INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 23, 2021

Ms. Debra Shore
Regional Administrator
U.S. EPA Region 5
77 West Jackson Boulevard
Mail Code: R-19J
Chicago, IL 60604-3507

Re: Updated Section 182(f) NO_x RACT Exemption Request for the Indiana Portion (Lake and Porter Counties) of the Chicago-Naperville, Illinois-Indiana-Wisconsin (IL-IN-WI) 2008 8-Hour Ozone Nonattainment Area

Dear Ms. Shore:

The Indiana Department of Environmental Management (IDEM) requests an exemption from the Reasonably Available Control Technology (RACT) requirements for major stationary sources of nitrogen oxides (NO_x) in Lake and Porter counties, Indiana as provided under Section 182(f) of the Clean Air Act (CAA). RACT is included as part of the implementation of the 2008 8-hour ozone standard for subpart 3, serious nonattainment areas.

Specifically, this request updates the Withdrawal and Replacement of Section 182(f) NO_x Exemption Request for the Indiana Portion (Lake and Porter Counties) of the Chicago-Naperville, Illinois-Indiana-Wisconsin (IL-IN-WI) 2008 8-Hour Ozone Nonattainment Area that was submitted January 22, 2020[1], under the serious nonattainment classification. It seeks to exempt major stationary sources of NO_x (as defined in Section 302 and Subsections 182(c) and (d) of the CAA from the RACT requirements of Section 182(b)(2)), based on the fact that the entire nonattainment area, as the result of permanent and enforceable emission control measures, has recorded three (3) years of complete, quality assured ambient air quality monitoring data for the years 2019 – 2021 demonstrating attainment of the 2008 8-hour ozone standard, as shown in Table 1. As such, the area is eligible for a waiver of NO_x RACT requirements, as specified in Section 182(f)(1)(A) of the CAA.

[1] IDEM: State Implementation Plans: Ozone (O3) Attainment Demonstrations

Table 1: Annual 4th Highs and Design Values for the Chicago-Naperville, IL-IN-WI 2008 8-Hour Ozone Nonattainment Area, 2019 – 2021

Monitors				Annual 4th High (ppm)			Design Values (average of 4th highs) (ppm)
AQS #	**State**	**County**	**Site**	**2019**	**2020**	**2021***	**2019-2021***
18-089-0022	Indiana	Lake	Gary - IITRI	0.065	0.074	0.070	0.069
18-089-2008	Indiana	Lake	Hammond	0.065	0.071	0.068	0.068
18-127-0024	Indiana	Porter	Ogden Dunes	0.068	0.076	0.072	0.072
18-127-0026	Indiana	Porter	Valparaiso	0.071	0.067	0.066	0.068
17-031-0001	Illinois	Cook	Alsip	0.070	0.076	0.068	0.071
17-031-0032	Illinois	Cook	Chicago - SWFP	0.071	0.077	0.077	0.075
17-031-0076	Illinois	Cook	Chicago-Com Ed	0.065	0.068	0.070	0.067
17-031-1003	Illinois	Cook	Chicago-Taft	0.069	0.077	0.068	0.071
17-031-1601	Illinois	Cook	Lemont	0.068	0.078	0.072	0.072
17-031-3103	Illinois	Cook	Schiller Park	0.064	0.068	0.060	0.064
17-031-4002	Illinois	Cook	Cicero	0.064	0.079	0.067	0.070
17-031-4007	Illinois	Cook	Des Plaines	0.066	0.072	0.069	0.069
17-031-4201	Illinois	Cook	Northbrook	0.069	0.079	0.075	0.074
17-031-7002	Illinois	Cook	Evanston	0.069	0.074	0.078	0.073
17-043-6001	Illinois	DuPage	Lisle	0.070	0.073	0.069	0.070
17-089-0005	Illinois	Kane	Elgin	0.071	0.073	0.068	0.070
17-097-1007	Illinois	Lake	Zion	0.066	0.076	0.077	0.073
17-111-0001	Illinois	McHenry	Cary	0.070	0.076	0.069	0.071
17-197-1011	Illinois	Will	Braidwood	0.060	0.067	0.065	0.064
55-059-0019	Wisconsin	Kenosha	Chiwaukee	0.067	0.078	0.079	0.074
55-059-0025	Wisconsin	Kenosha	Water Tower	0.066	0.078	0.072	0.072

* Illinois data is preliminary.

Throughout the development of this submittal IDEM staff worked with U.S. EPA Region 5 to ensure that any potential concerns regarding this submission were addressed. We would appreciate U.S. EPA's continued efforts to communicate regularly with us as it reviews this submittal.

This submittal consists of one (1) hardcopy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hardcopy has been sent to Sarah Arra, 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 this submittal. If you have any question or need additional information, 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,

Matt Stuckey
Assistant Commissioner
Office of Air Quality

MS/sd/bc/gf/lf

cc: Sarah Arra, U.S. EPA Region 5
Chris Panos, U.S. EPA Region 5
Kathleen D'Agostino, U.S. EPA Region 5
Katie Mullen, U.S. EPA Region 5
Matt Stuckey, IDEM-OAQ
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