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September 3, 2013

Administrator Gina McCarthy
U.S. Environmental Protection Agency
Air and Radiation Docket and Information Center
Mail Code: 2822T
1301 Constitution Avenue, N.W.
Washington, DC 20460
Attention: Docket ID No EPA-HQ-OAR-2010-0885

Re: Proposed Rule to Implement the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements

Dear Administrator McCarthy:

The Northeast States for Coordinated Air Use Management (NESCAUM) offers the following comments on the U.S. Environmental Protection Agency's (EPA's) proposed rulemaking, published on June 6, 2013, in the Federal Register (78 Fed. Reg. 34178-34239), entitled *Implementation of the 2008 National Ambient Air Quality Standards for Ozone: State Implementation Plan Requirements; Proposed Rule*. NESCAUM is a regional association of the environmental agencies in Connecticut, Maine, Massachusetts, New Hampshire, New Jersey, New York, Rhode Island, and Vermont. Our comments are based on extensive experience and expertise working with federal Clean Air Act (CAA) requirements and EPA rules specific to implementing national ambient air quality standards (NAAQS).[1]

Over the past 30 years, the NESCAUM member agencies have reviewed and worked under several proposed and final ozone implementation rules. The current proposal contains many constructs and elements that are similar, if not identical, to EPA's previous ozone rules, but offers a number of new approaches. While several of the newly proposed elements appear promising, others—particularly some of the proposed flexibility provisions—are of concern as they appear to excuse ozone nonattainment areas from specifically mandated CAA requirements. The NESCAUM member agencies fully support flexibility for states as they develop and implement their SIPs. However, we urge EPA to carefully consider the consequences of previous attempts to provide similar or identical flexibilities in NAAQS implementation rules, especially where those provisions were struck down by the courts.[2] While science and historical

[1] These comments represent regional views based on consensus. As such, there may be specific comments that, while reflecting regional consensus, do not necessarily reflect the position of an individual state agency.
[2] For example: *South Coast Air Quality Management Dist. v. EPA*, 472 F.3d 882 (D.C. Cir. 2006).

experience show the effectiveness of reducing nitrogen oxides (NOx) in addressing ozone pollution, EPA must be prudent in defining and allowing flexibility. Not doing so could place the entire rule—and the states responsible for implementing it—at significant risk to legal challenge, resulting in wasted resources and delays for public health protection.

Reasonably Available Control Technology (RACT) and Control Techniques Guidelines (CTGs) are proven strategies that have yielded significant emission reductions. Many states have successfully employed NOx RACT using up-to-date technology assumptions. However, EPA's NOx RACT guidance and many of its CTGs are nearly 20 years old and need updating. While states have the responsibility to develop RACT rules based on currently available control technologies, having updated federal guidance in place would promote regional consistency and reduce conflict when EPA reviews proposed RACT plans. This would be especially useful for gas, oil, and coal-fired electric generating units. To allow states, especially those with new nonattainment areas, to develop SIPs and rules based on outdated assumptions about available control technologies would undermine progress and public health protection.

EPA has requested comment on alternative Inspection and Management (I/M) designs in an effort to "right size" I/M for the current and future fleet.[3] NESCAUM members recognize the importance and continued relevance of I/M in controlling motor vehicle emissions. We agree with EPA that significant technological advances, including the diminishing relevance of tailpipe testing and widespread implementation of OBD programs, have occurred and that practical flexibility is warranted for the future. The NESCAUM member agencies, however, are concerned with the example programmatic changes that EPA has offered in this rulemaking. We urge EPA to carefully consider CAA requirements and the existing I/M performance standards in judging the merits of these concepts. Clearly, EPA should develop modeling guidance for such alternatives if deemed feasible. As such, NESCAUM believes EPA should defer to a more thorough and separate I/M program rulemaking process concerning I/M flexibility.

More detailed comments are provided below.

<u>Anti-backsliding</u>

General Provisions

NESCAUM agrees with EPA's overall approach for handling the CAA's anti-backsliding requirements. The proposed provisions appear to be comprehensive and provide clear guidance that will assist states in transitioning to the 2008 ozone NAAQS without concern for backsliding on progress to date. For example, we agree with EPA's proposal that an area's approved CAA section 175A maintenance plan for the revoked 1997 ozone NAAQS could satisfy its obligations for maintenance under CAA section 110(a)(1) for the 2008 ozone NAAQS as well as its obligation to submit a second approvable maintenance plan under CAA section 175A for the revoked 1997 ozone NAAQS (78 Fed. Reg. 34219).

[3] 78 Fed. Reg. at 34196 (June 6, 2013).

Relationship between the 1997 and 2008 Ozone NAAQS

The NESCAUM states are concerned about an assumption that seems to be the basis for a significant portion of EPA's anti-backsliding proposal:

[B]ecause the form of the 1997 and 2008 ozone NAAQS is the same, there is no possibility that an area attaining the 2008 ozone NAAQS could be violating the 1997 ozone NAAQS, which is unlike the relationship that existed between the 1-hour ozone NAAQS and the 1997 8-hour ozone NAAQS. Thus, the EPA believes that designation as attainment for the 2008 ozone NAAQS should result in no additional new obligations beyond PSD for this large group of areas, regardless of their status for prior standards (78 Fed. Reg. 34219).

EPA's assumption appears to be flawed. For example, the Louisville Metropolitan Area, which is currently a maintenance area under the 1997 ozone NAAQS, was designated attainment under the 2008 ozone NAAQS based on 2008-2010 data. Based on 2010-2012, the area is violating both the 1997 and 2008 ozone NAAQS. We urge EPA to reconsider its assumptions about the relationship between the 1997 and 2008 ozone NAAQS and develop an anti-backsliding approach that properly characterizes ozone violations and nonattainment.

With respect to revoking the 1997 ozone standard, we note that there is established legal precedent in this area. EPA should look closely at that prior to making a determination on how to revoke the standard.

Designating Areas that Violate the 2008 Ozone NAAQS

Part of ensuring against backsliding for the 2008 ozone NAAQS is ensuring that areas that violate the ozone NAAQS are designated as nonattainment and are required to achieve the emissions reductions necessary to meet and maintain the NAAQS. Monitoring data from 2012 indicate higher ozone levels than in previous years across the eastern U.S. Since 2010, there has been an increase of over 230 percent in the number of monitors in the eastern U.S. that violate the 2008 NAAQS. Many of those areas were designated by EPA in April 2012 as attaining the 2008 ozone NAAQS, based on 2008-2010 data (see Attachment A).[4]

The number and geographical extent of high ozone values—including violations—in the eastern U.S. in recent years makes it particularly important that EPA use its authority under section 107(d)(3) of the CAA to designate areas that currently violate the 2008 NAAQS based on most recent design values.

<u>Nonattainment SIP deadlines</u>

The NESCAUM member agencies recognize EPA's efforts to reduce the administrative burden on states by providing a new option for areas classified as moderate or higher to submit one consolidated SIP within 30 months of being designated nonattainment (78 Fed. Reg. 34183).

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[4] These areas were designated based on 2010 or 2011 design values, i.e., annual fourth-highest daily maximum eight-hour ozone concentrations, averaged over three years.

While we understand and support the rationale for this proposed flexibility, we urge EPA to choose its flexibility options carefully, within the context of the CAA and past court precedent.

<u>Reasonable Further Progress Reductions</u>

15 Percent Plans

EPA proposes that Reasonable Further Progress (RFP) plan requirements for volatile organic compounds (VOCs) are not required for nonattainment areas classified as moderate or higher that: (1) consist entirely of former nonattainment areas; and (2) have fulfilled the 15 percent reduction in VOCs for the RFP requirements of CAA section 182(b)(1) under a prior ozone NAAQS (78 Fed. Reg. 34189). The NESCAUM states agree that this is a reasonable approach, and that legal precedent exists to support it.[5]

For newly designated nonattainment areas classified for the first time as moderate and above, EPA proposes an option to allow NOx reductions to be substituted in whole or in part for the VOC reductions for 15 percent RFP demonstrations if those areas can demonstrate that they have achieved a 15 percent reduction in VOC emissions from a 1990 baseline (78 Fed. Reg. 34188). As another option, EPA proposes that, if it does not finalize a proposal to allow any area to substitute NOx reductions for VOC reductions where such area can demonstrate that it has achieved a 15 percent reduction in VOC emissions from a 1990 baseline, it would allow such substitution only for areas located in the Ozone Transport Region that would be subject to the 15 percent RFP requirement for the first time as a designated nonattainment area for the 2008 ozone NAAQS (78 Fed. Reg. 34188). EPA can best provide flexibility and ease state burdens for developing 15 percent plans within the context of the Clean Air Act by providing states with 15 percent plan templates, supporting documentation on federal measures that can help demonstrate already achieved VOC reductions (e.g., fleet turnover), and expediting the 15 percent plan approval process. By doing so, a sound and cost-effective basis for mandated 15 percent plans can be provided to the states, giving them a more solid footing for focusing their resources on flexible approaches for achieving additional emissions reductions.

Location of Emissions Reductions

The majority of NESCAUM states generally oppose allowing RFP credit for emissions reductions that occur outside of the nonattainment area (78 Fed. Reg. 34191), on the grounds that RFP reductions tie back to baseline emissions described in section 182(b)(1)(B) of the CAA, which references emissions “in the area.” If emissions reductions necessary for RFP and attainment were to come from a nearby area, then the nonattainment area should be expanded to include that area and all of its emissions in the baseline. The NESCAUM states would, however, support providing some RFP credit for energy efficiency and renewable energy measures instituted in the nonattainment area but whose reductions may not necessarily occur in that area. This support is conditioned on the availability of sound evidence that: (1) those measures would produce public health benefits; and (2) the approach does not conflict with the CAA.

[5] *Natural Resources Defense Council v. EPA*, 571 F.3d 1245 (D.C. Cir. 2009).

Ozone-forming Potential

EPA proposes other alternative approaches to achieving RFP, including basing the amount of credit from VOC reductions on their species-specific ozone-forming potential (78 Fed. Reg. 34190). The NESCAUM states oppose this approach, as the underlying scientific basis is still not well developed. Moreover, the CAA clearly requires a percentage reduction "from baseline emissions" for purposes of RFP.

Reasonably Available Control Technology, Control Techniques Guidelines, and Reasonably Available Control Measures

RACT, Reasonably Available Control Measures (RACM), and CTGs are the foundation for SIP reductions. EPA's NOx RACT guidance and many of the CTGs are nearly 20 years old, and are based on old technologies. EPA should make it a priority to update its NOx RACT guidance before RACT SIPs are due in 2014.

RACT certifications for the 2008 ozone NAAQS must be based on a full RACT analysis, as required under the CAA. Under no circumstances should RACT for the previous one -hour ozone standard (0.12 ppm, not to be exceeded more than once per year) be considered RACT under the 2008 ozone NAAQS.

EPA proposes that the Clean Air Interstate Rule (CAIR) be considered equivalent to RACT for sources within a nonattainment area if a state can provide documentation of those reductions (78 Fed. Reg. 34193). The NESCAUM states do not support this approach. Neither states nor EPA can guarantee such reductions either locationally or temporally through a regional cap-and-trade program. EPA needs to thoroughly review source-specific RACT certifications, and require the operation of all implemented RACT controls. We urge EPA to remove the CAIR option from the rule.

We also urge EPA to remove the option for states to consider air quality impacts when performing VOC RACT analyses. RACT and CTGs establish technology-based control levels mandated by section 182 of the CAA for moderate and higher nonattainment areas as well as for all areas within the Ozone Transport Region (OTR). Moreover, many states have expended considerable resources to adopt RACT and CTG rules. If EPA were to allow this proposed circumvention of mandatory CAA requirements, it will exacerbate an already inequitable distribution of clean air costs.

Inspection and Maintenance Programs

NESCAUM disagrees with EPA's assertion that I/M programs may no longer be relevant because of technological advances or alternative solutions. These programs are much easier to implement than in the past, and remain important in controlling motor vehicle emissions. Modeling shows that emissions from the on-road sector remain significant for the ozone problem.[6] While individual vehicle emissions have been substantially reduced and the overall

[6] *See, e.g.,* U.S. EPA, *Air Quality Modeling Technical Support Document: Proposed Tier 3 Emission Standards*, U.S. EPA OAQPS, EPA-454/R-13-001 (March 2013).

light duty fleet is cleaner, there still remains a significant gap between well-maintained vehicles and malfunctioning gross-emitting vehicles that would be identified through mandatory I/M inspections.[7] EPA should be consistent in its message about I/M programs in new nonattainment areas: all I/M programs must meet applicable I/M performance standards consistent with the requirements of the CAA and EPA's I/M regulation. EPA should defer making I/M program changes through this rulemaking, and instead pursue a separate rulemaking specific to the I/M program.

We appreciate EPA's willingness to be flexible regarding alternative I/M programs. However, any alternative I/M program approach must be consistent with CAA and any areas with new I/M programs should be treated with the same rigor as areas with existing I/M programs. While advances in technology often afford new approaches to existing problems, any innovative program structure must be accompanied by guidance indicating minimum requirements to assure that the program's emission reductions are real, quantifiable, and enforceable. EPA must also ensure that its mobile source emissions model (e.g., MOVES) is updated to better simulate the impacts of any alternative I/M programs.

I/M Program Substitution

The language of the CAA is clear with respect to requiring vehicle I/M programs. Over the years, many nonattainment areas have successfully implemented I/M programs, and the resultant emissions reductions and public health protections have been substantial. Technical advances since 1990 provide for much more streamlined, cost-effective, publicly-acceptable I/M programs. The on-board diagnostic (OBD) approach to I/M is straightforward and provides significant flexibility in terms of program design, oversight, and enforcement. We urge EPA to focus on alternative I/M program approaches, rather than on alternatives to the I/M program.

Moreover, we are concerned that some of EPA's proposed approaches, as articulated in the draft rule, are not well developed. We urge EPA to reconsider these approaches as well as develop new approaches, provide technical support for any proposed approaches, and vet them through a separate I/M rulemaking process, where they can undergo more rigorous scrutiny and review. .

EPA's backsliding provisions require that existing nonattainment areas maintain their I/M programs. EPA should ensure equity among nonattainment areas, and not treat new nonattainment areas differently than current nonattainment areas by allowing the use of non-I/M emission reductions to meet I/M program requirements.

Alternative I/M Program Implementation

NESCAUM appreciates EPA's willingness to provide I/M program flexibility, including using OBD-only emissions testing and telematics, and no longer requiring tailpipe testing for

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[7] *See, e.g.,* Colorado Dept. of Public Health and Environment, *Automobile Inspection and Readjustment (AIR) Program Annual Report Calendar Year 2012*, Air Pollution Control Division, Mobile Sources Program (July 1, 2013) (*see* Figure 5, p. 8, showing that average NOx emissions of recent model year cars failing I/M are an order of magnitude greater than from the same model year cars passing I/M, and the average excess NOx emissions of ~0.5-1 g/mi are quantitatively similar to the excess NOx emissions of older model year cars failing I/M).

applicable fleets. While advances in technology often afford innovative approaches, any alternative program structure must be accompanied by guidance indicating minimum requirements to assure the emission reductions are real, quantifiable, and enforceable, and must meet the I/M performance standard.

EPA's proposed I/M program alternatives introduce issues that must be addressed to ensure that any alternative program design meets performance standards. EPA's specific suggestion that I/M programs that do not rely on required testing would be considered adequate is problematic.. EPA's discussion is cursory, and does not address significant implementation issues, including vehicle tampering, motorist compliance and enforcement, program efficacy, and potential regulatory conflicts in cases where EPA suggests other agencies assist in implementing the program. Moreover, EPA's proposed voluntary program overlooks that higher failure rates typically occur when enhanced I/M programs are first implemented and decline as vehicle owners and repair technicians learn what level of maintenance or repair is required to pass the periodic tests. EPA's proposed metric for calculating equivalency, is therefore inappropriate. In designing alternatives, EPA should consider appropriate incentives for motorists to better maintain their vehicles and seek repairs as failures occur. We urge EPA to ensure that such issues are addressed through a separate I/M rulemaking.

Errors or Omissions Related to Inventory Development

The proposal appears to have several errors or omissions with respect to ozone season emissions inventory requirements. It does not specify that the inventory should be for a summer day, and some of its references to inventory rules and guidance are outdated, inconsistent, or no longer valid. EPA should expressly state that the baseline inventory for RFP and contingency measures be based on a summer day inventory, not on an annual emissions. Such specificity was expressed in the previous ozone implementation rule as follows: "Consistent with the manner in which [rate of progress] plans under the 1-hour ozone standard were developed, the RFP baseline for 2002 will have a typical summer day tons/day basis. As such, the attainment year target will also be a typical summer day target."[8]

If the intent of the language in the proposal was to allow such elements to be based on annual inventories, then EPA is misguided. If this is instead an error of omission, then EPA must clarify the requirements with language consistent with that used previously.

We are also concerned that EPA's proposal is inconsistent with the amendments currently proposed for the Air Emissions Reporting Requirements (AERR) rule. EPA's proposal references AERR for purposes of defining the data elements for the emissions inventories, but the AERR is currently under rulemaking and the proposed amendments remove ozone-related emissions reporting requirements, definitions, and guidance. The proposed ozone implementation rule's background section also references EPA's August 2005 inventory guidance. That guidance document references the Consolidated Emissions Reporting Rule (CERR), which no longer exists, and specifies that ozone season inventories should be reported as actual annual and actual summer weekday inventories.

[8] 70 Fed. Reg. 71638 (November 29, 2005).

States need clear, consistent, updated guidance on ozone inventory development. The NESCAUM states recommend that EPA clearly indicate in the body of the final ozone implementation rule—as it did for the previous ozone implementation rule—what is required for ozone inventories and for RFP and contingency measure baselines. The final rule must also reference appropriate guidance. Any references to the AERR should be clearly addressed to ensure that the proper ozone season inventories are developed.

Seasonal and Daily Emissions

NESCAUM urges EPA to more concretely help states address high electric demand day (HEDD) issues. EPA should start by updating its modeling guidance to account for daily peaks in energy use and ozone levels. EPA should consider requiring maximum daily emissions, such as HEDD emissions, during the ozone season to more accurately depict the cause of ozone exceedance. These emissions are not currently captured in an annual or typical ozone season day inventory.

Flexibilities and Equity

While the NESCAUM states appreciate EPA's desire to provide flexibility to new ozone nonattainment areas, we are concerned with the inequities that would result. Over the years, we and other nonattainment states have devoted significant resources to air pollution control programs. Those controls have yielded marked and important emissions reductions and public health benefits, but have come at a cost. If EPA were to allow new ozone nonattainment areas, as well as areas that should be designated nonattainment for the ozone NAAQS but are not, to be excused from their basic CAA obligations, that action would come at great cost. It would place citizens in those areas as well as in downwind areas, at a public health disadvantage. It would also provide an unwarranted economic advantage to those areas over existing nonattainment areas. Since the Clean Air Act Amendments of 1990 were passed, significant advances in technology have made many programs much easier and more economical to implement, not only for states, but for the regulated community. Such advances already provide considerable flexibility. We urge EPA to factor in these considerations as it finalizes its rule.

Conclusion

The NESCAUM states would like to ensure smooth and expeditious implementation of the 2008 ozone NAAQS to protect the public health and the environment. It has taken considerable time for this proposal to be released—over five years since the 75 parts per billion (ppb) ozone NAAQS was promulgated and nearly two years since EPA's reconsideration of that NAAQS was halted. We urge EPA to expeditiously promulgate an ozone implementation rule that provides appropriate flexibility, is equitable and defensible, and provides appropriate public health and environmental protection. We extend our offer to work with EPA as a partner in this regard.

If you or your staff have any questions regarding the issues raised in these comments, please contact Leah Weiss of NESCAUM at 617-416-4829. Some of NESCAUM's member agencies are submitting separate comments on their states' behalf.

Sincerely,

Arthur N. Marin
Executive Director

Attachment A: Design Values Based on 2010-2012 Data

Cc: Karl Pepple, EPA/OAQPS
Butch Stackhouse, EPA/OAQPS
Desk Officer, OIRA/OMB
Curt Spalding, EPA Region I
Judith Enck, EPA Region II
NESCAUM Directors

ATTACHMENT A – Design Values Based on 2010-2012 Data

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
PA	Allentown-Bethlehem-Easton, PA	71	Lancaster	0.077	0.077	0.082	MARGINAL	
PA	Allentown-Bethlehem-Easton, PA	77	Lehigh	0.076	0.076	0.078	MARGINAL	
PA	Allentown-Bethlehem-Easton, PA	95	Northampton	0.075	0.075	0.077	MARGINAL	
GA	Atlanta, GA	67	Cobb	0.076	0.078	0.077	MARGINAL	
GA	Atlanta, GA	77	Coweta	0.068	0.067	0.066	MARGINAL	
GA	Atlanta, GA	89	DeKalb	0.079	0.077	0.080	MARGINAL	
GA	Atlanta, GA	97	Douglas	0.075	0.074	0.075	MARGINAL	
GA	Atlanta, GA	121	Fulton	0.080	0.080	0.083	MARGINAL	
GA	Atlanta, GA	135	Gwinnett	0.074	0.075	0.078	MARGINAL	
GA	Atlanta, GA	151	Henry	0.079	0.078	0.082	MARGINAL	
GA	Atlanta, GA	223	Paulding	0.070	0.071	0.072	MARGINAL	
GA	Atlanta, GA	247	Rockdale	0.078	0.075	0.079	MARGINAL	
MD	Baltimore, MD	3	Anne Arundel	0.079	0.081	0.087	MODERATE	SERIOUS (June 2013)
MD	Baltimore, MD	5	Baltimore	0.078	0.080	0.084	MODERATE	SERIOUS (June 2013)
MD	Baltimore, MD	510	Baltimore (City)	0.067	0.074	0.075	MODERATE	SERIOUS (June 2013)
MD	Baltimore, MD	13	Carroll	0.076	0.076	0.079	MODERATE	SERIOUS (June 2013)
MD	Baltimore, MD	25	Harford	0.089	0.092	0.093	MODERATE	SERIOUS (June 2013)
LA	Baton Rouge, LA	5	Ascension	0.075	0.077	0.076	MARGINAL	
LA	Baton Rouge, LA	33	East Baton Rouge	0.078	0.082	0.079	MARGINAL	
LA	Baton Rouge, LA	47	Iberville	0.073	0.077	0.076	MARGINAL	
LA	Baton Rouge, LA	63	Livingston	0.075	0.076	0.074	MARGINAL	
LA	Baton Rouge, LA	121	West Baton Rouge	0.071	0.072	0.071	MARGINAL	
NC	Charlotte-Rock Hill, NC-SC	109	Lincoln	0.072	0.071	0.075	MARGINAL	
NC	Charlotte-Rock Hill, NC-SC	119	Mecklenburg	0.082	0.079	0.083	MARGINAL	
NC	Charlotte-Rock Hill, NC-SC	159	Rowan	0.077	0.076	0.078	MARGINAL	
NC	Charlotte-Rock Hill, NC-SC	179	Union	0.072	0.070	0.073	MARGINAL	
SC	Charlotte-Rock Hill, NC-SC	91	York	0.067	0.064	0.065	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	31	Cook	0.070	0.072	0.081	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	43	DuPage	0.060	0.063	0.068	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	89	Kane	0.066	0.069	0.071	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	97	Lake	0.074	0.076	0.082	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	111	McHenry	0.065	0.067	0.071	MARGINAL	
IL	Chicago-Naperville, IL-IN-WI*	197	Will	0.062	0.063	0.065	MARGINAL	
IN	Chicago-Naperville, IL-IN-WI*	89	Lake	0.067	0.068	0.073	MARGINAL	
IN	Chicago-Naperville, IL-IN-WI*	127	Porter	0.067	0.067	0.072	MARGINAL	

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
WI	Chicago-Naperville, IL-IN-WI*	59	Kenosha	0.074	0.077	0.084	MARGINAL	
KY	Cincinnati, OH-KY-IN	15	Boone	0.065	0.067	0.070	MARGINAL	MAINTENANCE (former Part 1)
KY	Cincinnati, OH-KY-IN	37	Campbell	0.072	0.073	0.079	MARGINAL	MAINTENANCE (former Part 1)
OH	Cincinnati, OH-KY-IN	17	Butler	0.073	0.076	0.082	MARGINAL	MAINTENANCE (former Part 1)
OH	Cincinnati, OH-KY-IN	25	Clermont	0.071	0.075	0.082	MARGINAL	MAINTENANCE (former Part 1)
OH	Cincinnati, OH-KY-IN	27	Clinton	0.074	0.076	0.082	MARGINAL	MAINTENANCE (former Part 1)
OH	Cincinnati, OH-KY-IN	61	Hamilton	0.079	0.080	0.085	MARGINAL	MAINTENANCE (former Part 1)
OH	Cincinnati, OH-KY-IN	165	Warren	0.078	0.078	0.079	MARGINAL	MAINTENANCE (former Part 1)
OH	Cleveland-Akron-Lorain, OH	7	Ashtabula	0.077	0.078	0.079	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	35	Cuyahoga	0.075	0.075	0.080	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	55	Geauga	0.077	0.073	0.078	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	85	Lake	0.076	0.077	0.083	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	93	Lorain	0.070	0.069	0.075	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	133	Portage	0.067	0.067	0.071	MARGINAL	
OH	Cleveland-Akron-Lorain, OH	153	Summit	0.075	0.074	0.074	MARGINAL	
OH	Columbus, OH	41	Delaware	0.073	0.072	0.074	MARGINAL	
OH	Columbus, OH	49	Franklin	0.077	0.079	0.082	MARGINAL	
OH	Columbus, OH	83	Knox	0.071	0.073	0.075	MARGINAL	
OH	Columbus, OH	89	Licking	0.072	0.074	0.076	MARGINAL	
OH	Columbus, OH	97	Madison	0.070	0.073	0.076	MARGINAL	
TX	Dallas-Fort Worth, TX	85	Collin	0.077	0.081	0.083	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	113	Dallas	0.078	0.082	0.082	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	121	Denton	0.080	0.083	0.083	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	139	Ellis	0.072	0.074	0.076	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	251	Johnson	0.080	0.079	0.079	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	257	Kaufman	0.067	0.068	0.070	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	367	Parker	0.075	0.079	0.078	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	397	Rockwall	0.074	0.077	0.077	MODERATE	SERIOUS (June 2013)
TX	Dallas-Fort Worth, TX	439	Tarrant	0.086	0.090	0.087	MODERATE	SERIOUS (June 2013)
MA	Dukes County, MA	7	Dukes	0.078	0.076	0.080	MARGINAL	
CT	Greater Connecticut, CT	3	Hartford	0.074	0.071	0.075	MARGINAL	
CT	Greater Connecticut, CT	5	Litchfield		0.070	0.071	MARGINAL	

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
CT	Greater Connecticut, CT	11	New London	0.076	0.076	0.081	MARGINAL	
CT	Greater Connecticut, CT	13	Tolland	0.079	0.073	0.076	MARGINAL	
TX	Houston-Galveston-Brazoria, TX	39	Brazoria	0.084	0.089	0.088	MARGINAL	SEVERE 15 (June 2019)
TX	Houston-Galveston-Brazoria, TX	167	Galveston		0.078	0.080	MARGINAL	SEVERE 15 (June 2019)
TX	Houston-Galveston-Brazoria, TX	201	Harris	0.083	0.084	0.084	MARGINAL	SEVERE 15 (June 2019)
TX	Houston-Galveston-Brazoria, TX	339	Montgomery	0.071	0.074	0.079	MARGINAL	SEVERE 15 (June 2019)
NY	Jamestown, NY	13	Chautauqua	0.077	0.072	0.076	MARGINAL	
TN	Knoxville, TN	1	Anderson	0.070	0.070	0.073	MARGINAL	
TN	Knoxville, TN	9	Blount	0.077	0.077	0.079	MARGINAL	
AR	Memphis, TN-MS-AR	35	Crittenden	0.074	0.077	0.079	MARGINAL	
MS	Memphis, TN-MS-AR	33	DeSoto	0.073	0.073	0.074	MARGINAL	
TN	Memphis, TN-MS-AR	157	Shelby	0.076	0.074	0.079	MARGINAL	
CT	New York-N. New Jersey-Long Island, NY-NJ-CT	1	Fairfield	0.081	0.080	0.085	MARGINAL	MODERATE (June 2010)
CT	New York-N. New Jersey-Long Island, NY-NJ-CT	7	Middlesex	0.077	0.077	0.080	MARGINAL	MODERATE (June 2010)
CT	New York-N. New Jersey-Long Island, NY-NJ-CT	9	New Haven	0.076	0.081	0.087	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	3	Bergen	0.076	0.076	0.078	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	13	Essex		0.076	0.082	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	17	Hudson	0.077	0.076	0.078	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	19	Hunterdon	0.078	0.077	0.080	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	23	Middlesex	0.078	0.080	0.085	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	25	Monmouth	0.080	0.079	0.083	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	27	Morris	0.075	0.075	0.078	MARGINAL	MODERATE (June 2010)
NJ	New York-N. New Jersey-Long Island, NY-NJ-CT	31	Passaic	0.074	0.073	0.075	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	5	Bronx	0.072	0.072	0.076	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	61	New York	0.073	0.072	0.076	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	81	Queens	0.074	0.075	0.080	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	85	Richmond	0.075	0.083	0.083	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	87	Rockland			0.076	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	103	Suffolk	0.084	0.084	0.085	MARGINAL	MODERATE (June 2010)
NY	New York-N. New Jersey-Long Island, NY-NJ-CT	119	Westchester	0.077	0.075	0.076	MARGINAL	MODERATE (June 2010)
DE	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	3	New Castle	0.076	0.077	0.080	MARGINAL	MODERATE (June 2010)
MD	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	15	Cecil	0.080	0.081	0.086	MARGINAL	MODERATE (June 2010)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	1	Atlantic	0.074	0.074	0.076	MARGINAL	MODERATE (June 2010)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	7	Camden	0.080	0.080	0.087	MARGINAL	MODERATE (June 2010)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	11	Cumberland	0.076	0.071	0.075	MARGINAL	MODERATE (June 2010)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	15	Gloucester	0.081	0.082	0.087	MARGINAL	MODERATE (June 2010)

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				8-hr Ozone DESIGN VALUES			2008 NAAQS	1997 NAAQS
ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	2008-10	2009-11	2010-12	Classification for 75 ppb NAAQS	Classification (attainment date)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	21	Mercer	0.078	0.078	0.081	MARGINAL	MODERATE (June 2010)
NJ	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	29	Ocean	0.081	0.081	0.085	MARGINAL	MODERATE (June 2010)
PA	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	17	Bucks	0.083	0.080	0.083	MARGINAL	MODERATE (June 2010)
PA	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	29	Chester	0.076	0.074	0.079	MARGINAL	MODERATE (June 2010)
PA	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	45	Delaware	0.074	0.073	0.078	MARGINAL	MODERATE (June 2010)
PA	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	91	Montgomery	0.078	0.077	0.078	MARGINAL	MODERATE (June 2010)
PA	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	101	Philadelphia	0.082	0.083	0.087	MARGINAL	MODERATE (June 2010)
PA	Pittsburgh-Beaver Valley, PA	3	Allegheny	0.081	0.080	0.082	MARGINAL	
PA	Pittsburgh-Beaver Valley, PA	5	Armstrong	0.076	0.073	0.075	MARGINAL	
PA	Pittsburgh-Beaver Valley, PA	7	Beaver	0.073	0.072	0.077	MARGINAL	
PA	Pittsburgh-Beaver Valley, PA	125	Washington	0.071	0.069	0.073	MARGINAL	
PA	Pittsburgh-Beaver Valley, PA	129	Westmoreland	0.072	0.069	0.074	MARGINAL	
PA	Reading, PA	11	Berks	0.079	0.077	0.079	MARGINAL	
DE	Seaford, DE	5	Sussex	0.077	0.076	0.081	MARGINAL	
WI	Sheboygan County, WI	117	Sheboygan	0.078	0.081	0.087	MARGINAL	MODERATE (June 2010)
IL	St. Louis-St. Charles-Farmington, MO-IL	119	Madison	0.072	0.076	0.080	MARGINAL	MAINTENANCE (Moderate)
IL	St. Louis-St. Charles-Farmington, MO-IL	163	Saint Clair	0.068	0.072	0.077	MARGINAL	MAINTENANCE (Moderate)
MO	St. Louis-St. Charles-Farmington, MO-IL	99	Jefferson	0.072	0.074	0.079	MARGINAL	MODERATE (June 2010)
MO	St. Louis-St. Charles-Farmington, MO-IL	183	Saint Charles	0.077	0.079	0.086	MARGINAL	MODERATE (June 2010)
MO	St. Louis-St. Charles-Farmington, MO-IL	189	Saint Louis	0.071	0.075	0.082	MARGINAL	MODERATE (June 2010)
MO	St. Louis-St. Charles-Farmington, MO-IL	510	St. Louis City	0.069	0.071	0.079	MARGINAL	MODERATE (June 2010)
DC	Washington, DC-MD-VA	1	District of Columbia	0.079	0.079	0.084	MARGINAL	MODERATE (June 2010)
MD	Washington, DC-MD-VA	9	Calvert	0.077	0.079	0.083	MARGINAL	MODERATE (June 2010)
MD	Washington, DC-MD-VA	17	Charles	0.075	0.077	0.083	MARGINAL	MODERATE (June 2010)
MD	Washington, DC-MD-VA	21	Frederick	0.075	0.076	0.079	MARGINAL	MODERATE (June 2010)
MD	Washington, DC-MD-VA	31	Montgomery	0.074	0.076	0.077	MARGINAL	MODERATE (June 2010)
MD	Washington, DC-MD-VA	33	Prince George's	0.078	0.079	0.087	MARGINAL	MODERATE (June 2010)
VA-OTC	Washington, DC-MD-VA	510	Alexandria City	0.074	0.077	0.083	MARGINAL	MODERATE (June 2010)
VA-OTC	Washington, DC-MD-VA	13	Arlington	0.079	0.080	0.086	MARGINAL	MODERATE (June 2010)
VA-OTC	Washington, DC-MD-VA	59	Fairfax	0.081	0.082	0.086	MARGINAL	MODERATE (June 2010)
VA-OTC	Washington, DC-MD-VA	107	Loudoun	0.075	0.073	0.075	MARGINAL	MODERATE (June 2010)
VA-OTC	Washington, DC-MD-VA	153	Prince William	0.070	0.069	0.072	MARGINAL	MODERATE (June 2010)
KY	Louisville, KY-IN	111	Jefferson	0.075	0.078	0.085		MAINTENANCE (former Part 1)

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
KY	Louisville, KY-IN	185	Oldham	0.074	0.078	0.086		MAINTENANCE (former Part 1)
AL		73	Jefferson	0.075	0.075	0.080		
AR		119	Pulaski	0.070	0.074	0.077		
DE		1	Kent	0.074	0.071	0.078		
IL		65	Hamilton	0.068	0.071	0.078		
IL		83	Jersey	0.069	0.072	0.079		
IN		19	Clark	0.073	0.075	0.081		
IN		43	Floyd	0.070	0.071	0.079		
IN		55	Greene	0.071		0.078		
IN		91	LaPorte	0.065	0.072	0.083		
KS		91	Johnson	0.065	0.069	0.076		
KS		173	Sedgwick	0.071	0.075	0.078		
KS		191	Sumner	0.072	0.075	0.078		
KY		59	Daviess	0.070	0.073	0.079		
KY		91	Hancock	0.071	0.072	0.076		
KY		101	Henderson	0.073	0.074	0.079		
KY		145	McCracken	0.070	0.070	0.077		
LA		15	Bossier	0.074	0.080	0.078		
LA		17	Caddo	0.072	0.075	0.076		
LA		77	Pointe Coupee	0.075	0.075	0.077		
MD		29	Kent	0.075	0.074	0.082		
MI		5	Allegan	0.074	0.078	0.084		
MI		21	Berrien	0.071	0.075	0.082		
MI		27	Cass	0.070	0.074	0.078		
MI		49	Genesee	0.068	0.069	0.076		
MI		91	Lenawee			0.076		
MI		99	Macomb	0.074	0.076	0.079		
MI		121	Muskegon	0.074	0.076	0.082		
MI		125	Oakland	0.073	0.075	0.078		
MI		139	Ottawa	0.069	0.073	0.078		
MI		147	St. Clair	0.071	0.074	0.077		
MI		161	Washtenaw	0.066	0.069	0.076		
MI		163	Wayne	0.075	0.078	0.081		
MO		47	Clay	0.072	0.075	0.080		
MO		49	Clinton	0.073	0.076	0.080		
MO		97	Jasper		0.075	0.078		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
MO		113	Lincoln	0.072	0.073	0.080		
MO		157	Perry	0.072	0.073	0.077		
NC		67	Forsyth	0.076	0.075	0.078		
NC		81	Guilford	0.076	0.074	0.076		
OH		23	Clark	0.073	0.074	0.076		
OH		95	Lucas	0.072	0.072	0.076		
OH		113	Montgomery	0.075	0.076	0.078		
OH		151	Stark	0.074	0.075	0.079		
OH		155	Trumbull	0.074	0.074	0.079		
OK		1	Adair	0.067	0.070	0.076		
OK		17	Canadian	0.071	0.075	0.076		
OK		21	Cherokee	0.068	0.071	0.076		
OK		27	Cleveland	0.069	0.073	0.076		
OK		37	Creek	0.070	0.075	0.078		
OK		97	Mayes	0.067	0.074	0.078		
OK		109	Oklahoma	0.074	0.077	0.079		
OK		115	Ottawa	0.065	0.070	0.076		
OK		143	Tulsa	0.075	0.077	0.080		
PA		43	Dauphin	0.073	0.073	0.077		
PA		49	Erie	0.072	0.072	0.076		
PA		63	Indiana	0.074	0.073	0.079		
PA		85	Mercer	0.074	0.073	0.079		
PA		133	York	0.074	0.072	0.077		
RI		9	Washington	0.076	0.073	0.078		
TN		65	Hamilton	0.075	0.073	0.076		
TN		89	Jefferson	0.074	0.073	0.078		
TN		155	Sevier	0.076	0.075	0.076		
TN		165	Sumner	0.076	0.075	0.079		
TX		29	Bexar	0.075	0.075	0.080		
TX		183	Gregg	0.074	0.077	0.079		
TX		221	Hood	0.075	0.076	0.077		
TX		245	Jefferson	0.074	0.079	0.080		
VA		36	Charles	0.075	0.075	0.079		
VA		650	Hampton City			0.076		
VA		85	Hanover	0.075	0.073	0.076		
VA		87	Henrico	0.076	0.074	0.078		
VA		179	Stafford	0.070	0.072	0.076		
WI		29	Door	0.073	0.074	0.078		
WI		61	Kewaunee	0.071	0.073	0.078		
WI		71	Manitowoc	0.073	0.077	0.080		
WI		79	Milwaukee	0.074	0.071	0.082		

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ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
WI		89	Ozaukee	0.071	0.073	0.080		
WI		101	Racine	0.071	0.075	0.081		
AL		3	Baldwin	0.071	0.072	0.071		
AL		33	Colbert	0.065	0.064	0.067		
AL		51	Elmore	0.067	0.067	0.068		
AL		55	Etowah	0.063	0.062	0.062		
AL		69	Houston	0.063	0.063	0.065		
AL		89	Madison	0.070	0.069	0.073		
AL		97	Mobile	0.073	0.073	0.071		
AL		101	Montgomery	0.068	0.068	0.069		
AL		103	Morgan	0.066	0.067	0.071		
AL		113	Russell	0.067	0.066	0.067		
AL		117	Shelby	0.074	0.072	0.075		
AL		125	Tuscaloosa	0.061	0.058	0.059		
AR		101	Newton	0.066	0.068	0.069		
AR		113	Polk	0.070	0.073	0.073		
AR		143	Washington	0.064	0.068	0.073		
FL		1	Alachua	0.064	0.063	0.065		
FL		3	Baker	0.062	0.061	0.063		
FL		5	Bay	0.070	0.069	0.069		
FL		9	Brevard	0.065	0.064	0.065		
FL		11	Broward	0.062	0.060	0.059		
FL		21	Collier			0.059		
FL		23	Columbia	0.064	0.063	0.064		
FL		31	Duval	0.068	0.067	0.065		
FL		33	Escambia	0.074	0.073	0.073		
FL		55	Highlands	0.067	0.064	0.064		
FL		57	Hillsborough	0.075	0.073	0.072		
FL		59	Holmes	0.063	0.062	0.063		
FL		69	Lake	0.066	0.066	0.066		
FL		71	Lee	0.065	0.063	0.064		
FL		73	Leon	0.064	0.063	0.066		
FL		81	Manatee			0.067		
FL		83	Marion	0.066	0.064	0.066		
FL		86	Miami-Dade	0.068	0.065	0.065		
FL		91	Okaloosa		0.067	0.067		
FL		95	Orange	0.069	0.071	0.073		
FL		97	Osceola	0.067	0.066	0.066		
FL		99	Palm Beach	0.065	0.063	0.063		
FL		101	Pasco	0.068	0.067	0.067		
FL		103	Pinellas	0.067	0.066	0.067		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
FL		105	Polk	**0.069**	**0.068**	**0.069**		
FL		113	Santa Rosa	**0.075**	**0.074**	**0.072**		
FL		115	Sarasota	**0.073**	**0.072**	**0.071**		
FL		117	Seminole	**0.065**	**0.066**	**0.069**		
FL		127	Volusia	**0.063**	**0.063**	**0.064**		
FL		129	Wakulla	**0.067**	**0.063**	**0.065**		
GA		21	Bibb	**0.073**	**0.073**	**0.073**		
GA		51	Chatham	**0.064**	**0.064**	**0.064**		
GA		55	Chattooga	**0.066**	**0.067**	**0.067**		
GA		59	Clarke	**0.072**	**0.071**	**0.073**		
GA		73	Columbia	**0.069**	**0.068**	**0.070**		
GA		85	Dawson	**0.071**	**0.068**	**0.067**		
GA		127	Glynn	**0.063**	**0.061**	**0.061**		
GA		213	Murray	**0.073**	**0.071**	**0.072**		
GA		215	Muscogee	**0.068**	**0.067**	**0.067**		
GA		245	Richmond	**0.071**	**0.069**	**0.072**		
GA		261	Sumter	**0.065**	**0.065**	**0.066**		
IA		17	Bremer	**0.062**	**0.063**	**0.065**		
IA		45	Clinton	**0.063**	**0.064**	**0.068**		
IA		85	Harrison	**0.063**	**0.065**	**0.069**		
IA		113	Linn	**0.062**	**0.063**	**0.066**		
IA		137	Montgomery	**0.062**	**0.064**	**0.067**		
IA		147	Palo Alto	**0.060**	**0.065**	**0.068**		
IA		153	Polk	**0.056**	**0.057**	**0.061**		
IA		163	Scott	**0.064**	**0.065**	**0.067**		
IA		169	Story	**0.058**	**0.060**	**0.062**		
IA		177	Van Buren	**0.062**	**0.063**	**0.068**		
IA		181	Warren	**0.061**	**0.062**	**0.065**		
IL		1	Adams	**0.064**	**0.064**	**0.069**		
IL		49	Effingham	**0.067**	**0.068**	**0.070**		
IL		115	Macon	**0.067**	**0.070**	**0.073**		
IL		117	Macoupin	**0.066**	**0.070**	**0.073**		
IL		113	McLean	**0.068**	**0.068**	**0.071**		
IL		143	Peoria	**0.068**	**0.069**	**0.072**		
IL		157	Randolph	**0.063**	**0.063**	**0.070**		
IL		161	Rock Island	**0.057**	**0.056**	**0.059**		
IL		201	Winnebago	**0.063**	**0.066**	**0.068**		
IN		3	Allen	**0.067**	**0.068**	**0.071**		
IN		11	Boone	**0.071**	**0.070**	**0.074**		
IN		15	Carroll	**0.066**	**0.067**	**0.071**		
IN		35	Delaware	**0.065**	**0.068**	**0.070**		

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ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
IN		39	Elkhart	**0.064**	**0.066**	**0.070**		
IN		57	Hamilton			**0.072**		
IN		59	Hancock	**0.071**	**0.069**	**0.067**		
IN		63	Hendricks	**0.068**	**0.068**	**0.068**		
IN		69	Huntington	**0.061**	**0.064**	**0.066**		
IN		71	Jackson	**0.067**	**0.066**	**0.067**		
IN		81	Johnson	**0.070**	**0.069**	**0.070**		
IN		95	Madison	**0.064**	**0.066**	**0.070**		
IN		97	Marion	**0.073**	**0.074**	**0.074**		
IN		109	Morgan	**0.067**	**0.068**	**0.069**		
IN		123	Perry	**0.070**	**0.070**	**0.075**		
IN		129	Posey	**0.068**	**0.070**	**0.071**		
IN		145	Shelby	**0.070**	**0.072**	**0.075**		
IN		141	St. Joseph	**0.063**	**0.064**	**0.071**		
IN		163	Vanderburgh	**0.070**	**0.070**	**0.073**		
IN		167	Vigo	**0.063**	**0.064**	**0.068**		
IN		173	Warrick	**0.068**	**0.070**	**0.074**		
KS		103	Leavenworth	**0.065**	**0.069**	**0.074**		
KS		107	Linn	**0.063**	**0.067**	**0.072**		
KS		177	Shawnee	**0.065**	**0.068**	**0.074**		
KS		195	Trego	**0.067**	**0.071**	**0.074**		
KS		209	Wyandotte	**0.061**	**0.060**	**0.067**		
KY		13	Bell	**0.066**	**0.063**	**0.065**		
KY		19	Boyd	**0.070**	**0.069**	**0.072**		
KY		29	Bullitt	**0.069**	**0.070**	**0.075**		
KY		43	Carter	**0.068**	**0.066**	**0.069**		
KY		47	Christian	**0.069**	**0.070**	**0.073**		
KY		61	Edmonson	**0.070**	**0.070**	**0.075**		
KY		67	Fayette	**0.068**	**0.069**	**0.074**		
KY		89	Greenup	**0.069**	**0.068**	**0.072**		
KY		93	Hardin	**0.070**	**0.068**	**0.073**		
KY		113	Jessamine	**0.067**	**0.068**	**0.072**		
KY		139	Livingston	**0.066**	**0.068**	**0.075**		
KY		193	Perry	**0.068**	**0.065**	**0.068**		
KY		195	Pike	**0.067**	**0.066**	**0.068**		
KY		199	Pulaski	**0.064**	**0.064**	**0.069**		
KY		213	Simpson	**0.070**	**0.070**	**0.071**		
LA		19	Calcasieu	**0.074**	**0.075**	**0.074**		
LA		51	Jefferson	**0.075**	**0.076**	**0.075**		
LA		55	Lafayette	**0.072**	**0.072**	**0.072**		
LA		57	Lafourche	**0.071**	**0.072**	**0.074**		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
LA		71	Orleans	0.071	0.070	0.070		
LA		73	Ouachita	0.064	0.066	0.063		
LA		89	St. Charles	0.070	0.072	0.071		
LA		93	St. James	0.068	0.069	0.069		
LA		95	St. John the Baptist	0.073	0.075	0.075		
LA		103	St. Tammany		0.074	0.074		
MA		1	Barnstable	0.074	0.072	0.075		
MA		9	Essex	0.074	0.071	0.071		
MA		13	Hampden	0.076	0.074	0.074		
MA		15	Hampshire	0.077	0.072	0.072		
MA		17	Middlesex	0.071	0.067	0.068		
MA		21	Norfolk	0.073	0.072	0.073		
MA		25	Suffolk	0.072	0.070	0.067		
MA		27	Worcester	0.076	0.070	0.069		
MD		23	Garrett	0.071	0.071	0.075		
MD		43	Washington	0.072	0.072	0.075		
ME		1	Androscoggin	0.065	0.062	0.060		
ME		3	Aroostook	0.054	0.053	0.053		
ME		5	Cumberland	0.070	0.070	0.069		
ME		9	Hancock	0.074	0.074	0.072		
ME		11	Kennebec	0.064	0.062	0.062		
ME		13	Knox	0.066	0.069	0.066		
ME		17	Oxford	0.056	0.055	0.054		
ME		19	Penobscot	0.059	0.057	0.057		
ME		23	Sagadahoc	0.063	0.061	0.061		
ME		29	Washington	0.060	0.059	0.058		
ME		31	York	0.072	0.072	0.074		
MI		19	Benzie	0.069	0.070	0.075		
MI		37	Clinton	0.065	0.066	0.071		
MI		63	Huron	0.067	0.068	0.074		
MI		65	Ingham	0.068	0.068	0.071		
MI		77	Kalamazoo	0.069	0.071	0.075		
MI		81	Kent	0.069	0.071	0.075		
MI		101	Manistee	0.067	0.069	0.074		
MI		105	Mason	0.068	0.070	0.075		
MI		113	Missaukee	0.065	0.065	0.070		
MI		153	Schoolcraft	0.067	0.068	0.075		
MN		3	Anoka	0.062	0.065	0.067		
MN		5	Becker			0.061		
MN		17	Carlton			0.055		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
MN		35	Crow Wing			**0.062**		
MN		49	Goodhue			**0.062**		
MN		83	Lyon			**0.064**		
MN		95	Mille Lacs		**0.059**	**0.060**		
MN		109	Olmsted			**0.063**		
MN		137	Saint Louis	**0.062**	**0.062**	**0.063**		
MN		139	Scott			**0.062**		
MN		145	Stearns			**0.061**		
MN		171	Wright			**0.064**		
MO		3	Andrew		**0.072**	**0.075**		
MO		19	Boone		**0.066**	**0.072**		
MO		27	Callaway		**0.065**	**0.070**		
MO		37	Cass	**0.065**	**0.067**	**0.072**		
MO		39	Cedar	**0.065**	**0.068**	**0.074**		
MO		77	Greene	**0.068**	**0.069**	**0.074**		
MO		137	Monroe	**0.065**	**0.067**	**0.071**		
MO		186	Sainte Genevieve	**0.070**	**0.070**	**0.075**		
MO		213	Taney			**0.070**		
MS		11	Bolivar	**0.068**	**0.070**	**0.074**		
MS		45	Hancock		**0.066**	**0.067**		
MS		47	Harrison	**0.076**	**0.075**	**0.073**		
MS		49	Hinds	**0.065**	**0.067**	**0.068**		
MS		59	Jackson	**0.074**	**0.072**	**0.073**		
MS		75	Lauderdale	**0.061**	**0.062**	**0.063**		
MS		81	Lee	**0.066**	**0.065**	**0.066**		
NC		3	Alexander	**0.070**	**0.067**	**0.068**		
NC		11	Avery	**0.067**	**0.064**	**0.065**		
NC		21	Buncombe	**0.068**	**0.067**	**0.068**		
NC		27	Caldwell	**0.069**	**0.067**	**0.067**		
NC		33	Caswell	**0.073**	**0.070**	**0.073**		
NC		37	Chatham	**0.068**	**0.066**	**0.065**		
NC		51	Cumberland	**0.071**	**0.071**	**0.072**		
NC		59	Davie			**0.073**		
NC		63	Durham	**0.072**	**0.070**	**0.072**		
NC		65	Edgecombe	**0.071**	**0.070**	**0.071**		
NC		69	Franklin	**0.071**	**0.069**	**0.071**		
NC		75	Graham	**0.073**	**0.071**	**0.072**		
NC		77	Granville	**0.074**	**0.071**	**0.072**		
NC		87	Haywood	**0.072**	**0.067**	**0.069**		
NC		99	Jackson		**0.067**	**0.070**		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
NC		101	Johnston	**0.072**	**0.071**	**0.074**		
NC		107	Lenoir	**0.069**	**0.067**	**0.069**		
NC		117	Martin	**0.069**	**0.066**	**0.067**		
NC		129	New Hanover		**0.062**	**0.063**		
NC		145	Person	**0.072**	**0.070**	**0.074**		
NC		147	Pitt	**0.070**	**0.069**	**0.071**		
NC		157	Rockingham	**0.075**	**0.071**	**0.073**		
NC		173	Swain	**0.064**	**0.062**	**0.062**		
NC		183	Wake	**0.073**	**0.073**	**0.075**		
NC		199	Yancey		**0.070**	**0.071**		
ND		7	Billings	**0.059**	**0.058**	**0.058**		
ND		13	Burke	**0.060**	**0.060**	**0.059**		
ND		15	Burleigh	**0.057**	**0.057**	**0.058**		
ND		17	Cass	**0.058**	**0.059**	**0.061**		
ND		53	McKenzie	**0.060**	**0.059**	**0.059**		
ND		57	Mercer	**0.059**	**0.058**	**0.060**		
ND		65	Oliver	**0.059**	**0.058**	**0.058**		
NE		55	Douglas	**0.061**	**0.061**	**0.066**		
NE		109	Lancaster	**0.051**	**0.052**	**0.053**		
NH		1	Belknap	**0.065**	**0.062**	**0.063**		
NH		5	Cheshire	**0.064**	**0.062**	**0.063**		
NH		7	Coos	**0.072**	**0.069**	**0.070**		
NH		9	Grafton	**0.062**	**0.059**	**0.060**		
NH		11	Hillsborough	**0.075**	**0.070**	**0.070**		
NH		13	Merrimack	**0.066**	**0.065**	**0.065**		
NH		15	Rockingham	**0.069**	**0.066**	**0.066**		
NY		1	Albany	**0.071**	**0.067**	**0.070**		
NY		15	Chemung	**0.067**	**0.066**	**0.067**		
NY		27	Dutchess	**0.075**	**0.072**	**0.074**		
NY		29	Erie	**0.071**	**0.069**	**0.073**		
NY		31	Essex	**0.072**	**0.068**	**0.073**		
NY		41	Hamilton	**0.068**	**0.066**	**0.067**		
NY		43	Herkimer	**0.067**	**0.063**	**0.062**		
NY		45	Jefferson	**0.072**	**0.071**	**0.074**		
NY		63	Niagara	**0.069**	**0.069**	**0.075**		
NY		65	Oneida	**0.061**	**0.059**	**0.064**		
NY		67	Onondaga	**0.068**	**0.067**	**0.072**		
NY		71	Orange	**0.073**	**0.069**	**0.069**		
NY		75	Oswego	**0.069**	**0.067**	**0.070**		
NY		79	Putnam	**0.075**	**0.071**	**0.071**		
NY		83	Rensselaer	**0.072**	**0.067**	**0.067**		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
NY		91	Saratoga	**0.072**	**0.068**	**0.068**		
NY		101	Steuben	**0.066**	**0.065**	**0.067**		
NY		111	Ulster	**0.068**	**0.069**	**0.069**		
NY		117	Wayne	**0.068**	**0.063**	**0.067**		
OH		3	Allen			**0.074**		
OH		57	Greene	**0.072**	**0.072**	**0.074**		
OH		81	Jefferson	**0.069**	**0.068**	**0.072**		
OH		87	Lawrence	**0.068**	**0.064**	**0.072**		
OH		99	Mahoning	**0.069**	**0.069**	**0.073**		
OH		109	Miami	**0.070**	**0.072**	**0.074**		
OH		135	Preble	**0.069**	**0.071**	**0.074**		
OH		167	Washington	**0.073**	**0.071**	**0.074**		
OH		173	Wood	**0.069**	**0.070**	**0.073**		
OK		31	Comanche	**0.069**	**0.072**	**0.075**		
OK		43	Dewey	**0.066**	**0.070**	**0.073**		
OK		71	Kay	**0.066**	**0.070**	**0.072**		
OK		87	McClain	**0.068**	**0.073**	**0.075**		
OK		89	McCurtain			**0.068**		
OK		121	Pittsburg	**0.067**	**0.071**	**0.074**		
PA		13	Blair	**0.070**	**0.070**	**0.075**		
PA		21	Cambria	**0.067**	**0.069**	**0.072**		
PA		27	Centre	**0.070**	**0.070**	**0.073**		
PA		33	Clearfield	**0.073**	**0.072**	**0.074**		
PA		55	Franklin	**0.067**	**0.065**	**0.068**		
PA		59	Greene	**0.072**	**0.069**	**0.071**		
PA		69	Lackawanna	**0.072**	**0.071**	**0.072**		
PA		73	Lawrence	**0.066**	**0.067**	**0.073**		
PA		79	Luzerne	**0.069**	**0.065**	**0.066**		
PA		81	Lycoming	**0.073**	**0.066**	**0.069**		
PA		89	Monroe	**0.070**	**0.066**	**0.070**		
PA		99	Perry	**0.072**	**0.067**	**0.070**		
PA		117	Tioga	**0.070**	**0.069**	**0.071**		
RI		3	Kent	**0.071**	**0.073**	**0.074**		
RI		7	Providence	**0.072**	**0.071**	**0.075**		
SC		1	Abbeville	**0.067**	**0.062**	**0.064**		
SC		3	Aiken	**0.069**	**0.067**	**0.064**		
SC		7	Anderson		**0.069**	**0.073**		
SC		15	Berkeley	**0.062**	**0.062**	**0.064**		
SC		19	Charleston	**0.067**	**0.065**	**0.066**		
SC		21	Cherokee	**0.069**	**0.066**	**0.070**		
SC		25	Chesterfield	**0.068**	**0.066**	**0.065**		

(continued)

ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
SC		29	Colleton	**0.066**	**0.064**	**0.063**		
SC		31	Darlington	**0.070**	**0.068**	**0.070**		
SC		37	Edgefield	**0.065**	**0.063**	**0.063**		
SC		45	Greenville		**0.068**	**0.069**		
SC		73	Oconee	**0.069**	**0.065**	**0.064**		
SC		77	Pickens	**0.072**	**0.071**	**0.071**		
SC		79	Richland	**0.071**	**0.073**	**0.073**		
SC		83	Spartanburg	**0.076**	**0.074**	**0.075**		
SD		11	Brookings	**0.059**	**0.061**	**0.065**		
SD		33	Custer		**0.060**	**0.062**		
SD		71	Jackson	**0.055**	**0.054**	**0.058**		
SD		93	Meade	**0.058**	**0.057**	**0.060**		
SD		99	Minnehaha	**0.062**	**0.063**	**0.067**		
SD		127	Union		**0.061**	**0.064**		
TN		37	Davidson	**0.067**	**0.067**	**0.074**		
TN		105	Loudon	**0.073**	**0.072**	**0.075**		
TN		121	Meigs	**0.071**	**0.071**	**0.074**		
TN		149	Rutherford	**0.069**	**0.067**	**0.070**		
TN		163	Sullivan	**0.071**	**0.070**	**0.074**		
TN		187	Williamson	**0.068**	**0.069**	**0.073**		
TN		189	Wilson	**0.072**	**0.071**	**0.074**		
TX		27	Bell			**0.075**		
TX		43	Brewster	**0.064**	**0.069**	**0.070**		
TX		61	Cameron	**0.065**	**0.064**	**0.064**		
TX		141	El Paso	**0.071**	**0.071**	**0.072**		
TX		203	Harrison	**0.070**	**0.072**	**0.074**		
TX		215	Hidalgo	**0.061**	**0.062**	**0.062**		
TX		231	Hunt	**0.064**	**0.069**	**0.072**		
TX		309	McLennan	**0.070**	**0.072**	**0.072**		
TX		349	Navarro			**0.070**		
TX		355	Nueces	**0.071**	**0.072**	**0.072**		
TX		361	Orange	**0.071**	**0.075**	**0.074**		
TX		423	Smith	**0.073**	**0.075**	**0.075**		
TX		453	Travis	**0.074**	**0.075**	**0.074**		
TX		469	Victoria	**0.066**	**0.070**	**0.069**		
VA		3	Albemarle	**0.069**	**0.067**	**0.068**		
VA		33	Caroline	**0.073**	**0.070**	**0.074**		
VA		41	Chesterfield	**0.075**	**0.072**	**0.075**		
VA		61	Fauquier	**0.065**	**0.064**	**0.063**		
VA		69	Frederick	**0.068**	**0.066**	**0.069**		
VA		113	Madison	**0.073**	**0.071**	**0.072**		

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ST	Area Name (75 ppb nonattainment)	CTY	COUNTY NAME	8-hr Ozone DESIGN VALUES 2008-10	2009-11	2010-12	2008 NAAQS Classification for 75 ppb NAAQS	1997 NAAQS Classification (attainment date)
VA		139	Page	**0.066**	**0.066**	**0.068**		
VA		161	Roanoke	**0.069**	**0.068**	**0.070**		
VA		163	Rockbridge	**0.065**	**0.063**	**0.064**		
VA		165	Rockingham	**0.066**	**0.066**	**0.068**		
VA		800	Suffolk City	**0.072**	**0.071**	**0.073**		
VA		197	Wythe	**0.066**	**0.064**	**0.066**		
VT		3	Bennington	**0.068**	**0.065**	**0.064**		
VT		7	Chittenden	**0.064**	**0.060**	**0.062**		
WI		3	Ashland	**0.057**	**0.057**	**0.059**		
WI		9	Brown	**0.064**	**0.065**	**0.070**		
WI		21	Columbia	**0.063**	**0.064**	**0.068**		
WI		25	Dane	**0.062**	**0.063**	**0.067**		
WI		27	Dodge			**0.071**		
WI		39	Fond du Lac	**0.063**	**0.067**	**0.071**		
WI		41	Forest	**0.062**	**0.061**	**0.067**		
WI		55	Jefferson	**0.066**	**0.067**	**0.070**		
WI		63	La Crosse	**0.061**	**0.061**	**0.065**		
WI		73	Marathon	**0.061**	**0.061**	**0.064**		
WI		87	Outagamie	**0.062**	**0.066**	**0.070**		
WI		105	Rock	**0.065**	**0.067**	**0.072**		
WI		111	Sauk	**0.061**	**0.062**	**0.066**		
WI		125	Vilas	**0.061**	**0.061**	**0.063**		
WI		127	Walworth	**0.066**	**0.067**	**0.070**		
WI		133	Waukesha	**0.060**	**0.064**	**0.069**		
WV		3	Berkeley	**0.070**	**0.068**	**0.070**		
WV		11	Cabell	**0.066**	**0.067**	**0.072**		
WV		25	Greenbrier	**0.066**	**0.065**	**0.066**		
WV		29	Hancock	**0.073**	**0.072**	**0.075**		
WV		39	Kanawha	**0.069**	**0.070**	**0.074**		
WV		61	Monongalia	**0.068**	**0.069**	**0.072**		
WV		69	Ohio	**0.073**	**0.073**	**0.074**		
WV		107	Wood	**0.068**	**0.066**	**0.071**		

Gray shaded cells indicate more than one monitor in county.