



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

Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

August 25, 2020

Mr. Kurt Thiede
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Supplement to 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)

Dear Mr. Thiede:

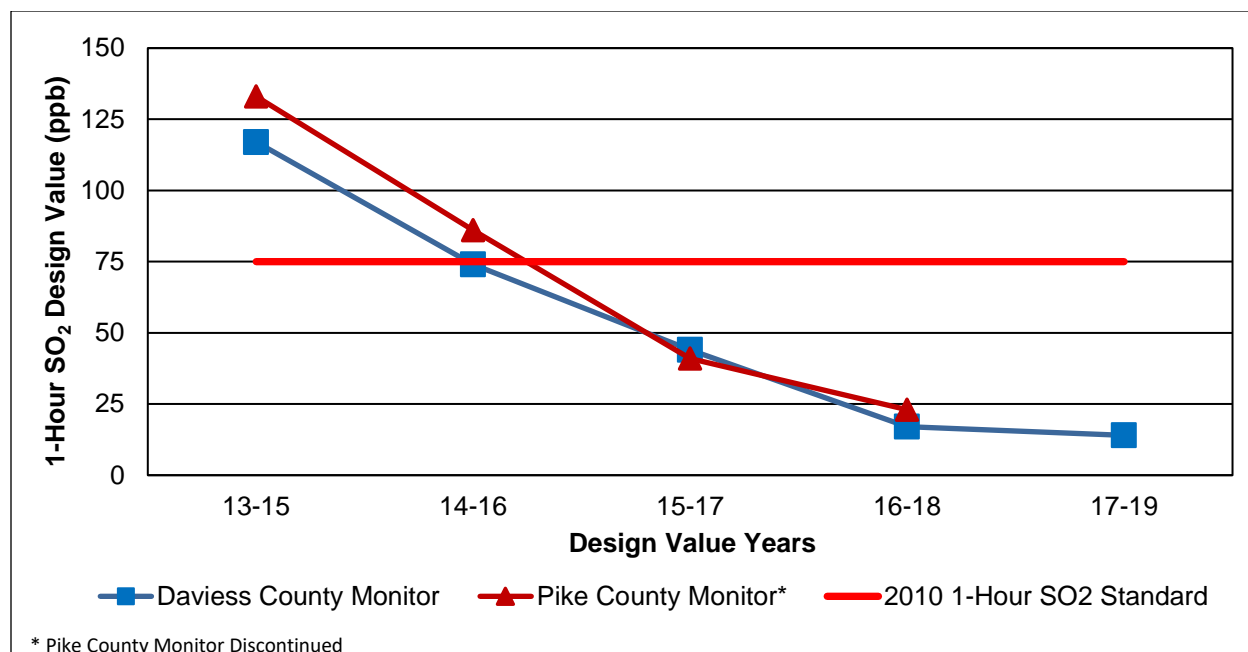
On October 24, 2018, the Indiana Department of Environmental Management (IDEM) submitted the *Request for Redesignation and Maintenance Plan for Attainment of the Southwest Indiana, IN Partial Daviess County and Partial Pike County 2010 Primary 1-Hour Sulfur Dioxide (SO₂) Nonattainment Area (Veale Township, Daviess County and Washington Township, Pike County)* based on monitoring data demonstrating attainment of the SO₂ standard by the October 4, 2018, attainment date. IDEM submits this supplement to provide additional information to inform United States Environmental Protection Agency's (U.S. EPA) consideration of the redesignation of the Southwest, IN nonattainment area.

On August 17, 2020, U.S. EPA approved Indiana's state implementation (SIP) revision to the Southwest Indiana, IN SO₂ nonattainment area, which IDEM submitted to U.S. EPA dated October 2, 2015, as supplemented on November 15, 2017 and September 18, 2019 (85 FR 49967). U.S. EPA has concluded that Indiana has demonstrated that the plan provides for attainment of the 2010 Primary 1-Hour SO₂ National Ambient Air Quality Standard (NAAQS) by the attainment date and meets the other applicable requirements under the Clean Air Act.

In addition, monitoring data in the Southwest Indiana, IN Nonattainment Area continues to show compliance with the 2010 Primary 1-Hour SO₂ NAAQS. Two SO₂ monitors were originally located in the Southwest Indiana, IN Nonattainment area: AES/IPL Petersburg – West off SR 57, Site ID# 18-027-0002 in Daviess County and Petersburg – Arda Lane, Site ID# 18-125-0005 in Pike County. The Pike County

monitor was approved for discontinuation by U.S. EPA on August 22, 2019. The Daviess County monitor continues to demonstrate compliance with the 1-Hour SO₂ NAAQS, as indicated in the chart below.

**Southwest Indiana, IN Nonattainment Area
1-Hour SO₂ Monitoring Data 2015-2019**



IDEM has performed modeling of the nonattainment area to determine the effects of emission control strategies on SO₂ and to demonstrate attainment and ongoing maintenance of the standard. The IPL-Petersburg Generating Station is in compliance with their permanent and enforceable SIP approved SO₂ emission limits, as shown in the tables below. Continuous Emissions Monitoring System data and compliance reports submitted through U.S. EPA's Clean Air Markets database further demonstrate the source's compliance with these requirements.

IPL-Petersburg 30-Day Data, 1st Quarter 2020

	Unit 1	Unit 2	Unit 3	Unit 4
SO ₂ Emission Limit lb/hr	263	495.4	1,633.7	1,548.2
IPL - SO ₂ lb/hr max	153	262	639	717
SO ₂ Emission Limit lb/MMBtu	0.10	0.10	0.25	0.24
IPL - SO ₂ lb/MMBtu max	0.07	0.06	0.17	0.17

IPL- Petersburg - Diesel Generator Operating Hours

Diesel Generator	2019 Operating Hours	2020 1st Quarter Operating Hours	Operating Limit
PB-2	33.8	4.7	500-hour calendar year operating limit (each)
PB-3	3.4	0.0	
PB-4	20.3	3.3	

IDEM believes the Southwest Indiana, IN Nonattainment Area meets the requirements for redesignation under Section 107(d)(3) of the Clean Air Act and U.S. EPA guidance. As such, IDEM requests that U.S. EPA proceed with the review and approval of 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)*.

This submittal consists of one (1) hardcopy of the required documentation. An electronic version of the submittal in PDF format that is identical to the hardcopy will be sent to Doug Aburano, Chief of U.S. EPA Region 5's Attainment Planning and Maintenance Section and Chris Panos of U.S. EPA Region V.

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,



Matt Stuckey
Deputy Assistant Commissioner
Office of Air Quality

MS/sd/bc/gf/mb
Enclosure:

*Air Quality System (AQS) Monitor Data Values for the Southwest Indiana, IN
2010 Primary 1-Hour SO₂ Nonattainment Area*

cc: Doug Aburano U.S. EPA Region 5 (no enclosure)
Chris Panos, U.S. EPA Region 5 (no enclosure)

Mr. Kurt Thiede

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John Summerhays, U.S. EPA Region 5 (no enclosure)

Sara Arra, U.S. EPA Region 5 (no enclosure)

Abby Teener, U.S. EPA Region 5 (no enclosure)

Keith Baugues, IDEM-OAQ (no enclosure)

Matt Stuckey, IDEM-OAQ (no enclosure)

Scott Deloney, IDEM-OAQ (no enclosure)

Brian Callahan, IDEM-OAQ (w/ enclosure)

Gale Ferris, IDEM-OAQ (w/ enclosure)

Michele Boner, IDEM-OAQ (w/ enclosure)

File Copy

Air Quality System (AQS) Monitor Data Values
for the Southwest Indiana, IN
2010 Primary 1-Hour SO₂ Nonattainment Area

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User ID: BJR

DESIGN VALUE REPORT

Report Request ID: 1858423

Report Code: AMP480

Jul. 21, 2020

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	EXCLUDE REGIONALLY CONCURRED EVENTS
QUARTERLY DATA IN WORKFILE	NO
AGENCY ROLE	PQAO
USER SITE METADATA	STREET ADDRESS
MERGE PDF FILES	YES
USE LINKED SITES	YES

DATE CRITERIA

Start Date	End Date
2015	2019

APPLICABLE STANDARDS

Standard Description
SO2 1-hour 2010

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
PRELIMINARY DESIGN VALUE REPORT

Report Date: Jul. 21, 2020

- Notes:**
1. Computed design values are a snapshot of the data at the time the report was run (may not be all data for year).
 2. Some PM2.5 24-hour DVs for incomplete data that are marked invalid here may be marked valid in the Official report due to additional analysis.
 3. Annual Values not meeting completeness criteria are marked with an asterisk ('*').

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
PRELIMINARY DESIGN VALUE REPORT

Report Date: Jul. 21, 2020

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

Notes: 1. Computed design values are a snapshot of the data at the time the report was run (may not be all data for year).
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
AIR QUALITY SYSTEM
PRELIMINARY DESIGN VALUE REPORT

Report Date: Jul. 21, 2020

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

Site ID	STREET ADDRESS	2016			2015			2014			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	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

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PRELIMINARY DESIGN VALUE REPORT

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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

Site ID	STREET ADDRESS	2017			2016			2015			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	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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AIR QUALITY SYSTEM
PRELIMINARY DESIGN VALUE REPORT

Report Date: Jul. 21, 2020

Pollutant: Sulfur dioxide(42401)

Standard Units: Parts per billion(008)

NAAQS Standard: SO2 1-hour 2010

Statistic: Annual 99th Percentile

Design Value Year: 2018

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

Level: 75

State Name: Indiana

Site ID	STREET ADDRESS	2018			2017			2016			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Value	Ind.
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	4	19	Y	4	24	Y	4	26	Y	23	Y
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	13	Y	4	16	Y	4	22	Y	17	Y

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Statistic: Annual 99th Percentile

Design Value Year: 2019

REPORT EXCLUDES MEASUREMENTS WITH REGIONALLY CONCURRED EVENT FLAGS.

Level: 75

State Name: Indiana

Site ID	STREET ADDRESS	2019			2018			2017			3-Year	
		Comp.	99th	Cert&	Comp.	99th	Cert&	Comp.	99th	Cert&	Design	Valid
		Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Qtrrs	Percentile	Eval	Value	Ind.
18-125-0005	1587 EAST ARDA LANE/ IPL-Ra	2	13 *	Y	4	19	Y	4	24	Y	19	N
18-027-0002	WEST OFF OF STATE ROUTE 57-	4	12	Y	4	13	Y	4	16	Y	14	Y

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Report Date: Jul. 21, 2020

CERTIFICATION EVALUATION AND CONCURRENCE FLAG MEANINGS

FLAG	MEANING
M	The monitoring organization has revised data from this monitor since the most recent certification letter received from the state.
N	The certifying agency has submitted the certification letter and required summary reports, but the certifying agency and/or EPA has determined that issues regarding the quality of the ambient concentration data cannot be resolved due to data completeness, the lack of performed quality assurance checks or the results of uncertainty statistics shown in the AMP255 report or the certification and quality assurance report.
S	The certifying agency has submitted the certification letter and required summary reports. A value of "S" conveys no Regional assessment regarding data quality per se. This flag will remain until the Region provides an "N" or "Y" concurrence flag.
U	Uncertified. The certifying agency did not submit a required certification letter and summary reports for this monitor even though the due date has passed, or the state's certification letter specifically did not apply the certification to this monitor.
X	Certification is not required by 40 CFR 58.15 and no conditions apply to be the basis for assigning another flag value
Y	The certifying agency has submitted a certification letter, and EPA has no unresolved reservations about data quality (after reviewing the letter, the attached summary reports, the amount of quality assurance data submitted to AQS, the quality statistics, and the highest reported concentrations).

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