



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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June 5, 2009

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

Re: Technical Addendum to the Lead  
Maintenance Plan Update for Marion  
County, Indiana

Dear Mr. Mathur:

The Indiana Department of Environmental Management (IDEM) has prepared this technical addendum to the Lead Maintenance Plan Update for Marion County, Indiana to incorporate projected emissions inventories for stationary sources within Marion County for the year 2020. This additional information is being provided at your request pursuant to Section 175A(b) of the Clean Air Act (CAA) to demonstrate that Marion County will maintain the 1978 Lead National Ambient Air Quality Standard (NAAQS) for the next ten years beyond the current maintenance plan (i.e. 2020). IDEM submitted this Maintenance Plan Update to the United States Environmental Protection Agency (U.S. EPA) on April 1, 2009 to demonstrate that Marion County, Indiana has remained well below the 1978 Lead NAAQS and should remain designated as attainment of the standard and classified as maintenance.

Table 4.2 (to be considered an update to Table 4.2 on Page 13 of the Maintenance Plan Update) compares the 1996 base year, 2007 actual emissions and 2010 and 2020 projected lead emissions inventories for stationary sources within Marion County. As can be seen in Table 4.2, stationary source lead emissions are expected to continue decreasing in Marion County through the year 2020 ensuring air quality in Marion County will continue to improve and provide for an ample margin of safety.

**Table 4.2**  
**Marion County Base Year Stationary Source Lead Emissions with Actual and Projected Emissions (Tons/Year Pb)**

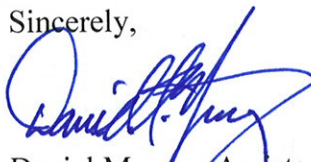
Source Type	Base Year 1996	Actual Emissions 2007	Projected Year 2010	Difference from 2010 Projected Emissions	Projected Year 2020
Point Sources	2.897	1.113	3.145	-2.032	*0.63

\*Projected 2020 year emissions were generated utilizing trended Toxics Release Inventory Program lead values for Marion County point sources for the years 2001 through 2007.

IDEM believes that this supplemental information in conjunction with the Maintenance Plan Update, provides the necessary weight of evidence to demonstrate that Marion County will continue to maintain the Lead NAAQS for the next ten years beyond the current maintenance period and satisfies Indiana's obligation under 175A(b) of the CAA.

Therefore, IDEM requests that U. S. EPA proceed with final review and approval of 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](mailto:sdeloney@idem.IN.gov).

Sincerely,



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

DM/sad/ghf

cc: Cheryl L. Newton, U.S. EPA Region 5  
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John Mooney, U.S. EPA Region 5  
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