



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Michael R. Pence
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

December 12, 2013

Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Dear Ms. Hedman:

Re: Preliminary Recommendations Concerning
Air Quality Designations for the Annual
Particulate Matter National Ambient Air
Quality Standard

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's) April 16, 2013, guidance memorandum concerning air quality designations for the annual particulate matter (PM_{2.5}) National Ambient Air Quality Standard (NAAQS). The guidance indicates U.S. EPA's intention to propose designations by August 14, 2014 and finalize them by December 12, 2014. The guidance also requests that states submit their recommendations for area designations by no later than December 13, 2013.

Enclosed you will find quality-assured monitoring data from 2010 through 2012 for Indiana's PM_{2.5} monitoring network, as well as preliminary data through the first three quarters of 2013. Six monitors in five counties within Indiana have PM_{2.5} monitored concentrations above the new annual standard for the period ending 2012. However, PM_{2.5} monitored concentrations have decreased over time and many of the counties with monitored values above the standard are likely to attain prior to the effective date of final designations. Indiana expects monitoring data to decline even further over the next few years with the implementation of federal regulations such as the utility Mercury and Air Toxics Standards (MATS). Because of this, Indiana strongly encourages U.S. EPA to take 2013 and 2014 data into consideration when issuing preliminary and final designations.

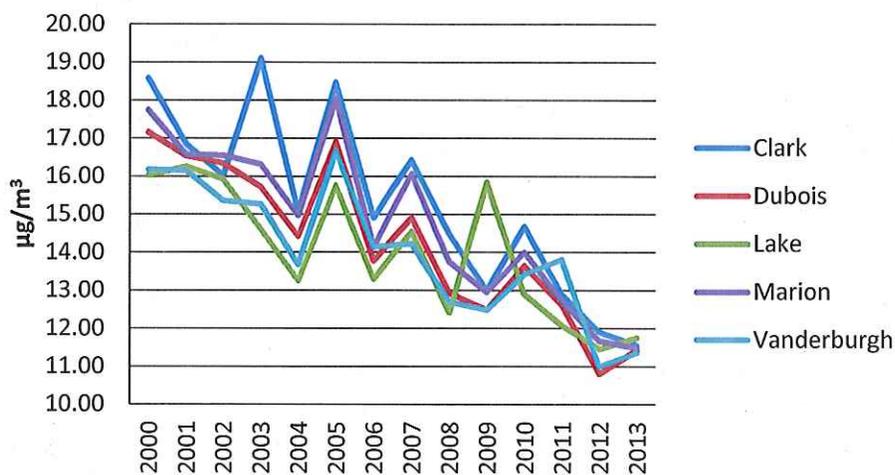
The following enclosures are included with this letter:

- Enclosure 1 2010-2012 & 2011-2013 Particulate Matter (PM_{2.5}) Monitoring Data for Indiana's Network
- Enclosure 2 Indiana's Preliminary Designation Recommendations
- Enclosure 3 Indiana's Preliminary Designation Recommendations for the 2012 Annual PM_{2.5} Standard
- Enclosure 4 Indiana's Assessment of the Particulate Matter (PM_{2.5}) Standard for Nonattainment Designation

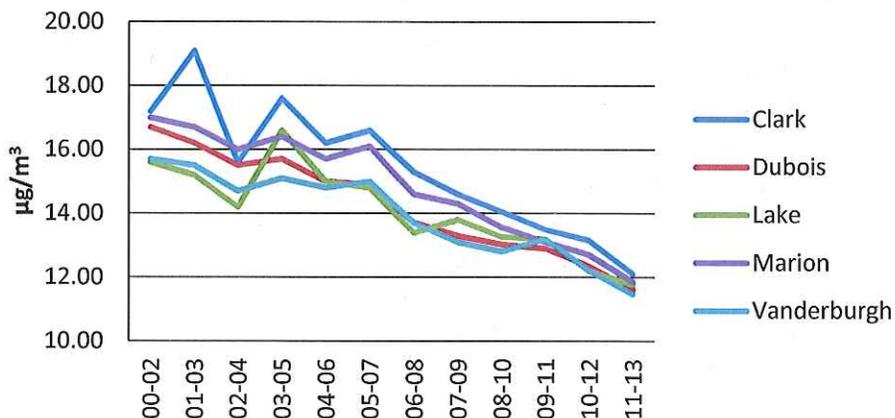
Figure 1 illustrates the downward trend in monitored PM_{2.5} concentrations for the five counties that were yet to reach attainment at the close of 2012. Once the PM_{2.5} monitoring data through September 2013 is quality assured and included in the air quality assessment, only one of the five counties (Clark County) with monitored values above the standard at the end of 2012 is likely to remain above the new standard at the close of 2013. The controlling monitor in Clark County will likely be just 0.1 µg/m³ above the new standard. However, it is important to note that the three-year design values for that county have been declining by an average of 0.6 µg/m³ per year over the past five years. Therefore, IDEM fully expects measured air quality in Clark County to meet the 2012 annual standard before final designations become effective under U.S. EPA's current schedule.

Figure 1: Indiana Highest Annual Average & Three-Year Design Value by County

Indiana Highest Annual Average by County



Indiana Highest Three-Year Design Value by County



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Based on IDEM's air quality assessment and future year forecast, IDEM recommends all of the monitored counties in Indiana be designated as attainment. Specifically, IDEM recommends that Allen, Clark, Delaware, Dubois, Elkhart, Floyd, Greene, Henry, LaPorte, Lake, Marion, Monroe, Porter, St. Joseph, Spencer, Tippecanoe, Vanderburgh, Vigo, and Whitley counties all be designated as attainment, and all other counties within Indiana be designated as unclassifiable. This recommendation is based on quality assured monitoring data through 2012, preliminary and projected monitoring data for 2013, and a probability forecast for 2014.

The above recommendations are based on the best available information as of the date of this letter, including historical trend information, and how these trends are likely to influence future data. Indiana reserves the right to supplement and/or revise the recommendations contained herein as additional monitoring and technical information become available. Thank you for this opportunity to provide recommendations on this important matter. If you have any questions, please feel free to contact Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222 or by email at kbaugues@idem.in.gov.

Sincerely,



Thomas W. Easterly
Commissioner

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Enclosures:

1. 2010-2012 & 2011-2013 PM_{2.5} Monitoring Data for Indiana's Network
2. Indiana's Preliminary Designation Recommendations
3. Indiana's Preliminary Designation Recommendations for the 2012 Annual PM_{2.5} Standard
4. Indiana's Assessment of the 2012 Annual PM_{2.5} Standard: Technical Support Document

cc: Doug Aburano, U.S. EPA Region 5 (w/ enclosures)
Steve Rosenthal, U.S. EPA Region 5 (no enclosures)
Chris Panos, U.S. EPA Region 5 (no enclosures)
Keith Baugues, IDEM (no enclosures)
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