



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

---

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

December 6, 2004

Steve Rothblatt  
Office of Air and Radiation  
U.S. Environmental Protection Agency, Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Re: PM2.5 Nonattainment Designations

Dear Mr. Rothblatt:

On December 2, 2004, I and others from the Indiana Department of Environmental Management, discussed with members of your staff USEPA's upcoming decision on PM2.5 attainment and nonattainment designations, with particular attention on counties in southwestern Indiana. This letter provides additional data and analysis for your consideration.

We understand that USEPA is evaluating whether to consider data from the first three quarters of 2004 in addition to the 2001-2003 annual averages as a further indicator of whether air quality in a given area meets the PM2.5 health standard. We strongly urge USEPA to take these data into account, as it is clear that utility and other clean air reduction programs implemented in recent years are resulting in cleaner air in several Indiana regions. Recognizing that progress now, through either an attainment or unclassifiable designation, will avoid unnecessary imposition of requirements on counties where air quality meets health standards and emissions are not contributing to nonattainment downwind. And, given the likelihood that these areas will attain the standard once 2004 data are fully quality assured, it does not make sense to designate these areas in December, only to begin a public process of redesignation several months later.

One of the areas where monitoring data show a downward trend, and where 2004 data to date strongly suggest that the 2002-2004 annual average will show compliance with the health standard is Evansville. The data show not only that air quality is meeting the standard in the Evansville area, but also that emissions from Vanderburgh County are not contributing to high PM2.5 values in Dubois County. Enclosed with this letter is further information on this issue for your consideration that supports the following conclusions:

- Wind rose analysis shows that on those days where values are particularly high, driving up the annual average, winds are generally not from the south/southwest (i.e. Evansville) direction;
- On days with high values, PM2.5 concentrations at the Jasper monitor do not appear to increase relative to other sites when the wind is directly from Vanderburgh County;
- The Jasper monitor shares the same regional background as all other sites;
- Local influences such as nearby highway and emissions from local industry are possible causes of differences in Jasper values relative to other sites;
- Power plant emissions, which are clearly a substantial contributor to regional values, are just as high in surrounding counties relative to Vanderburgh County.

Indiana is fully committed to improving air quality for all Hoosiers. Regardless of the outcome of the nonattainment designations, there are clean air measures on the way, but not yet implemented, that will continue to improve air quality across our state. We strongly urge USEPA to consider all the data presented, including this most recent information, prior to making these critical policy determinations. If you or your staff have questions about the information in this letter or the nonattainment determinations, please contact me at 317-232-8222 or Ken Ritter at 317-233-5682.

Very truly yours,

Janet G. McCabe  
Assistant Commissioner

Enclosure

cc: Cheryl Newton  
Jay Bortzer  
John Summerhays  
Joanne Alexandrovich  
Dona Bergman