



CITY OF EVANSVILLE
ONE N.W. MARTIN LUTHER KING, JR. BLVD.
EVANSVILLE, INDIANA 47708

OFFICE OF THE MAYOR
JONATHAN WEINZAPFEL

December 9, 2004

Michael Leavitt
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Ave, N.W.
Washington, D.C. 20460

Dear Administrator Leavitt:

On June 24, 2004, the U.S. Environmental Protection Agency (EPA) proposed designating Vanderburgh, Warrick, Gibson, Pike, Spencer and Dubois Counties in Indiana as in nonattainment for the PM_{2.5} (particulate matter – 2.5 microns in diameter) annual National Ambient Air Quality Standard (NAAQS). The U.S. EPA proposed this designation for these six counties based on monitoring data from three PM_{2.5} FRM monitors located in Vanderburgh County and one located in Dubois County. These monitors ~~each had~~ design values over the 15.0 microgram/cubic meter NAAQS.

However, since June 24, 2004, the monitoring data we have received for the third quarter of 2004 demonstrates that all three Vanderburgh County monitors ~~now~~ have design values under the 15.0 micrograms per cubic meter limit. In ~~other~~ words, Vanderburgh County can now demonstrate attainment of the annual PM_{2.5} ~~standard~~. ~~Furthermore~~, the fourth quarter has historically demonstrated lower PM_{2.5} levels relative to the third quarter. At the end of this year, we expect Vanderburgh County to conclusively demonstrate attainment with the annual PM_{2.5} NAAQS.

Nonetheless, the U.S. EPA is under a consent decree to make PM_{2.5} attainment designations by December 15, 2004. If U.S. EPA persists in designating Vanderburgh County as in nonattainment for PM_{2.5} in spite of the positive data for the third quarter and our expectations for the fourth quarter, it could still take us up to two years to have a Petition for Redesignation approved by the U.S. EPA even though we are currently in attainment. The nonattainment designation could have a serious negative impact on our economic development efforts.

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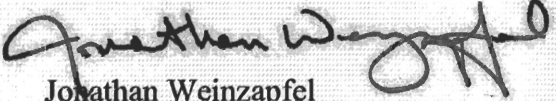
Administrator Michael Leavitt
Re: Nonattainment designation
December 9, 2004

Although Vanderburgh County's monitors now demonstrate attainment, the monitor in Dubois County, though trending downward, is still above the 15.0 microgram/cubic meter annual standard. Research performed by the Vanderburgh County Ozone Officer, Dr. Joanne Alexandrovich, indicates the Dubois County monitor is improperly sited and does not reflect actual ambient air quality data. We believe it would be **unfair and unfounded** to designate Vanderburgh County, as well as Dubois, Gibson, Pike, Spencer and Warrick Counties as in nonattainment simply on the basis of an improperly sited Dubois County monitor.

Please reconsider U.S. EPA's proposal to designate these six counties as in nonattainment. At the very least, the nonattainment area should be limited to Dubois County.

Thank you for your consideration. Please do not hesitate to contact me should I be of further assistance on this matter.

Sincerely,



Jonathan Weinzapfel
Mayor

Cc: Bharat Mathur, Acting Regional Administrator, U.S. EPA Region 5
Norman Niedergang, Acting Deputy Regional Administrator, U.S. EPA Region 5
Steve Rothblatt, Director, Air and Radiation Division, U.S. EPA Region 5
Joseph E. Kernan, Governor, State of Indiana
Lori Kaplan, Commissioner, Indiana Department of Environmental Management
The Honorable Evan Bayh, U.S. Senator
The Honorable Richard Lugar, U.S. Senator
The Honorable John Hostettler, U.S. Representative

Table 1.

site #	site location	PM2.5 in ug/m3 by year				
		1999	2000	2001	2002	2003
18-163-0006	Evv Cv Center	16.6	16.1	15.6	15.4	14.9
18-163-0006	Evv Cv Ctr2		18.0	14.6	14.0	14.6
18-163-0012	Evansville	17.2	16.2	15.2	15.3	15.3
18-163-0016	Univ Evansville	18.9	15.7	16.2	15.2	15.1
21-101-0006	Henderson	14.6	15.0	14.2	14.2	13.2
21-101-0006	Baskett					14.0
21-059-0014	Owensboro	15.2	17.2	15.2	14.6	14.6
18-147-0009	Dale (Spencer)		16.3	14.5	14.1	14.6
18-037-2001	Jasper (Dubois)		17.2	16.5	16.3	15.7
18-083-0004	Purdue Ag. (Knox)		13.9	13.4	14.2	14.0

Table 2.

plant	ORIS id	capacity MW	1999	2002	1999	2002
			NOx tons/yr	NOx tons/yr	SO2 tons/yr	SO2 tons/yr
Edwardsport	1004	160	2918.6	1924.6	11308.1	8177.7
Gibson	6113	3124	49450.5	38241.0	158900.7	127356.5
Frank E Ratts	1043	243	3668.5	4012.3	17180.2	18055.0
Petersburg	994	1664	20196.6	20248.6	50196.0	47152.1
A B Brown	6137	500	8231.6	7399.5	11252.8	8638.6
Warrick	6705	432	18391.4	17550.1	119655.6	98777.4
F B Culley	1012	386	7670.1	6318.4	11329.4	7118.7
Rockport	6166	2600	37946.0	34242.7	66844.5	53195.8
HMP&L Station 2	1382	308	6074.5	5684.9	5805.4	3484.3
Henderson I	1372	26	96.4	39.8	996.3	382.4
Robert Reid	1383	64	1507.4	1295.6	7913.0	10581.7
R D Green	6639	450	7257.5	7400.5	4843.8	3423.8
Elmer Smith	1374	390	12702.0	9560.7	8402.4	7112.7
Coleman	1381	452	7156.8	6848.5	37437.4	49028.3
D B Wilson	6823	416	9876.0	8516.2	10416.0	8893.2
Green River	1357	233	3654.3	2198.0	20975.9	13027.8
Paradise	1378	2169	104356.7	47027.2	181065.0	84071.9
		13617	301154.9	218508.6	724522.5	548477.9

Table 3

**PM2.5 Means by quarter and year in ug/m3
EVV Civic
Center**

	2000	2001	2002	2003	2004
1Q	14.545	16.738	11.937	14.510	12.590
2Q	14.383	14.497	14.843	14.045	12.400
3Q	20.043	18.218	22.000	20.187	16.224
4Q	15.785	12.352	12.676	10.979	
year	16.166	15.451	15.364	14.930	

EVV Mill Road

1Q	15.696	18.114	11.857	14.714	13.040
2Q	14.990	14.107	15.432	14.230	12.941
3Q	18.552	16.361	21.485	20.992	16.148
4Q	15.439	12.030	12.297	11.138	
year	16.169	15.153	15.268	15.268	

EVV U of E

1Q	15.412	17.944	12.189	14.527	13.232
2Q	14.690	14.935	14.521	14.590	12.700
3Q	19.016	18.672	21.752	20.583	16.413
4Q	13.968	13.100	12.507	10.654	
year	15.704	16.163	15.242	15.088	

**Jasper Post
Office**

1Q	16.577	18.336	13.122	16.741	13.519
2Q	15.962	15.532	17.056	13.879	13.213
3Q	19.268	17.961	21.429	20.352	17.062
4Q	16.850	12.842	13.735	11.917	
year	17.164	16.168	16.336	15.722	

Dale

1Q	20.869	16.793	12.143	11.917	11.950
2Q	14.829	12.850	13.993	12.529	10.000
3Q	19.646	16.400	18.825	23.277	15.267
4Q	18.473	12.020	11.286	10.786	
year	18.454	14.516	14.062	14.627	

Figure 1.

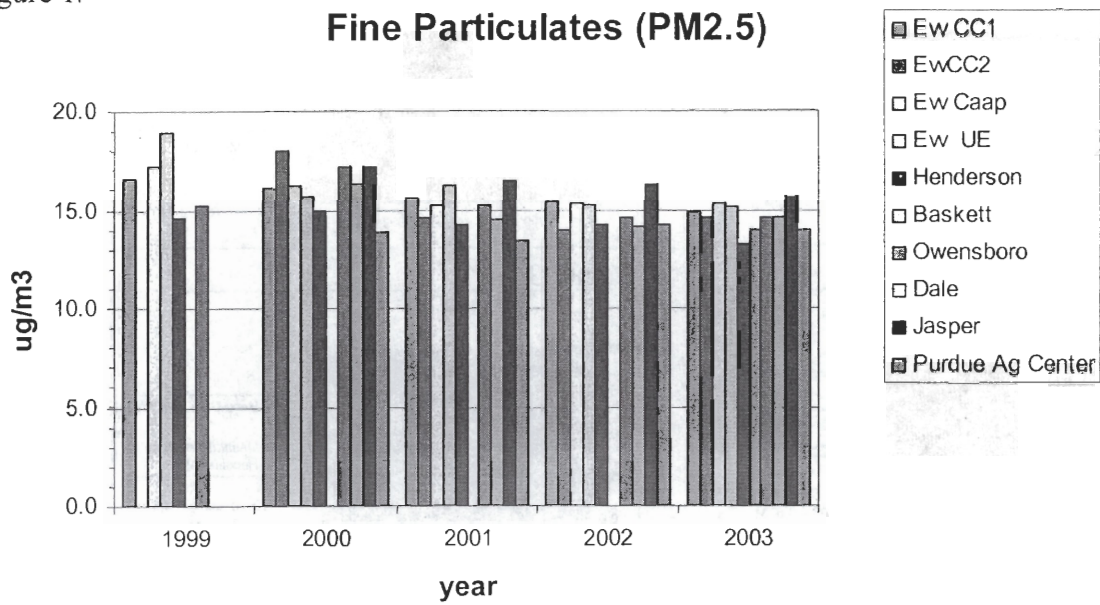


Figure 2.



Figure 3a

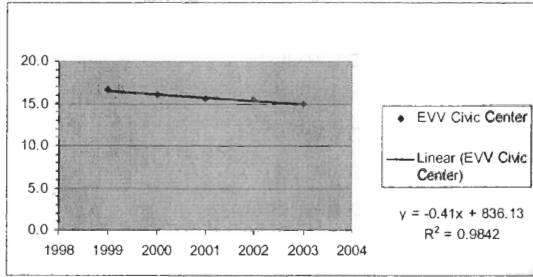


Figure 3b

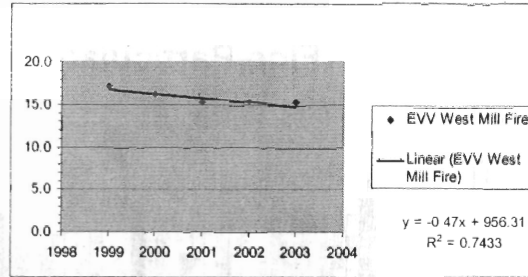


Figure 3c

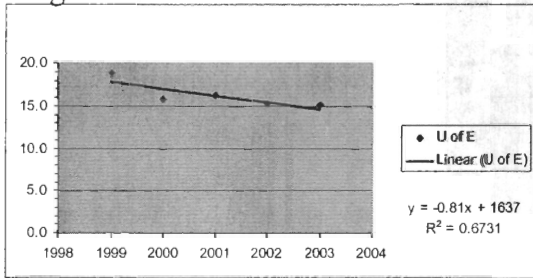


Figure 3d

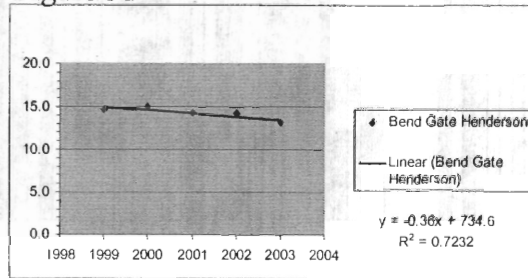


Figure 3e

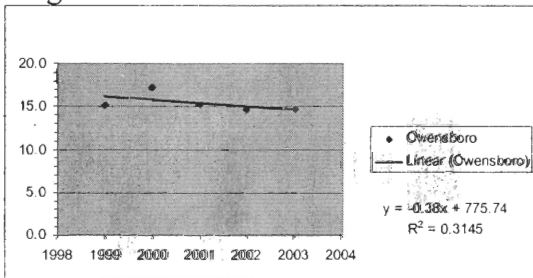


Figure 3f

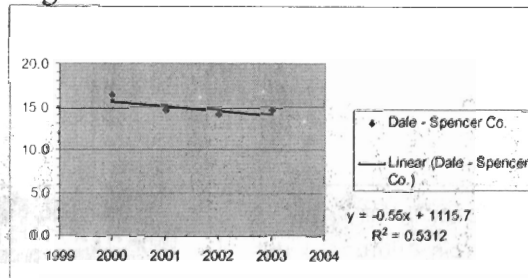


Figure 3g

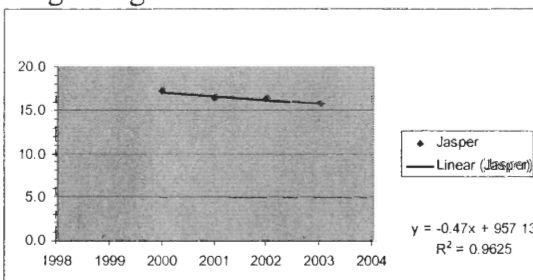


Figure 3h

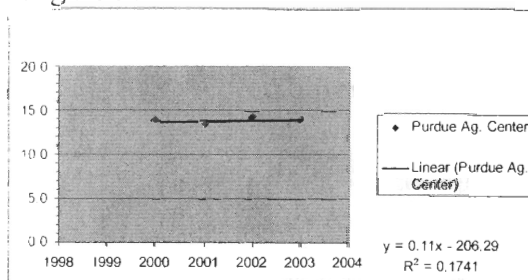


Figure 3i

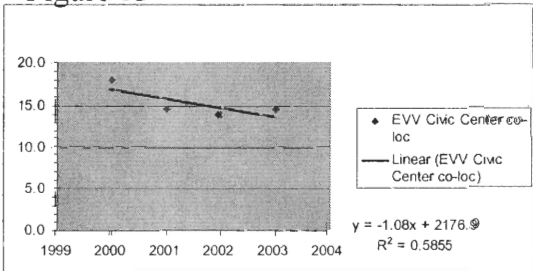


Figure 4a

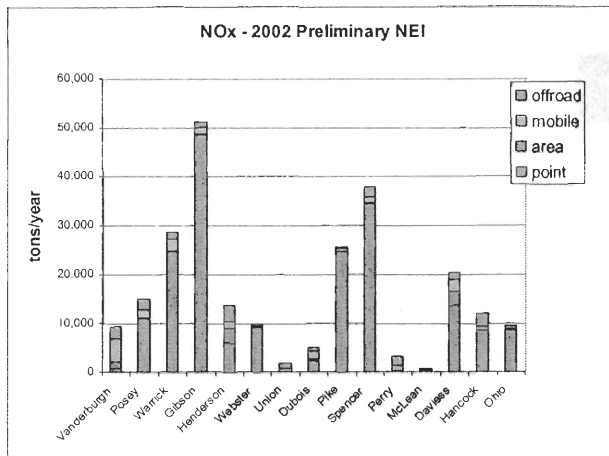


Figure 4b

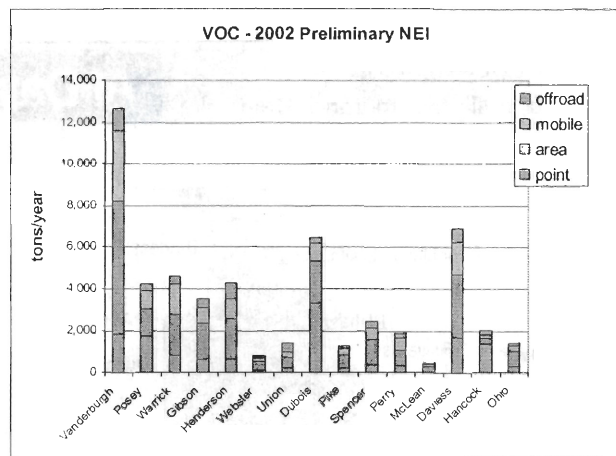


Figure 4c

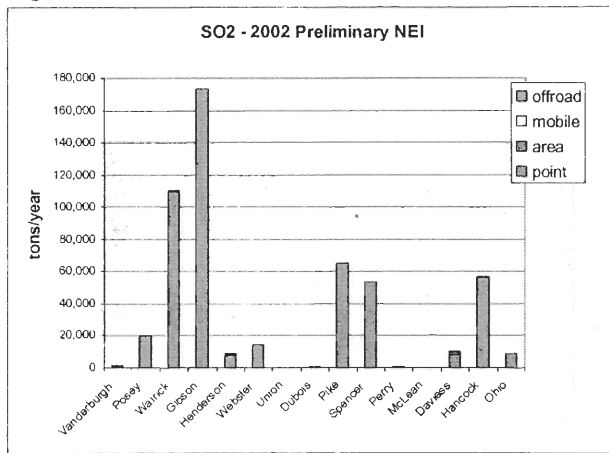


Figure 4d

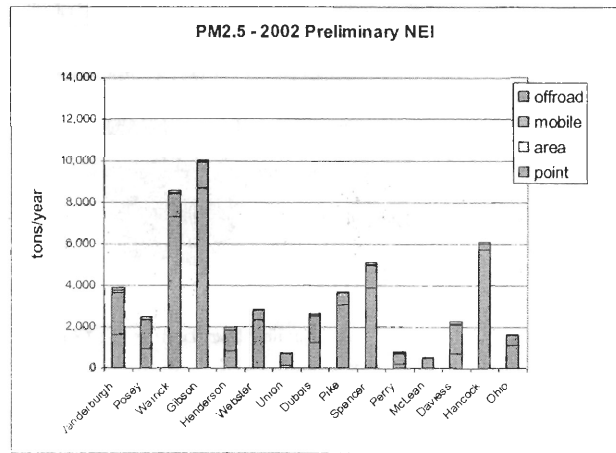


Figure 4e

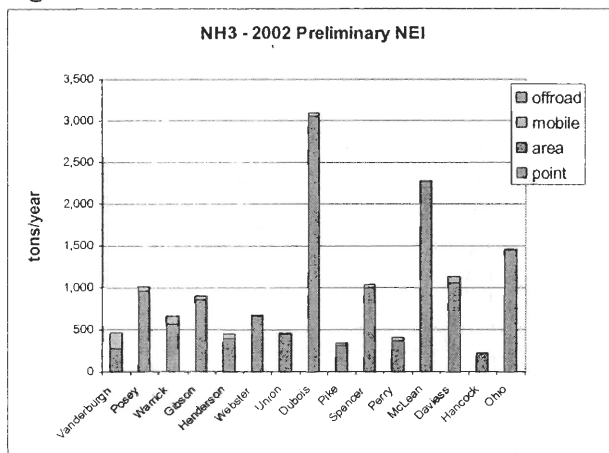


Figure 5.



Figure 6

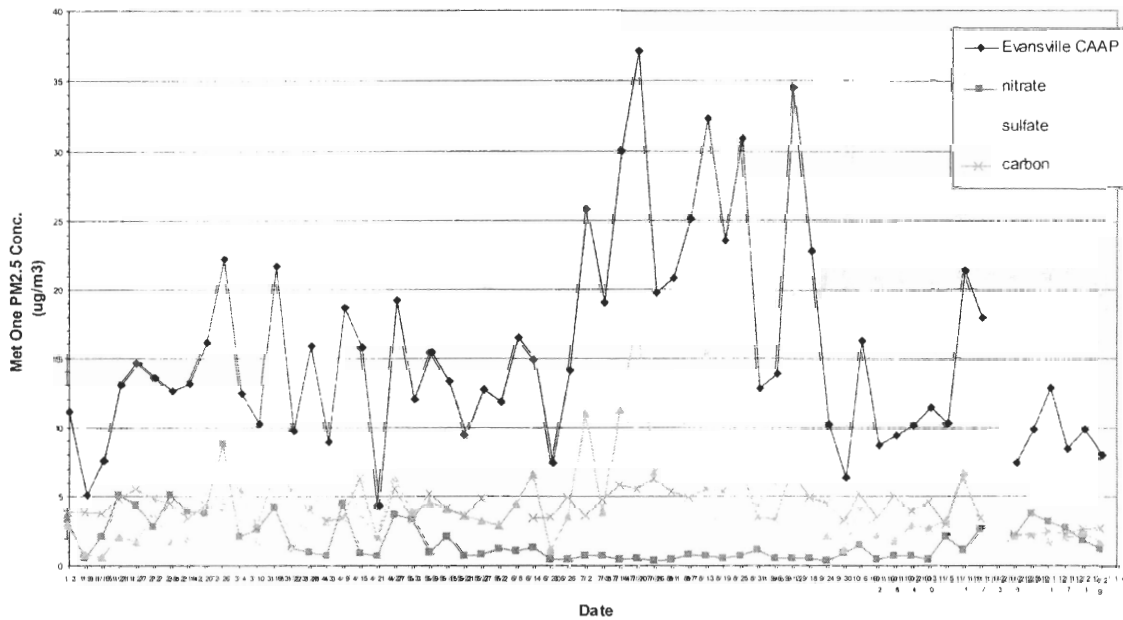


Figure 7.

