March 28, 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: Technical Addendum to Provide an Updated Response to Preliminary Designations under the 2010 National Ambient Air Quality Standard for Sulfur Dioxide (SO₂)

The Indiana Department of Environmental Management (IDEM) has prepared this technical addendum to provide updated recommendations to the United States Environmental Protection Agency (U.S. EPA), in response to the February 6, 2013 letter concerning proposed designations for the 2010 National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). U.S. EPA has stated that multiple rounds of nonattainment designations will take place for the 2010 SO₂ NAAQS.

U.S. EPA initially proposed a designation of nonattainment for Wayne Township in Wayne County for the 2010 SO₂ NAAQS. Since that time, revised data have become available for Wayne County (monitor 18-177-0006 in Richmond, IN), and Indiana would like to update its nonattainment recommendations. The SO₂ monitor in question is owned by Richmond Power and Light (RPL), as a condition of their Title V permit, and is operated by a consultant. IDEM staff held a meeting with RPL, in which further details of the nonattainment status and the opportunity to further evaluate the 2010 through 2012 ambient air quality data within the 120-day timeframe were discussed. After a review of days with high values, it was discovered that, on some dates and hours, the data submitted to IDEM should have been null and void because the monitor was either being calibrated or quarterly audits were being performed by RPL or their consultant. Proper reason codes were not entered to void the data. The 10-second data obtained from their videographic recorder as received from the data logger and monitor site log book, which documents the maintenance activity on those dates, were made available to IDEM Monitoring Branch staff. IDEM staff agreed with these changes and data were resubmitted to AQS and subsequently recertified, as can be seen in Enclosure 1. The result from the changes to the data is that for the period of 2010 through 2012, Wayne County meets the SO₂ NAAQS. With the revised data, the design value for Wayne County is 66 parts per billion, which is significantly below the standard of 75 ppb. Therefore, Wayne County should not be designated as nonattainment.
Ms. Hedman  
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U.S. EPA's February 6, 2013 letter with proposed designations was in accordance with Indiana's initial recommendation that Wayne Township in Wayne County be designated as nonattainment for the 2010 SO₂ NAAQS. U.S. EPA's proposed nonattainment areas are also consistent with Indiana's recommendation that nonattainment areas be limited to areas where a monitored violation occurs. Therefore, in light of updated 2010 through 2012 data for Wayne County, Indiana respectfully asks U.S. EPA to reconsider its initial designation of nonattainment for Wayne County and move forward with nonattainment designations per Indiana's refined boundary recommendations as illustrated in Enclosure 2.

I would like to thank you for the opportunity to provide feedback to U.S. EPA regarding the proposed designations for the 2010 SO₂ 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 Baugles, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,

[Signature]
Thomas W. Easterly  
Commissioner

TE/kb/sd/jrg  
Enclosures
1. AQS Report with Revised Data for Wayne County Sulfur Dioxide (SO₂)  
2. Map of Updated State Nonattainment Recommendations

cc: John Summe-hays, U.S. EPA  
Doug Aburano, U.S. EPA  
Keith Baugles, IDEM  
Scott Deloney, IDEM  
Jennifer Geisenhaver, IDEM
Enclosure 1:
AQS Report with Revised Data for Wayne County Sulfur Dioxide (SO₂)

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