INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

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August 17, 2012

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

Dear Ms. Hedman:

Re: MOBILE6.2 to MOVES MVEB Replacement Update to the South Bend-Elkhart Maintenance Area under the 1997 8-Hour Ozone Standard

The Indiana Department of Environmental Management (IDEM) submits the enclosed MOBILE6.2 to Motor Vehicle Emissions Simulator (MOVES) Motor Vehicle Emissions Budget (MVEB) replacement update for the South Bend-Elkhart maintenance area under the 1997 8-hour ozone standard. The South Bend-Elkhart maintenance area includes St. Joseph and Elkhart counties. IDEM requests that the United States Environmental Protection Agency (U.S. EPA) process this final submittal for approval into Indiana's State Implementation Plan.

IDEM provided an opportunity for a public hearing on the MVEB replacement update to the South Bend-Elkhart maintenance area if a public hearing request was received by July 11, 2012. A hearing was scheduled for July 20, 2012. No request for a public hearing was received and the hearing was cancelled. In addition, IDEM received no comments during the public notice process. Documents related to the public participation process are included in Appendix C of this submittal.

This MOBILE6.2 to MOVES MVEB replacement update incorporates onroad emission estimates and revised MVEBs using U.S. EPA's recently adopted MOVES model. The onroad emission estimates were calculated using the MOVES-based emission factors and data extracted from the South Bend-Elkhart area's travel-demand model.

MVEBs are being revised in anticipation of the mandatory use of the MOVES model in future transportation conformity determinations. Preliminary use of the new model indicates that emission estimates can be considerably different than similar calculations using MOBILE6.2, which was used to create the MVEBs in the original ozone maintenance plan.

Onroad safety margins, established through the interagency consultation process, are included for nitrogen oxides (NO_x) and volatile organic compounds (VOCs). These onroad safety margins are allocated to onroad emission estimates in order to account for the wide array of assumptions that are factored into the calculation process. With the addition of onroad safety margins applied to mobile sources, the South Bend-Elkhart maintenance area will continue to remain well below the overall safety margins for all sources. MVEBs are also constrained to ensure that total NO_x and VOC emissions (i.e., all source categories) do not exceed attainment year emissions, to ensure continued maintenance of the 1997 8-hour ozone standard.

This submittal consists of one (1) hard copy of the required documentation. An electronic version of the submittal in PDF format, that is identical to the hard copy, has been sent to Pamela Blakley, Chief of U.S. EPA Region 5's Control Strategies Section.

IDEM respectfully requests that U.S. EPA proceed with review of the MOBILE6.2 to MOVES MVEB replacement update and revised transportation conformity budgets and approval into Indiana's State Implementation Plan for the South Bend-Elkhart Maintenance Area under the 1997 8-hour ozone standard. If you have any questions or need additional information, please contact Scott Deloney, Chief, Air Programs Branch, at (317) 233-5694.

Sincerely,

Keith Baugues

Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sad/sms

Enclosure:
Onroad Emissions MOBILE6.2 to MOVES Replacement Submittal for the South Bend-Elkhart, Indiana Maintenance Area under the 1997 8-Hour Ozone Standard

Cc: Doug Aburano, U.S. EPA Region 5 (w/ enclosures)
Ed Doty, U.S. EPA Region 5 (w/ enclosures)
Pamela Blakley, U.S. EPA Region 5 (w/ enclosures)
Pat Morris, U.S. EPA Region 5 (w/ enclosures)
Steve Rosenthal, U.S. EPA Region 5 (no enclosures)
Sandi Seanor, MACOG (w/ enclosures)
Scott Deloney, IDEM (no enclosures)
Christine Pedersen, IDEM (no enclosures)
Shawn Seals, IDEM (w/ enclosures)