May 12, 2014

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

Dear Ms. Hedman:

Re: Designations under the 2012 National Ambient Air Quality Standard for Particulate Matter (PM$_{2.5}$)

The Indiana Department of Environmental Management (IDEM) has prepared this technical addendum to provide updated monitoring data to the United States Environmental Protection Agency (U.S. EPA) to supplement Indiana’s designation recommendations for the 2012 annual PM$_{2.5}$ National Ambient Air Quality Standard (NAAQS) submitted on December 12, 2013. Initially, based on 2010-2012 monitoring data, IDEM proposed designations of attainment or unclassifiable for all counties within Indiana. Since that time, 2011-2013 monitoring data have become available that further supports IDEM’s original recommendations.

As reflected in Enclosure 1, monitors located in Dubois, Lake, Marion, and Vanderburgh counties, which previously measured air quality above the standard, demonstrate attainment of the standard based on certified 2011-2013 monitoring data. Therefore, IDEM maintains its original recommendation of attainment for these counties.

Though one of the monitors located in Clark County (180190006—Jeffersonville Walnut St.) measured a 2011-2013 design value slightly above the annual standard, IDEM stands by its original recommendation of attainment. At the close of 2013, the Jeffersonville-Walnut St. monitor measured a 2011-2013 design value of 12.07 \( \mu g/m^3 \), which is only 0.03 \( \mu g/m^3 \) above the standard due to rounding convention. However, the design value of the monitor has decreased by an average of 0.6 \( \mu g/m^3 \) per year over the last five years and it is anticipated that the monitor will attain the standard at the close of 2014, before designations are likely to become effective.
Please note that the 2011-2013 design values for the Hammond-Purdue monitor in Lake County (180892004) and the Indianapolis-W. 18th St. monitor in Marion County (180970081) were incomplete in that the minimum data requirements were not met. Using data substitution methods recommended by U.S. EPA, IDEM completed an analysis regarding the missing data for these two monitors. The results of this analysis show that the design values for both monitors are well below the annual PM$_{2.5}$ standard.

Based on certified design values from 2011-2013 and a projection of Clark County’s 2012-2014 design value, 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 be designated as attainment, while all other counties within Indiana be designated as unclassifiable.

I would like to thank you for the opportunity to provide additional feedback to U.S. EPA regarding designation recommendations for the 2012 PM$_{2.5}$ NAAQS. We look forward to working with your staff as U.S. EPA moves forward with future designations. If you have any questions regarding IDEM’s response, please feel free to contact me at (317) 232-8611 or Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,

[Signature]

Thomas W. Easterly
Commissioner

TE/kb
Enclosures
1) 2010-2012 & 2011-2013 Monitoring Data for Indiana’s Network
2) Map of Indiana 2011-2013 Annual PM$_{2.5}$ Design Values

cc: John Summerhays, U.S. EPA
    Doug Aburano, U.S. EPA
    Keith Baugues, IDEM