



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels Jr.*  
Governor

*Thomas W. Easterly*  
Commissioner

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June 16, 2011

Ms. Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Request for Redesignation Petition and  
Maintenance Plan for the Indiana Portion  
(Madison Township, Jefferson County and  
Clark and Floyd counties) of the Louisville  
KY-IN Nonattainment Area for Fine  
Particles

Dear Ms. Hedman:

The Indiana Department of Environmental Management (IDEM) submits a Redesignation Petition and Maintenance Plan for the Indiana Portion (Madison Township, Jefferson County and Clark and Floyd counties) of the Louisville KY-IN Nonattainment Area, which was designated as nonattainment of the annual standard for fine particles on April 5, 2005. IDEM conducted a public hearing concerning the Redesignation Petition and Maintenance Plan on May 26, 2011, and the public comment period concluded on May 29, 2011.

During the public comment period, the Louisville Metro Air Pollution Control District and Kentucky Department of Environmental Management provided an updated emission inventory for Kentucky's portion of the nonattainment area (Bullitt and Jefferson counties). The new emission inventory numbers have been incorporated into the final Redesignation Petition and Maintenance Plan and Appendices B, C, and E.

The attached document consists of the following:

### ***Redesignation Petition and Maintenance Plan***

- A formal request that the Indiana Portion (Madison Township, Jefferson County and Clark and Floyd counties) of the Louisville KY-IN Nonattainment Area for Fine Particles be redesignated to attainment and reclassified as maintenance. It contains and meets the requirements set forth in Section 107 of the Clean Air Act and in United States Environmental Protection Agency (U.S. EPA) Redesignation Guidance.
- The appendices of the document contain historical air quality trend data, projected emission inventory data, and thorough documentation of the mobile emissions analysis.

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- A maintenance year of 2025 is established and 2015 and 2020 are analyzed as interim years.
- A summary of, and response to, all comments.

### **Motor Vehicle Emissions Budgets**

- Contained in the Redesignation Petition is a new Motor Vehicle Emissions Budget for 2015 and 2025. The Kentuckiana Regional Planning and Development Agency's (KIPDA's) travel demand forecasting model and U.S. EPA's software program referred to as Motor Vehicle Emission Simulator (MOVES) were used to determine emissions for the annual fine particle nonattainment area.
- A conservative margin of safety was applied to the 2015 and 2025 projected emissions.
- The travel demand model was updated with the best available assumptions.
- Vehicle registration data gathered from the Indiana Bureau of Motor Vehicles were used to replace the MOVES default vehicle age distribution.

IDEM requests that U.S. EPA proceed with review and approval of this submittal. If you have any questions or need additional information, please contact Scott Deloney, Chief, Air Programs Branch, at (317) 233-5694.

Sincerely,



Keith Baugues  
Assistant Commissioner  
Office of Air Quality

KB/sad/ghf

Enclosure:

Request for Redesignation Petition and Maintenance Plan Under the Annual National Ambient Air Quality Standard for Fine Particles for the Indiana Portion of the Louisville KY-IN Nonattainment Area

Cc: John Summerhays, U.S. EPA Region 5 (w/ enclosures)  
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