



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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July 23, 2010

Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard, R-19J
Chicago, IL 60604

Re: Recommendations Concerning Air Quality
Designations for the 2008 Lead National
Ambient Air Quality Standard

Dear Ms. Hedman:

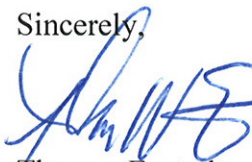
This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's) June 14, 2010 letter concerning the modification to Indiana's boundary recommendation for the Muncie, Indiana lead nonattainment area. Upon review of the U.S. EPA's meteorological analysis and associated technical justification, Indiana agrees with U.S. EPA's proposed boundary expansion encompassed by West 26th Street to the north and the vertical "extension" of South Hoyt Avenue to the west.

Indiana firmly believes that the nonattainment boundaries for the revised 2008 lead National Ambient Air Quality Standard (NAAQS) should be limited to the area that actually possesses a three-month rolling average ambient monitor-based design value above the standard. Indiana appreciates U.S. EPA keeping the nonattainment area for lead limited to the geographical area that is most likely to experience concentrations above the National Ambient Air Quality Standard (NAAQS) for lead.

Enclosed for your review and consideration is the quality assured ambient air quality monitoring data for the years 2007 through 2009 for Indiana's lead monitoring network. This data further supports Indiana's boundary recommendations for all other portions of the state, as submitted to U.S. EPA on October 7, 2009.

I appreciate the opportunity to provide comments to U.S. EPA concerning the designations for the revised 2008 lead NAAQS. Likewise, I look forward to working with your staff as U.S. EPA moves forward with the second round of the designation process later this year. 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 Easterly
Commissioner

TE/kb/sd/skr

cc: John Summerhays, U.S. EPA Region 5
Matt Rau, U.S. EPA Region 5
John Mooney, U.S. EPA Region 5
Cheryl Newton, U.S. EPA Region 5
Keith Baugues, IDEM
Scott Deloney, IDEM
Christine Pedersen, IDEM
Sarah Raymond, IDEM

2007-2009 Indiana Lead Monitor Data Summary

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.

			Three-Month Averages (2007-2009)																	
County	Site #	Site Name	11/06-01/07	12/06-02/07	01/07-03/07	02/07-04/07	03/07-05/07	04/07-06/07	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
Delaware	180350008	Muncie-West Site	0.127	0.154	0.177	0.235	0.215	0.211	0.198	0.209	0.209	0.214	0.164	0.144	0.089	0.079	0.107	0.325	0.335	0.285
Delaware	180350009	Muncie-East Site	0.630	0.601	0.434	0.427	0.476	0.468	0.573	0.735	0.705	0.927	0.870	0.838	0.522	0.347	0.403	0.425	0.685	1.963
Lake	180890023	East Chicago	0.044	0.040	0.030	0.036	0.045	0.045	0.045	0.042	0.056	0.041	0.046	0.037	0.038	0.028	0.031	0.031	0.029	0.031
Lake	180892008	Hammond-141st St.	0.011	0.010	0.010	0.020	0.019	0.023	0.029	0.032	0.031	0.016	0.014	0.009	0.009	0.012	0.014	0.019	0.016	0.018
Lake	180892011	Hammond-167th St.	0.024	0.023	0.028	0.076	0.104	0.112	0.068	0.057	0.057	0.043	0.027	0.016	Monitor Shut Down					
Marion	180970063	Indianapolis-Rockville Rd.	0.032	0.025	0.029	0.023	0.036	0.031	0.032	0.026	0.028	0.029	0.028	0.020	0.028	0.022	0.034	0.028	0.042	0.034
Marion	180970076	Indianapolis-Quemetco	0.013	0.012	0.021	0.027	0.027	0.020	0.013	0.015	0.016	0.015	0.013	0.011	0.011	0.013	0.022	0.025	0.024	0.014
Marion	180970078	Indianapolis-Washington Park	0.005	0.005	0.007	0.007	0.009	0.008	0.016	0.018	0.019	0.009	0.008	0.006	0.006	0.006	0.005	0.008	0.011	0.012
Vanderburgh	181630006	Evansville-Civic Center	0.003	Monitor Temporarily Shut Down																

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

Blue Text: Highest Three-Month Average from 2007-2009

County	Site #	Site Name	Three-Month Averages (2007-2009) cont.																			
			05/08-07/08	06/08-08/08	07/08-09/08	08/08-10/08	09/08-11/08	10/08-12/08	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		
Delaware	180350008	Muncie-West Site	0.073	0.082	0.133	0.148	0.129	0.068	0.055	0.053	0.070	0.080	0.085	0.078	0.073	0.090	0.110	0.094	0.087	0.059		
Delaware	180350009	Muncie-East Site	2.163	1.867	0.495	0.238	0.231	0.191	0.154	0.146	0.144	0.227	0.258	0.234	0.151	0.228	0.209	0.233	0.202	0.246		
Lake	180890023	East Chicago	0.037	0.045	0.040	0.037	0.025	0.016	0.028	0.030	0.030	0.016	0.014	0.019	0.017	0.014	0.009	0.007	0.012	0.012		
Lake	180892008	Hammond-141st St.	0.016	0.018	0.018	0.023	0.020	0.015	0.075	0.074	0.074	0.007	0.007	0.010	0.013	0.012	0.011	0.007	0.010	0.009		
Lake	180892011	Hammond-167th St.	Monitor Shut Down																			
Marion	180970063	Indianapolis-Rockville Rd.	0.043	0.036	0.031	0.016	0.014	0.014	0.013	0.007	0.020	0.027	0.034	0.022	0.015	0.015	0.016	0.017	0.014	0.014		
Marion	180970076	Indianapolis-Quemetco	0.015	0.015	0.013	0.009	0.013	0.013	0.014	0.013	0.013	0.011	0.007	0.005	0.005	0.004	0.007	0.009	0.011	0.011		
Marion	180970078	Indianapolis-Washington Park	0.013	0.010	0.010	0.007	0.007	0.006	0.006	0.004	0.004	0.003	0.003	0.003	0.004	0.005	0.006	0.005	0.004	0.003		
Vanderburgh	181630006	Evansville-Civic Center	0.005	0.005	0.005	0.005	0.005	0.006	0.005	0.010	0.007	0.006	0.002	0.006	0.005	0.006	0.004	0.005	0.007	0.007		

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

Blue Text: Highest Three-Month Average from 2007-2009