



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

October 25, 2007

Re: Clean Data Finding for Determining
Attainment of the 1-hour Ozone National
Ambient Air Quality Standard (NAAQS)
for Lake and Porter Counties, Indiana

Dear Ms. Gade:

On April 30, 2004, the United States Environmental Protection Agency (U.S. EPA) published the first phase of its final rule to implement the 8-hour ozone national ambient air quality standard (Phase 1 Implementation Rule). The 8-hour ozone nonattainment designation for Lake and Porter counties became effective on June 15, 2004. The Phase 1 Implementation Rule provided that the 1-hour ozone NAAQS would no longer apply for an area one (1) year following the effective date of the area's designation for the 8-hour ozone NAAQS. As such, on August 3, 2005, U.S. EPA published a final rule (70 FR 44470) to codify the revocation of the 1-hour standard for those areas (including Lake and Porter counties) with effective 8-hour ozone designations.

On December 22, 2006, the U.S. Court of Appeals for the District of Columbia Circuit issued a determination that in the Phase I Implementation Rule, U.S. EPA improperly determined that areas would no longer be subject to 1-hour ozone NAAQS new source review requirements, section 185 penalty fees for failure of severe and extreme areas to attain the 1-hour ozone NAAQS and contingency measures for failure to attain or make reasonable further progress toward attainment of the 1-hour ozone NAAQS. In response to the U.S. EPA petition for re-hearing and clarification of the December 22, 2006 decision, the U.S. Court of Appeals for the District of Columbia Circuit reaffirmed its earlier decision with regards to anti-backsliding (as outlined in the U.S. EPA Office Memorandum by Robert Myers, Acting Assistant Administrator, dated June 15, 2007).

Based on the implications of the court's ruling, the Indiana Department of Environmental Management (IDEM) is requesting that the U.S. EPA issue a clean data finding for Indiana's portion of the Chicago-Gary-Lake, IL-IN 1-Hour Ozone Non-Attainment Area (i.e. Lake and Porter counties). The basis for this request is grounded in a U.S. EPA policy that has been in existence for over a decade, and court precedent set forth in three separate U.S. Circuit Court Appeals cases¹ (Seventh, Ninth and Tenth Circuits) that upheld U.S. EPA rulemakings applying the Clean Data Policy². In its rulemaking process, the U.S. EPA indicated that when a nonattainment area has attained the standard, the need for showing reasonable further progress, an attainment demonstration and contingency measures are no longer necessary.³

The State of Indiana has met all the 1-hour ozone nonattainment area requirements applicable to Lake and Porter counties. This includes a fully approved attainment SIP and associated reasonably available VOC reduction control measures (i.e., RACT, RACM, NSR, transportation control measures), rate-of-progress plans, contingency measures, and the submittal of a midcourse review document on January 31, 2005.

IDEM has enclosed ozone (and ozone precursor) monitoring data (see Exhibit A) that demonstrates that air quality in Lake and Porter counties has demonstrated attainment with the 1-hour ozone NAAQS since 2004. This data also demonstrates that the improvement in ozone air quality is consistent with the reductions in local VOC emissions (see Exhibits B and C) due to motor vehicle control programs, including vehicle inspection and maintenance, and reformulated gasoline; area source control programs, and stationary source programs. Significant regional NO_x reductions (see Exhibits B and C) following implementation of Phase II NO_x and CAIR will also ensure continued compliance (maintenance) with the standard.

Although this request only pertains to Lake and Porter counties, it should also be noted that all of the monitoring sites in the remaining portion of the nonattainment area (i.e., N.E. Illinois and S.E. Wisconsin) have demonstrated attainment with the 1-hour ozone NAAQS as well.

Lake and Porter counties met the 1-hour ozone standard prior to it being revoked. However, based on the criteria detailed in the Phase I Implementation Rule and subsequent revocation of the 1-hour standard, the State of Indiana did not proceed with a request for redesignation and maintenance plan prior to the standard being revoked. As such, the State of Indiana should not be wrongfully penalized for abiding by published rules and guidance that were subsequently overturned.

¹ *Sierra Club v. EPA*, 375 F. 3d 537 (7th Cir., 2004), *Sierra Club v. EPA*, 99 F. 3d 1551 (10th Cir., 1996), and *Our Children's Earth Foundation v. EPA*, No. 04-73032 (9th Cir., June 28, 2005) memorandum opinion, citing, 70 FR 71612, 71645 (Nov. 29, 2005).

² U.S. EPA Memorandum from John Seitz, *Reasonable Further Progress, Attainment Demonstration, and Related Requirements for Ozone Nonattainment Areas Meeting the Ozone National Ambient Air Quality Standard* (May 10, 1995).

³ 68 FR 62041, 62044 (Oct. 31, 2003).

Ms. Mary A. Gade
Page 3

IDEM hereby requests that the U.S. EPA proceed with its review of this request and timely issuance of a clean data finding. If you have any questions or need additional information, please contact Daniel Murray, Assistant Commissioner, at (317) 232-8222.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom W. Easterly', written over a horizontal line.

Thomas W. Easterly, Commissioner
Indiana Department of Environmental Management

Attachments

cc: Jay Bortzer, US EPA
John Mooney, US EPA
Daniel Murray, IDEM
Scott Deloney, IDEM

Exhibit A

Aerometric Information Retrieval System (AIRS) Data

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
QUICK LOOK REPORT (AMP450)

October 3, 2007

EXCEPTIONAL DATA TYPES

EDT	DESCRIPTION
0	NO EVENTS
1	EVENTS EXCLUDED
2	EVENTS INCLUDED
3	EXCEPTIONAL EVENTS EXCLUDED
4	NATURAL EVENTS EXCLUDED
5	EVENTS WITH CONCURRENCE EXCLUDED
6	EXCEPTIONAL EVENTS WITH CONCURRENCE EXCLUDED
7	NATURAL EVENTS WITH CONCURRENCE EXCLUDED

Ozone (44201)

Indiana

PPM (007)

1-HOUR

SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS MEAS	NUM DAYS REQ	1ST MAX 1-HR	2ND MAX 1-HR	3RD MAX 1-HR	4TH MAX 1-HR	DAY MAX>=/ 0.125	CERT
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	1995	47	91	101	0.116	0.115	0.115	0.113	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	1996	47	182	183	0.122	0.113	0.108	0.105	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	1997	47	167	183	0.120	0.116	0.112	0.111	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	1998	47	171	183	0.110	0.104	0.097	0.097	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	1999	47	175	183	0.116	0.112	0.109	0.106	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2000	47	176	183	0.104	0.091	0.090	0.084	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2001	47	172	183	0.110	0.106	0.104	0.101	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2002	47	171	183	0.129	0.125	0.120	0.113	2	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2003	47	177	183	0.106	0.094	0.090	0.086	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2004	47	183	183	0.078	0.078	0.076	0.075	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2005	47	176	183	0.129	0.114	0.112	0.111	1	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2006	47	181	183	0.090	0.086	0.082	0.080	0	Y
18-089-0022	1	520	Gary	Lake	201 MISSISSIPPI ST., IITRI BUNKER	2007	47	149	183	0.105	0.102	0.095	0.089	0	

Ozone (44201) 1-HOUR		Indiana						PPM (007)							
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS	NUM DAYS	1ST MAX	2ND MAX	3RD MAX	4TH MAX	DAY MAX>=	CERT
	MEAS							REQ	1-HR	1-HR	1-HR	1-HR	0.125		
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	1998	47	180	183	0.122	0.109	0.109	0.100	0	
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	1999	47	176	183	0.101	0.101	0.101	0.100	0	
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	2000	47	183	183	0.099	0.091	0.090	0.084	0	Y
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	2001	47	183	183	0.108	0.094	0.089	0.088	0	Y
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	2002	47	183	183	0.111	0.098	0.094	0.094	0	Y
18-089-0024	1	520	Lowell	Lake	LOWELL WASTEWATER TREATMENT PLANT	2003	47	180	183	0.126	0.102	0.093	0.092	1	Y
Ozone (44201) 1-HOUR		Indiana						PPM (007)							
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS	NUM DAYS	1ST MAX	2ND MAX	3RD MAX	4 TH MAX	DAY MAX>=	CERT
	MEAS							REQ	1-HR	1-HR	1-HR	1-HR	0.125		
18-089-0030	1	520	Whiting	Lake	1751 OLIVER ST/ WHITING HIGH SCHOOL	2004	47	183	183	0.088	0.083	0.078	0.074	0	Y
18-089-0030	1	520	Whiting	Lake	1751 OLIVER ST/ WHITING HIGH SCHOOL	2005	47	183	183	0.121	0.116	0.104	0.098	0	Y
18-089-0030	1	520	Whiting	Lake	1751 OLIVER ST/ WHITING HIGH SCHOOL	2006	47	183	183	0.109	0.092	0.089	0.087	0	Y
18-089-0030	1	520	Whiting	Lake	1751 OLIVER ST/ WHITING HIGH SCHOOL	2007	47	153	183	0.103	0.102	0.101	0.093	0	

Ozone (44201) 1-HOUR								Indiana		PPM (007)							
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS	NUM DAYS	1ST MAX	2ND MAX	3RD MAX	4TH MAX	DAY MAX>=	CERT		
	MEAS							REQ	1-HR	1-HR	1-HR	1-HR	0.125				
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	1995	47	183	183	0.157	0.120	0.117	0.113	1	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	1996	47	182	183	0.131	0.110	0.105	0.104	1	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	1997	47	180	183	0.116	0.110	0.108	0.105	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	1998	47	174	183	0.117	0.113	0.110	0.107	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	1999	47	180	183	0.108	0.108	0.103	0.103	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2000	47	182	183	0.098	0.096	0.095	0.095	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2001	47	183	183	0.106	0.105	0.103	0.102	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2002	47	183	183	0.127	0.119	0.118	0.108	1	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2003	47	177	183	0.104	0.099	0.092	0.092	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2004	47	183	183	0.085	0.082	0.081	0.078	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2005	47	183	183	0.118	0.107	0.100	0.099	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2006	47	183	183	0.089	0.082	0.082	0.078	0	Y		
18-089-2008	1	520	Hammond	Lake	1300 141 ST STREET	2007	47	153	183	0.105	0.103	0.094	0.084	0			

Ozone (44201) 1-HOUR		Indiana						PPM (007)								
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS	NUM DAYS	1ST MAX	2ND MAX	3RD MAX	4 TH MAX	DAY MAX>/=	CERT	
	MEAS							REQ	1-HR	1-HR	1-HR	1-HR	0.125			
18-127-0020	1	745	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	1995	53	164	183	0.116	0.116	0.112	0.110	0		
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	1998	47	177	183	0.133	0.121	0.103	0.102	1		
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	1999	47	182	183	0.125	0.116	0.115	0.112	1		
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	2000	47	164	183	0.105	0.099	0.090	0.086	0	Y	
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	2001	47	179	183	0.108	0.107	0.105	0.096	0	Y	
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	2002	47	174	183	0.130	0.124	0.123	0.119	1	Y	
18-127-0020	2	520	Dune Acres	Porter	INDIANA DUNES N. LAKESHORE	2003	47	177	183	0.098	0.096	0.094	0.089	0	Y	

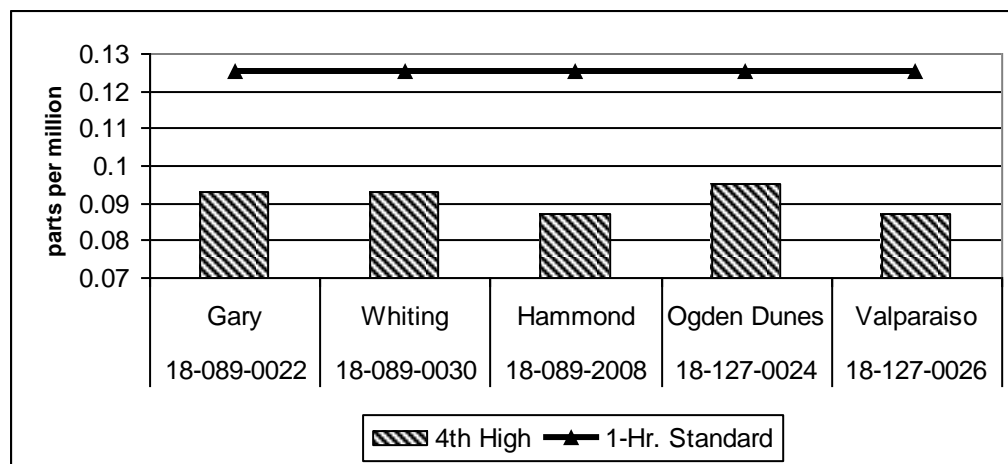
Ozone (44201) 1-HOUR			Indiana					PPM (007)							
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID	NUM	1ST	2ND	3RD	4 TH	DAY	CERT
	DAYS							DAYS	MAX	MAX	MAX	MAX	MAX>=		
								MEAS	REQ	1-HR	1-HR	1-HR	1-HR	0.125	
18-127-0024	1	520	Ogden Dunes	Porter	84 DIANA RD/ WATER	1995	47	173	183	0.131	0.123	0.122	0.118	1	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	1996	47	182	183	0.159	0.132	0.124	0.109	2	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	1997	47	174	183	0.122	0.122	0.108	0.105	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	1998	47	177	183	0.128	0.120	0.112	0.103	1	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	1999	47	183	183	0.125	0.121	0.115	0.114	1	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2000	47	180	183	0.11	0.098	0.094	0.092	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2001	47	183	183	0.111	0.109	0.105	0.103	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2002	47	177	183	0.136	0.132	0.127	0.122	3	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2003	47	183	183	0.101	0.095	0.094	0.089	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2004	47	183	183	0.089	0.089	0.086	0.084	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2005	47	183	183	0.144	0.119	0.114	0.110	1	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2006	47	183	183	0.094	0.085	0.084	0.082	0	Y
18-127-0024	1	520	(Wickliffe) Ogden Dunes	Porter	TREATMENT PLANT 84 DIANA RD/ WATER	2007	47	148	183	0.109	0.100	0.099	0.092	0	
			(Wickliffe)		TREATMENT PLANT										

Ozone (44201) 1-HOUR					Indiana		PPM (007)								DAY MAX>/=	CERT
SITE ID	P O C	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	VALID DAYS MEAS	NUM DAYS REQ	1ST MAX 1-HR	2ND MAX 1-HR	3RD MAX 1-HR	4TH MAX 1-HR	0.125		
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	1998	47	127	183	0.132	0.100	0.099	0.099	1		
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	1999	47	171	183	0.106	0.106	0.106	0.104	0		
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2000	47	182	183	0.104	0.102	0.097	0.091	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2001	47	161	183	0.093	0.092	0.088	0.085	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2002	47	183	183	0.124	0.123	0.115	0.115	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2003	47	183	183	0.100	0.097	0.096	0.095	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2004	47	183	183	0.093	0.092	0.091	0.088	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2005	47	183	183	0.097	0.094	0.093	0.091	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2006	47	183	183	0.088	0.081	0.078	0.078	0	Y	
18-127-0026	1	520	Valparaiso	Porter	1000 WESLEY/ VALPARAISO WATER DEPT.	2007	47	147	183	0.099	0.093	0.093	0.091	0		

Fourth Highest Daily Values

				1ST	2 ND	3RD	4TH	2005-2007
SITE ID	COUNTY	CITY	YEAR	1-HR	1-HR	1-HR	1-HR	AVERAGE
18-089-0022	Lake	Gary	2005	0.129	0.114	0.112	0.111	
18-089-0022	Lake	Gary	2006	0.090	0.086	0.082	0.080	
18-089-0022	Lake	Gary	2007	0.105	0.102	0.095	0.089	0.093
18-089-0024	Lake	Lowell	Site discontinued in 2004					
18-089-0030	Lake	Whiting	2005	0.121	0.116	0.104	0.098	
18-089-0030	Lake	Whiting	2006	0.109	0.092	0.089	0.087	
18-089-0030	Lake	Whiting	2007	0.103	0.102	0.101	0.093	0.093
18-089-2008	Lake	Hammond	2005	0.118	0.107	0.100	0.099	
18-089-2008	Lake	Hammond	2006	0.089	0.082	0.082	0.078	
18-089-2008	Lake	Hammond	2007	0.105	0.103	0.094	0.084	0.087
18-127-0020	Porter	Portage	Site discontinued in 2004					
18-127-0024	Porter	Ogden Dunes	2005	0.144	0.119	0.114	0.110	
18-127-0024	Porter	Ogden Dunes	2006	0.094	0.085	0.084	0.082	
18-127-0024	Porter	Ogden Dunes	2007	0.109	0.100	0.099	0.092	0.095
18-127-0026	Porter	Valparaiso	2005	0.097	0.094	0.093	0.091	
18-127-0026	Porter	Valparaiso	2006	0.088	0.081	0.078	0.078	
18-127-0026	Porter	Valparaiso	2007	0.099	0.093	0.093	0.091	0.087

Fourth Highest Daily Value Three-Year Average 2005 through 2007

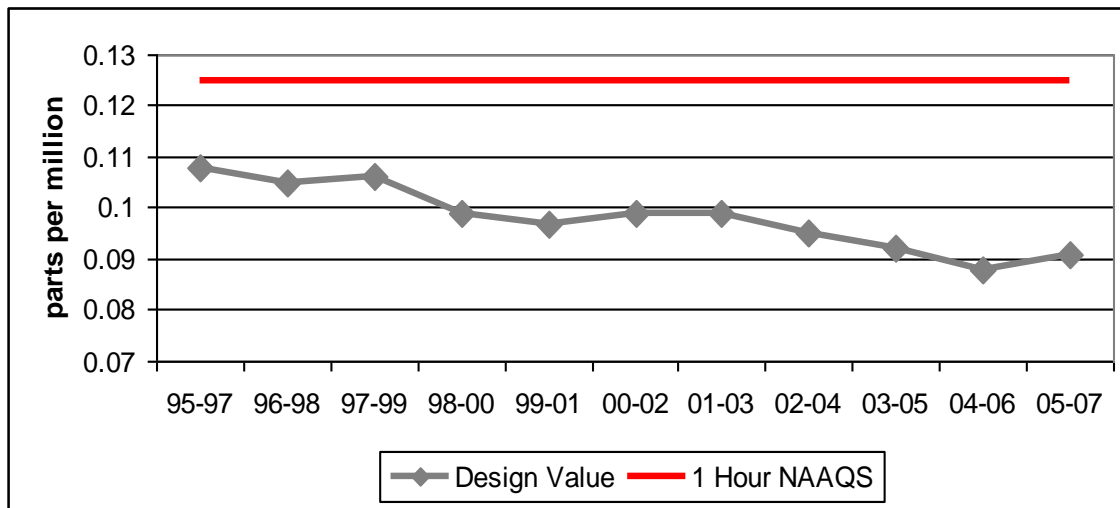


Annual 4th High Values

County	Site #	City			Annual 1-Hour Design Values										
			1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
Lake	18-089-0022	Gary	0.113	0.105	0.111	0.097	0.106	0.084	0.101	0.113	0.086	0.075	0.111	0.080	0.089
Lake	18-089-0024	Lowell	Site started 4/98			0.100	0.100	0.084	0.088	0.094	0.092	Site discontinued			
Lake	18-089-0030	Whiting	Site started in 1/04									0.074	0.098	0.087	0.093
Lake	18-089-2008	Hammond	0.113	0.104	0.105	0.107	0.103	0.095	0.102	0.108	0.092	0.078	0.099	0.078	0.084
Porter	18-127-0020	Portage	Site started in 4/98			0.102	0.112	0.086	0.096	0.119	0.089	Site discontinued			
Porter	18-127-0024	Ogden Dunes	0.118	0.109	0.105	0.103	0.114	0.092	0.103	0.122	0.089	0.084	0.110	0.082	0.092
Porter	18-127-0026	Valparaiso	Site started in 4/98			0.099	0.104	0.091	0.085	0.115	0.095	0.088	0.091	0.078	0.091

Historic Design Values

County	Site #	City				Three Year 1-Hour Design Values							
			95-97	96-98	97-99	98-00	99-01	00-02	01-03	02-04	03-05	04-06	05-07
Lake	18-089-0022	Gary	0.110	0.104	0.105	0.096	0.097	0.099	0.100	0.091	0.091	0.089	0.093
Lake	18-089-0024	Lowell	Site started 4/98			0.095	0.091	0.087	0.091	Site discontinued			
Lake	18-089-0030	Whiting	Site started in January 2004									0.086	0.093
Lake	18-089-2008	Hammond	0.107	0.105	0.105	0.102	0.100	0.102	0.101	0.093	0.090	0.085	0.087
Porter	18-127-0020	Portage	Site started in April 1998			0.100	0.098	0.100	0.101	Site discontinued			
Porter	18-127-0024	Ogden Dunes	0.108	0.106	0.107	0.103	0.103	0.106	0.105	0.098	0.094	0.092	0.095
Porter	18-127-0026	Valparaiso	Site started in April 1998			0.098	0.093	0.097	0.098	0.099	0.091	0.086	0.087



Site Exceedance Days for Lake and Porter Counties 1995 – 2007

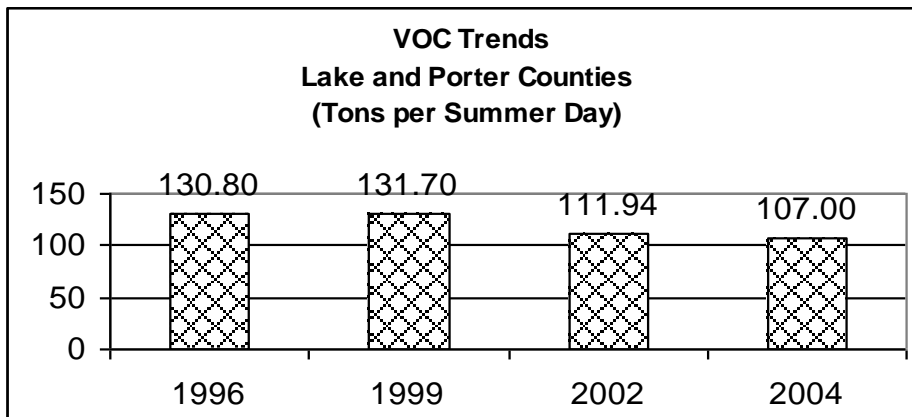
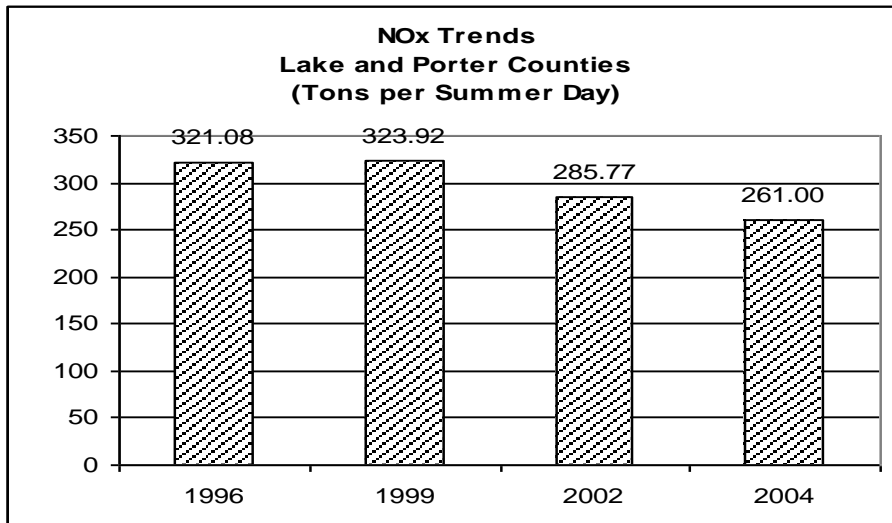
County	Site #	City			Site Exceedance Days ≥ 0.125										
			1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007
Lake	18-089-0022	Gary	0	0	0	0	0	0	0	2	0	0	1	0	0
Lake	18-089-0024	Lowell	Site started 4/98			0	0	0	0	0	1	Site discontinued			
Lake	18-089-0030	Whiting	Site started in 1/04									0	0	0	0
Lake	18-089-2008	Hammond	1	1	0	0	0	0	0	1	0	0	0	0	0
Porter	18-127-0020	Portage	Site started in 4/98			1	1	0	0	1	0	Site discontinued			
Porter	18-127-0024	Ogden Dunes	1	2	0	1	1	0	0	3	0	0	1	0	0
Porter	18-127-0026	Valparaiso	Site started in 4/98			1	0	0	0	0	0	0	0	0	0

Exhibit B

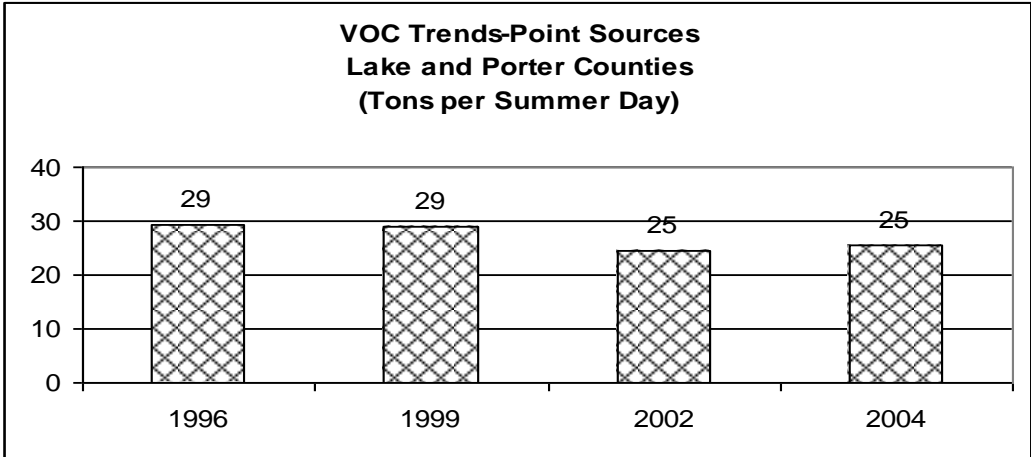
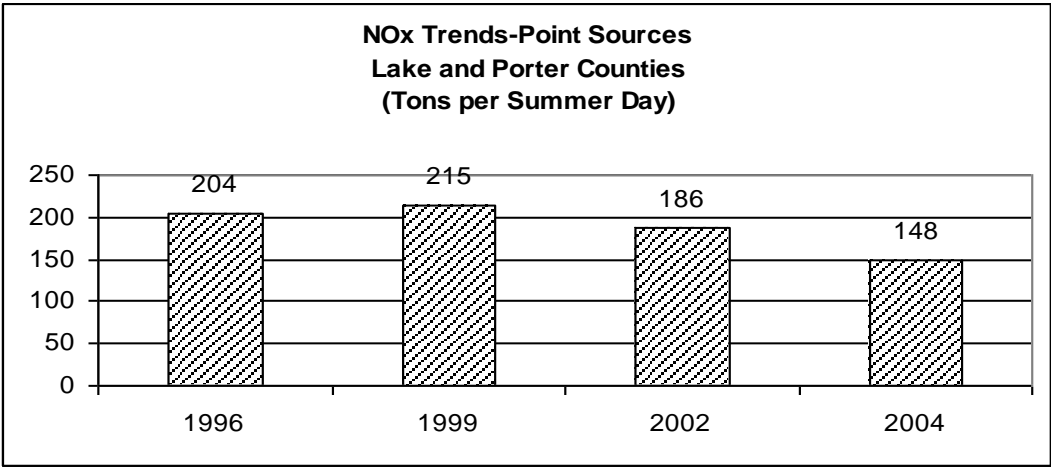
Emissions Inventories

NO_x and VOC Emission Trends, All Anthropogenic Sources, Lake and Porter counties (Tons per Summer Day)

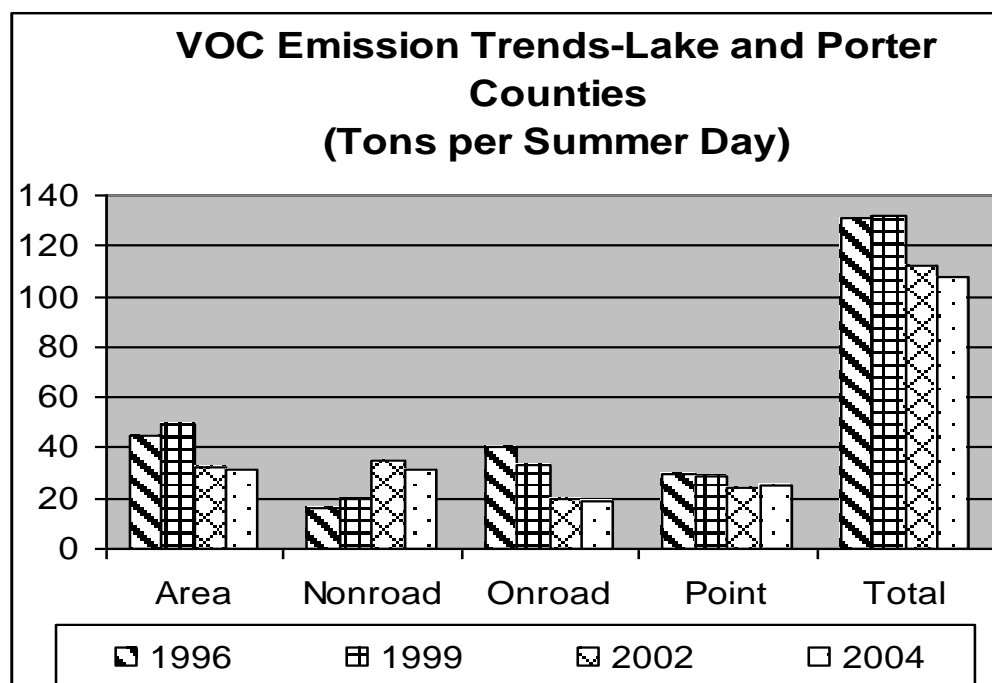
Year	NOx	VOC
1996	321.08	130.8
1999	323.92	131.70
2002	285.77	111.94
2004	261.00	107.00

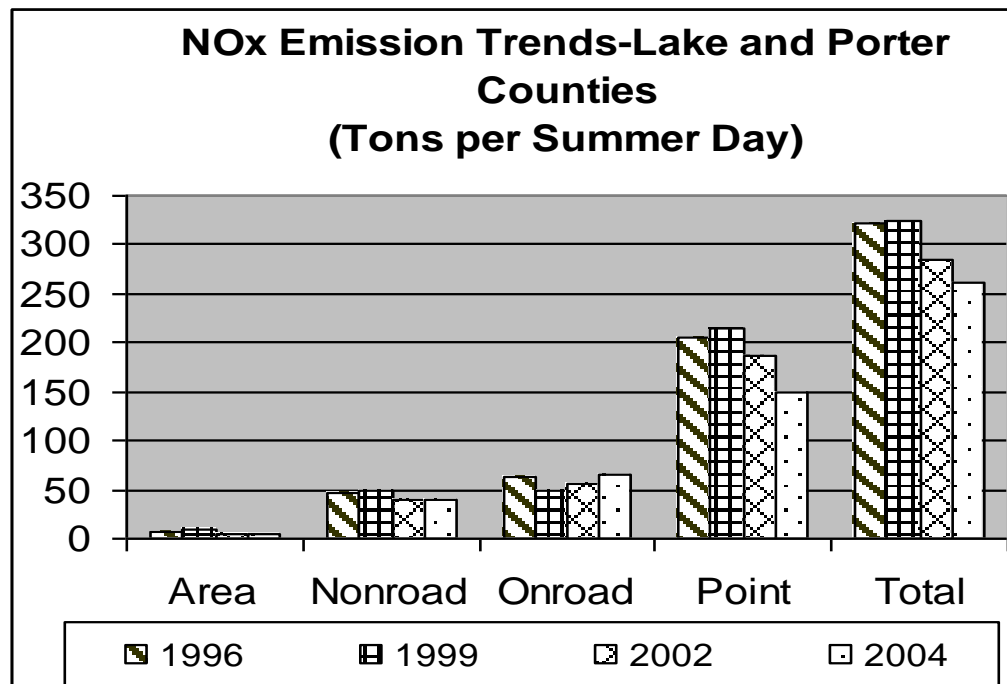


Point Source NO _x and VOC Emission Trends, Lake and Porter counties (Tons per Summer Day)		
Year	NO _x	VOC
1996	204	29
1999	215	29
2002	186	25
2004	148	25

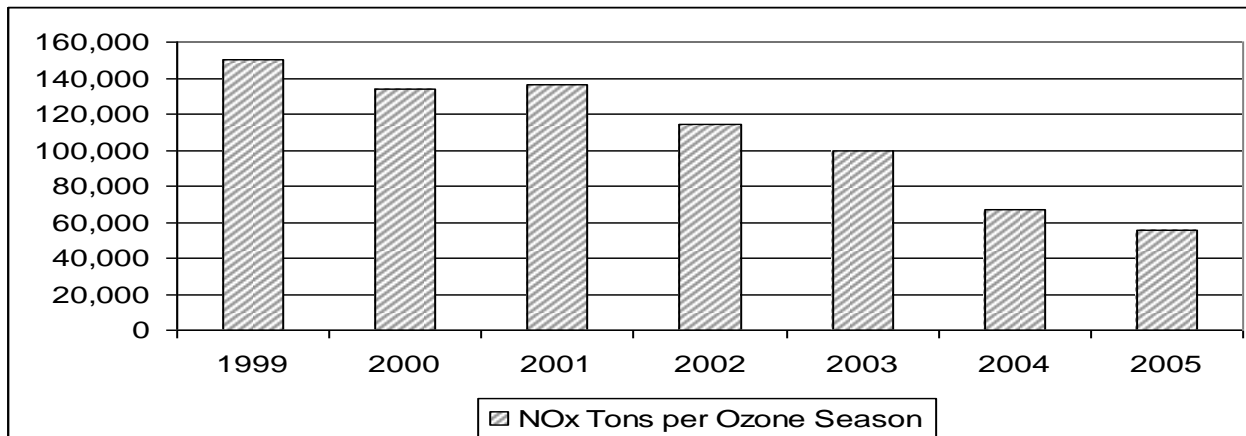


NO_x and VOC Emission Trends, All Anthropogenic Sources by Sector, Lake and Porter counties (Tons per Summer Day)				
Sector	NO_x 1996	NO_x 1999	NO_x 2002	NO_x 2004
Area	8.02	10.36	5.72	5.76
Non-road	45.70	49.07	38.61	40.64
Mobile	63.14	49.92	55.00	65.95
Point	204.22	214.58	186.44	148.22
Total	321.08	323.93	285.77	260.57
Sector	VOC 1996	VOC 1999	VOC 2002	VOC 2004
Area	45.19	49.59	32.27	31.34
Non-road	16.23	19.98	35.09	31.63
Mobile	40.05	33.29	20.00	18.90
Point	29.33	28.84	24.58	25.43
Total	130.80	131.70	111.94	107.30





Statewide	
EGU NOx Emissions Trends (Tons per Ozone Season)	
Year	
1999	149,827
2000	133,881
2001	136,052
2002	113,996
2003	99,283
2004	66,568
2005	55,486



Lake and Porter Counties	
EGU NOx Emission Trends (Tons per Ozone Season)	
Year	
1999	31,815
2000	25,028
2001	27,394
2002	22,661
2003	17,984
2004	11,798
2005	10,591

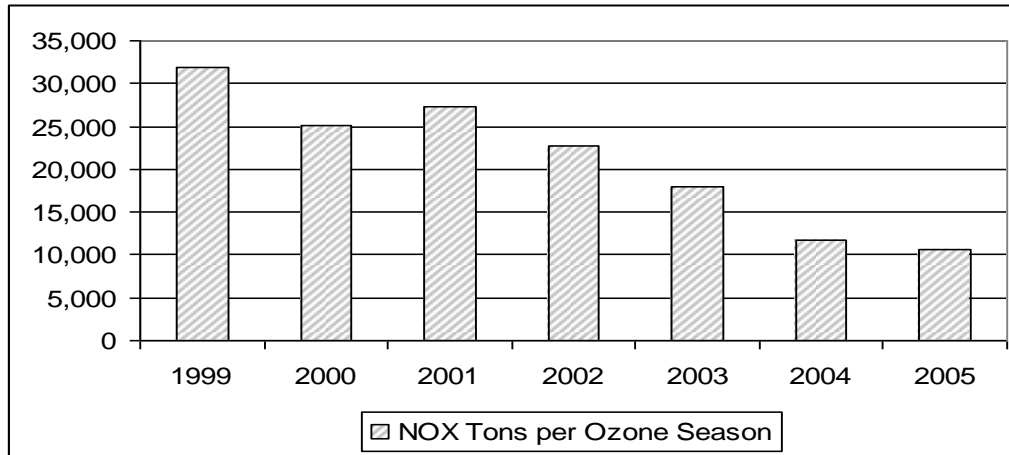
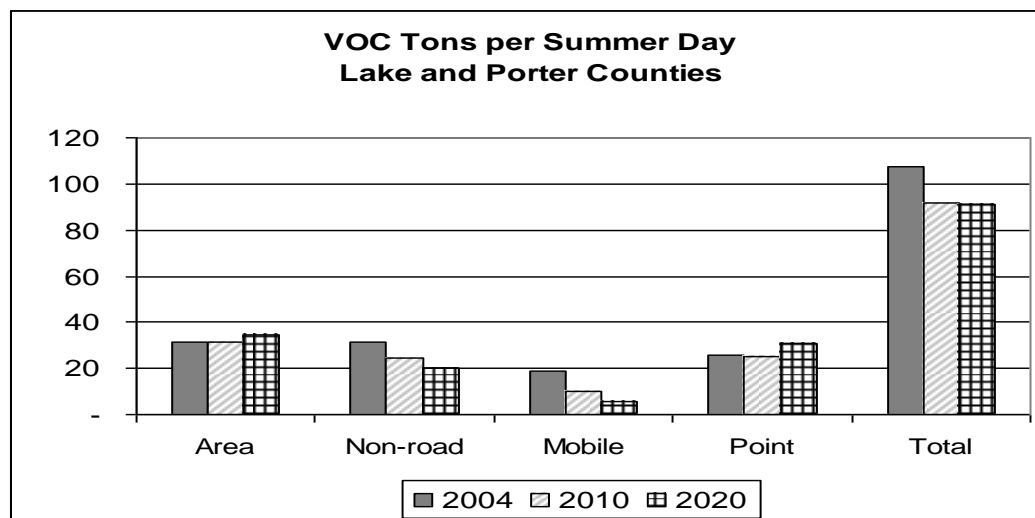


Exhibit C

2010 and 2020 Projected Emissions Inventories Lake and Porter Counties

Lake and Porter Counties			
Sector	NOx 2004	NOx 2010	NOx 2020
Area	5.77	6.07	6.40
Non-road	40.64	33.95	28.51
Mobile	65.95	38.65	11.97
Point	148.20	97.06	102.15
Total	260.56	175.73	149.03
Sector	VOC 2004	VOC 2010	VOC 2020
Area	31.33	31.72	34.31
Non-road	31.63	24.44	20.26
Mobile	18.90	9.93	5.71
Point	25.62	25.36	30.84
Total	107.48	91.45	91.12



**NOx Tons per Summer Day
Lake and Porter Counties**

