Indiana Department of Environmental Management
*We Protect Hoosiers and Our Environment.*
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**Michael R. Pence**
*Governor*

**Carol S. Comer**
*Commissioner*

September 16, 2016

Mr. Robert A. Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3608

Re: Recommendations Concerning Air Quality Designations for the Revised 2015 8-Hour Ozone National Ambient Air Quality Standard (NAAQS)

Dear Mr. Kaplan:

This letter is in response to U.S. Environmental Protection Agency's (U.S. EPA's) February 25, 2016 guidance memorandum concerning area designations for the 2015 8-hour ozone National Ambient Air Quality Standards. U.S. EPA's February 25, 2016, guidance memorandum states that air quality designations will be proposed in June of 2017 and final designations will be promulgated in October of 2017. The guidance indicates that states must submit their initial air quality designation recommendations to U.S. EPA by October 1, 2016.

The Indiana Department of Environmental Management (IDEM) is submitting Indiana's initial recommendations following a thorough analysis of the five factors identified by U.S. EPA in its guidance memorandum. Air quality data is among the five factors, and U.S. EPA has informed states that they should base recommendations on the most recent complete three consecutive years of quality-assured, certified air quality data available at the time initial recommendations must be submitted. Because quality-assured data from the 2016 ozone season is expected to be certified by May of 2017, U.S. EPA expects to base final air quality designation recommendations on 2014-2016 data. U.S. EPA has also informed states that they may update recommendations once 2016 data has met certification requirements.

Consistent with U.S. EPA guidance, IDEM has based its evaluations on quality-assured, certified ambient air quality data for 2013-2015 and quality-assured data for the 2014-2016 timeframe, both of which show that all monitors in Indiana are meeting the 2015 8-hour ozone NAAQS. Based on air quality data and a thorough examination of the additional factors, including emissions data, meteorology, geography/topography and jurisdictional boundaries, IDEM recommends all of the monitored counties in Indiana be designated attainment and all other counties within Indiana be designated as unclassifiable.

The following documents are enclosed to provide detailed data in support of Indiana's initial recommendations:

- Enclosure 1—List of Indiana counties with recommendations; map containing graphical representation of Indiana's recommendations
- Enclosure 2—Air quality data for all monitors in Indiana
- Enclosure 3—Indiana's assessment/technical support document

An electronic version of this letter in PDF format has been transmitted to Doug Aburano of U.S. EPA Region 5.

Consistent with U.S. EPA's February 2016 guidance, Indiana reserves the right to make necessary updates to its recommendations once 2016 monitoring data becomes certified. I would like to thank you for this opportunity to provide feedback to U.S. EPA regarding initial air quality designations under the 2015 8-hour ozone NAAQS. IDEM looks forward to continued coordination with Region 5 staff as the designation process moves forward. If you have any questions regarding Indiana's initial recommendations, please feel free to contact me at (317) 232-8611 or ccomer@idem.IN.gov, or Keith Baugues, Assistant Commissioner of IDEM's Office of Air Quality, at (317) 232-8222 or kbaugues@idem.IN.gov.

Sincerely,

Carol S. Comer
Commissioner

CSC/kb/sd/bc/gf/as
Enclosures

cc: Chris Panos, U.S. EPA Region 5 (no enclosures)
Steve Rosenthal, U.S. EPA Region 5 (no enclosures)
Doug Aburano, U.S. EPA Region 5 (no enclosures)
Keith Baugues, IDEM-OAQ (no enclosures)
Scott Deloney, IDEM-OAQ (no out enclosures)
Brian Callahan, IDEM-OAQ (no enclosures)
Mark Derf, IDEM-OAQ (no enclosures)
Gale Ferris, IDEM-OAQ (no out enclosures)
Amy Smith, IDEM-OAQ (with enclosures)
File Copy (no enclosures)