

US EPA ARCHIVE DOCUMENT



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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July 15, 2004

Mr. Bharat Mathur
Acting Regional Administrator
U.S. EPA, Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Mr. Mathur:

The State of Indiana respectfully requests that you exercise the authority granted to you under Section 181 (a)(4) of the Clean Air Act to reclassify LaPorte County, Indiana from its current classification of “moderate” under the 8-Hour Ozone National Air Quality Standard to “marginal”. The Indiana Department of Environmental Management (IDEM) has worked closely with the Lake Michigan Air Directors Consortium (LADCO) and a variety of stakeholders representing the communities of LaPorte County in evaluating the status of air quality in the area and concludes that this reclassification is warranted.

LaPorte County’s current design value is within 5% of a design value within the next lowest classification (marginal). According to U.S. EPA guidance, for an area classified as “moderate”, the design value must be 96 parts per billion or less in order to qualify for a reclassification to a “marginal” classification. LaPorte County’s highest current design value is 93 parts per billion and thus meets this criterion.

A reclassification to “marginal” would result in a new attainment deadline of June 15, 2007. As illustrated in the attached Technical Support Document (TSD), modeling conducted by the U.S. EPA and LADCO indicates that LaPorte County is on track to attain the standard by this new deadline. Progress towards compliance is already being made, as the 2003 fourth high 8-hour ozone values for the Michigan City and City of LaPorte monitors were 82 and 84 parts per billion respectively, both below the National Ambient Air Quality Standard.

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Modeling that was conducted by the U.S. EPA to support the NO_x SIP Call clearly indicates that LaPorte County is adversely and significantly affected by transported air pollutants. This is further illustrated by model runs conducted by LADCO for the Lake Michigan Area that are summarized in the attached TSD. In order to verify the significance of transport and the potential impact of local emission reductions in LaPorte County on ozone concentrations within the area, IDEM recently conducted its own modeling. The results of this modeling exercise (summarized in the attached TSD) clearly demonstrate that local emission reductions, regardless of volume, have little to no impact on ozone concentrations within LaPorte County or neighboring downwind areas. Therefore, LaPorte County is reliant on regional reductions to attain the standard.

IDEM has facilitated several meetings over the past two months in the LaPorte County area to acquire input from community, business, and environmental leaders. While there is some opposition within the community to reclassify LaPorte County, the clear majority of the stakeholders involved in this consultation process determined that the pursuit of this reclassification is merited and is in the best interest of the citizens of LaPorte County. Furthermore, the board of the Northwestern Indiana Regional Planning Commission, representing fifty-one separate governmental jurisdictions in Lake, Porter, and LaPorte Counties, formally recommended that IDEM request that the U.S. EPA reclassify LaPorte County. This recommendation, along with other input received from the community, is enclosed.

Local governments within LaPorte County have recently adopted and implemented strategies to improve air quality in the area voluntarily. These strategies include the use of cleaner burning alternative fuels, implementation of non-idling policies for municipal vehicles, and enhanced public education and awareness. IDEM will continue working with stakeholders within the community to identify and implement cost-effective local and regional programs to improve air quality in LaPorte County and ensure that compliance with the standard is achieved as soon as possible.

Upon your review of the attached TSD, I am hopeful that the U.S. EPA will agree with our analysis and proceed in reclassifying LaPorte County to "marginal". If I can be of assistance during your review, please feel free to contact me at (317) 232-8222 or jmccabe@dem.state.in.us.

Sincerely,

Lori F. Kaplan
Commissioner

Cc: Jay Bortzer, U.S. EPA Region 5
Steve Marquardt, U.S. EPA Region 5
John Mooney, U.S. EPA Region 5
Patricia Morris, U.S. EPA Region 5
Cheryl Newton, U.S. EPA Region 5

The Honorable Leigh Morris, City of LaPorte
The Honorable Chuck Oberlie, City of Michigan City
Marlow Harmon, LaPorte County
Clay Turner, LaPorte County
Bill Hager, LaPorte County
Reggie Korthals, NIRPC