same as proposed
Wheeling	Belmont	entire MSA should be designated

Robert f. Hodanbosi, Chief  
Division of Air Pollution Control  
Ohio Environmental Protection Agency  
Lazarus Government Center  
122 S. Front Street  
Columbus, Ohio 43215-1099

May 29, 2003

Dear Mr. Hodanbosi,

As organizations representing Ohio citizens, we wanted to voice our opposition to several of your draft recommendations for the 8-hour ozone non-attainment areas in Ohio.

After reviewing your map and outline in your letter to regional air organizations, we have noticed that you have omitted 6 counties from ozone non-attainment areas. We urge Ohio EPA to include Fulton, Columbiana, Brown, Carroll, Auglaize, and Belmont counties in the list of non-attainment areas for ozone. We have listed the reasons below:

1. These counties are all part of MSA (Metropolitan Statistical Areas) with one or more counties with monitors that indicate unacceptable ozone levels. Federal air regulations state that if one county within a MSA area is in non-attainment, all other counties within that MSA area should be considered in non-attainment as well unless proven otherwise.
2. These six counties do not have any ozone monitoring stations, but that does not preclude them from having serious air quality problems that remain undetected. We believe that the agency should list them until proven otherwise.
3. EPA's own "AirNow" (an on-line EPA database that shows limited air quality forecasts and maps on some states) shows high levels of unhealthy air forecasts in areas that are not covered by EPA monitors. See attachments. On a number of days last summer, all of these counties were forecasted as having unhealthy air. During numerous days last year, each of these counties predicted high levels of ozone.
4. Environmental Defense and Ohio Citizen Action released a report today demonstrating that ozone levels vary significantly within a region and that sometimes the EPA does not capture the highest levels within an area. Consequently, the air quality in these counties may indeed be higher than we know.
5. According to federal guidelines on ozone monitoring site selection (EPA-454/R-98-002) the government requires that two national network ozone monitors be located in every area with 200,000 or more people. Brown, Fulton, and Columbiana counties are within C/MSA areas that violate that federal regulation as you can see below:
  - Brown County is part of the Cincinnati area C/MSA area with a population of 1,218,389 people and only has 1 national network monitor;
  - Fulton County is part of the Toledo area with a population of 475,456 people and only has 1 national network monitor; and
  - Columbiana County is part of the Youngstown area with a population of 377,549 people and only has 1 national network monitor.
6. In your document entitled, "Additional Information Concerning the Counties.....", you have listed each county with emission data and tons emitted, but you didn't state how that

compares with other counties in Ohio or the nation. According to data submitted by facilities themselves to USEPA Toxic Release Inventory Reporting and assembled for Environmental Defense's Scorecard Database ([www.scorecard.org](http://www.scorecard.org)), these counties are home to facilities that emit pollutants contributing to ozone, including Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOCs). The counties rank in the nation as follows:

Belmont County	80-90% of dirtiest counties for NOx emissions 60-70% of dirtiest counties for VOC emissions;
Columbiana County	60-70% of the dirtiest counties in the country for NOx emissions 70-80% of the dirtiest counties in the country for VOC emissions;
Fulton Count	60-70% of the dirtiest counties in the country for both VOC & NOx.

Counties that are declared in non-attainment of the ozone standard are subject to pollution reducing regulation.

7. We strongly disagreed with your argument that the counties are small and therefore not affected by poor air quality. If you do not know what the population is being exposed to, how can you ignore the over 350,000 people that live in the listed counties and over 2.3 million Ohioans that live in counties that do not have any ozone monitors at all.

Lastly, we believe that Champaign County should be listed as a non-attainment area for ozone. Champaign County is located between several non attainment areas, including Miami, Clark and Madison counties and is likely to have poor air quality. Because Champaign County has no monitors, it is considered to be 'unclassifiable' by Ohio EPA. Champaign County is the home of Urbana, Ohio and has heavily polluting facilities.

We call upon Ohio EPA to protect our health by listing Fulton, Brown, Columbiana, Carroll, Auglaize, Belmont and Champaign Counties as non attainment for ozone as provided by the federal guidelines as mentioned above. We would like a formal response to our comments as soon as possible, so that we can send additional comments prior to the end of the formal comment period.

Sincerely,

Jane Forrest Redfern 937-277-7194  
Environmental Projects Director  
**Ohio Citizen Action**  
P.O. Box 473  
Dayton, Ohio 45405

Leanne Jablonski 937-429-3582  
Director, **Marianist Environmental  
Education Center**  
4435 E. Patterson  
Dayton, Ohio 45430

Teresa Mills 614-871-1353  
Director  
**Buckeye Environmental Network**  
P.O. box 182  
Grove City, Ohio 43123

Kurt Waltzer 614-487-7506  
Clean Air Program Coordinator  
**Ohio Environmental Council**  
1407 Grandview Avenue  
Columbus, Ohio 43212

Larry McAllister 614-279-1700  
President/CEO  
**American Lung Association of Ohio**

Chris Trepal 216-281-6468  
**Earth Day Coalition**  
3606 Bridge Avenue

1950 Arlingate Lane  
Columbus, Ohio 43228

Alonzo Spencer 330-385-4584  
President  
**Save Our County, Inc.**  
P.O. Box 1242  
East Liverpool, Ohio 43920

Leanne Jablonski 937-429-3582  
Director  
**Marianist Environmental Education  
Center**  
4435 E. Patterson  
Dayton, Ohio 45430

Cleveland, Ohio 44113

Halley Rosen 202-387-3500  
**Environmental Defense**  
1875 Connecticut Avenue NW  
Washington DC 20008

Terri Swearingen 304-387-0574  
Executive Director  
**Tri-State Environmental Council**  
Box 365  
Chester, WV 26034