



REGIONAL AIR POLLUTION CONTROL AGENCY

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Jennifer L. Hunter
Ohio EPA-DAPC
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216- 1049

Ms. Hunter:

The following are the comments of the Regional Air Pollution Control Agency (RAPCA) of Dayton, Ohio, on the Ohio EPA proposed designations for the 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS). RAPCA is a six-county local air pollution control agency serving the citizens of the Southwest Ohio counties of Clark, Darke, Greene, Miami, Montgomery, and Preble. RAPCA staff have reviewed the Ohio proposal and offer the following comments.

Based on the December 4, 2008, U.S. EPA guidance document to evaluate area designations for the 2008 Revised Ozone NAAQS, RAPCA supports the Ohio EPA proposal to designate the counties of Clark, Greene, and Montgomery as nonattainment for the 8-hour ozone NAAQS. All three of these counties have a design value over, or nearly over the 0.075 ppm 8-hour ozone limit. RAPCA also supports the Ohio EPA proposal to designate Miami County as attainment for the 2008 standard. Using the nine-factor analysis for designations, RAPCA believes that Miami County's air quality data, emissions, population, traffic patterns and land use factors are distinct from the three proposed nonattainment counties in RAPCA jurisdiction. Thank you for this opportunity to comment. Please let me know if you have any questions.

Sincerely,

John A. Paul, RAPCA Administrator