



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

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Eric J. Holcomb  
Governor

Bruno L. Pigott  
Commissioner

October 24, 2018

Ms. Cathy Stepp  
Regional Administrator  
U.S. EPA, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Re: Request for Redesignation and  
Maintenance Plan for Attainment of the  
Southwest Indiana, IN Partial Daviess  
County and Partial Pike County 2010  
Primary 1-Hour Sulfur Dioxide  
Nonattainment Area (Veale Township,  
Daviess County, and Washington  
Township, Pike County)

Dear Ms. Stepp:

The Indiana Department of Environmental Management (IDEM) submits a Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, IN Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area (Veale Township, Daviess County, and Washington Township, Pike County).

The attached enclosure consists of the following:

***Redesignation Petition and Maintenance Plan***

- A formal request that the Southwest, Indiana Nonattainment Area for the 2010 primary 1-hour sulfur dioxide standard be redesignated to "attainment" and reclassified as "maintenance". It contains and meets the requirements set forth in Section 107 of the Clean Air Act and in U.S. EPA Redesignation Guidance.
- The appendices of the document contain Air Quality System (AQS) Monitoring Data Values for the years 2012 - 2017.
- A maintenance year of 2030 is established.


Throughout the development of these submittals IDEM staff worked with U.S. EPA Region 5 to ensure that any potential concerns regarding this submission were addressed. We would appreciate U.S. EPA's continued efforts to communicate regularly with us as it reviews these submittals.

IDEM provided a 30-day public comment period and an opportunity for a public hearing concerning this submittal on the *Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, IN Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area (Veale Township, Daviess County and Washington Township, Pike County, Indiana)*. 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 request 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.

IDEM requests that U.S. EPA proceed with review and approval of this submittal. 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](mailto:bcallaha@idem.IN.gov).

Sincerely,



Keith Baugues  
Assistant Commissioner  
Office of Air Quality

KB/sad/bc/gf/mlb

Enclosure:

Request for Redesignation Petition and Maintenance Plan for Attainment of the Southwest Indiana, IN Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area (Veale Township, Daviess County, and Washington Township, Pike County)

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Request for Redesignation and  
Maintenance Plan for Attainment of the  
Southwest Indiana, IN Partial Daviess  
County and Partial Pike County 2010  
Primary 1-Hour Sulfur Dioxide  
Nonattainment Area

**Veale Township, Daviess County and  
Washington Township, Pike County,  
Indiana**

Prepared By:

The Indiana Department of Environmental  
Management

October 2018

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**Request for Redesignation and  
Maintenance Plan for Attainment  
of the Southwest Indiana, IN Partial Daviess County and  
Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide  
Nonattainment Area**

**Veale Township, Daviess County and Washington, Township  
Pike County, Indiana**

**1.0 Introduction**

This document supports Indiana's request that Veale Township, Daviess County, and Washington Township, Pike County, in the Southwest Indiana, IN (Southwest, IN) Nonattainment Area be redesignated from nonattainment to attainment for the 2010 primary 1-hour sulfur dioxide (SO<sub>2</sub>) standard. The Southwest, IN Nonattainment Area has recorded three (3) years of complete, quality-assured ambient air quality monitoring data for the years 2015 – 2017 demonstrating attainment of the 1-hour SO<sub>2</sub> standard.

Indiana's request is based on Section 107(d)(3)(D) of the Clean Air Act (CAA), which states:

- (D) The Governor of any State may, on the Governor's own motion, submit to the Administrator a revised designation of any area or portion thereof within the State. Within 18 months of receipt of a complete State redesignation submittal, the Administrator shall approve or deny such redesignation. The submission of a redesignation by a Governor shall not affect the effectiveness or enforceability of the applicable implementation plan for the State.

Section 107(d)(3)(E) of the CAA establishes specific requirements to be met in order for an area to be considered for redesignation including:

- (a) A determination that the area has attained the SO<sub>2</sub> national ambient air quality standard (NAAQS).
- (b) A state implementation plan (SIP) for the area under Section 110(k) of the CAA that is fully approved.
- (c) A determination that the improvement in air quality is due to permanent and enforceable reductions in emissions resulting from implementation of the SIP or other federal requirements.
- (d) A maintenance plan under Section 175A of the CAA that is fully approved.

- (e) A determination that all Section 110 and Part D requirements of the CAA have been met.

Indiana is formally requesting a redesignation of the Southwest, IN Nonattainment Area to attainment.

The requirements for redesignation are addressed in Section 2.0 of this document.

### 1.1 Sulfur Dioxide

SO<sub>2</sub> is part of a group of highly reactive gases known as oxides of sulfur (SO<sub>x</sub>) and is primarily derived from fossil fuel combustion at power plants and other industrial facilities. SO<sub>2</sub> is one of the “six” criteria air pollutants regulated under the federal CAA. SO<sub>2</sub> is considered to be harmful to human health and has been linked with many adverse health effects, particularly within the respiratory system. SO<sub>2</sub> is also a primary contributor to acid rain, which causes acidification of lakes and streams, damages trees at high elevations, and damages sensitive forest soils.

### 1.2 National Ambient Air Quality Standards

SO<sub>2</sub> is one of the six criteria air pollutants that scientists have identified as being particularly harmful to humans and the environment. NAAQS have been developed for these six pollutants and are used as measurements of air quality. The CAA requires United States Environmental Protection Agency (U.S. EPA) to set primary standards at a level judged to be “requisite to protect the public health with an adequate margin of safety” and establish secondary standards that are requisite to protect public welfare from “any known or anticipated effects associated with the pollutant in the ambient air,” including effects on crops, vegetation, wildlife, buildings and national monuments, and visibility.

On June 2, 2010, U.S. EPA promulgated a new primary NAAQS for SO<sub>2</sub>, replacing the two primary standards of 140 parts per billion (ppb) evaluated over 24-hours and 30 ppb evaluated over an entire year with a 1-hour standard of 75 ppb. The 2010 primary 1-hour SO<sub>2</sub> NAAQS was published in the June 22, 2010, Federal Register (FR), at 75 FR 35520, with an effective date of August 23, 2010. The primary SO<sub>2</sub> NAAQS is met when the 3-year average of the annual 99<sup>th</sup> percentile of the daily maximum 1-hour average concentration at any ambient air quality monitor in an area does not exceed 75 ppb. This three-year average is termed the “design value” for the monitor. The design value for a nonattainment area is the highest monitored design value in the area.

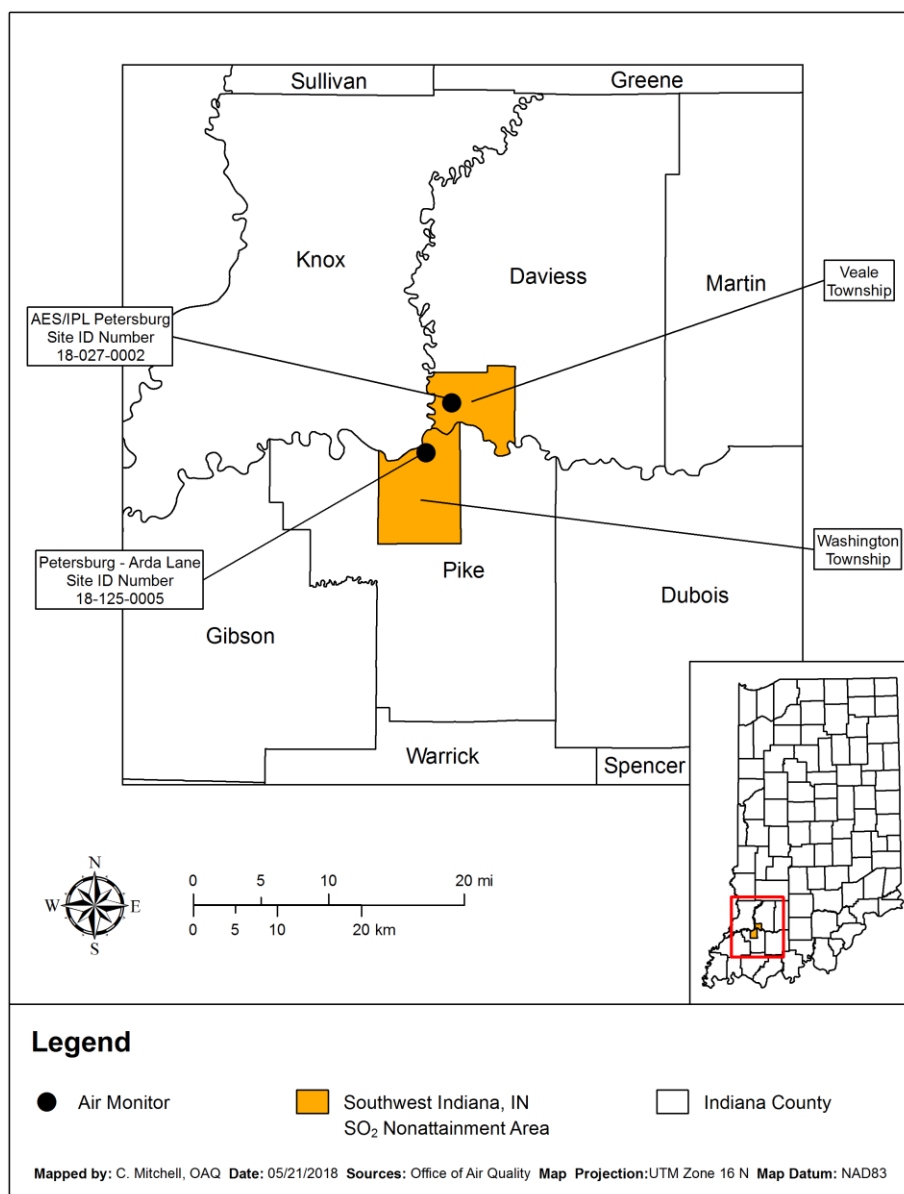
On July 25, 2013, using monitored air quality data measured during 2009, 2010, and 2011, U.S. EPA designated Veale Township, Daviess County and Washington Township, Pike County in Southwest, Indiana, as a single nonattainment area under Subpart 1 of Section 107(d)(1) of the CAA (78 FR 47191). These designations became effective on October 4, 2013, establishing an attainment date of October 4, 2018.



### 1.3 Geographical Description

U.S. EPA designated four nonattainment areas comprised of nine townships in five counties in the State of Indiana for the 2010 primary 1-hour SO<sub>2</sub> NAAQS. As depicted in Figure 1.1, the Southwest, IN Nonattainment Area consists of Veale Township in Daviess County and Washington Township in Pike County, Indiana. Daviess and Pike counties are located in southwest Indiana and are surrounded by the Indiana counties of Dubois, Gibson, Greene, Knox, Martin, and Warrick.

**Figure 1.1: Map of the Southwest Indiana, IN 2010 Primary 1-Hour SO<sub>2</sub> Nonattainment Area**



## 1.4 Status of Air Quality

There are currently two monitors measuring SO<sub>2</sub> concentrations in the Southwest, IN Nonattainment Area (Daviess County – AES/IPL Petersburg- West off SR 57; Site ID# 18-027-0002 and Pike County – Petersburg – Arda Lane; Site ID# 18-125-0005). These two monitors are source operated by Indianapolis Power & Light (IPL). A listing of the sites, with annual 99<sup>th</sup> percentile daily maximum 1-hour values from 2012 – 2017 and corresponding design values retrieved from U.S. EPA's Air Quality System (AQS) database, are shown in Table 2.1. The location of the monitoring sites for this nonattainment area is shown in Figure 1.1.

SO<sub>2</sub> monitoring data for the most recent three (3) years, 2015 – 2017, demonstrates that the air quality meets the 2010 primary 1-hour SO<sub>2</sub> standard in the nonattainment area. This fact, accompanied by the permanent and enforceable decreases in emission levels discussed in Section 2.3, justifies a redesignation to attainment for Indiana's nonattainment area based on Section 107(d)(3)(E) of the CAA.

## 2.0 Requirements for Redesignation

U.S. EPA has published guidance in the document "Procedures for Processing Requests to Redesignate Areas to Attainment," issued September 4, 1992, to Regional Air Directors.<sup>1</sup> In addition, U.S. EPA has published guidance specific to SO<sub>2</sub> titled "Guidance for 1-Hour SO<sub>2</sub> Nonattainment Area SIP Submissions," issued April 23, 2014, to Regional Air Division Directors.<sup>2</sup> This Request for Redesignation and Maintenance Plan is based on the Redesignation Guidance and SO<sub>2</sub> Nonattainment Area SIP Guidance, supplemented with additional guidance received from U.S. EPA Region V staff. The SO<sub>2</sub> guidance, as well as Section 107(d)(3)(E) of the CAA, lists the requirements that must be met by nonattainment areas prior to consideration for redesignation to attainment. The specific requirements for redesignation are discussed below.

### 2.1 Attainment of the SO<sub>2</sub> National Ambient Air Quality Standard (NAAQS).

- 1) A demonstration that the NAAQS for SO<sub>2</sub>, as published in 40 Code of Federal Regulations (CFR) 50.17, has been attained.
- 2) Ambient monitoring data quality-assured in accordance with 40 CFR Part 50, Appendix T have been recorded in the U.S. EPA AQS database and made available for public view.

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<sup>1</sup> [https://www.epa.gov/sites/production/files/2016-03/documents/calagni\\_memo\\_-\\_procedures\\_for\\_processing\\_requests\\_to\\_redesignate\\_areas\\_to\\_attainment\\_090492.pdf](https://www.epa.gov/sites/production/files/2016-03/documents/calagni_memo_-_procedures_for_processing_requests_to_redesignate_areas_to_attainment_090492.pdf)

<sup>2</sup> [https://www.epa.gov/sites/production/files/2016-06/documents/20140423guidance\\_nonattainment\\_sip.pdf](https://www.epa.gov/sites/production/files/2016-06/documents/20140423guidance_nonattainment_sip.pdf)

Attainment of the NAAQS for SO<sub>2</sub> is demonstrated in two ways: ambient air monitoring and atmospheric dispersion modeling.

### 2.1.1 Ambient Air Monitoring Data

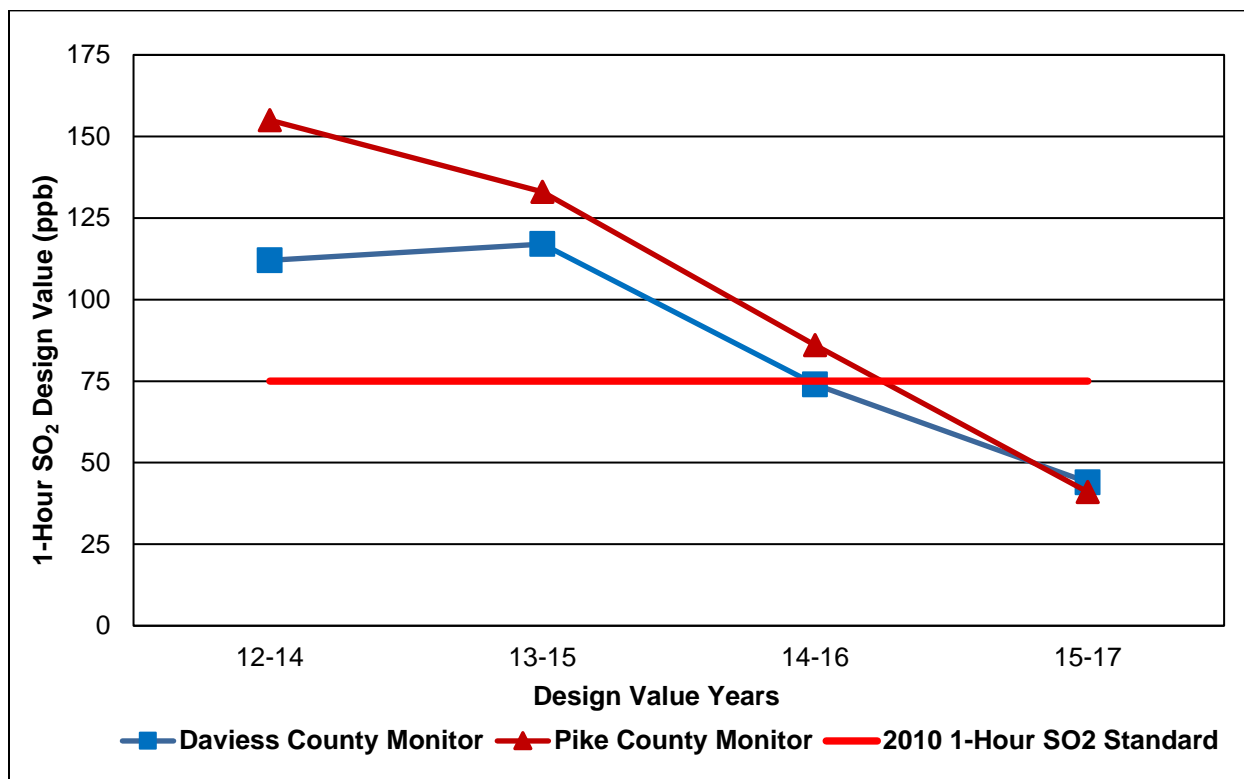
As explained in 40 CFR 50, Appendix T, three (3) complete years of SO<sub>2</sub> monitoring data are required to demonstrate attainment at a monitoring site. The 1-hour SO<sub>2</sub> NAAQS is met at an air quality monitoring site when the three-year average of the annual 99<sup>th</sup> percentile daily maximum 1-hour value concentration is less than or equal to 75 ppb. When this occurs, the site is deemed to be in attainment. The 1-hour primary design value is rounded to the nearest whole number or 1 ppb (i.e. decimals 0.5 and greater are rounded up to the nearest whole number, and any decimal lower than 0.5 is rounded down to the nearest whole number). Values equal to or below 75 ppb meet the standard; values greater than 75 ppb exceed the standard. These data handling procedures are applied on an individual basis at each monitor in the area. An individual site's three-year average of the 99<sup>th</sup> percentile daily maximum 1-hour average SO<sub>2</sub> concentration is called the site's design value. The air quality design value for the area is the highest design value among all sites in the area. The data from the SO<sub>2</sub> monitors within the Southwest, IN Nonattainment Area are evaluated according to the procedures outlined in 40 CFR 50 Appendix T.

Table 2.1 lists the annual 99<sup>th</sup> percentile daily maximum 1-hour values from 2012 – 2017 and corresponding design values for the monitoring sites in the Southwest, IN Nonattainment Area demonstrating that the NAAQS for SO<sub>2</sub> has been attained. Graph 2.1 displays 2012 – 2017 three-year design values for the Southwest, IN Nonattainment Area. U.S. EPA's Design Value Report for this period, taken from U.S. EPA's AQS database, shows certified data for this period for the Southwest, IN Nonattainment Area is included in Appendix A.

**Table 2.1: Monitoring Data for the Southwest, IN 1-Hour SO<sub>2</sub> Nonattainment Area (Annual 99<sup>th</sup> Percentile and Design Values in ppb)**

Site ID	County	Site Name	99th Percentile Values							3-Year Design Values			
			2012	2013	2014	2015	2016	2017	2012-2014	2013-2015	2014-2016	2015-2017	
180270002	Daviess	AES/IPL – Petersburg	78	150	107	93	22	16	112	117	74	44	
181250005	Pike	Petersburg - Arda Lane	140	169	157	74	26	24	155	133	86	41	

**Graph 2.1: Design Value Trends for the Southwest, IN Nonattainment Area, 2012-2017**



### 2.1.2 Atmospheric Dispersion Modeling

IDEM has performed extensive modeling of the Southwest, IN Nonattainment Area to determine the effect of local and national emission control strategies on SO<sub>2</sub> and to demonstrate attainment of the SO<sub>2</sub> NAAQS. This modeling was performed in conjunction with the attainment plan submitted on October 2, 2015.<sup>3</sup>

The American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD version 14134) was the regulatory air quality model used for the 1-hour SO<sub>2</sub> attainment demonstration modeling for the Southwest, IN Nonattainment Area. Five years, 2008 – 2012, of surface meteorological data from the Evansville, IN National Weather Service (NWS) site was used in conjunction with five years of concurrent upper-air meteorological data from Lincoln, Illinois.

The modeled concentrations are the highest 4<sup>th</sup> high 1-hour maximum daily SO<sub>2</sub> concentration values (i.e. the 99<sup>th</sup> percentile daily maximum) averaged across five years for allowable limits established through source-specific limits adopted at Title 326 Indiana Administrative Code (IAC) 7-4-15 for the Indianapolis Power & Light – Petersburg Generating Station and the Hoosier Energy – Frank E. Ratts Generating Station. There are several federal rules including the Cross State Air Pollution Rule

<sup>3</sup> [https://www.in.gov/idem/airquality/files/attainment\\_so2\\_multi\\_2015\\_demo\\_attach\\_k.pdf](https://www.in.gov/idem/airquality/files/attainment_so2_multi_2015_demo_attach_k.pdf)

(CSAPR), Mercury and Air Toxics Standards (MATS), and National Emission Standards for Hazardous Air Pollutants for Major Sources (NESHAP): Industrial, Commercial, and Institutional Boilers and Process Heaters that apply to the sources in this area.

Although a single nonattainment area, because of different background concentrations, Pike and Daviess counties were modeled separately. The AERMOD modeling results for Daviess County showed a maximum 1-hour SO<sub>2</sub> concentration of 170.0 micrograms per cubic meter (µg/m<sup>3</sup>). When added to a background concentration value of 22.5 µg/m<sup>3</sup>, a total 1-hour SO<sub>2</sub> concentration of 192.4 µg/m<sup>3</sup> for Daviess County is achieved. The AERMOD modeling results for Pike County showed a maximum 1-hour SO<sub>2</sub> concentration of 169.1 micrograms per cubic meter (µg/m<sup>3</sup>). When added to a background concentration value of 25.9 µg/m<sup>3</sup>, a total 1-hour SO<sub>2</sub> concentration of 194.8 µg/m<sup>3</sup> for Pike County is achieved. Results for both Daviess and Pike counties are below the 1-hour SO<sub>2</sub> NAAQS of 75 ppb or 196.2 µg/m<sup>3</sup> and, therefore, demonstrate attainment of the NAAQS for SO<sub>2</sub>. For a comprehensive discussion of the modeling, refer to “Attachment K: 1-Hour Sulfur Dioxide Attainment Demonstration and Technical Support Document for Central, West Central, and Southwest Indiana Nonattainment Areas” Table 5.2, page 28, submitted October 2, 2015.

## 2.2 Approved State Implementation Plan

Section 191(a) of Subpart 5 of Part D, Title 1 of the CAA requires states with SO<sub>2</sub> nonattainment areas to submit a plan (referred to as an “attainment demonstration”) within eighteen months of the effective date of the designations (i.e. by April 4, 2015) detailing how the SO<sub>2</sub> standard will be attained as expeditiously as practicable but no later than five years after the effective date of the designation (i.e. by October 4, 2018). On October 2, 2015, Indiana submitted the attainment demonstration for the Southwest, IN Nonattainment Area to U.S. EPA.

## 2.3 Permanent and Enforceable Improvement in Air Quality

Two facilities were included in the 1-hour SO<sub>2</sub> attainment demonstration and technical support document for the Southwest, IN Nonattainment Area submitted to U.S. EPA for review and approval on October 2, 2015. These facilities are: the Hoosier Energy – Frank E. Ratts Generating Station and the Indianapolis Power and Light (IPL) – Petersburg Generating Station. These facilities were required to comply with soon-to-be SIP-approved emission limits in 326 IAC 7-4-15 adopted to demonstrate compliance with the 1-hour SO<sub>2</sub> standard.

In Table 2.2, actual SO<sub>2</sub> emissions were extracted from U.S. EPA's Air Markets Program Data (AMPD).<sup>4</sup> As demonstrated in Table 2.2, permanent and enforceable reductions were achieved at the primary source of SO<sub>2</sub> emissions within the Southwest Indiana Nonattainment Area, with the closing of the Hoosier Energy – Ratts Generating Station, and in addition, significant reductions at the IPL – Petersburg Generating

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<sup>4</sup> <https://ampd.epa.gov/ampd/>

Station with new control technologies being added in preparation for meeting their new emission limitations by January 1, 2017. These permanent and enforceable reductions of SO<sub>2</sub> emissions have contributed to attainment of the NAAQS. EGU SO<sub>2</sub> emissions within the area declined by approximately 77% between the nonattainment-year (2011) and the attainment-year (2017) resulting in attainment of the 2010 primary 1-hour SO<sub>2</sub> NAAQS.

**Table 2.2: Actual SO<sub>2</sub> Emission Reductions from 2011 Nonattainment-Year to 2017 Attainment-Year for EGUs, Southwest, IN (tons per year)**

<b>Affected Source</b>	<b>Type of Reduction</b>	<b>Effective Date of Reduction</b>	<b>Actual 2011 Emissions (tpy)</b>	<b>Actual 2017 Emissions (tpy)</b>	<b>Change (tpy)</b>
Hoosier Energy – Ratts Generating Station	Facility Closed	March 10, 2015	9,496	0 <sup>a</sup>	-9,496
IPL – Petersburg Generating Station	New Controls	January 1, 2017 (326 IAC 7-4-15)	25,232	7,967	-17,265
<b>Total</b>			<b>34,728</b>	<b>7,967</b>	<b>-26,761</b>

<sup>a</sup> This coal-fired power plant ceased operation in 2015. As a result, the facility's Acid Rain and Title V permits were revoked on July 28, 2016 and August 24, 2016, respectively.<sup>5</sup>

IDEM has performed modeling of the nonattainment area to determine the effect of emission control strategies on SO<sub>2</sub> and to demonstrate attainment of the standard. Modeling results for the two facilities demonstrated that Southwest, IN would attain the standard by January 1, 2017. Additionally, the Hoosier Energy – Ratts Generating Station ceased operation on March 10, 2015, and was completely dismantled in late 2016. The facility's Title V permit was revoked on August 24, 2016<sup>5</sup>. As a result of Hoosier Energy – Ratts Generating Station closing and the permanent and enforceable SO<sub>2</sub> emission limits and operational requirements implemented at IPL – Petersburg identified in 326 IAC 7-4-15, as outlined in Table 2.3, SO<sub>2</sub> emissions in the Southwest, IN Nonattainment Area have decreased significantly ensuring the area will continue to maintain compliance with the 2010 primary 1-hour SO<sub>2</sub> standard. IPL – Petersburg is prohibited from reducing or removing emissions controls (anti-backsliding) following the redesignation of the area unless such a change is first approved by U.S. EPA as a revision to Indiana's SIP consistent with Section 110(l) of the CAA.

In addition, SO<sub>2</sub> emissions are limited by new source performance standards (NSPS) under Sections 111 and 129 of the CAA; and the national emission standards for

<sup>5</sup>[https://ecm.idem.in.gov/cs/idcplg?IdcService=GET\\_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf](https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf)

hazardous air pollutants (NESHAP) under Section 112 of the CAA. Several recent U.S. EPA air quality regulations on EGUs and other large sources (such as various types of boilers and incinerators) have the potential to significantly further reduce SO<sub>2</sub> emissions (e.g. CSAPR, MATS, and, NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters). Permanent and enforceable control measures have led to reductions of SO<sub>2</sub> from point sources and other emission source sectors (e.g. Clean Air Non-road Diesel Rule, Highway Heavy Duty Engines Rule, and the application of tighter federal standards on new vehicles).

**Table 2.3: 1-Hour SO<sub>2</sub> Emission Rate Limits for Pike County, IN (326 IAC 7-4-15)**

<b>Modeled Source</b>	<b>Emission Unit</b>	<b>lbs/hr</b>	<b>lbs/MMBtu</b>
Hoosier Energy – Ratts Generating Station <sup>a</sup>	Boiler 1	58	0.05
	Boiler 2	58	0.05
	No. 2 Auxiliary Boiler	1	0.05
IPL-Petersburg Generating Station	Unit 1	330.0	0.15
	Unit 2	621.6	0.15
	Unit 3	2,049.8	0.37
	Unit 4	1,942.5	0.35
	Diesel Generators PB-2, PB-3, and PB-4	500 Hour Calendar Year Operating Limit (each)	

<sup>a</sup> This coal-fired power plant ceased operation in 2015. As a result, the facility's Acid Rain and Title V permits were revoked on July 28, 2016 and August 24, 2016, respectively.<sup>6</sup>

Indiana commits that any changes to its rules, or emission limits applicable to SO<sub>2</sub> sources, as required for maintenance of the SO<sub>2</sub> standard in the Southwest, IN Nonattainment Area, will be submitted to U.S. EPA for approval as a SIP revision. This will include, where appropriate, a demonstration based on modeling that the standard will be maintained. Indiana does intend, upon redesignation, to apply 326 IAC 2-2 (PSD Requirements) rather than 326 IAC 2-3 (Emission Offsets) for permitting any new sources or modifications. Indiana, through IDEM's Office of Compliance and Enforcement, has the legal authority and necessary resources to actively enforce any violations of its rules or permit provisions. After redesignation, Indiana intends to continue enforcing all rules that relate to the emission of sulfur dioxide in the Southwest, IN Nonattainment Area.

Indiana has a longstanding and fully implemented NSR program. This program is addressed in 326 IAC 2. The rule includes provisions for the Prevention of Significant Deterioration (PSD) in 326 IAC 2-2. Indiana's PSD program has been approved by U.S. EPA as part of its SIP (69 FR 29071).

<sup>6</sup>[https://ecm.idem.in.gov/cs/idcplg?IdcService=GET\\_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf](https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf)

## 2.4 Approved Maintenance Plan

A maintenance plan provides for the continued attainment of the air quality standard for a period of 10 years after U.S. EPA has formally redesignated the area to attainment. The plan also provides assurances that if there is a subsequent violation of the air quality standard, measures in the maintenance plan will prevent any future occurrences through contingency measures that would be triggered.

Indiana submits the Maintenance Plan found in Section 3.0 of this document for U.S. EPA's consideration and approval. Once the Maintenance Plan is approved, the area will have a fully approved implementation plan under CAA section 110(k).

## 2.5 Section 110 and Part D Requirements

Prior to redesignation, a state containing a nonattainment area must demonstrate compliance with all requirements applicable to the area under Section 110 and Part D of the CAA. This means the state must meet all requirements that applied to the area prior to, and at the time of, the submission of a complete request for redesignation to attainment.

### 2.5.1 Section 110 CAA Requirements

Section 110(a) of the CAA contains the general requirements for a SIP. Only the Section 110 requirements that are linked with a particular area's designations are the relevant measures to consider in evaluating a redesignation request. Further, Indiana believes that other Section 110 elements that are not connected with nonattainment plan submissions and not linked with an area's attainment status are also not applicable requirements for purposes of redesignation as a state remains subject to these requirements after an area is redesignated to attainment. The requirements of CAA Section 110(a)(2) that are statewide requirements and that are not linked to the SO<sub>2</sub> attainment status of the Southwest, Indiana Nonattainment Area are therefore not applicable requirements for purposes of review of Indiana's redesignation request.

U.S. EPA has approved provisions of Indiana's SIP addressing Section 110 requirements, including provisions addressing SO<sub>2</sub>. On May 22, 2013, Indiana submitted to U.S. EPA an infrastructure SIP for the 2010 revised SO<sub>2</sub> standard further demonstrating compliance with the requirements "applicable to the area" under CAA Section 110. CAA Section 110(a)(2) contains the general requirements or infrastructure elements necessary for U.S. EPA approval of the SIP. These requirements include, but are not limited to, submittal of a SIP that has been adopted by the state after reasonable notice and public hearing. Indiana's infrastructure SIP for the 2010 1-hour SO<sub>2</sub> standard was approved on August 3, 2015 (80 FR 48733).



## 2.5.2 CAA Part D Plan Requirements for Nonattainment Areas

Part D of the CAA contains requirements applicable to all areas designated nonattainment. SO<sub>2</sub> nonattainment areas must meet the general provisions of Subpart 1 and the specific SO<sub>2</sub> provisions in Subpart 5. The maintenance plan associated with this request for redesignation for the Southwest, IN Nonattainment Area is a SIP revision for an area designated as a nonattainment area and meets the applicable requirements of Part D of Title 1 of the CAA.

### 2.5.2.1 Section 172(c) CAA Requirements

Section 172(c) of the CAA contains general requirements for nonattainment plans. These requirements include reasonable further progress, emission inventories, permitting provisions, and other measures for attainment. These requirements were addressed in the attainment demonstration submitted to U.S. EPA on October 2, 2015.

### 2.5.2.2 Section 173 CAA Requirements

These provisions outline requirements related to permitting of air pollution sources in nonattainment areas. Stationary sources of air pollution are subject to the applicable regulations of 326 IAC 2. These regulations include:

- Prevention of Significant Deterioration (PSD) Permitting Requirements (326 IAC 2-2)
- Emission Offset Permitting Program Requirements (326 IAC 2-3)

These permitting, stationary source monitoring and reporting, preconstruction review, offset ratios and enforceable emission limitation requirements were adopted to implement the federally mandated requirements in Sections 110, 172, and 173 of the CAA.

### 2.5.2.3 Section 176(c) CAA Requirements

Transportation conformity is required under Section 176(c) of the CAA to ensure that federally supported highway and transit project activities are consistent with (i.e. “conform to”) the purpose of the SIP. Indiana’s general conformity rules were approved into Section 176(c) of the CAA on January 14, 1998 (63 FR 2146). Transportation conformity applies to areas that are designated nonattainment and those areas redesignated attainment after 1990 (i.e. “maintenance areas”) with plans developed under Section 175A of the CAA for transportation-related criteria pollutants. Due to the relatively small and decreasing amounts of sulfur in gasoline and on-road diesel fuel, transportation conformity rules do not apply to SO<sub>2</sub> unless transportation conformity budgets have been established for other reasons such as SO<sub>2</sub> is found to be a significant contributor to a fine particles (PM<sub>2.5</sub>) nonattainment area or if the SIP has established an approved or adequate budget for such emissions as part of the reasonable further progress (RFP) attainment or maintenance strategy. Neither of

these circumstances applies to the Southwest, IN Nonattainment Area. Therefore, Indiana did not create mobile source SO<sub>2</sub> emission budgets for the area. As such, transportation conformity is not of concern for the 2010 1-hour SO<sub>2</sub> NAAQS.

#### 2.5.2.4 Section 191(a) CAA Requirements

Section 191(a) of the CAA identifies requirements related to nonattainment plan submission and attainment deadlines. Indiana has submitted all required SIP elements for this area in either previous submittals, or as part of this submittal. On October 2, 2015, Indiana submitted the attainment demonstration for the Southwest, IN Nonattainment Area to U.S. EPA.

### **3.0 Southwest, Indiana SO<sub>2</sub> Nonattainment Area Maintenance Plan**

On July 25, 2013, U.S. EPA designated Veale Township in Daviess County and Washington Township in Pike County as a single nonattainment area under Subpart 1 of Section 107 of the CAA (78 FR 47191). Designations were made based on monitored air quality data measured during 2009, 2010, and 2011. These designations became effective on October 4, 2013. However, ambient air data from all monitors within the Southwest, IN Nonattainment Area for the 2015 – 2017 design value period indicate that the 2010 primary 1-hour SO<sub>2</sub> standard was attained at the end of 2017 in advance of the October 4, 2018, attainment date. In order for the Southwest, IN Nonattainment Area to be redesignated to attainment, Indiana must submit, and U.S. EPA must approve, a SIP showing maintenance of the SO<sub>2</sub> NAAQS within the nonattainment area for at least 10 years after redesignation.

According to U.S. EPA's *"Procedures for Processing Requests to Redesignate Areas to Attainment"*<sup>7</sup> and *"Guidance for 1-Hour SO<sub>2</sub> Nonattainment Area SIP Submissions"*<sup>8</sup>, states may generally demonstrate maintenance of the standard "by either showing that future emissions of a pollutant or its precursors will not exceed the level of the attainment inventory, or by modeling to show that the future mix of sources and emissions rates will not cause a violation of the NAAQS." Per U.S. EPA guidance, Indiana is relying on the attainment plan to serve as a maintenance plan for the area since it relies on modeling based on maximum allowable emissions. This modeling is based on never-to-exceed maximum-allowable rates that demonstrate attainment of the standard and that the standard will be maintained for the requisite 10 years and beyond without regard to any changes in operation rate in the pertinent sources that do not involve increases in maximum allowable emissions. The following plan has been developed in support of Indiana's request for redesignation.

U.S. EPA's Redesignation Guidance states that the Maintenance Plan must consist of the following items:

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<sup>7</sup> [https://www.epa.gov/sites/production/files/2016-03/documents/calagni\\_memo\\_-\\_procedures\\_for\\_processing\\_requests\\_to\\_redesignate\\_areas\\_to\\_attainment\\_090492.pdf](https://www.epa.gov/sites/production/files/2016-03/documents/calagni_memo_-_procedures_for_processing_requests_to_redesignate_areas_to_attainment_090492.pdf)

<sup>8</sup> [https://www.epa.gov/sites/production/files/2016-06/documents/20140423guidance\\_nonattainment\\_sip.pdf](https://www.epa.gov/sites/production/files/2016-06/documents/20140423guidance_nonattainment_sip.pdf)

- Attainment Inventory
- Demonstration of Maintenance
- Continued Operation of Monitoring Network
- Verification of Continued Attainment
- Contingency Plan

### 3.1 Attainment Inventory

U.S. EPA's Redesignation Guidance requires states to identify the level of emissions in the affected area that is sufficient to attain and maintain the NAAQS. To satisfy this requirement, Indiana is submitting an inventory, shown in Table 3.1, based on the allowable limits in 326 IAC 7-4-15 for sources identified in the attainment plan submitted in October 2015.

In Table 3.1, emissions are calculated based on the source's allowable limits to emit SO<sub>2</sub>. Control strategies were implemented, or were already in place, by January 1, 2017, at all of the EGU point sources within the Southwest, IN Nonattainment Area. These permanent and enforceable reductions of SO<sub>2</sub> emissions have contributed to attainment of the NAAQS.

In 2015, the Hoosier Energy – Ratts Generating Station was permanently shut down and was completely dismantled in late-2016. Based on this fact, and as a result of the permanent and enforceable SO<sub>2</sub> emission limits and operational requirements implemented at the IPL – Petersburg facility in 326 IAC 7-4-15, EGU point source SO<sub>2</sub> emissions in the Southwest, IN Nonattainment Area have decreased dramatically.

**Table 3.1: SO<sub>2</sub> Emissions for EGU Point Sources, Daviess and Pike Counties, Indiana (tons per year)**

<b>Affected Source</b>	<b>SO<sub>2</sub> Emissions (tpy)</b>
Hoosier Energy – Ratts Generating Station	512
IPL – Petersburg Generating Station	21,661
<b>TOTAL</b>	<b>22,173</b>

### 3.2 Demonstration of Maintenance

#### 3.2.1 Modeling

As mentioned in Section 3.0, Indiana is relying on modeling from the attainment plan as the basis for demonstrating maintenance of the SO<sub>2</sub> NAAQS. In Section 2.1.2, it is discussed that AERMOD modeling results for Daviess and Pike counties showed total 1-hour SO<sub>2</sub> concentration values (i.e. maximum 1-hour SO<sub>2</sub> concentrations added to background concentration values) below the 1-hour SO<sub>2</sub> NAAQS of 75 ppb or 196.2 µg/m<sup>3</sup>. This modeling was based on never-to-exceed maximum-allowable rates that are

protective of the standard. Because there are not any large sources of SO<sub>2</sub> projected to enter the nonattainment area, the area can be expected to demonstrate attainment of the standard for the requisite 10 years and beyond without regard to any changes in operation rate of the pertinent sources that do not involve increases in maximum allowable emissions.

Indiana has a longstanding and fully implemented NSR program. This program is addressed in 326 IAC 2. The rule includes provisions for the Prevention of Significant Deterioration (PSD) in 326 IAC 2-2. PSD does not prevent sources from increasing emissions, instead is designed to protect public health and welfare. This program will safeguard that economic growth will occur in a manner consistent with the preservation of existing clean air resources. This program will also guarantee that any decision to permit increased air pollution in any area to which this program applies is made only after careful evaluation of all the consequences of such a decision and after adequate procedural opportunities for informed public participation in the decision making process. If a company were to notify IDEM of plans to construct or resume operations in the area, any emission unit would be subject to NSR requirements and modeling to ensure that the area will continue to comply with the standard.

### 3.2.2 Projected Inventory

U.S. EPA's Redesignation Guidance requires states to project emissions for at least the 10 year period following redesignation of the area to attainment. These emissions are shown in Table 3.2.

Because there are no large sources of SO<sub>2</sub> projected to enter the nonattainment area, projected emissions to 2030 for the IPL – Petersburg facility are consistent with the allowable emissions limits in 326 IAC 7-4-15. SO<sub>2</sub> emissions for the Hoosier Energy – Ratts Generating Station are projected to be zero for the year 2030 with the facility ceasing operation in 2015 and being completely dismantled in late-2016.

As a result of the permanent and enforceable SO<sub>2</sub> attainment strategies, operational requirements that took effect on January 1, 2017, and existing national control regulations, SO<sub>2</sub> emissions in the Southwest, IN Nonattainment Area have decreased significantly. These measures in conjunction with the closing of Hoosier Energy – Ratts Generating Station and IPL – Petersburg Generating Station taking limits on their SO<sub>2</sub> emission units, confirms the area will continue to maintain compliance with the standard.

**Table 3.2: Projected SO<sub>2</sub> Emissions to 2030 Maintenance-Year for EGUs, Southwest, IN Nonattainment Area (tons per year)**

<b>Affected Source</b>	<b>2030 Projected Emissions (tpy)</b>
Hoosier Energy – Ratts Generating Station	0 <sup>a</sup>
IPL – Petersburg Generating Station	21,661
<b>TOTAL</b>	<b>21,661</b>

<sup>a</sup> This coal-fired power plant ceased operation in 2015. As a result, the facility's Acid Rain and Title V permits were revoked on July 28, 2016 and August 24, 2016, respectively.<sup>9</sup>

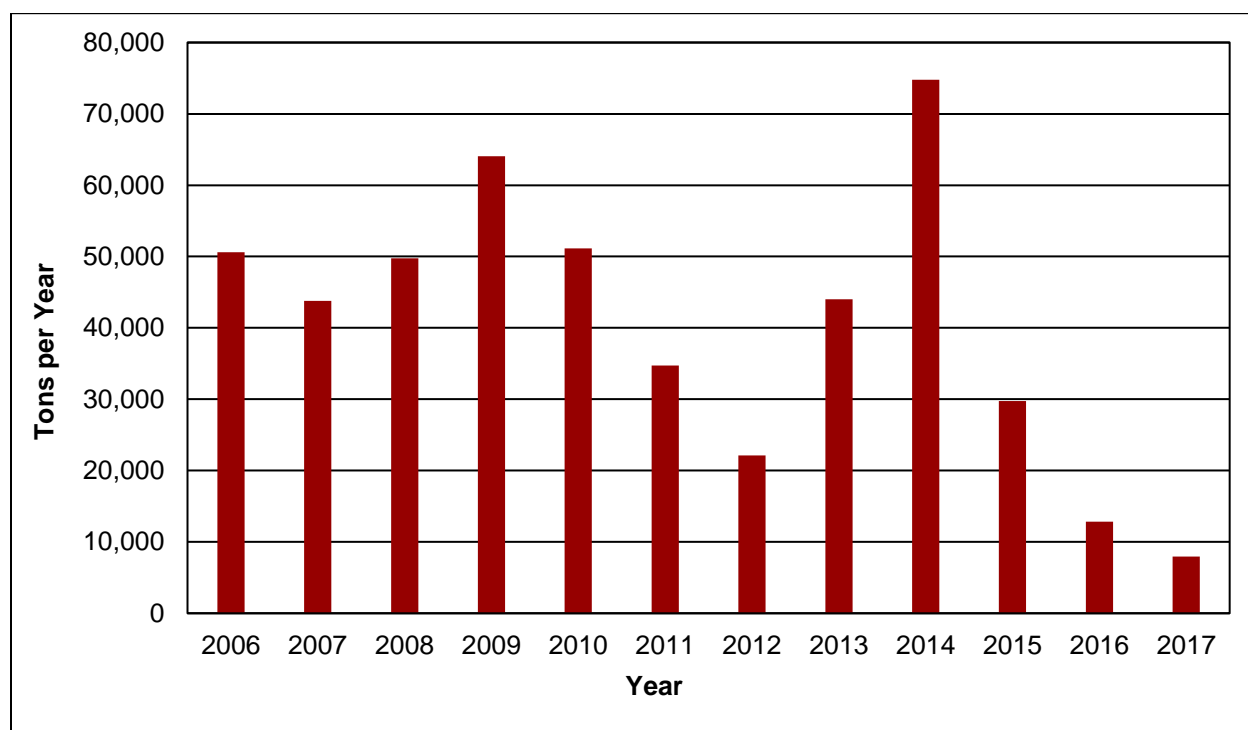
### 3.2.3 Emission Trends

Graph 3.1 shows the trend in actual reported SO<sub>2</sub> emissions, as retrieved from U.S. EPA's Air Markets Program Data<sup>10</sup>, for EGUs located within Pike County for 2006 – 2017 (IPL – Petersburg Generating Station and Hoosier Energy – Ratts Generating Station). Daviess County does not have any EGU sources located within the county. SO<sub>2</sub> emissions decreased substantially with the closing of the Hoosier Energy – Ratts Generating Station and in response to national programs affecting all EGUs such as the NSPS under Section 111 and 129 of the CAA, the NESHAP under Section 112 of CAA, CAIR, and now CSAPR.

<sup>9</sup> [https://ecm.idem.in.gov/cs/idcplg?IdcService=GET\\_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf](https://ecm.idem.in.gov/cs/idcplg?IdcService=GET_FILE&dID=80340696&dDocName=80340333&Render=web&allowInterrupt=1&noSaveAs=1&fileName=80340333.pdf)

<sup>10</sup> <https://ampd.epa.gov/ampd/>

**Graph 3.1: SO<sub>2</sub> Emissions from Pike County, Indiana, Electric Generating Units:  
Hoosier Energy – Ratts Generating Station and IPL – Petersburg Generating  
Station, 2006-2017**



### 3.3 Monitoring Network

Indiana is committed to continue monitoring SO<sub>2</sub> in the nonattainment area. IDEM will consult with U.S. EPA Region V staff prior to making changes to the existing monitoring network should changes become necessary in the future. Indiana will continue to quality assure the monitoring data to meet the requirements of 40 CFR 50. Indiana will enter all data into AQS in a timely manner in accordance with federal guidelines.

Indiana has quality-assured all SO<sub>2</sub> data shown in Appendix A in accordance with 40 CFR 50.17 and the Quality Assurance Manual. Indiana has recorded the data in the AQS database and the data are available to the public. Further, according to the applicable requirements of 40 CFR 58.10, Indiana will consult with U.S. EPA through the annual review of Indiana's monitoring network prior to making any changes to the existing monitoring network.

### 3.4 Verification of Continued Attainment

According to U.S. EPA's *"Procedures for Processing Requests to Redesignate Areas to Attainment"*, each State should ensure that it has the legal authority to implement and enforce all measures necessary to attain and maintain the 2010 primary 1-hour NAAQS for SO<sub>2</sub>. Indiana maintains the legal authority, necessary resources, and structural components of its air quality management program to implement and enforce all

measures necessary to maintain the NAAQS.

In order to track the progress of the maintenance plan, Indiana commits to periodically reevaluate the modeling assumptions and input data used in the attainment plan, as well as monitor contingency plan indicators and triggers as discussed in Section 3.5.

### 3.5 Contingency Plan

As required by Section 175A(b) of the CAA, Indiana commits to submit to the Administrator, eight (8) years after redesignation, an additional revision of the SIP. The revision will contain Indiana's plan for maintaining the 2010 primary 1-hour NAAQS for SO<sub>2</sub> for an additional ten (10) years beyond the first ten (10) year maintenance period after redesignation.

Indiana commits to adopt and expeditiously implement necessary corrective actions in response to exceeding specified levels or in the event that future violations of the ambient standard occur. Indiana hereby commits to adopt and implement necessary corrective actions in the following circumstances:

#### 3.5.1 Warning Level Response

A Warning Level Response shall be prompted whenever the annual average 99<sup>th</sup> percentile maximum daily 1-hour SO<sub>2</sub> concentration of 79 ppb occurs in a single calendar year within the maintenance area. A Warning Level Response will consist of a study to determine whether the SO<sub>2</sub> value indicates a trend toward higher SO<sub>2</sub> values or whether emissions appear to be increasing. The study will evaluate whether the trend, if any, is likely to continue and, if so, the control measure(s) necessary to reverse the trend, taking into consideration ease and timing for implementation, as well as economic and social considerations. Implementation of necessary control(s) in response to a Warning Level Response trigger will take place as expeditiously as possible, but in no event later than twelve months from the conclusion of the most recent calendar year.

Should it be determined through the Warning Level study that action is necessary to reverse the noted trend, procedures for control selection and implementation outlined under "Action Level Response" shall be followed.

#### 3.5.2 Action Level Response

An Action Level Response shall be prompted whenever a violation of the standard (three-year average of the 99<sup>th</sup> percentile maximum daily 1-hour SO<sub>2</sub> concentration of 75 ppb or greater) occurs within the maintenance area. In the event that the Action Level is triggered and is not found to be due to an exceptional event, malfunction, or noncompliance with a permit condition or rule requirement, IDEM will determine additional control measure(s) needed to assure future attainment of NAAQS for 1-hour SO<sub>2</sub>. In this case, measure(s) that can be implemented within a short period of time will be selected and be in place within eighteen months from the close of the calendar year

that prompted the Action Level. IDEM will also consider the timing of an action level trigger and determine if additional, significant new regulations not currently included as part of the maintenance provisions will be implemented in a timely manner and will constitute an acceptable Action Level response.

### 3.5.3 Control Measure Selection and Implementation

Adoption of any additional control measure(s) is subject to the necessary administrative and legal process. This process will include posting of notices, an opportunity for public hearing, and other measures required by Indiana law for rulemaking by the State of Indiana's Environmental Rules Board.

If a new measure or control is already promulgated and scheduled to be implemented at the federal or state level and that measure or control is determined to be sufficient to address the upward trend in air quality, additional local measures may be unnecessary. Furthermore, Indiana will submit to U.S. EPA an analysis to demonstrate that the proposed measure(s) are adequate to return the area to attainment.

### 3.5.4 Contingency Measures

Contingency measures to be considered will be selected from a comprehensive list of measures deemed appropriate and effective at the time the selection is made. Listed below are example measures that may be considered. The selection of measures will be based upon cost-effectiveness, emission reduction potential, economic and social considerations, or other factors that IDEM deems appropriate. IDEM will solicit input from all interested and affected persons in the maintenance area prior to selecting appropriate contingency measures. All of the listed contingency measures are potentially effective or proven methods of obtaining significant reductions of SO<sub>2</sub> emissions. Because it is not possible at this time to determine what control measure(s) will be appropriate at an unspecified time in the future, the list of contingency measures outlined below is not comprehensive. Indiana anticipates that if contingency measure(s) should ever be necessary, it is unlikely that a significant number (i.e., all those listed below) will be required.

1. Require alternative fuel
2. Require SO<sub>2</sub> emissions add-on control technologies for existing emission units
3. Require reduced operating hours
4. Require SO<sub>2</sub> emission offsets for new and modified major sources
5. Require SO<sub>2</sub> emission offsets for new and modified minor sources

No contingency measure shall be implemented without providing the opportunity for full public participation during which the relative costs and benefits of individual measures, at the time they are under consideration, can be fully evaluated.



## **4.0 Public Participation**

In accordance with 40 CFR 51.102, public participation in this request was provided as follows:

Notice of availability of the complete document and a request for the opportunity for a public hearing was made available on IDEM's website on September 17, 2018, at <https://www.in.gov/idem/5474.htm>. It remained posted on the site until at least October 18, 2018.

During the public comment period IDEM did not receive any public comments. The deadline during the public comment period to request a hearing was October 17, 2018. There was not a request for a public hearing and therefore the hearing was not required to be held.

A copy of the legal public notice and certification of publication can be found in Appendix B.

## **5.0 Conclusions**

The Southwest, IN Nonattainment Area, has attained the 2010 primary 1-hour SO<sub>2</sub> standard. This petition demonstrates that the Southwest, IN Nonattainment Area has complied with the applicable provisions of the CAA regarding redesignation of SO<sub>2</sub> nonattainment areas. IDEM has prepared a Redesignation Request and Maintenance Plan that meets the requirements of Section 110(a)(1) of the CAA.

Based on this analysis, the Southwest, IN Nonattainment Area meets the requirements for redesignation under Section 107(d)(3) of the CAA and U.S. EPA guidance. Indiana has demonstrated that air quality improvements are due to permanent and enforceable measures. As a result of the SO<sub>2</sub> attainment strategies and emission limits implemented at the IPL – Petersburg Generating Station, the closing of the Hoosier Energy – Ratts Generating Station and existing national control strategies, SO<sub>2</sub> emissions in the Southwest, IN Nonattainment Area have decreased significantly, ensuring the area will continue to maintain compliance with the 2010 primary 1-hour SO<sub>2</sub> standard. Indiana has ensured that all CAA requirements necessary to support redesignation have been met.

Consistent with the authority granted to U.S. EPA under Section 107(d)(3) of the CAA, Indiana requests that the Southwest, IN Nonattainment Area be redesignated from nonattainment to attainment for the 2010 primary 1-hour SO<sub>2</sub> standard simultaneously with U.S. EPA approval of the Redesignation Request and Maintenance Plan provisions contained herein.

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# **APPENDIX A**

## **Air Quality System (AQS) Monitor Data Values for the Southwest, Indiana 2010 Primary 1-Hour SO<sub>2</sub> Nonattainment Area**

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# **AQS Monitoring Data for the Southwest, IN** **2010 Primary 1-Hour SO<sub>2</sub> Nonattainment Area**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

User ID: BJR

DESIGN VALUE REPORT

Report Request ID: 1677145

Report Code: AMP480

Aug. 24, 2018

GEOGRAPHIC SELECTIONS												
Tribal Code	State	County	Site	Parameter	POC	City	AQCR	UAR	CBSA	CSA	EPA Region	
	18	027	0002									
	18	125	0005									

PROTOCOL SELECTIONS			
Parameter Classification	Parameter	Method	Duration
DESIGN VALUE	42401		

SELECTED OPTIONS	
Option Type	Option Value
WORKFILE DELIMITER	,
SINGLE EVENT PROCESSING	
QUARTERLY DATA IN WORKFILE	EXCLUDE REGIONALLY CONCURRED EVENTS
AGENCY ROLE	NO
USER SITE METADATA	PQAO
MERGE PDF FILES	STREET ADDRESS
	YES

DATE CRITERIA	
Start Date	End Date
2014	2017

APPLICABLE STANDARDS
Standard Description
SO2 1-hour 2010

Pollutant: Sulfur dioxide(42401)  
 Standard Units: Parts per billion(008)  
 NAAQS Standard: SO2 1-hour 2010  
 Statistic: Annual 99th Percentile

Level: 75

Design Value Year: 2014

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

State Name: Indiana

Site ID	STREET ADDRESS	2014			2013			2012			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Value	Ind.
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	107	Y	4	150	Y	4	78	Y	112	Y
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	4	157	Y	4	169	Y	4	140	Y	155	Y

Pollutant: Sulfur dioxide(42401)  
 Standard Units: Parts per billion(008)  
 NAAQS Standard: SO2 1-hour 2010  
 Statistic: Annual 99th Percentile

Level: 75

Design Value Year: 2015

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

State Name: Indiana

Site ID	STREET ADDRESS	2015			2014			2013			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Value	Ind.
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	93	Y	4	107	Y	4	150	Y	117	Y
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	4	74	Y	4	157	Y	4	169	Y	133	Y

Pollutant: Sulfur dioxide(42401)  
 Standard Units: Parts per billion(008)  
 NAAQS Standard: SO2 1-hour 2010

Statistic: Annual 99th Percentile

Level: 75

Design Value Year: 2016

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

State Name: Indiana

<u>Site ID</u>	<u>STREET ADDRESS</u>	2016			2015			2014			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Value</u>	<u>Ind.</u>
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	22	Y	4	93	Y	4	107	Y	74	Y
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	4	26	Y	4	74	Y	4	157	Y	86	Y

Pollutant: Sulfur dioxide(42401)  
 Standard Units: Parts per billion(008)  
 NAAQS Standard: SO2 1-hour 2010

Statistic: Annual 99th Percentile

Level: 75

Design Value Year: 2017

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

State Name: Indiana

<u>Site ID</u>	<u>STREET ADDRESS</u>	2017			2016			2015			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Qtrrs</u>	<u>Percentile</u>	<u>Eval</u>	<u>Value</u>	<u>Ind.</u>
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	16	Y	4	22	Y	4	93	Y	44	Y
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	4	24	Y	4	26	Y	4	74	Y	41	Y

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# **APPENDIX B**

## **Public Participation Process Documentation**

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## **LEGAL NOTICE OF PUBLIC HEARING**

### **Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area**

#### **Veale Township, Daviess County, and Washington Township, Pike County, Indiana**

**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:

<https://www.in.gov/idem/5474.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 *Draft Request Redesignation Petition and Maintenance Plan for Sulfur Dioxide Attainment of the Southwest Indiana Partial Daviess County and Partial Pike County 2010 Primary 1-hour SO<sub>2</sub> Nonattainment Area - Veale Township in Daviess County and Washington Township in Pike County, Indiana*. All interested persons are invited and will be given reasonable opportunity to express their views concerning this submittal.

On July 25, 2013, U.S. EPA designated Veale Township in Daviess County and Washington Township in Pike County, Indiana, nonattainment under Subpart 1 of Section 107(d)(1) of the CAA (78 FR 47191). These designations became effective on October 4, 2013.

SO<sub>2</sub> monitoring data for the most recent three (3) years, 2015-2017, demonstrates that the air quality meets the 2010 primary 1-hour SO<sub>2</sub> standard in the nonattainment area. This fact, accompanied by the permanent and enforceable decreases in emission levels discussed in Section 2.3 of the Redesignation and Maintenance Plan, justifies a redesignation to attainment for Indiana's nonattainment area based on Section 107(d)(3)(E) of the CAA.

Copies of the Draft Redesignation Petition and Maintenance Plan will be available on or before September 17, 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
- Southwest Regional Office, Indiana Department of Environmental Management, 114 S. 7<sup>th</sup> Street, Petersburg, Indiana

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

<https://www.in.gov/ide/airquality/2443.htm>  
<https://www.in.gov/ide/airquality/2392.htm>

Any person may submit written comments on the *Draft Request for Redesignation and Maintenance Plan for Sulfur Dioxide Attainment of the Southwest Indiana Partial Daviess County and Partial Pike County 2010 Primary 1-hour SO<sub>2</sub> Nonattainment Area*. Written comments should be directed to: Mrs. Michele Boner, Indiana Department of Environmental Management, Office of Air Quality, Room 1003, 100 North Senate Avenue, Indianapolis, IN 46204. Comments can also be submitted via fax (317) 233-5967 or email at [mboner@idem.IN.gov](mailto:mboner@idem.IN.gov). Comments must be submitted by October 17, 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 *Draft Request Redesignation and Maintenance Plan for Sulfur Dioxide Attainment of the Southwest Indiana Partial Daviess County and Partial Pike County Nonattainment Area* will be held if a request is received by October 17, 2018. If a hearing is requested, the hearing will be held on October 23, 2018, and the comment period will be extended to October 30, 2018. The hearing will convene at 6:00 p.m. local time at the Southwest Regional Office, Indiana Department of Environmental Management, 114 South 7<sup>th</sup> Street, Petersburg, Indiana 47567. If a request for a public hearing is not received by October 17, 2018, the hearing will be cancelled. Interested parties can check the online IDEM calendar at <http://calendar.in.gov/site/ide/ide> or contact Mrs. Michele Boner at (317) 233-6844, after October 17, 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 Mrs. Michele Boner, 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) 233-6844 or (800) 451-6027 ext. 3-6844 (in Indiana).

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*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.*

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## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

100 N. Senate Avenue • Indianapolis, IN 46204

(800) 451-6027 • (317) 232-8603 • [www.idem.IN.gov](http://www.idem.IN.gov)

**Eric J. Holcomb**  
Governor

**Bruno L. Pigott**  
Commissioner

September 13, 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 Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area

was published on IDEM's web site on September 13, 2018. It is expected that it will remain posted on the site until at least October 18, 2018.

The notice in full was available online at the following web address, under "Southwestern":

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

The draft document was also posted online September 12, 2018 at the following web address:

<https://www.in.gov/idem/airquality/2723.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: Southwest Indiana

This is the IDEM Public Notice Site for the Southwest Region covering the counties of [Crawford](#), [Davies](#), [Dubois](#), [Gibson](#), [Greene](#), [Knox](#), [Lawrence](#), [Martin](#), [Orange](#), [Perry](#), [Pike](#), [Posey](#), [Spencer](#), [Vanderburgh](#), and [Warrick](#). This page is designed to provide public access to all agency public notices for permitting, rulemaking, meeting and hearing notices. Click highlighted links to view additional information on public meetings that do not require public notice.

As soon as they're posted? You can now subscribe to this regional public notice page. By subscribing to your phone every time IDEM adds information to this regional page. This allows you to stay up to date. To subscribe, click on the subscription link in the left hand column.

Public Notices: Southwestern Region

Type of Notice/Event	Publication Dates	Public Comment?	Additional Information
Multi-County Notices			
Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, Partial Davies County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide Nonattainment Area	<a href="#">Legal Notice and Opportunity for Public Hearing [PDF]</a>	09/17/2018 - 10/17/2018	Yes
			Project Manager: Michele Boner Counties: Davies and Pike County Additional information is available on the <a href="#">IDEM Air Quality in Indiana - Redesignations and Maintenance Plans: Davies And Pike Counties</a> page
Crawford			
English (town) Wastewater Treatment Plant	<a href="#">Draft NPDES Permit Renewal [PDF]</a>	08/08/2018 - 09/07/2018	Yes
			Project Manager: Gabrielle Ghrechi Permit Number: IN0039993

Date and Time

Date and Time

Additional Clocks

Date:  
Thursday, September 13, 2018  
Time:  
9:58:34 AM  

Change date and time...

Time zone  
(UTC-05:00) Eastern Time (US & Canada)  

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