



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard, R-19J
Chicago, IL 60604-3950

December 7, 2010

Re: Updated Recommendations for the
Second Round of Air Quality
Designations for the 2008 Lead
National Ambient Air Quality
Standard

Dear Ms. Hedman:

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's) June 14, 2010 guidance memorandum concerning air quality designations for the 2008 revised lead National Ambient Air Quality Standard (NAAQS). The guidance indicates U.S. EPA's intention to defer designation decisions for up to one year from when the first round of designations were proposed so that additional lead air quality data can be collected. States have until December 15, 2010, to submit updated recommendations for those areas not included in the first round of designations announced on November 16, 2010 and provide updated monitoring data for U.S. EPA's consideration in the second round of designations. According to the guidance, U.S. EPA will notify States of preliminary responses to the second round of designations by no later than June 17, 2011.

The lead monitoring network in Indiana currently consists of ten sites. The federal requirement at 40 CFR Part 58, Appendix D, Section 4.5 specifies that lead monitoring must be conducted taking into account lead sources that are expected to, or have been shown to, contribute to a maximum lead concentration in ambient air in excess of the NAAQS, the potential for population exposure, and logistics. At a minimum, there must be one source-oriented site located to measure the maximum lead concentration in ambient air resulting from each lead source that emits 1.0 or more tons per year. Indiana deployed its required source-oriented sites as defined in the "2010 Indiana Lead Monitoring Plan" submitted to U.S. EPA in 2009. Indiana added three new monitors to the monitoring network and the sites were established at the beginning of 2010. Enclosed are quality assured ambient air quality monitoring data through June 30, 2010, for Indiana's lead monitoring network.

Indiana's monitored lead concentrations have declined over time, resulting in just one county (Delaware County) with a design value above the revised lead NAAQS. A small portion of the city of Muncie, IN, located in Delaware County, was designated nonattainment on November 16, 2010. Monitoring data through June 30, 2010 still shows a violation at the monitor located in Delaware County. All other monitors in the state show values well below the revised lead NAAQS.

Indiana firmly believes that the nonattainment boundaries for the new lead standard should be limited to the area that actually possesses a three-month rolling average ambient monitor-based design value above the standard. Since every monitor except the one located in Delaware County is well below the revised lead NAAQS Indiana is not recommending any additional areas for nonattainment. Nonattainment boundaries should remain the same as defined by the first round of designations on November 16, 2010. Indiana expects the monitor values in Delaware County to trend downward since the local source of lead emissions has implemented a number of improvement projects to decrease lead emissions at the facility and ensure future compliance with the 2008 lead NAAQS.

I appreciate the opportunity to provide comments and recommendations to U.S. EPA concerning the second round of designations for the revised 2008 lead NAAQS. 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 Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,



Thomas W. Easterly
Commissioner

TWE/sad/skr
Enclosures

Indiana Lead Monitor Data Summary

cc: Cheryl L. Newton, U.S. EPA Region 5
John Mooney, U.S. EPA Region 5
Keith Baugues, IDEM-OAQ
Scott Deloney, IDEM-OAQ
Christine Pedersen, IDEM-OAQ
Sarah Raymond, IDEM-OAQ

Indiana Lead Monitor Data Summary (As of 06/30/2010)

Note: Prior to 2008 the lead standard was 1.5 micrograms per cubic meter (ug/m3). Beginning in October 2008, the new lead standard is 0.15 ug/m3. Any three-month average exceeding 0.15 ug/m3 within a three-year period is considered a violation of the standard.

County	Site #	Site Name	Three-Month Averages																					
			05/07-07/07	06/07-08/07	07/07-09/07	08/07-10/07	09/07-11/07	10/07-12/07	11/07-01/08	12/07-02/08	01/08-03/08	02/08-04/08	03/08-05/08	04/08-06/08	05/08-07/08	06/08-08/08	07/08-09/08	08/08-10/08	09/08-11/08	10/08-12/08				
Delaware	180350008	Muncie-West Site	0.198	0.209	0.209	0.214	0.164	0.144	0.089	0.079	0.107	0.325	0.335	0.285	0.073	0.082	0.133	0.148	0.129	0.068				
Delaware	180350009	Muncie-East Site	0.573	0.735	0.705	0.927	0.870	0.838	0.522	0.347	0.403	0.425	0.685	1.963	1.867	0.495	0.238	0.231	0.191	0.191				
Lake	180890023	East Chicago-Aldis St.	0.045	0.042	0.056	0.041	0.046	0.037	0.038	0.028	0.031	0.031	0.029	0.031	0.045	0.040	0.037	0.025	0.016	0.016				
Lake	180890032	Gary-4th Ave	Monitor Began Operation in 2010																					
Lake	180890033	East Chicago-E. 135th St.	Monitor Began Operation in 2010																					
Lake	180892008	Hammond-141st St.	0.029	0.032	0.031	0.016	0.014	0.009	0.009	0.012	0.014	0.019	0.016	0.018	0.016	0.018	0.018	0.023	0.020	0.015				
Lake	180892011	Hammond-167th St.	0.068	0.057	0.057	0.043	0.027	0.016	Monitor Shut Down										0.043	0.036	0.031	0.016	0.014	0.014
Marion	180970063	Indianapolis-Rockville Rd.	0.032	0.026	0.028	0.029	0.028	0.020	0.028	0.022	0.034	0.028	0.042	0.034	0.043	0.036	0.031	0.016	0.014	0.014				
Marion	180970076	Indianapolis-Quemetco	0.013	0.015	0.016	0.015	0.013	0.011	0.011	0.013	0.022	0.025	0.024	0.014	0.015	0.015	0.013	0.009	0.013	0.013				
Marion	180970078	Indianapolis-Washington Park	0.016	0.018	0.019	0.009	0.008	0.006	0.006	0.006	0.005	0.008	0.011	0.012	0.013	0.010	0.010	0.007	0.007	0.006				
Porter	181270023	Portage-Hwy. 12	Monitor Began Operation in 2010																					
Vanderburgh	181630006/20	Evansville-Post Office	Monitor Temporarily Shut Down																					

Red Text: Three-Month Average greater than 0.15 ug/m3

Blue Text: Highest Three-Month Average as of 06/30/2010

County	Site #	Site Name	Three-Month Averages (cont.)																	
			11/08-01/09	12/08-02/09	01/09-03/09	02/09-04/09	03/09-05/09	04/09-06/09	05/09-07/09	06/09-08/09	07/09-09/09	08/09-10/09	09/09-11/09	10/09-12/09	11/09-01/10	12/09-02/10	01/10-03/10	02/10-04/10	03/10-05/10	04/10-06/10
Delaware	180350008	Muncie-West Site	0.055	0.053	0.070	0.080	0.085	0.078	0.073	0.090	0.110	0.094	0.087	0.059	0.145	0.105	0.108	0.163	0.163	0.163
Delaware	180350009	Muncie-East Site	0.154	0.146	0.144	0.227	0.258	0.234	0.151	0.228	0.209	0.233	0.202	0.246	0.185	0.105	0.108	0.163	0.163	0.163
Lake	180890023	East Chicago-Aldis St.	0.028	0.030	0.030	0.016	0.014	0.019	0.017	0.014	0.009	0.007	0.012	0.012	0.011	0.020	0.030	0.036	0.036	0.036
Lake	180890032	Gary-4th Ave	Monitor Began Operation in 2010																	
Lake	180890033	East Chicago-E. 135th St.	Monitor Began Operation in 2010																	
Lake	180892008	Hammond-141st St.	0.075	0.074	0.074	0.007	0.007	0.010	0.013	0.012	0.011	0.007	0.010	0.009	0.012	0.010	0.025	0.032	0.037	0.037
Lake	180892011	Hammond-167th St.	Monitor Shut Down																	
Marion	180970063	Indianapolis-Rockville Rd.	0.013	0.007	0.020	0.027	0.034	0.022	0.015	0.015	0.016	0.017	0.014	0.014	0.012	0.010	0.017	0.025	0.032	0.032
Marion	180970076	Indianapolis-Quemetco	0.014	0.013	0.013	0.011	0.007	0.005	0.005	0.004	0.007	0.009	0.011	0.011	0.011	0.012	0.009	0.007	0.006	0.006
Marion	180970078	Indianapolis-Washington Park	0.006	0.004	0.004	0.003	0.003	0.003	0.004	0.005	0.006	0.005	0.004	0.003	0.003	0.003	0.004	0.004	0.004	0.004
Porter	181270023	Portage-Hwy. 12	Monitor Began Operation in 2010																	
Vanderburgh	181630006/20	Evansville-Post Office	0.005	0.010	0.007	0.006	0.002	0.006	0.005	0.006	0.004	0.005	0.007	0.007	0.006	0.004	0.004	0.005	0.005	0.006

Red Text: Three-Month Average greater than 0.15 ug/m3

Blue Text: Highest Three-Month Average as of 06/30/2010

