

July 15, 2003

L. John Iani  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue  
Seattle, WA 98101

Re: Recommendations for  
8-hour Ozone Area Designations

Dear Mr. Iani:

I am pleased to present to you my recommendations for air quality designations in the State of Oregon for the eight-hour ozone National Ambient Air Quality Standard, as requested by your letter of March 31, 2003.

Based on quality-assured, federal reference monitoring data collected in 2000, 2001 and 2002, all areas of Oregon are in compliance with the eight-hour ozone public health standard. Therefore, in accordance with an Environmental Protection Agency guidance memorandum from Jeffrey Holmstead dated February 27, 2003, I recommend that the Environmental Protection Agency designate all counties in the state of Oregon "attainment/unclassifiable".

If you have any questions, please contact Annette Liebe, Manager, Air Quality Planning, Air Quality Division, Department of Environmental Quality, at (503) 229-6919.

Sincerely,

Theodore R. Kulongoski, Governor

Enc: Summary of Oregon 8-hour Ozone Data, 2000-2002  
cc: Oregon Department of Environmental Quality  
Lane Regional Air Pollution Authority  
Salem-Keizer Area Transportation Study  
Southwest Clean Air Agency (WA)

**State of Oregon**  
**Department of Environmental Quality**

**Memorandum**

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**Date:** June 26, 2003

**To:** Governor Kulongoski  
**From:** Stephanie Hallock  
**Subject:** Area designations for 8-hour ozone standard

The US Environmental Protection Agency (EPA) revised the national ambient air quality standard (NAAQS) for ozone in 1997 to an 8-hour standard that EPA believes is more protective of air quality than the former 1-hour standard. Implementation was delayed by court cases that were not fully resolved until the US Supreme Court upheld the rule in 2001 and all remaining challenges were resolved in March 2002.

The EPA is obligated under the Clean Air Act and consent decree to designate all areas of the country as “nonattainment” or “attainment/unclassifiable” under the revised 8-hour ozone standard. The term “nonattainment” means an area has had, or has contributed to, nearby ozone violations over a three-year period. EPA is not requesting a distinction between areas where monitoring data is available and those areas without monitors.

EPA sent you a letter on March 31, 2003 requesting that we submit recommended designations for Oregon by July 15, 2003. Based on monitoring data collected during 2000, 2001, and 2002, all areas in Oregon are meeting the 8-hour ozone NAAQS. A draft letter is attached for your signature, recommending that EPA designate all areas of Oregon as “attainment/unclassifiable”.

EPA expects to publish final area designations in the Federal Register by April 15, 2004.

If you have any questions, please contact Andy Ginsburg, Administrator, Air Quality Division, at (503) 229-5397.

STATE OF OREGON 8-HOUR OZONE DESIGNATION RECOMMENDATIONS

Based on the 2000-2002 design value

Airshed	Site ID	County (State)	Site Name	2000-2002 Design Value <sup>2</sup>	Attainment?	Recommended Designation <sup>3</sup>
Portland-Vancouver AQMA (part of Portland-Vancouver MSA1)	530110011	Clark (WA)	Mt. View High School	0.06	Yes	Attainment/Unclassifiable
	410050004	Clackamas	Carus	0.07	Yes	
	410052002	Clackamas	Milwaukie	0.06	Yes	
	410090004	Columbia	Sauvie Island	0.06	Yes	
Salem-Keizer	410470004	Marion	Turner	0.06	Yes	Attainment/Unclassifiable
Eugene-Springfield AQMA	410390060	Lane	Amazon Park	0.06	Yes	Attainment/Unclassifiable
	410391007		Saginaw	0.07		
Medford-Ashland AQMA	410290201	Jackson	Talent	0.07	Yes	Attainment/Unclassifiable
Rest of State (no monitoring data available)						Attainment/Unclassifiable

NOTES: 1. Metropolitan area boundaries are defined by the Federal Office of Management and Budget. MSA means Metropolitan Statistical Area; CMSA, Consolidated Metropolitan Statistical Area.

2. The design value is compared to the standard of 0.08 ppm.

3. EPA does not make a distinction between attainment designations and unclassifiable designation since the Clean Air Act treats attainment and unclassifiable areas in the same way.

STATE OF OREGON 8-HOUR OZONE DESIGN VALUES

Based on the 3-year average of 4th highest daily maximum values for 2000-2002

Designated Area	Site ID	County (State)	Site Name	Percent Valid Days <sup>2</sup>	4th Highest Daily Maximum (ppm)			3-Year Average (ppm) <sup>4</sup>	2000-2002 Design Value
					2000	2001	2002		
Portland-Vancouver AQMA (part of Portland-Vancouver MSA <sup>1</sup> )	530110011	Clark (WA)	Mt. View High School	98	0.058	0.063	0.058	0.060	0.06
	410050004	Clackamas	Carus	96	0.065	0.069	0.063	0.066	0.07
	410052002	Clackamas	Milwaukie	92	0.056	0.059	0.063	0.059	0.06
	410090004	Columbia	Sauvie Island	95	0.054	0.056	0.061	0.057	0.06
Salem-Keizer	410470004	Marion	Turner	98	0.059	0.057	0.063	0.060	0.06
Eugene-Springfield AQMA	410390060	Lane	Amazon Park	98	0.047	0.061	0.067	0.058	0.06
	410391007		Saginaw	90	0.064	0.066	0.065	0.065	0.07
Medford-Ashland AQMA	410290201	Jackson	Talent	95	0.067	0.064	0.078	0.070	0.07

- NOTES: 1. Metropolitan area boundaries are defined by the Federal Office of Management and Budget. MSA means Metropolitan Statistical Area; CMSA, Consolidated Metropolitan Statistical Area.
2. Percent Valid Days. The design value is based on 3 consecutive calendar years of data where daily maximum 8-hour concentrations are available for an average of 90% of the days in each ozone monitoring season (May 1 through September 30).
3. The 3-year average of the 4th highest daily maximum is compared to the standard of 0.08 ppm after rounding the average to two decimal places by rounding the third decimal place of 4 and below down and 5 and above up.