



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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October 22, 2014

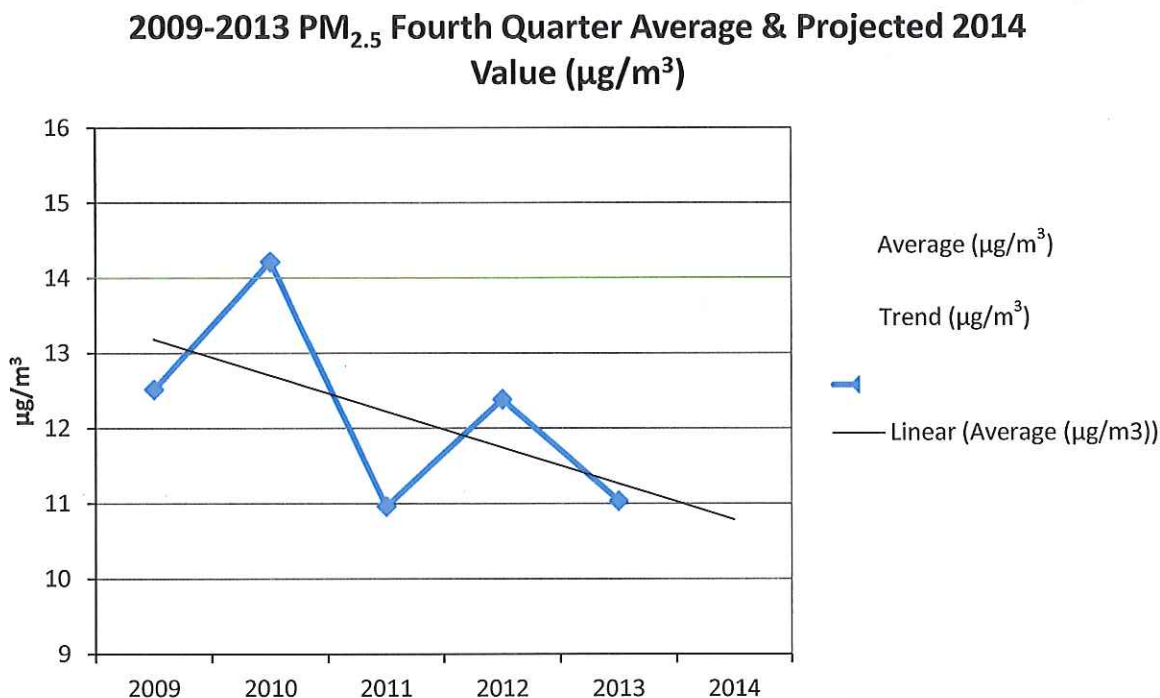
Ms. Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Dear Ms. Hedman:

Re: Designations under the 2012 National  
Ambient Air Quality Standard for Particulate  
Matter (PM<sub>2.5</sub>)

The Indiana Department of Environmental Management (IDEM) has prepared this letter in response to United States Environmental Protection Agency's (U.S. EPA) August 19, 2014, letter concerning proposed designations for the 2012 National Ambient Air Quality Standard (NAAQS) for particulate matter (PM<sub>2.5</sub>). IDEM greatly appreciates the opportunity to provide comment on the proposed designations and would like to thank U.S. EPA for taking our recommendations into account when proposing these designations.

U.S. EPA proposed to designate both Clark and Floyd Counties in the Louisville, KY-IN area as nonattainment because one of the monitors located in Clark County (180190006—Jeffersonville Walnut St.) measured a 2011-2013 design value of 12.1  $\mu\text{g}/\text{m}^3$ , 0.1  $\mu\text{g}/\text{m}^3$  above the annual standard of 12.0  $\mu\text{g}/\text{m}^3$ . IDEM is confident that this monitor will attain the PM<sub>2.5</sub> standard at the close of 2014. Through the third quarter of 2014, the 2012 – 2014 design value for the Jeffersonville Walnut St. monitor is 11.9  $\mu\text{g}/\text{m}^3$ . A calculation of the fourth quarter critical value determined that a monitored value of 14.5  $\mu\text{g}/\text{m}^3$  is needed in order for the monitor to be in violation of the standard at the close of 2014. A trend analysis of historical data (fourth quarters of 2009-2013) from the Walnut St. monitor indicates that a value of 10.8  $\mu\text{g}/\text{m}^3$  should be expected for the fourth quarter of 2014. This would result in the Walnut St. monitor attaining the standard. Figure 1 below shows that the fourth quarter average has been decreasing for the past five years and the 2014 projection is well below the critical value needed for the monitor to violate the standard. It is also worth noting that the Walnut St. monitor has not recorded a fourth quarter of 14.5  $\mu\text{g}/\text{m}^3$  or higher within the past five years.



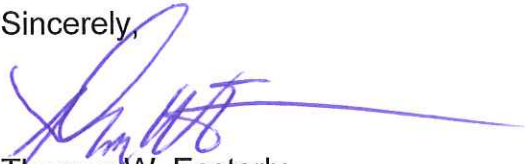
IDEM will certify and submit the monitoring data as early as possible after the close of 2014, but certainly no later than January 30, 2015. This will provide U.S. EPA with the most current data in order to reconsider the classification for Clark and Floyd Counties prior to designation becoming effective. It is our understanding that if the 2012 - 2014 design value for the Jeffersonville Walnut St. monitor is below the standard that U.S. EPA intends to designate both Clark and Floyd Counties as "unclassifiable" due to uncertainties with monitoring data collected by the Louisville Air Pollution Control District. Indiana agrees that this would be the most appropriate designation/classification for those counties.

With regard to U.S. EPA's recommendation that both Lake and Porter Counties in Northwest Indiana be designated "unclassifiable" due to uncertainties with monitoring data within the Chicago-area monitoring network, IDEM understands U.S. EPA's rationale. However, the certified data collected by Indiana's network within Lake and Porter Counties should be sufficient for U.S. EPA to classify Lake and Porter Counties as attainment.

I would like to thank you for the opportunity to provide additional feedback to U.S. EPA regarding the proposed designations for the 2012 PM<sub>2.5</sub> 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.

S. Hedman  
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Sincerely,

A handwritten signature in blue ink, appearing to read 'Tom Easterly', with a long horizontal flourish extending to the right.

Thomas W. Easterly  
Commissioner

TE/kb

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

