



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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*Thomas W. Easterly*  
Commissioner

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March 11, 2013

Ms. Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Dear Ms. Hedman:

Re: Designations under the 2010 National  
Ambient Air Quality Standard for Sulfur Dioxide  
(SO<sub>2</sub>)

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA) February 6, 2013 letter concerning proposed designations for the revised National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). U.S. EPA has stated that multiple rounds of nonattainment designations would take place for the 2010 SO<sub>2</sub> NAAQS. This letter is in response to the first round of nonattainment designations.

The State of Indiana greatly appreciates the opportunity to provide comment on the proposed designations and would like to submit comments on two issues, both relating to proposed nonattainment designations within Vigo County, Indiana:

1. IDEM agrees with U.S. EPA's proposed designation of nonattainment with regard to Fayette Township. IDEM acknowledges that, at the time state recommendations were made, Indiana misjudged where the source in question was located in relation to township boundaries. Indiana later consulted with U.S. EPA regarding this matter and concurred with U.S. EPA's decision to include Fayette Township in the nonattainment area. This finding is consistent with our analysis of sources in the area and we support the proposed nonattainment designation of Fayette Township for the 2010 SO<sub>2</sub> NAAQS.
2. IDEM disagrees with the rationale used by U.S. EPA in order to propose designation of Otter Creek Township as part of the nonattainment area within Vigo County. In a previous SO<sub>2</sub> guidance entitled "Guidance for 1-Hour SO<sub>2</sub> NAAQS SIP Submissions (2011)," U.S. EPA stated that "areas with no SO<sub>2</sub> monitors would be designated as 'unclassifiable,' as well, absent any other appropriate data to support a designation of 'attainment' or 'nonattainment' (p. 2)." Based on a lack of data that warrants a nonattainment designation for SO<sub>2</sub>, Otter Creek Township should not be included in the nonattainment area for Vigo County. Currently, there are no monitors within Otter Creek Township,

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and there are no sources of SO<sub>2</sub> emissions located in the township. Also, as illustrated in Enclosure 1, the population density within Vigo County is mainly limited to Harrison Township. The population density of Otter Creek Township is sparse compared to Harrison Township and does not differ significantly from other townships surrounding Harrison Township, which further supports Indiana's belief that inclusion based on contiguous boundaries is an insufficient justification for including Otter Creek Township in the proposed nonattainment area for Vigo County. Limiting the nonattainment area boundary to Fayette and Harrison Townships captures the monitors that exceed the 1-hour standard, all of the sources with the potential to influence measured concentrations, and the portion of the population likely to be affected by the concentrations measured near the monitors and emission sources. Based on the above factors, Indiana respectfully requests the reconsideration of U.S. EPA's proposal to include Otter Creek Township in the nonattainment area for Vigo County.

Indiana asks U.S. EPA to move forward with the nonattainment designations for Fayette and Harrison Townships in Vigo County, as referenced in Enclosure 2. Based on the information contained herein, Indiana also respectfully asks U.S. EPA to exclude Otter Creek Township from the nonattainment boundary.

I would like to thank you for the opportunity to provide feedback to U.S. EPA regarding the proposed designations for the 2010 SO<sub>2</sub> NAAQS. We look forward to working with your staff as U.S. EPA moves forward with future designations. If you have any questions regarding IDEM's response, please feel free to contact me at (317) 232-8611 or Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,



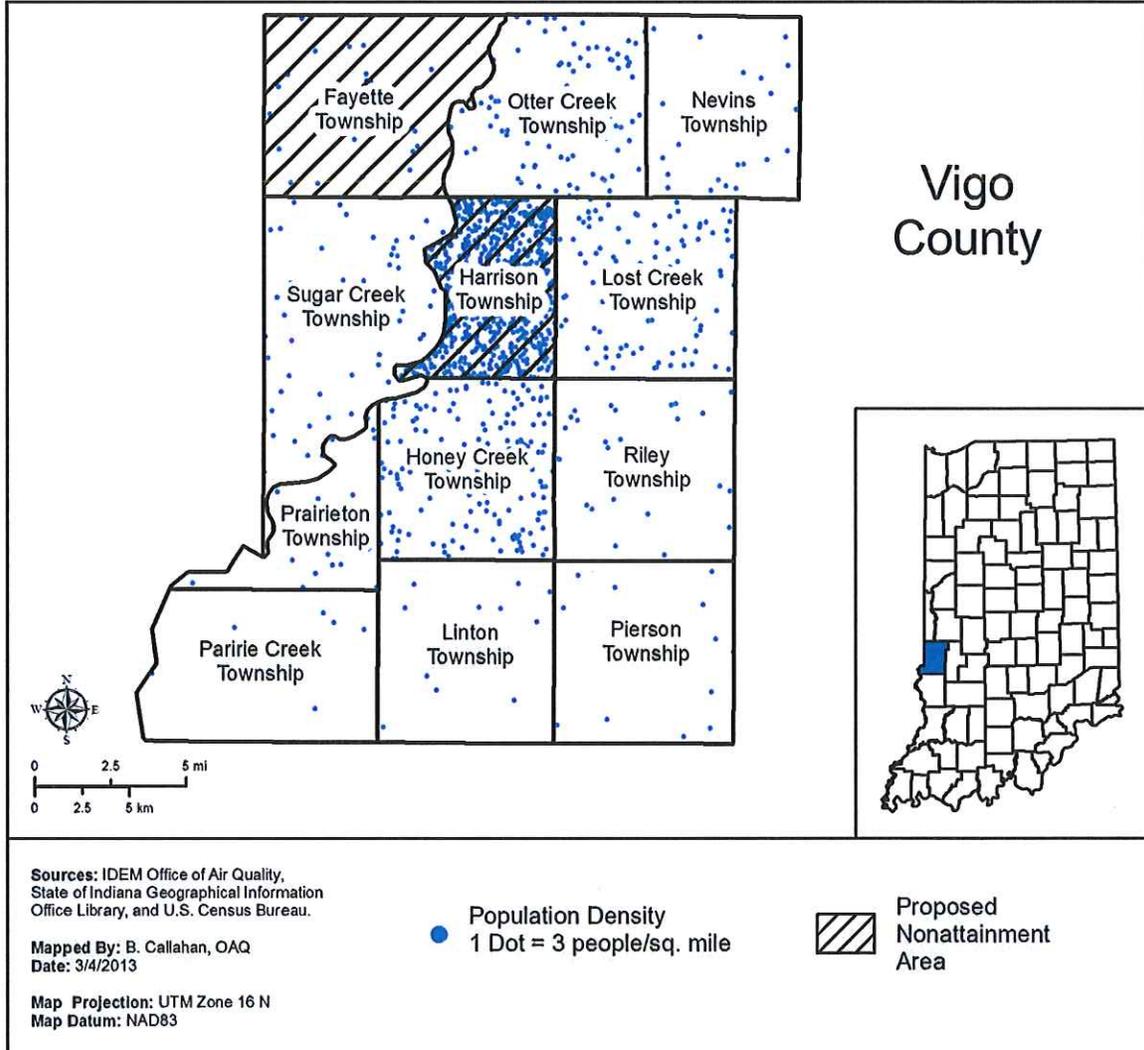
Thomas W. Easterly  
Commissioner

TE/kb/sd/jrg  
Enclosures

Map of Vigo County Demonstrating Population Density  
Map of Vigo County with State Proposed Nonattainment Boundaries

cc: John Summerhays, U.S. EPA  
Doug Aburano, U.S. EPA  
Keith Baugues, IDEM  
Scott Deloney, IDEM

**Enclosure 1:  
Map of Vigo County Demonstrating Population Density**



**Enclosure 2:  
Map of Vigo County with State Proposed Nonattainment Boundaries**

