February 28, 2017

Mr. Robert Kaplan
Acting Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Section 172 and 182 Requirements for Indiana’s Portion (Lake and Porter Counties) of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area

Dear Mr. Kaplan:

Pursuant to Sections 172 and 182 of Clean Air Act (CAA), the Indiana Department of Environmental Management (IDEM) submits amendments to the Indiana State Implementation Plan (SIP). These amendments apply to Indiana’s portion (Lake and Porter counties) of the Chicago-Naperville, Illinois-Indiana-Wisconsin (IL-IN-WI) 2008 8-hour ozone Moderate nonattainment area.

Indiana hereby requests review and approval of the following submittals that fulfill requirements in Sections 172 and 182 of the CAA.

- **Attainment Demonstration and Technical Support Document (Attachment A)**

  Indiana demonstrates that the Chicago nonattainment area will meet the standard by the attainment date of July 20, 2018.

  The Lake Michigan Air Directors Consortium (LADCO), in cooperation with the states of Illinois, Indiana, and Wisconsin developed updated air quality analyses to support the development of ozone attainment demonstrations. LADCO’s modeling results demonstrate that existing emission reduction control measures are expected to improve ozone air quality in the region between 2011 and 2017.

  All monitoring sites in the Chicago nonattainment area, including sites in northwest Indiana, northeast Illinois, and southeast Wisconsin, are expected to meet the 2008 ozone air quality standard by the end of the 2017 ozone season. This attainment demonstration and weight of evidence analysis, along with LADCO’s modeling analyses, clearly demonstrate that existing permanent and
enforceable emission control measures will ensure the area continues to maintain compliance with the standard with an adequate margin of safety.

- **Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT) (Attachment B)**

Indiana certifies that the existing VOC rules contained in 326 Indiana Administrative Code (IAC) 8 satisfy the VOC RACT requirements of Section 182(b)(2) of the CAA. These rules have been approved into the Indiana SIP and no additional measures that are reasonably available will advance the attainment date.

Indiana also certifies that the Negative Declaration for the Control Techniques Guidelines (CTGs) for Fiberglass Boat Manufacturing Materials, approved March 26, 2010, is still current.

- **2017 Fifteen Percent (15%) Rate of Progress Plan and Three Percent (3%) Contingency Measure Plan (Attachment C)**

These plans fulfill CAA requirements under Sections 182(b)(1) of the CAA. They are based on measures that are already in-place and technology that is already available. The emission reductions that were found were adequate to meet the 15% and 3% requirements and also provide for an ample margin of safety. There are not any additional control measures that were identified that would advance the attainment date.

- **Revised 2011 Base-Year Emissions Inventory (Attachment D)**

The revised 2011 base-year emissions inventory updates and replaces the 2011 base-year emissions inventory that was included as Appendix F of the Request for Redesignation Petition and Maintenance Plan, submitted June 15, 2016. As such, Indiana formally withdraws the June 15, 2016, 2011 base-year emissions inventory submittal.

This revised 2011 base-year emissions inventory satisfies the state’s obligation under Section 182(a)(1) of the CAA and represents a comprehensive and accurate inventory of ozone precursor emissions for Lake and Porter counties.

- **Nonattainment New Source Review (NNSR) Plan (Attachment E)**

Indiana certifies that the existing NNSR rules, found in 326 IAC 2-3 satisfy, and are at least as stringent as, the NNSR SIP plan requirements of 40 CFR 51.165 for the 2008 8-Hour Ozone NAAQS. These rules were approved into the Indiana SIP August 25, 1994, (94 FR 24838) and June 28, 2011 (76 FR 40242), and have not been subsequently amended.
• Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program (Attachment F)

Indiana certifies that the existing Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program for Lake and Porter counties fulfills the motor vehicle inspection and maintenance requirement of Clean Air Act (CAA) Section 182(b)(4). The program is authorized by state statute Indiana Code (IC) 13-17-5, paid through the general funds, and implemented through rules promulgated by the Indiana Environmental Rules Board at 326 IAC 13. The program was approved effective May 20, 1996 (61 FR 11142).

• Periodic Inventory Emissions Statement (Attachment G)

Indiana certifies that the June 15, 2016, submission of Indiana’s Periodic Inventory Emissions Statement SIP for Ozone in Lake and Porter Counties, Indiana – Emissions Reporting Rule 326 Indiana Administrative Code (IAC) 2-6 fulfills the CAA requirement of Section 182(a)(3)(B). The emissions reporting rule requires sources located in Lake, LaPorte, and Porter counties, and Lawrenceburg Township, Dearborn County that emit either NOx or VOCs into the ambient air equal to or greater than twenty-five (25) tons per year to annually report their actual emission levels to the state.

IDEM provided opportunity for public comment and a hearing concerning the Attainment Demonstration and Technical Support Document, Fifteen Percent (15%) Rate of Progress and Three Percent (3%) Contingency Measure Plans, and NOx Exemption Request for Indiana’s Portion (Lake and Porter Counties) of the Chicago-Naperville, Illinois-Indiana-Wisconsin (IL-IN-WI), 2008 8-Hour Ozone Nonattainment Area. If a request for public hearing was received by February 10, 2017. A hearing was tentatively scheduled for February 15, 2017. IDEM did not receive a request for a public hearing therefore it was canceled. There were not any written comments received during the public comment period that concluded on February 17, 2017.

The 2011 Base-Year Emissions Inventory went through the public participation process with the June 15, 2016, Request for Redesignation and Maintenance Plan for Ozone Attainment in Indiana’s Portion (Lake and Porter Counties) of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area submittal.

All of the regulations in the submittals that Indiana is certifying, the Volatile Organic Compounds (VOCs) Reasonably Available Control Technology (RACT) in Lake and Porter Counties, Indiana, Indiana’s Nonattainment New Source Review (NNSR) Plan for the 2008 8-Hour Ozone National Ambient Air Quality Standards (NAAQS), Enhanced Vehicle Emissions Inspection and Maintenance (I/M) Testing Program in Lake and Porter Counties, Indiana, and Indiana’s Periodic Inventory Emissions Statement for Ozone went through the public participation process and were approved by U.S. EPA before being implemented into Indiana’s SIP.
Throughout the development of these submittals IDEM staff worked with U.S. EPA Region 5 to ensure that any potential concerns regarding this submission were addressed. We would appreciate U.S. EPA's continued efforts to communicate regularly with us as it reviews these submittals.

This request consists of one (1) hardcopy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hard copy has been sent to Doug Aburano, Chief of U.S. EPA Region 5's Attainment Planning and Maintenance Section and Chris Panos of U.S. Region 5. If you have any questions or need additional information, please contact Brian Callahan, Chief, Air Quality Standards and Implementation Section, Office of Air Quality at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,

Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sd/bc/gf/lf

Attachment A: Attainment Demonstration and Technical Support Document
Attachment B: VOC Reasonably Available Control Technology (RACT) Certification
Attachment C: 2017 15% Rate of Progress Plan and 3% Contingency Plan
Attachment D: Revised 2011 Base-Year Inventory
Attachment E: Nonattainment New Source Review Plan Certification
Attachment F: Enhanced Vehicle Emissions Inspection and Maintenance Certification
Attachment G: Periodic Inventory Emissions Statement Certification

cc: Doug Aburano U.S. EPA Region 5 (no enclosure)
    Chris Panos, U.S. EPA Region 5 (no enclosure)
    Steve Rosenthal, U.S. EPA Region 5 (no enclosure)
    Keith Baugues, IDEM-OAQ (no enclosure)
    Scott Deloney, IDEM-OAQ (no enclosure)
    Brian Callahan, IDEM-OAQ (no enclosure)
    Gale Ferris, IDEM-OAQ (no enclosure)
    Leslie Ferguson, IDEM-OAQ (w/ enclosure)
    File Copy