



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

AUG 22 2017

The Honorable John R. Kasich  
Governor  
Office of the Governor, State of Ohio  
Vern Riffe Center  
77 South High Street, 30<sup>th</sup> Floor  
Columbus, OH 43215-6117

REPLY TO THE ATTENTION OF:

Dear Governor Kasich:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for all of the remaining areas in Ohio for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The designations for this NAAQS are an important part of the EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated June 3, 2011, April 12, 2012, January 18, 2013, January 13, 2017, and June 28, 2017.<sup>1</sup>

On July 25, 2013, the EPA designated certain areas in 16 states as nonattainment,<sup>2</sup> but did not at that time designate other areas. Additional areas were designated on June 30, 2016,<sup>3</sup> and November 29, 2016.<sup>4</sup> In Ohio, the following areas were designated in these previous actions: Clermont County, Gallia County, Lake County, and portions of Jefferson, Meigs, Morgan, and Washington Counties. Pursuant to a March 2, 2015, court-ordered schedule,<sup>5</sup> the agency must complete the remaining SO<sub>2</sub> designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of the EPA's assessment of your state's recommended designations for all remaining undesignated areas in Ohio except areas that are associated with sources for which Ohio elected to install and begin operating a new SO<sub>2</sub> monitoring network. While we are in agreement with your recommendation for many of these areas, some warrant further discussion as explained below and the accompanying technical support document. We stand ready to assist and hope to resolve any differences regarding the proper designation for these areas within this 120-day period provided by the Clean Air Act.

To this end, if you or your staff have additional information that the EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You

---

<sup>1</sup> Ohio also provided information relevant to these designations in a letter dated June 29, 2011.

<sup>2</sup> The Campbell/Clermont area, including a portion of Clermont County in Ohio; the Lake County area, including all of Lake County; the Muskingum River area, including portions of Morgan and Washington Counties; and the Steubenville OH-WV area, including a portion of Jefferson County in Ohio, were designated as nonattainment in this action. The Ohio portion of the Campbell/Clermont area was redesignated to attainment on November 21, 2016. The Campbell/Clermont and Steubenville areas are multi-state areas that also include portions in Kentucky and West Virginia, respectively.

<sup>3</sup> In this action, EPA designated the Gallia County area, including Gallia County and a portion of Meigs County as unclassifiable, and designated the remainder of Clermont County as unclassifiable/attainment.

<sup>4</sup> This action only affected Texas.

<sup>5</sup> *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

may submit additional information by sending it to the EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at [www.regulations.gov](http://www.regulations.gov), and sending a copy to EPA Region 5. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on the EPA's intended designations.

Ohio has recommended a designation of unclassifiable/attainment for the area indicated below. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Ohio or by a third party. The air monitoring data show a portion of Cuyahoga County may be violating the 2010 primary SO<sub>2</sub> NAAQS, which would require a modification of the recommended designation. We invite Ohio to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation.

Area	Included Area
Cuyahoga (p)	The portions of the Cities of Cleveland, Newburgh Heights, and Cuyahoga Heights that are south of I-490, west of I-77, and east of the Cuyahoga River*

(p) indicates portion of county

An asterisk (\*) indicates that the EPA's intended designation for this portion of this county represents a modification to the designation that you have most recently recommended.

Ohio also recommended a designation of unclassifiable/attainment for the area indicated below. EPA regulations for implementing the SO<sub>2</sub> NAAQS require Ohio to characterize SO<sub>2</sub> air quality in this area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Ohio or by a third party. Our review of this information indicates that it is not consistent with your recommendation due to unresolved air dispersion modeling issues, which would require a modification of the recommended designation. EPA intends to designate this area unclassifiable. Again, we invite Ohio to review the available information and further discuss this issue with the EPA in order to inform an appropriate final designation.

Area	Included Area
Lorain County	Entire County*

Ohio has recommended a designation of unclassifiable/ attainment for the areas indicated below. EPA regulations for implementing the SO<sub>2</sub> NAAQS require Ohio to characterize SO<sub>2</sub> air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Ohio or by a third party. Our review of this information indicates that it is consistent with your recommendation. The EPA intends to designate each listed area as a separate unclassifiable/attainment area, as indicated.

Unclassifiable/Attainment Area	Included Area
Adams	Entire County
Coshocton	Entire County
Hamilton	Entire County
Jefferson (p)	Remainder of County†
Lucas	Entire County
Ottawa, Sandusky	Entire Counties
Seneca	Entire County

†All townships except Cross Creek, Steubenville, Warren, and Wells Townships and Steubenville City

(p) indicates portion of county.

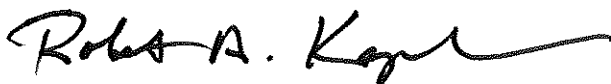
The enclosure to this letter provides the information that supports the intended designation decisions for these areas in Ohio.<sup>6</sup>

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Ohio that were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the last section of the enclosure.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. We are then required to designate all other remaining undesignated areas in Ohio by December 31, 2020, consistent with the prescribed timing of the court order. Ohio has no other remaining undesignated areas.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO<sub>2</sub> NAAQS. For additional information regarding designations under the SO<sub>2</sub> NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Ed Nam of my staff at (312) 353-2192 or Nam.Ed@epa.gov.

Sincerely,



Robert A. Kaplan  
Acting Regional Administrator

Enclosures

<sup>6</sup> Enclosure 1 is Chapter 32 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, addressing areas in Ohio. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>

Cc Craig Butler, Director, Ohio Environmental Protection Agency  
Bob Hodanbosi, Director, Division of Air Pollution Control, Ohio Environmental Protection Agency