

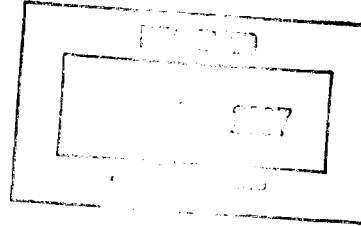
Allen R. Ellett

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July 2, 2007



John M. Mooney  
Chief, Criteria Pollutant Section  
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**Re: Redesignation of the Toledo, Ohio Area to Attainment for the 8-Hour Ozone Standard, 72 *Federal Register* 32246-32257**  
Docket ID No. EPA-R05-OAR-2007-0001

Dear Mr. Mooney:

On behalf of BP Products, North America Inc. (BP), I am pleased to submit these comments supporting the proposed plan of action to redesignate the Toledo non-attainment area as attainment for the 8-hour ozone standard and to approve Ohio's maintenance plan SIP revision for the Toledo area.

BP's Toledo Refinery, as well as several marketing and distribution facilities, are in the Toledo non-attainment area that is being considered for redesignation. As such, we will be impacted by EPA's decision regarding the proposed redesignation.

We support the proposed redesignation request, and we encourage the EPA to approve the request as expeditiously as possible. We believe that the most recent three years of ambient air quality monitoring data, which demonstrate that the area has attained the 8-hour National Ambient Air Quality Standard (NAAQS) for ozone, and the Ohio EPA petition for redesignation of the area from non-attainment to attainment contain adequate evidence that the area is currently attaining the NAAQS for ozone. We also believe that the Ohio EPA, by working closely with the local governmental and industrial sectors and the State legislature in developing this plan of action, has developed an adequate maintenance plan which demonstrates that the area will remain in attainment of the standard, even allowing for growth.

BP believes in doing its part to ensure a clean environment and we have taken necessary steps to help attain the ozone standard in the Toledo area. We have already made significant reductions of VOC emissions at our Toledo Refinery, and we are producing the fuels that meet EPA's standards for sulfur and other parameters to assist in the attainment of the ozone standard in the State of Ohio. We believe that these reductions have played a significant role in bringing the Toledo area into attainment.

Thank you for the opportunity to comment on this proposed action. If you have any questions concerning our comments, please contact me at (419) 697-6064.

Sincerely,



Allen R. Ellett  
Environmental Team Leader  
BP Products, North America Toledo Refinery

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