



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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April 1, 2009

Mr. Bharat Mathur
Acting Regional Administrator
U. S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Lead Maintenance Plan Update for Marion
County, Indiana

Dear Mr. Mathur:

The Indiana Department of Environmental Management (IDEM) submits the enclosed Lead Maintenance Plan Update for Marion County, Indiana. This submittal demonstrates that Marion County, Indiana has remained well below the 1978 Lead National Ambient Air Quality Standard (NAAQS) and should remain designated as attainment of the standard.

On November 6, 1991, the United States Environmental Protection Agency (U.S. EPA) designated a small portion of Franklin Township, Marion County, Indiana as a primary nonattainment area for lead under Section 107 of the Clean Air Act (CAA) (56 FR 56694). On the same date, U.S. EPA designated a small portion of Wayne Township, Marion County, Indiana as an unclassifiable area for lead. Section 107(d)(3)(E) of the CAA states that in order for a county to have its status redesignated to attainment, it must meet several requirements established by U. S. EPA. These are:

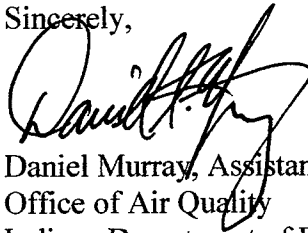
1. Ambient monitoring data showing that the county has met the NAAQS for the past three years.
2. Air quality improvements that can be attributed to reductions in lead emissions which are permanent and enforceable.
3. A maintenance plan that assures continued attainment of the standard.

On March 2, 2000, IDEM submitted a Redesignation Request and Maintenance Plan for the Marion County lead nonattainment areas. U. S. EPA approved the Redesignation Request and Maintenance Plan on May 10, 2000 (65 FR 114223), with an effective date of July 10, 2000. Section 175A of the CAA sets forth the elements of a maintenance plan for areas seeking redesignation from nonattainment to attainment. As part of the original Redesignation Request and Maintenance Plan, IDEM committed to review and, if necessary, revise the Maintenance Plan eight years after the areas were redesignated to attainment of the lead NAAQS. The submittal of this update satisfies that commitment.

Mr. Mathur
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IDEM requests that U. S. EPA approve the Lead Maintenance Plan Update for Marion County, Indiana. If you have any questions regarding this submittal, please contact Mr. Scott Deloney, Chief, Air Programs Branch at (317) 233-5694 or sdeloney@idem.IN.gov.

Sincerely,



Daniel Murray, Assistant Commissioner
Office of Air Quality
Indiana Department of Environmental Management

DM/sad/ghf

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Lead (Pb)
Maintenance Plan Update

Marion County, Indiana

March 2009

Office of Air Quality
Indiana Department of Environmental Management

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Lead Maintenance Plan Update Marion County, Indiana

1.0 Introduction

On March 2, 2000, the State of Indiana submitted a Redesignation Request and Maintenance Plan for Marion County (Indianapolis) lead (Pb) nonattainment areas. The United States Environmental Protection Agency (U.S. EPA) subsequently approved the *Request for Redesignation for Lead Attainment in Marion County* (May 10, 2000, 65 FR 11423).

Section 175A of the Clean Air Act (CAA) sets forth the elements of a maintenance plan for areas seeking redesignation from nonattainment to attainment. The plan must demonstrate continued attainment of the applicable National Ambient Air Quality Standard (NAAQS) for at least ten years after the Administrator approves a redesignation to attainment. Eight years after the redesignation, the state must submit a revised maintenance plan which demonstrates attainment for the ten years following the initial ten-year period.

As part of that document, Indiana committed to review and, if necessary, revise the Maintenance Plan eight years after the area was redesignated to attainment of the lead standard, as required by Section 175A of the CAA. The submittal of this document honors that commitment.

2.0 Background

On November 6, 1991, U.S. EPA designated a small portion of Franklin Township, Marion County, Indiana as a primary nonattainment area for lead under Section 107 of the CAA (56 FR 56694). On the same date, U.S. EPA designated a small portion of Wayne Township, Marion County, Indiana as an unclassifiable area for lead.

Lead monitors in Marion County have not recorded a violation of the lead NAAQS since the second quarter of 1994. The Indiana Department of Environmental Management (IDEM) submitted a *Request for Redesignation for Lead Attainment in Marion County*, on March 2, 2000 (Appendix A). U.S. EPA subsequently approved the Redesignation Request on May 10, 2000 (65 FR 114223), with an effective date of July 10, 2000 (Appendix B).

2.1 Geographical Boundaries

The following is a brief description of the two maintenance areas included in this update.

Marion County

Marion County is located in central Indiana. It is surrounded by the Indiana counties of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, and Shelby counties. Indianapolis is the largest city in the county.

Only a small portion of Franklin Township in Marion County was determined to be nonattainment for lead. This area is described as follows:

“Marion County (part) – (part of Franklin Township: area bound by Thompson Road on the south, Emerson Avenue on the west, Five Points Road on the east, and Troy Avenue on the north)”, see Figure 2.1.

A small portion of Wayne Township in Marion County was determined to be unclassifiable for lead. This area is described as follows:

“Marion County (part) – (part of Wayne Township: area bound by Rockville Road on the north, Girls School Road on the east, Washington Street on the south, and Bridgeport Road on the west)”, see Figure 2.2.

Figure 2.1 Map of Marion County (Franklin Township) Lead Maintenance Area

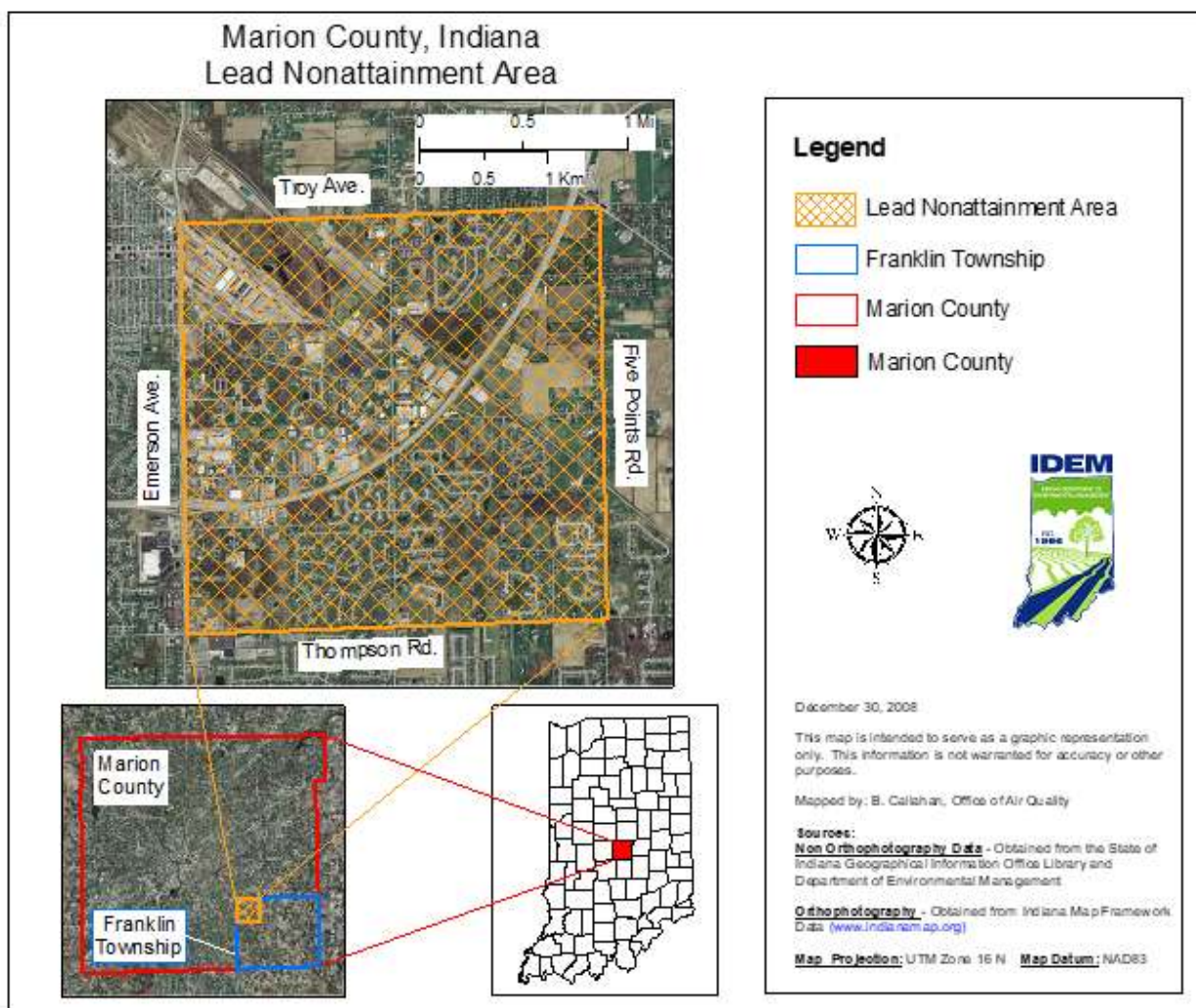
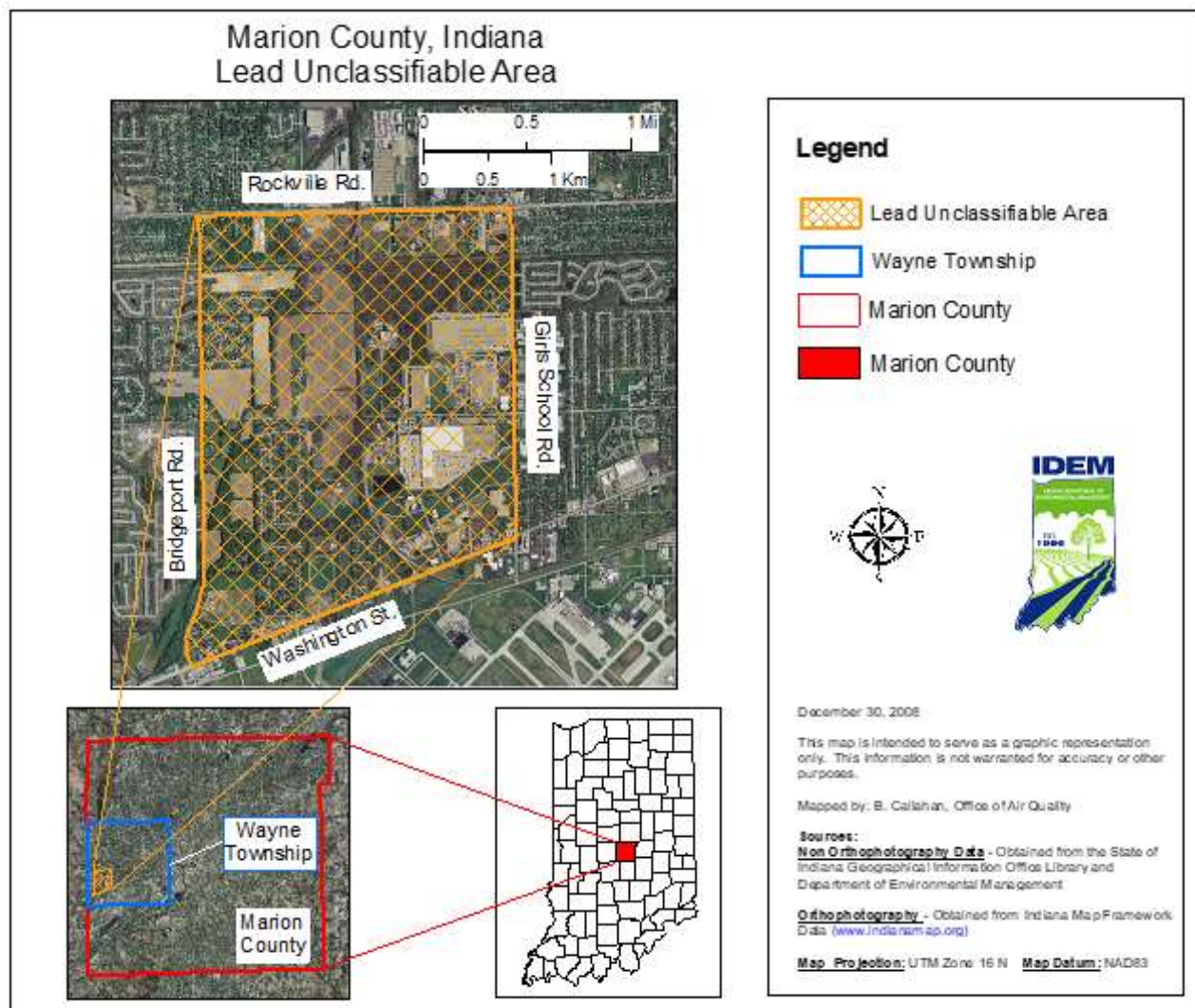


Figure 2.2 Map of Marion County (Wayne Township) Lead Maintenance Area



2.2 National Ambient Air Quality Standard for Lead

Lead is a metal found naturally in the environment. It is also emitted from some industrial processes and is present in some manufactured products. The major sources of lead emissions have historically been motor vehicles (such as cars and trucks) and industrial sources. Motor vehicle emissions have been dramatically reduced with the phase-out of leaded gasoline in the nation's motor vehicle gasoline supply. Lead is currently only used as a fuel additive for aviation gasoline in some general aviation aircraft, but not in commercial jet aircraft. Larger industrial sources of lead emissions currently include metals processing, particularly primary and secondary lead smelters, among others. U.S. EPA's lead air quality monitoring strategy generally focuses on areas surrounding these industrial sources.

U.S. EPA promulgated the primary (health-based) and secondary (welfare-based) NAAQS for lead in 1978, at 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$). On October 15, 2008, U.S. EPA substantially strengthened the primary and secondary NAAQS for lead to 0.15 $\mu\text{g}/\text{m}^3$ to provide increased protection for at-risk populations against a variety of health effects, most notably effects on the developing nervous system. States have until October 2009 to make recommendations for areas to be designated attainment, nonattainment, or unclassifiable. This document only addresses the 1978 lead NAAQS.

The lead NAAQS of 1.5 $\mu\text{g}/\text{m}^3$ is calculated as a maximum arithmetic mean averaged over a calendar quarter. To be in attainment, an area must meet the NAAQS for two consecutive years and collect air quality monitoring data during the entire time.

2.3 Status of Air Quality

There are two monitors currently measuring lead concentrations in Marion County. These sites are both located in the unclassifiable portion of Wayne Township and have been in operation since January 1, 1984 and May 6, 1991, respectively. Both sites have been operated by the City of Indianapolis' Office of Environmental Services. Current ambient air quality monitoring data shows a continued downward trend well below the lead NAAQS since the area was redesignated to attainment, as shown in Table 2.1.

Table 2.1 Marion County 1999-2008 Lead Ambient Monitoring Data

				1st Quart er	2nd Quart er	3rd Quart er	4th Quart er
SITE ID	COUNT Y	SITE NAME	YEA R	µg/m ³	µg/m ³	µg/m ³	µg/m ³
18-097-0063	Marion	7601 Rockville Road	1999	0.05	0.02	0.08	0.12
18-097-0063	Marion	7601 Rockville Road	2000	0.07	0.02*	0.02	0.12
18-097-0063	Marion	7601 Rockville Road	2001	0.03	0.07	0.01	0.01
18-097-0063	Marion	7601 Rockville Road	2002	0.04	0.02	0.03	0.02
18-097-0063	Marion	7601 Rockville Road	2003	0.03	0.05	0.03	0.03
18-097-0063	Marion	7601 Rockville Road	2004	0.02	0.08	0.02	0.03
18-097-0063	Marion	7601 Rockville Road	2005	0.03	0.03	0.03	0.02
18-097-0063	Marion	7601 Rockville Road	2006	0.02	0.02	0.03	0.03
18-097-0063	Marion	7601 Rockville Road	2007	0.03	0.03	0.03	0.02
18-097-0063	Marion	7601 Rockville Road	2008	0.03	0.03	0.03	N/A**
18-097-0076	Marion	230 South Girls School Road	1999	0.01	0.01	0.07	0.09
18-097-0076	Marion	230 South Girls School Road	2000	0.05	0.02	0.01	0.06
18-097-0076	Marion	230 South Girls School Road	2001	0.03	0.02	0.02	0.01
18-097-0076	Marion	230 South Girls School Road	2002	0.02	0.01	0.02	0.01
18-097-0076	Marion	230 South Girls School Road	2003	0.01	0.01	0.01	0.01
18-097-0076	Marion	230 South Girls School Road	2004	0.01	0.02	0.02	0.01
18-097-0076	Marion	230 South Girls School Road	2005	0.02	0.03	0.01	0.01
18-097-0076	Marion	230 South Girls School Road	2006	0.02	0.02	0.02	0.01
18-097-0076	Marion	230 South Girls School Road	2007	0.02	0.02	0.01	0.01
18-097-0076	Marion	230 South Girls School Road	2008	0.02	0.01	0.01	N/A**

*The mean does not satisfy the summary criteria.

**Fourth quarter data for the year 2008 is not yet available.

3.0 Maintenance Plan Requirements

Section 107(d)(3)(E) of the CAA lists a number of requirements that must be met by nonattainment areas prior to consideration for redesignation to attainment. In addition, U.S. EPA has published guidance titled “Procedures for Processing Requests to Redesignate Areas to Attainment” in a September 4, 1992 memo from John Calcagni, Director, Air Quality Management Division (Appendix C).

Based on U.S. EPA's guidance, the core provisions that are required to be included in the maintenance plan for lead nonattainment areas are listed below:

3.1 Attainment/Emissions Inventory

The state is required to develop an attainment emissions inventory to identify a level of emissions in the area which is sufficient to attain the NAAQS. For this submittal, a comprehensive emissions inventory of major and minor permitted sources in Marion County, Indiana for the base-year (1996) is compared to the most recent emissions inventory (2007).

3.2 Maintenance Demonstration

The state is required to submit a revised maintenance plan eight years after redesignation demonstrating that attainment of the lead NAAQS will be maintained for ten years following the initial ten-year maintenance period.

3.3 Monitoring Network/Verification of Continued Attainment

To verify the attainment status of the area over the maintenance period, the maintenance plan should contain provisions for continued operation of an appropriate U.S. EPA approved air quality monitoring network.

3.4 Contingency Plan

The maintenance plan is required to include contingency provisions, as necessary, to promptly correct any violation of the NAAQS that occurs after redesignation of the area.

Each of these components is discussed in greater detail in the remaining sections of this document.

4.0 Attainment/Emissions Inventory

The state is required to develop an attainment emissions inventory to identify a level of emissions in the area which is sufficient to attain the NAAQS. For this submittal, the attainment emissions inventory was compared to the most recent emissions inventory.

Table 4.1 below shows the lead emissions for all major and minor permitted sources in Marion County and the change in emissions from the original maintenance plan's emissions from 1996. The emissions are taken from the 2007 emission reports submitted by each source. The 2007 emissions are the most recent quality assured data available. The complete lead emissions inventory for Marion County can be found in Appendix D.

Table 4.1 Lead Emissions for All Permitted Sources in Marion County

Source	Source ID	1996	2007	Emission Change from 2007 to 1996
		Emissions in Tons per year	Emissions in Tons per year	
Allison Engine Company - Plant 5	00070	0.1502234		-0.1502234
Allison Gas Turbine Division - Plant 8 Allison Engine Company B Plant 8	00071	0.0014595		- 0.0014595
Allison Transmission Division of GMC (Plant 3)	00017	0.0005809		-0.0005809
Allison Transmission, Inc.	00310		0.00011102	0.00011102
Altec Industries, Inc.	00256	0.0178959		-0.0178959
American Art Clay Company	00002	0.0371888		-0.0371888
Asphalt Material and Construction, Inc.	00098	0.0000000		0.0000000
BHMM Energy Services, LLC	00586		0.00004525	0.00004525
Bridgeport Brass d.b.a. Olin Brass	00005	0.0000000		0.0000000
Cargill, Inc.	00020		0.0000263	0.0000263
Central State Hospital	00009	0.0000000		0.0000000
Chrysler Corporation IN Foundry	00012	0.5740000		-0.5740000
Citizens Gas and Coke	00061	0.0000258	0.00226878	0.00224298
Citizens Gas and Coke Utility – LNG South	00287		0.0000022	0.0000022
Community Hospital East	00299	0.0000002		-0.0000002
Connor Corporation - Richardson Division (Richardson Co. B. Witco)	00065	0.0804000		-0.0804000
Covanta Indianapolis	00123		0.05971294	0.05971294
DOA Ft. Benjamin Harrison	00022	0.0001675		-0.0001675
Eastern Electric Apparatus Repair Co.	00251	0.0006000		-0.0006000
Eli Lilly and Company	00019	0.0030000		-0.0030000
Eli Lilly and Company	00074	0.0980000		-0.0980000
Farm Fans, Inc.	00199	0.0088287		-0.0088287
Federal Express	00257		0.00000625	0.00000625
Indiana Girls School	00068	0.0000028		-0.0000028
Indianapolis Casting Corporation	00039	0.0201100		-0.0201100
Inter-State Foundry Co., Inc./Interstate Castings, Inc.	00063	0.0641543		-0.0641543

IPALCO - Perry K	00034	0.0967112	0.0276501	-0.0690611
IPL Harding Street Station	00033	0.0342931	0.37526286	0.34096976
Link-Belt Bearing-Rexnord Corporation	00025	0.0017702		-0.0017702
National Railroad Passenger Corporation	00014	0.0000000		0.0000000
National Starch and Chemical Corporation	00042		0.00018553	0.00018553
Navistar, Inc.	00039		0.00279265	0.00279265
Ogden Martin Systems of Indianapolis	00123	0.0061200		-0.0061200
Praxair (Union Carbide Corporation)	00060	0.0000000		0.0000000
Quemetco, Inc.	00079	1.6700000	0.64	-1.03
Raytheon (Naval Air Warfare Center)	00100	0.0000000		0.0000000
Refined Metals Corporation	00036	0.0179100		-0.0179100
Reilly Industries, Inc.	00049	0.0000000		0.0000000
Rolls Royce/Allison (Allison Plants 5 and 8)	00311		0.00362766	0.00362766
South Side Landfill, Inc.	00366		0.0000000849	0.0000000849
St. Francis Hospital - Beech Grove	00163	0.0130000		-0.0130000
St. Vincent Hospital	00129		0.0000182589	0.0000182589
Thomson Consumer Electronics	00047	0.0000042		-0.0000042
Vertellus Agriculture and Nutrition Specialties, LLC	00315		0.0010647	0.0010647
Visteon Automotive Systems (Ford Motor Company)	00021	0.0001598		-0.0001598
Marion County Totals		2.8966063	1.1127745838	-1.7838317162

Lead emissions from permitted sources in Marion County have decreased by over 1.78 tons (61.58%) from 1996 to 2007. The decrease in lead emissions in Marion County can be attributed to federally mandated programs and the closing of a significant number of permitted stationary sources. Additionally, source-specific operating provisions have also been implemented at the largest stationary source of lead emissions in Marion County (Quemetco, Inc.). As stated previously in Section 2.3, Status of Air Quality, there have been no exceedances of the NAAQS for lead measured at the two monitoring sites found within the “unclassifiable” portion of Marion County, where Quemetco, Inc., is located. The above information further demonstrates that all portions of Marion County, Indiana continue to attain the NAAQS for lead.

The original maintenance plan compared the 1996 base-year emissions inventory to a projected 2010 emissions inventory (Tons/Year). Table 4.2 compares the base-year emissions inventory and 2010 projected emissions inventory to the 2007 actual emissions inventory and the difference from the projected and actual 2007 emissions. The actual

2007 Marion County point source lead emissions totals were much lower than the projected levels for the year 2010.

Table 4.2 Marion County Base Year Point Source Lead Emissions with Projected 2010 and Actual 2007 Emissions (Tons/Year)

Source Type	Base Year 1996	Projected Year 2010	Actual Emissions 2007	Difference from Projected Emissions
Point Sources	2.897	3.145	1.113	-2.032

IDEM is not required to project future lead emissions for Marion County as part of this update to the maintenance plan.

4.1 Controls and Regulations

The following is a list of several state and federal control measures already in place that will continue to ensure that the lead emissions will remain well below levels necessary to maintain the 1978 lead NAAQS.

Prohibition on Gasoline Containing Lead or Lead Additives for Highway Use

On February 2, 1996, U.S. EPA issued a direct final rule to amend 40 CFR Part 80 to prohibit the introduction of gasoline which is produced with the use of any lead additive, or contains more than 0.05 gram of lead per gallon, into commerce for use as motor vehicle fuel, effective January 1, 1996, in accordance with Section 211(n) of the Clean Air Act.

Implementation of Past SIP Revisions

The Indiana rules controlling lead emissions are in effect and being enforced. Indiana rule, 326 IAC 15, requires all lead sources in Indiana to be in compliance with specified limits. The Indiana Lead rule applies to all stationary sources of lead listed in 326 IAC 15-2 unless alternative limitations and requirements have been established in a Part 70 permit in accordance with 326 IAC 2-7-24.

New Source Review Provisions

Indiana has a long standing and fully implemented New Source Review procedure. New Source Review is addressed in rule 326 IAC 2. The rule includes provisions for the Prevention of Significant Deterioration (PSD) in 326 IAC 2-2 and Emission Offset requirements for nonattainment areas in 326 IAC 2-3.

Any facility that is not listed in the 1996 emission inventory, or for which credit was taken for closing in demonstrating attainment, will not be allowed to construct, reopen, modify or reconstruct without meeting all applicable permit rule requirements.

Controls to Remain in Effect

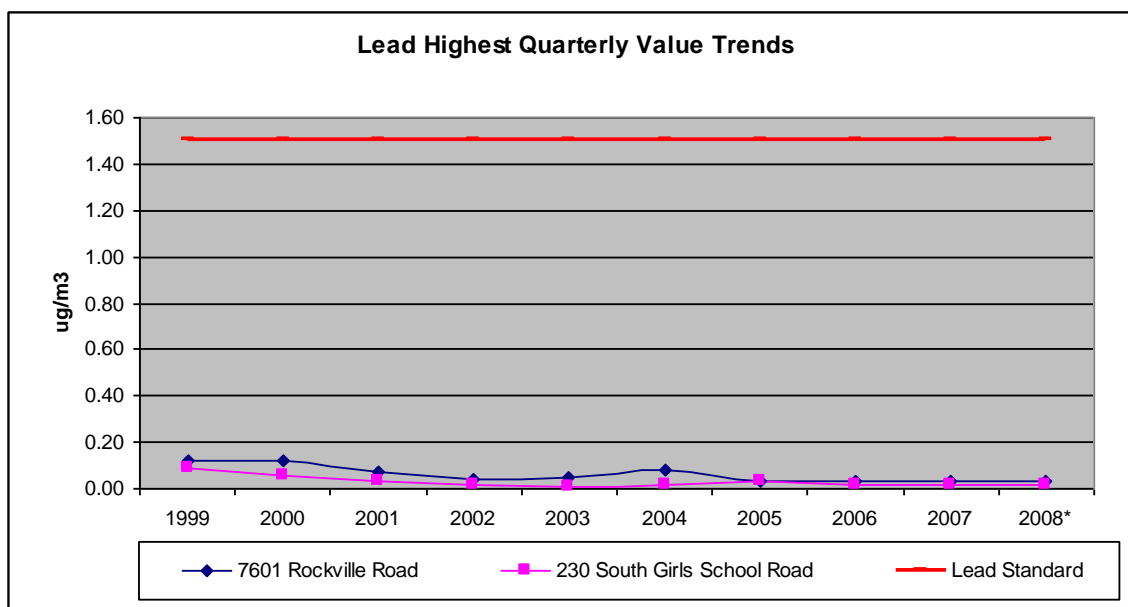
Indiana does not intend to relax any of the control measures already implemented. Indiana hereby commits that any changes to its rules, or emission limits applicable to lead sources, will be submitted to U.S. EPA for approval. Indiana intends to continue enforcing all rules that relate to the emission of lead in Marion County, Indiana.

5.0 Demonstration of Continued Maintenance

The maintenance demonstration requirement is considered to be satisfied for nonattainment areas if the most recent three-years of ambient monitoring data show that the county is meeting the NAAQS for lead.

Ambient air quality data from all monitoring sites in Marion County indicate that the NAAQS for lead continues to be met. Marion County, Indiana was redesignated to attainment in 2000. The current limited maintenance plan demonstrated that the standard would continue to be maintained through 2008. This update to the maintenance plan demonstrates that ambient air quality data should continue to decline. Total emissions of lead from all sources have continued to decline and it is not anticipated that emissions will increase to levels that would alter the downward trend in air quality data for lead. Chart 5.1 shows the trend in the highest quarterly annual design values from 1999 – 2008 for the Marion County monitors.

Chart 5.1 Marion County 1999-2008 Lead Highest Quarterly Values



**Fourth quarter data for the year 2008 is not yet available.*

6.0 Monitoring Network/Verification of Continued Attainment

To verify the attainment status of the area over the maintenance period, the maintenance plan should contain provisions for continued operation of an appropriate U.S. EPA approved air quality monitoring network. There are currently two lead monitoring sites operating in the Indianapolis area. These sites are both located in the unclassifiable portion of Wayne Township (AQS I.D. 18-097-0063 at 7601 Rockville Road and AQS I.D. 18-097-0076 at 230 South Girls School Road) and have been in operation since January 1, 1984 and May 6, 1991, respectively.

A Quick Look report from U.S. EPA's AQS database which lists the quality assured monitoring data for Marion County, Indiana is enclosed as Appendix E.

6.1 Quality Assurance

IDEM has quality assured all data shown in the tables above and in Appendix E in accordance with 40 CFR 58.10 and the Indiana Quality Assurance Manual and found the data to be valid. IDEM has recorded the data in the AQS database and thus, the data is available to the public.

6.2 Continued Monitoring

To comply with U.S. EPA guidance, Indiana commits to continue monitoring lead in these areas to ensure that lead concentrations remain well below the lead NAAQS. Should changes become necessary in the future, IDEM will consult with U.S. EPA Region V staff prior to making changes to the existing monitoring network. IDEM will continue to quality assure the monitoring data to meet the requirements of 40 CFR 58. IDEM will continue to enter all data into the AQS database on a timely basis in accordance with federal guidelines.

7.0 Contingency Plan

Indiana will closely monitor lead concentrations to determine whether trends indicate higher values or whether emissions appear to be increasing. If it is determined that lead levels and emissions are increasing and action is necessary to reverse that trend, Indiana will take action to reverse the noted trend, prior to a violation of the standard occurring.

Future contingency measures for this area will include requiring any proposed stationary sources of lead emissions to comply with all applicable New Source Review provisions and other controls referenced in Section 4.1.

IDEM will closely monitor existing stationary sources of lead emissions. The following methods will be used to monitor the existing stationary lead sources in Marion County, Indiana:

- During routine inspections of permitted stationary sources, IDEM will evaluate any potential increases in lead emissions at these facilities, and
- IDEM will examine the annual point source inventory for sources with increased emissions and for any new sources. Emissions reporting is required by the annual “emissions statement” reporting requirements found in 326 IAC 2-6.

In the event there is an exceedance of the lead standard, the above information will be used to identify additional control measures that are needed to assure future attainment of the lead NAAQS. Indiana hereby commits to implement, as expeditiously as possible, any identified necessary corrective actions.

No contingency measure shall be implemented without providing the opportunity for full public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be fully evaluated.

Adoption of any control measure is subject to administrative and legal approval. This will include publication of notices, an opportunity for public hearing, and other measures required by Indiana law (IC 13-14-8-7) for rule making by state environmental boards. This law provides accelerated procedures for adopting interim control measures in the event of an emergency affecting public health.

In any event, the contingency plan would include an analysis, by a method mutually agreed upon by Indiana and the U.S. EPA, to demonstrate that the proposed measures are adequate to return the area to attainment.

The lead sources that are potentially subject to future controls are basically the same as the current list of sources which is found in Section 4.0, Table 4.1. Sources subject to additional controls will be those that a planned study shows are responsible for triggering the contingency measures and the control of which will effectively help to ensure compliance with the lead NAAQS. In addition to reviewing the known sources, the possibility that the problem is attributable to new or previously unknown source will not be overlooked.

8.0 Commitment to Revise Plan

This submittal satisfies Indiana’s commitment to revisit the original maintenance plan and no further action is necessary since Marion County, Indiana has maintained its attainment status in the eight years since it was reclassified to attainment.

9.0 Public Participation

Indiana published a legal notice of public hearing notification and solicitation for public comment concerning the draft Maintenance Plan Update in The Indianapolis Star on February 20, 2009.

The public comment period closed on March 25, 2009. No comments or request for public hearing were received during the public comment period. As such, no public hearing was conducted. Appendix F includes a copy of the public notice and a certification of publication.

10.0 Conclusion

Monitored air quality in Marion County, Indiana has remained well below the lead NAAQS as a result of national and local control strategies implemented. The current quarterly values in Marion County, Indiana have remained well below the standard since the county was redesignated and are expected to continue to maintain compliance with the standard.

This plan update demonstrates that Marion County, Indiana will continue to attain the lead NAAQS. Indiana has verified that the emission controls adopted to maintain the standard continue to be permanent and enforceable, that there are no new significant sources of lead or increases in background emissions, and that the state has in place a comprehensive program to identify sources of violations and address any violation through enforcement and implementation of a contingency plan.

This plan update demonstrates that reductions since redesignation have had a positive effect on lead levels, and existing local and national control measures will ensure that air quality in Marion County, Indiana will continue to improve and provide for an ample margin of safety.

This plan satisfies Indiana's obligation under Section 175(A)(b) of the CAA to submit a plan for maintaining the lead NAAQS for the next ten years beyond the current maintenance plan.