



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Commissioner

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March 11, 2009

Mr. Bharat Mathur  
Acting Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3608

Re: Recommendations Concerning Air Quality  
Designations for the 2008 Revised 8-Hour  
Ozone National Ambient Air Quality Standard

Dear Mr. Mathur:

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's) December 4, 2008, guidance memorandum concerning air quality designations for the revised 2008 8-hour ozone National Ambient Air Quality Standard (NAAQS). The guidance indicates U.S. EPA's intention to propose designations in November 2009, and finalize them by March 12, 2010, and requests that states submit recommendations by March 12, 2009.

Enclosed are quality assured monitoring data from 2006 through 2008 for Indiana's ozone monitoring network. Indiana's monitored ozone concentrations have trended downward since 2002, resulting in just twelve Indiana counties (Boone, Clark, Floyd, Greene, Hamilton, Hancock, Lake, Marion, Morgan, Perry, Vanderburgh and Warrick) with design values above the revised 8-hour ozone standard. Indiana expects this downward trend to continue over the next few years with the continued phase-in of recently implemented federal and state regulations.

The following enclosures are also included with this letter:

- Enclosure 1—2006-2008 Indiana Ozone Summary
- Enclosure 2—List of Indiana Counties with Recommendations
- Enclosure 3—Map of Indiana Ozone Nonattainment Recommendations
- Enclosure 4—Indiana's Assessment of the Revised 2008 8-Hour Ozone Standard and Technical Support Documents
  - Appendix A—Indiana Growth Rates and Patterns
  - Appendix B—2006 Indiana Commuting Patterns
  - Appendix C—2005 Indiana Emissions Summary

Monitoring data indicates that Indiana's air quality continues to improve. Indiana firmly believes that the nonattainment boundaries for the revised 8-hour ozone standard should be limited to the counties that actually possess a three-year average ambient monitor-based design value above the standard. With the exception of two ozone monitors in Indiana (Charlestown-Clark County and Inglefield-Vanderburgh

County), monitored values exceed the standard by only 1 to 3 ppb. Because there is a public stigma associated with nonattainment designations, Indiana urges U.S. EPA to carefully review all data, as well as federal and regional modeling of the impact of federal and state control measures prior to imposing undue economic hardships on areas that are adjacent to counties where monitoring data slightly exceeds the revised standard.

Limiting the designated nonattainment areas is further supported by the fact that air emissions in Indiana counties adjacent to the larger urban areas do not significantly contribute to exceeding monitors. Air quality in those counties will be further improved by federal and state control programs, such as the Clean Air Interstate Rule (CAIR) and cleaner engine and fuel standards, which are expected to dramatically reduce the precursors for ozone over the next few years.

Although the Clean Air Act (CAA) requires U.S. EPA to complete the designation process within two years of the effective date of the standard, it does allow U.S. EPA to take up to an additional year to issue designations (i.e., no later than three years after the effective date of the standard). In this case, that enables U.S. EPA to delay issuance of designations until March 12, 2011. Indiana urges U.S. EPA to take advantage of this CAA provision to fully realize the effects from some of the recently implemented federal and state control measures, prior to imposing an undue burden on states and local communities. Technical information within Enclosure 4 illustrates that all but one county in Indiana will likely attain the revised standard by 2012.

Since the U.S. EPA will not designate areas under the revised standard until the completion of the 2009 ozone season (2010 ozone season if designations are delayed another year), Indiana reserves the right to update the recommendations contained within based on the 2007-2009 design values, once available. Indiana also reserves the right to supplement its recommendations with additional technical support information as it becomes available and intends to do so within the next 60 days.

I appreciate the opportunity to provide comments and recommendations to U.S. EPA concerning the designations for the revised 2008 8-hour ozone standard. Likewise, I look forward to working with your staff as U.S. EPA moves forward with the designation process. If you have any questions regarding IDEM's analysis and recommendations, please feel free to contact me at (317) 232-8611 or Dan Murray, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,



Thomas W. Easterly  
Commissioner

TWE/dm/sad/skr  
Enclosures

cc: Cheryl L. Newton, U.S. EPA Region 5  
John Mooney, U.S. EPA Region 5  
Daniel Murray, IDEM-OAQ