INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

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Commissioner

November 21, 2017

Doug Aburano, Chief
Attainment Planning and Maintenance Section
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Clarification of the 2011 Indiana Base Year Emissions Inventory for Indiana's Portion in Lake and Porter Counties of the Chicago-Naperville, IL-IN-WI, 2008 8-Hour Ozone Nonattainment Area

Dear Mr. Aburano:

The Indiana Department of Environmental Management (IDEM) submits this clarification letter in response to inquiries from United States Environmental Protection Agency (U.S. EPA), Region 5, Attainment Planning and Maintenance Section about incongruent mobile-source emissions between Indiana's 2011 Base-Year Emissions Inventory, 2017 Fifteen Percent (15%) Rate of Progress Plan (ROP) and Three Percent (3%) Contingency Measure Plan, and associated mobile-source emissions.

On June 15, 2016, IDEM submitted a 2011 Base-Year Emissions Inventory for Indiana's portion (Lake and Porter counties) of the Chicago-Naperville, IL-IN-WI nonattainment area. The inventory was submitted as Appendix F of the Request for Redesignation and Maintenance Plan submitted for the counties. It was approved by U.S. EPA on March 21, 2017, and published in the Federal Register on April 7, 2017 (82 FR 16934).

On February 28, 2017, IDEM submitted a Revised 2011 Base-Year Emissions Inventory and formally withdrew the June 15, 2016, 2011 Base-Year Emissions Inventory submittal prior to it being approved on March 21, 2017. The revised inventory was submitted as Attachment D to a submittal addressing Section 172 and 182 Requirements with respect to the Lake and Porter Nonattainment Area. The Section 172 and 182 Requirements submittal also contained Indiana's Attainment Demonstration as Attachment A, the 2017 15% ROP Plan, and 3% Contingency Measure Plan as Attachment C.

In the June 15, 2016, submittal, the mobile-source emissions, produced by U.S. EPA's 2014 version of the Motor Vehicle Emissions Simulator (MOVES) software program and the Northwestern Indiana Regional Planning Commission (NIRPC) travel demand

Model (TDM), were "straight-lined" back to 2011 from 2020 and 2015 data runs. The mobile-source emissions in the February 28, 2017, revised base-year inventory were also produced from MOVES2014 and the NIRPC TDM but were based on ***actual*** travel demand model network runs for 2011 and 2017, and therefore differ from the approved June 15, 2016, base-year inventory. The revised base-year inventory emissions were also used as the basis for the ROP Plan and the 3% Contingency Measure Plan of the February 28, 2017, submittal. The MOVES2014 Input Data and Parameters can be found in Appendix A4 of Attachment A and Appendix D2 of Attachment D in the February 28, 2017, Section 172 and 182 Requirements submittal.

This clarification letter consists of one (1) hard copy of the required documentation. An electronic version of the letter 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. EPA Region 5.

IDEM requests that U.S. EPA proceed with review and approval of the February 28, 2017, Section 172 and 182 Requirements submittal. If you have any question or need additional information concerning this matter please contact, Brian Callahan, Section Chief, Air Quality Standards and Implementation, Office of Air Quality, IDEM, at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,

Scott Deloney, Chief
Air Programs Branch
Office of Air Quality

SD/bc/gf/lf

cc: Scott Deloney, IDEM
Brian Callahan, IDEM
Gale Ferris, IDEM
Leslie Ferguson, IDEM
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