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4.6 Air Quality

No substantive changes have been made to this section since the publication of the Draft Environmental Impact Statement (DEIS).

4.6.1 Introduction

The Clean Air Act (CAA) and the 1990 CAA Amendments require the United States Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) for pollutants that are considered to be harmful to the public health and environment. USEPA set forth standards for six criteria or principal pollutants – particulate matter (PM), sulfur dioxide (SO₂), carbon monoxide (CO), ozone, nitrogen dioxide (NO₂), and lead. When levels of pollutants do not exceed the standards, an area is considered in attainment of the NAAQS. An area that does not meet the NAAQS for one or more pollutants is designated by the USEPA as a nonattainment area.

Areas that were formerly in nonattainment and now meet the NAAQS may petition for redesignation to attainment. The state must submit, and USEPA can approve, a plan for maintaining attainment for 10 years. These are called maintenance areas and the CAA calls for the state to update the maintenance plan for another 10 years for a total period of 20 years. Under the CAA, each state is required to establish a plan to achieve and/or maintain the NAAQS in nonattainment and maintenance areas. This plan is known as the State Implementation Plan (SIP) and sets the emission budget that meets the NAAQS. In nonattainment and maintenance areas for the transportation-related NAAQS, new federally funded or approved transportation projects must conform with the purpose of the SIP. The process of determining whether a specific project, such as I 69 Section 6, conforms with the SIP is called project-level transportation conformity.

FHWA, in consultation with the Indiana Department of Environmental Management, USEPA, and INDOT, is responsible for determining transportation conformity in nonattainment and maintenance areas for the transportation related pollutants: ozone, NO₂, PM, and CO. Projects that do not conform are ineligible for federal funding or approval.

This conformity process is separate from the NEPA process but is concurrent with it, and therefore it is documented within the EIS. Both the CAA and NEPA require analysis of the potential air quality impacts of transportation projects on the human environment. Two notable differences exist between the project level air quality requirements under NEPA and those under the CAA. First, NEPA applies to federal projects regardless of location whereas the CAA applies to projects within specifically identified nonattainment or maintenance areas. Second, NEPA and its implementing regulations provide limited detail on the direction and criteria for conducting project level air quality analyses whereas the CAA and its implementing regulations provide substantial detail.

A common element to project level analysis under both NEPA and the CAA is that the criteria pollutants of the CAA are applied to both for considering potential air quality issues. The



corresponding NAAQS for these pollutants are applied as the criteria for evaluating proposed projects and actions.

4.6.2 I-69 Section 6 Air Quality

The I-69 Section 6 corridor is located in Morgan, Johnson, and Marion counties. All three counties are within the Metropolitan Indianapolis Intrastate Air Quality Control Region #80. Marion County has a 0.5 square mile CO maintenance area in central downtown Indianapolis.¹ This maintenance area is approximately 5 miles north of the northern limits of the proposed project. All three counties were redesignated to maintenance for the 1997 PM_{2.5} standard on July 11, 2013, and are in attainment for 2012 PM_{2.5} standard. With the implementation rule for the 2012 PM_{2.5} standard effective on October 24, 2016, the USEPA revoked the “1997 primary annual PM_{2.5} NAAQS in areas that have always been designated attainment for that NAAQS and in areas that have been redesignated to attainment for that NAAQS. Thus, after the effective date of the revocation, areas that have been redesignated to attainment for the 1997 annual PM_{2.5} NAAQS (i.e., maintenance areas for the 1997 annual PM_{2.5} NAAQS) will not be required to make transportation or general conformity determinations for the 1997 annual PM_{2.5} NAAQS.”

This proposed project is included in the Indianapolis Metropolitan Planning Organization (MPO) *2035 Long Range Plan Transportation Plan (LRTP)* and *2018-2021 Indianapolis Regional Transportation Improvement Program (IRTIP)*. A plan amendment in June 2017 consolidated segments shown in previous LRTP versions. The amended 2035 LRTP identifies I-69 Section 6 as MPO project number 5004 from SR 39 in Martinsville to I-465 in Indianapolis.² I-69 Section 6 information was updated in an amendment to the 2018-2021 IRTIP on August 23, 2017.

The portions of the three counties which the I-69 Section 6 passes through are all in attainment for all transportation related criteria pollutants.

In addition to demonstrating conformity in nonattainment and maintenance areas for the NAAQS at the regional level, transportation conformity requirements may also require project-level hotspot analyses for CO and/or PM in nonattainment and maintenance areas for CO and/or PM. Section 93.109(b) of the federal conformity rule lays out the requirements for project-level conformity determinations. It specifies that interagency consultation is required to determine whether a project meets the criteria that would require a hotspot analysis.

Section 5.9 describes the methodology and results of the air quality analysis conducted for I-69 Section 6, with a discussion of CO, ozone, PM_{2.5}, mobile source air toxics (MSATs), and greenhouse gases (GHG).

¹ *Federal Register*, Vol. 65, No. 12, January 19, 2000, EPA, 40 CFR Parts 52 and 81, Approval and Promulgation of Implementation Plans; and Designation of Areas for Air Quality Planning Purposes; Indiana, pages 2883 - 2889.

² <http://www.indympo.org/whats-underway/lrtp-2035-amendments> 2017 - Summer, pages 4 and 6, accessed July 31, 2017.