June 19, 2018

Ms. Cathy Stepp
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Dear Ms. Stepp:

Re: Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

The Indiana Department of Environmental Management (IDEM) has completed a review of areas subject to ongoing data requirements under the 2010 primary 1-hour sulfur dioxide (SO$_2$) National Ambient Air Quality Standard (NAAQS). Based on the evaluation, IDEM recommends that no additional assessments to characterize air quality are needed at this time.

Implementation of the 2010 primary 1-hour SO$_2$ standard began in 2013 when United States Environmental Protection Agency (U.S. EPA) established nonattainment areas near monitors with data above the SO$_2$ NAAQS. In order to evaluate the remaining areas of the country, U.S. EPA established three additional rounds of designations: Round 2 on June 30, 2016, Round 3 on December 21, 2017, and Round 4 by December 31, 2020. This evaluation, per 40 Code of Federal Regulations (CFR) Subpart BB §51.1205(b), only addresses areas designated during Round 2.

During Round 2 designations, U.S. EPA identified five coal-fired electric power plants in Indiana, shown in Table 1, around which air quality characterization was required.

**Table 1: Facilities Subject to the Round 2 Designation Process**

<table>
<thead>
<tr>
<th>County</th>
<th>Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spencer</td>
<td>American Electric Power (AEP) – Rockport Generating Station</td>
</tr>
<tr>
<td>LaPorte</td>
<td>Northern Indiana Public Service Company (NIPSCO) – Michigan City Generating Station</td>
</tr>
<tr>
<td>Posey</td>
<td>Vectren – A.B. Brown Generating Station</td>
</tr>
<tr>
<td>Jefferson</td>
<td>Indiana-Kentucky Electric Corporation (IKEC) – Clifty Creek Generating Station</td>
</tr>
<tr>
<td>Gibson</td>
<td>Duke Energy – Gibson Generating Station</td>
</tr>
</tbody>
</table>
On June 30, 2016, U.S. EPA completed designations for Round 2 designating all of Indiana’s identified sources as "unclassifiable/attainment". The final rule was published in the Federal Register (FR) on July 12, 2016 (81 FR 45039).

Ongoing data requirements, per 40 CFR §51.1205, are applicable to sources that relied on SO\textsubscript{2} monitoring or modeling using actual 2012 – 2014 emissions to demonstrate attainment of the NAAQS during the designations process. As such, ongoing data requirements are applicable to only three of the five sources identified in Table 1: AEP’s Rockport Station, NIPSCO’s Michigan City Station, and Duke Energy’s Gibson Station. Ongoing data requirements are not applicable, per 40 CFR Part §51.1204, to Vectren’s A.B. Brown Station and IKEC’s Clifty Creek Station because these facilities accepted federally enforceable and permanent SO\textsubscript{2} emission limits as the basis for establishing designations demonstrating that the area will not violate the 2010 SO\textsubscript{2} NAAQS.

For Duke Energy’s Gibson Station, because monitoring data was used to characterize air quality for Round 2 designations, ongoing data requirements are the continued operation of the SO\textsubscript{2} monitors as well as the continued reporting of such data. Duke Energy continues to operate the SO\textsubscript{2} monitoring network and data is reported to U.S. EPA’s Air Quality System (AQS) database. It is worth noting that certified ambient air quality monitoring data continues to demonstrate attainment of the 2010 primary 1-hour SO\textsubscript{2} standard as shown in Table 2.

**Table 2: Duke Energy’s Gibson Generating Station SO\textsubscript{2} Monitoring Data**

<table>
<thead>
<tr>
<th>Site ID</th>
<th>County</th>
<th>Site Name</th>
<th>99th Percentile Values</th>
<th>3-Year Design Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>180510002</td>
<td>Gibson</td>
<td>Coal Rd.</td>
<td>76</td>
<td>64</td>
</tr>
</tbody>
</table>

For AEP’s Rockport Station and NIPSCO’s Michigan City Station, in order to conduct the 2018 assessment, annual SO\textsubscript{2} emissions for 2016 were obtained from IDEM’s Emission Inventory Tracking System (EMITS). This data, shown in Table 3, was compared to data (2012 – 2014) used for the initial designations.
Table 3: Yearly Comparison of SO₂ Emissions (tons) for the AEP – Rockport and NIPSCO – Michigan City Generating Stations

<table>
<thead>
<tr>
<th>County</th>
<th>Source Name</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
<th>Averaged 2012-2014 (tons)</th>
<th>2015</th>
<th>2016</th>
<th>Averaged 2014-2016 (tons)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spencer</td>
<td>AEP – Rockport</td>
<td>54,390</td>
<td>51,636</td>
<td>54,979</td>
<td>53,668</td>
<td>29,890</td>
<td>24,341</td>
<td>36,403</td>
</tr>
<tr>
<td>LaPorte</td>
<td>NIPSCO – Michigan City</td>
<td>11,584</td>
<td>10,429</td>
<td>15,991</td>
<td>12,668</td>
<td>10,148</td>
<td>1,901</td>
<td>9,347</td>
</tr>
</tbody>
</table>

Results of the emission assessment show 2016 SO₂ emissions from the AEP – Rockport and NIPSCO – Michigan City stations have decreased by approximately 55% and 85%, respectively, from the averaged SO₂ emissions of 2012 – 2014. As outlined in Table 3, 2016 SO₂ emissions are also below each of the individual reporting years of 2012, 2013, and 2014 for both sources. Chart 1 below shows the trends in SO₂ emissions from 2012 – 2016 for both sources.

Chart 1 – SO₂ Emissions Trends for the AEP – Rockport and NIPSCO – Michigan City Generating Stations

Based on this SO₂ emissions assessment, Indiana recommends no additional modeling is needed to further characterize air quality in the areas surrounding the AEP – Rockport Generating Station in Spencer County and the NIPSCO – Michigan City Generating Station located in LaPorte County. Both sources reported lower SO₂ emissions in 2016 than what was modeled to demonstrate attainment of the 2010 primary 1-hour SO₂ NAAQS. Both areas are currently designated as
“attainment/unclassifiable” and no changes to their classification are necessary at this time.

IDEM provided a 30-day public comment period and an opportunity for a public hearing concerning this submittal of the Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard. A public hearing was not requested and there were not any comments received. Please refer to the Supporting Document for further information and dates regarding the public participation process.

This report consists of one (1) hardcopy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hard copy has been sent to Doug Aburano, Chief of U.S. EPA Region 5’s Attainment Planning and Maintenance Section and Chris Panos of U.S. Region 5. If you have any questions or need additional information, please contact Brian Callahan, Chief, Air Quality Standards and Implementation Section, Office of Air Quality at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,

Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sd/bc/gf/lf

Supporting Document:

1. Public Participation Process Documentation

cc: Chris Panos, EPA – Region 5 (no enclosure)
    Doug Aburano, EPA – Region 5 (no enclosure)
    John Summerhays, EPA – Region 5 (no enclosure)
    Keith Baugues, IDEM (no enclosure)
    Scott Deloney, IDEM (no enclosure)
    Brian Callahan, IDEM (no enclosure)
    Gale Ferris, IDEM (no enclosure)
    Leslie Ferguson, IDEM (w/ enclosure)
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LEGAL NOTICE OF PUBLIC HEARING

Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

Note: Legal notices for public hearings are no longer published in newspapers, but can be found on the Indiana Department of Environmental Management’s web site at: http://www.in.gov/idem/6777.htm.

Notice is hereby given under 40 Code of Federal Regulations (CFR) 51.102 that the Indiana Department of Environmental Management (IDEM) is accepting written comment and providing an opportunity for a public hearing regarding the Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard. All interested persons are invited and will be given reasonable opportunity to express their views concerning this submittal.

The purpose of this submittal is to review areas subject to ongoing data requirements under the 2010 primary 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). This evaluation, per 40 CFR Subpart BB §51.1205(b), only addresses areas designated during Round 2. Based on this SO₂ assessment, Indiana recommends no additional modeling is needed to further characterize air quality in the areas surrounding the American Electric Power – Rockport Generating Station in Spencer County and the Northern Indiana Public Service Company – Michigan City Generating Station in LaPorte County.

Copies of the Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard will be available on or before May 14, 2018, to any person upon request at the following locations:

- Indiana Department of Environmental Management, Office of Air Quality, Indiana Government Center North, 100 North Senate Avenue, Room N1003, Indianapolis, Indiana
- Indianapolis-Marion County Public Library-West Indianapolis Branch, 1216 South Kappes Street, Indianapolis, Indiana

The draft documents will also be available on the following web page:

http://www.in.gov/idem/airquality/2432.htm

Any person may submit written comments on the Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard. Written comments should be directed to: Ms. Leslie Ferguson, Indiana Department of Environmental Management, Office of Air Quality, Room 1003, 100 North Senate Avenue, Indianapolis, Indiana 46204. Comments can also be submitted via fax (317) 233-5967 or e-mail at lferguson@idem.IN.gov. Comments must be submitted by June 13, 2018. Interested parties may also present oral or written comments at the public
hearing, if held. Oral statements will be heard, but for the accuracy of the record, statements should be submitted in writing. Written statements may be submitted to the attendant designated to receive written comments at the public hearing.

A public hearing on the **Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard** will be held if a public hearing request is received by June 13, 2018. If a hearing is requested, the hearing will be held on June 18, 2018, and the comment period will be extended to June 22, 2018. The hearing will convene at 6:00 p.m. local time at Indianapolis-Marion County Public Library-West Indianapolis Branch, 1216 South Kappes Street, Indianapolis, Indiana 46221. If a request for a public hearing is not received by June 13, 2018, the hearing will be cancelled. Interested parties can check the online IDEM calendar at https://calendar.in.gov/site/idem/ or contact Ms. Leslie Ferguson at (317) 233-1179 or lferguso@idem.in.gov, after June 13, 2018, to see if the hearing has been cancelled or will convene.

If a hearing is held, a transcript of the hearing and all written submissions provided at the public hearing shall be open to public inspection at IDEM and copies may be made available to any person upon payment of reproduction costs. Any person heard or represented at the hearing or requesting notice shall be given written notice of actions resulting from the hearing.

For additional information contact Ms. Leslie Ferguson, at the Indiana Department of Environmental Management, Office of Air Quality, Room N1003, Indiana Government Center North, 100 North Senate Avenue, Indianapolis, IN 46204, or call (317) 233-1179 or (800) 451-6027 ext. 3-5682 (in Indiana).

Speech and hearing impaired callers may contact the agency via the Indiana Relay Service at 1-800-743-3333. Individuals requiring reasonable accommodations for participation in this hearing should contact the IDEM Americans with Disabilities Act (ADA) coordinator at: Attn: ADA Coordinator, Indiana Department of Environmental Management – Mail Code 50-10, 100 North Senate Avenue, Indianapolis, IN 46204-2251, or call (317) 233-1785 (voice) or (317) 233-6565 (TDD). Please provide a minimum of 72 hours notification.
May 10, 2018

CERTIFICATE OF PUBLICATION

This is to certify that the Indiana Department of Environmental Management (IDEM) Notice of the opportunity for a Public Hearing regarding the following:

- Draft Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

was published on IDEM’s web site on May 10, 2018. It is expected that it will remain posted on the site until at least June 13, 2018.

The notice in full was available online at the following web address, under “Statewide”:

http://www.in.gov/idem/5474.htm

The draft document was also posted online May 10, 2018 at the following web address:

https://www.in.gov/idem/airquality/2432.htm

Web publication of the notice was at the request of Scott Deloney, Branch Chief, Programs Branch, Office of Air Quality, IDEM.

By:

Mike Finklestein
IDEM Webmaster

Attachments:
Copy of web page as published.
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Public Notices: Statewide

This is the IDEM Public Notice Site for notices covering statewide public notices as required by statute or rule in Indiana. Additional information related to the notice, unless noted otherwise, can be found on the IDEM website.

The IN.gov News and Events Calendar provides information about public notices on the website.

Subscriptions: Want to know about new notices as they are posted to a region, you will be sent an email or text message. You can opt to receive these notices at any time convenient to you.

By clicking the link on the public notice page. By subscribing to the Public Notices site on IN.gov, you can receive public notice notifications and view any public notices from any page on the IDEM website.

Information About Statewide

Draft Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

Legal Notice and Opportunity for Public Hearing [PDF]

05/11/2018

06/13/2018

Yes

Project Manager: Leslie Ferguson

Additional information is available on the IDEM Air Quality in Indiana: Sulfur Dioxide (SO2) Air Quality Attainment/Nonattainment Designations page.
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Round 2 Nonattainment Designations

- Draft Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard [PDF]
- Emissions Assessment for Sources Subject to the Data Requirements Rule [PDF]
- Federal Register Notice Concerning Round 2 SO2 Designations [PDF]
- U.S. EPA Round 2 Nonattainment Boundaries for the 2010 SO2 1-Hour Standard [PDF]
- U.S. EPA Technical Support Information for SO2 Boundary Definitions [PDF]
- Approval and Promulgation of Indiana's SIP Submittals of Commissioner's Orders for the A.B. Brown and Clifty Creek Generating Stations effective June 6, 2016 [PDF]
- Indiana SIP Submittal of Commissioner's Order for the A.B. Brown Generating Station [PDF]
- Indiana SIP Submittal of Commissioner's Order for the Clifty Creek Generating Station [PDF]
- Indiana Preliminary Round 2 Designation Recommendations (September 16, 2015) [PDF]
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