



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

December 19, 2025

Ms. Anne Vogel
Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Preliminary Recommendations for Air
Quality Designations under the 2024
Revised Secondary Annual Sulfur Dioxide
(SO₂) National Ambient Air Quality
Standard (NAAQS)

Dear Regional Administrator Vogel:

On December 10, 2024, United States Environmental Protection Agency (U.S. EPA) revised the secondary SO₂ NAAQS from a three-hour average, not to be exceeded more than once per year, of 0.5 parts per million (ppm) to an annual standard with a level of 10 parts per billion (ppb), averaged over three years (89 FR 105692).¹

This letter is in response to U.S. EPA's subsequent guidance memorandum (guidance memo), "Initial Area Designations for the 2024 Revised Secondary Annual Sulfur Dioxide National Ambient Air Quality Standard" (Revised January 16, 2025), concerning the implementation of the new standard in accordance with Section 107(d) of the federal Clean Air Act (CAA). U.S. EPA's guidance memo states that air quality designations will be proposed in late-August 2026 and final designations will be promulgated no later than December 11, 2026. The deadline for states to submit their initial air quality designations recommendations to U.S. EPA is December 11, 2025.

U.S. EPA determined in the final NAAQS rulemaking that the current monitoring network is adequate to provide the data needed to implement the 2024 revised secondary annual SO₂ NAAQS.² As discussed in its guidance memo, U.S. EPA published 2022-2024 annual design values for states to use in making their initial

¹ For the guidance memo, please see: <https://www.epa.gov/sulfur-dioxide-designations/area-designations-2024-revised-secondary-annual-sulfur-dioxide-national>. For information about the rule, please see: <https://www.epa.gov/so2-pollution/secondary-national-ambient-air-quality-standards-naaqs-nitrogen-dioxide-no2-and>.

² See Section IV of the final rule: <https://www.govinfo.gov/content/pkg/FR-2024-12-27/pdf/2024-29463.pdf>.

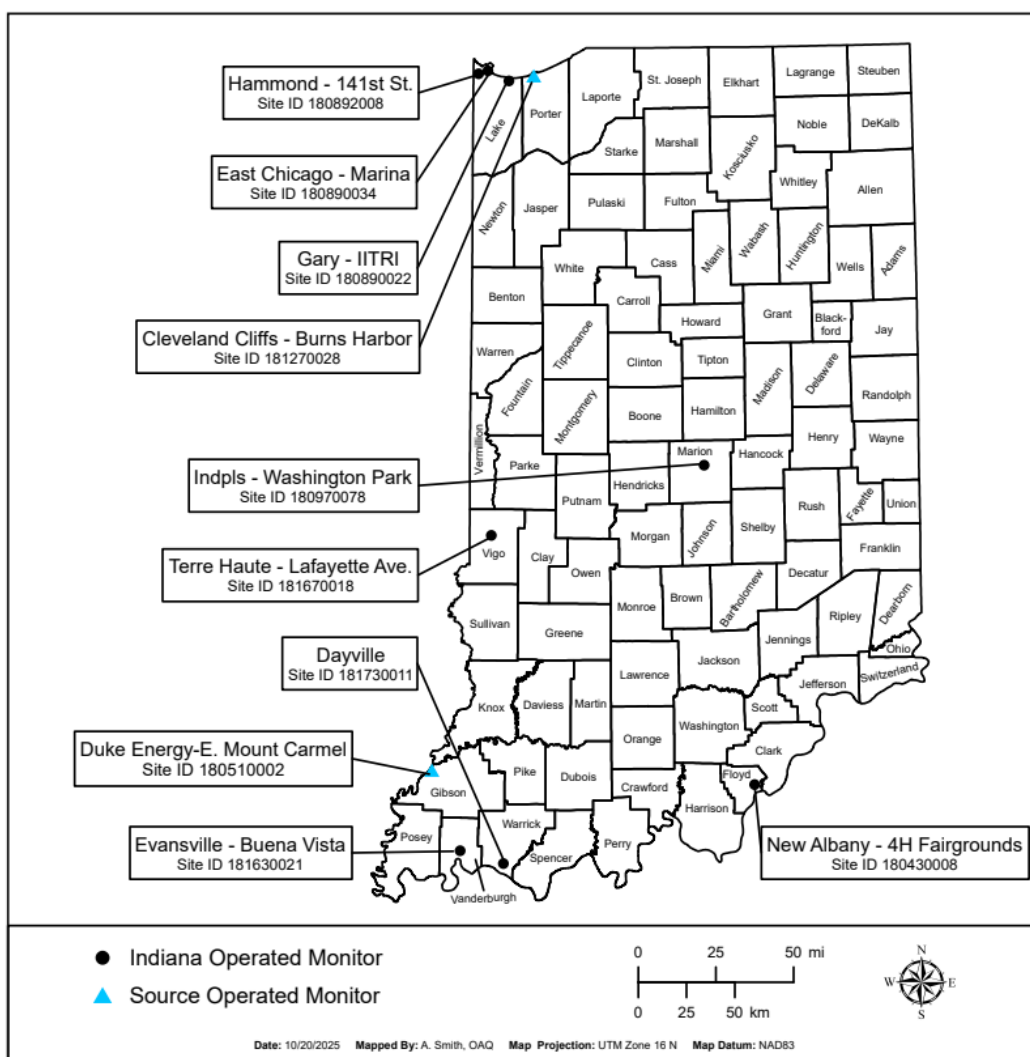


designation recommendations.³ U.S. EPA's preliminary review of the Air Quality System (AQS) monitoring data indicates the vast majority of the country are attaining the 2024 revised secondary annual SO₂ NAAQS.

Indiana's SO₂ Monitoring Network

Indiana's SO₂ monitoring network is operated in compliance with the requirements in 40 Code of Federal Regulations (CFR) Part 58 Appendix D §4.4. Ten SO₂ monitors operated during the period covering 2022-2024, including eight operated by the State of Indiana and two operated by industrial sources. Figure 1 displays the SO₂ monitor locations, names, and Site IDs.

Figure 1: Indiana's SO₂ Air Quality Monitoring Network



³ See U.S. EPA's 2024 Design Value Reports, "Sulfur Dioxide Design Values, 2024," Table 5b. Site-level Design Values for the 2024 Annual Secondary Sulfur Dioxide NAAQS (<https://www.epa.gov/air-trends/air-quality-design-values#report>).

Annual SO₂ Monitoring Data for 2022 to 2024

The 2024 revised secondary annual SO₂ NAAQS is violated when SO₂ monitor values averaged over three years exceed a value of 10 ppb. The annual mean concentration averaged over three consecutive years is the design value (DV).⁴ Generally, the attainment status of an area (i.e., core-based statistical area (CBSA), county, etc.) is based on the highest DV reported.

U.S. EPA AQS data for the 2024 revised secondary annual SO₂ NAAQS for Indiana monitors, which is summarized in Table 1, was evaluated to determine the state's attainment status. The data shows 2022, 2023, and 2024 annual mean values between 0.2 to 1.6 ppb and 2022-2024 design values (DVs) well below the standard of 10 ppb, at 0 to 1 ppb.

Table 1: Summary of Indiana's SO₂ Air Quality Monitor Values for the 2024 Revised Secondary Annual NAAQS (2022-2024)

County	Site ID	Site Name	Site Status			
			Annual Mean Value (ppb)			2022-2024 Design Value (ppb)
			2022	2023	2024	
Floyd ^a	180430008	4H Fairgrounds		0.7	1.1 ^b	Invalid
	180431004	Green Valley Elem. Sch.	0.8			Invalid
Gibson	180510002	Duke Energy - E. Mt. Carmel	1.6	1.0	1.1	1
Lake	180890022	Gary - IITRI	0.6	1.3	0.9	1
	180890034	East Chicago - Marina	0.9	0.6	0.8	1
	180892008	Hammond - 141 st St.	0.7	1.1	0.6	1
Marion	180970078	Indianapolis - Washington Park	0.3	0.2	0.2	0
Porter	181270028	Cleveland Cliffs - Burns Harbor	0.9	1.1	0.8	1
Vanderburgh	181630021	Evansville - Buena Vista	1.0	0.2	0.4	1
Vigo	181670018	Terre Haute - Lafayette Ave	0.5	1.0	0.2	1
Warrick	181730011	Dayville	1.3	1.1	0.9 ^b	Invalid

^a Site ID 180431004 (Green Valley Elementary School) was discontinued on 1/4/2023 and Site ID 180430008 (4H Fairgrounds) began on 1/11/2023 as part of a planned relocation.

^b Monitoring sites must meet the data completeness requirements listed in Appendix T to 40 CFR Part 50 in order to have a valid DV. Data was incomplete for 2024 for Site ID 180430008 (4H Fairgrounds) and Site ID 181730011 (Dayville).

Indiana shares borders with other states in the following CBSAs: Chicago-Naperville-Elgin, Illinois-Indiana-Wisconsin (IL-IN-WI); Louisville/Jefferson County, Kentucky-Indiana (KY-IN); Cincinnati, Ohio-Kentucky-Indiana (OH-KY-IN), and, Evansville, Indiana-Kentucky (IN-KY). AQS data, summarized in Table 2, was evaluated to

⁴ Design values are computed and published annually by U.S. EPA (<https://www.epa.gov/air-trends/air-quality-design-values>).

determine the state's potential contributions to violations in these nearby areas. The data shows annual mean values between 0.0 and 2.4 ppb and DVs well below the standard of 10 ppb, at 0 to 2 ppb.

Table 2: Summary of SO₂ Air Quality Monitor Values in Neighboring Areas for the 2024 Revised Secondary Annual NAAQS (2022-2024)

State Name	County Name	Core-Based Statistical Area	Site ID	Annual Mean Value (ppb)			2022-2024 Design Value (ppb)
				2022	2023	2024	
Illinois	Cook	Chicago-Naperville-Elgin, IL-IN-WI	170310076	1.2	1.9	0.7	1
			170311601	0.8	1.3	0.0	1
			170314201	0.2	0.4	0.8	0
Kentucky	Campbell	Cincinnati, OH-KY-IN	210373002	0.6	0.7	0.2	1
	Henderson	Evansville, IN-KY	211011011	1.3	2.4	2.4	2
	Jefferson	Louisville/Jefferson County, KY-IN	211110051	0.7	0.7	1.2	1
			211110067	1.1	0.8	1.2	1
			211111041	0.5	0.3 ^a	0.9	Invalid
Ohio	Butler	Cincinnati, OH-KY-IN	390170019	0.3	0.1	0.3	0
			390170020	0.6	0.5	0.6	1
			390170021	1.0	0.6	0.2	1
	Hamilton	Cincinnati, OH-KY-IN	390610010	0.8	0.1	0.2	0
			390610040	0.7	1.0	0.5	1

^a Monitoring sites must meet the data completeness requirements listed in Appendix T to 40 CFR Part 50 in order to have a valid DV. Site ID 211111041 (Jefferson County, Kentucky) data was incomplete for 2023.

Indiana has worked diligently with federal, state, and local partners to ensure compliance with the NAAQS in all areas of the state. All of Indiana SO₂ monitors currently measure concentrations below the standard, and SO₂ emissions from stationary sources across the state have been reduced by approximately 94% over the past 20 years.

Conclusion

In accordance with Section 107(d) of the federal CAA, Indiana has conducted a thorough analysis of air quality data and factors outlined in U.S. EPA's guidance memo for the designation of areas under the 2024 revised secondary annual SO₂ NAAQS. IDEM believes 2022-2024 SO₂ monitoring data presented in Tables 1 and 2 sufficiently demonstrates that all Indiana monitors are meeting the standard and are not contributing to violations of the standard in nearby areas. As such, as provided in Enclosure 1, IDEM recommends all of the monitored counties in Indiana with a valid design value be designated as attainment and all other counties within Indiana be designated as unclassifiable under the revised 2024 secondary annual SO₂ NAAQS.

A copy of this submittal was sent to U.S. EPA through the State Planning Electronic Collaboration System (SPeCS).

Consistent with U.S. EPA's January 16, 2025 guidance, Indiana reserves the right to make necessary updates to its recommendations once 2025 monitoring data becomes certified. I would like to thank U.S. EPA for the opportunity to provide feedback regarding initial designation recommendations under the 2024 revised secondary annual SO₂ NAAQS. IDEM looks forward to continued coordination with Region 5 staff as the designation process moves forward.

If you have any questions or need additional information, please contact Matt Stuckey, Assistant Commissioner, Office of Air Quality, at (317) 233-0203 or mstuckey@idem.IN.gov.

Sincerely,



Clint Woods
Commissioner

Enclosure 1: Indiana's Preliminary Recommendations for Air Quality Designations under the 2024 Revised Secondary Annual Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS)

cc: Sara Arra, U.S. EPA Region 5
Chris Panos, EPA Region 5
Michael Compher, EPA Region 5
Eric Svingen, EPA Region 5
Krista Thomason, EPA Region 5
Matt Stuckey, IDEM
Scott Deloney, IDEM
Brian Callahan, IDEM
Gale Ferris, IDEM
Amy Smith, IDEM
File Cop

This page left intentionally blank.

Enclosure 1

Indiana's Preliminary Recommendations for Air Quality Designations under the 2024 Revised Secondary Annual Sulfur Dioxide (SO₂) National Ambient Air Quality Standard (NAAQS)*

County	Recommendation
Adams	Unclassifiable
Allen	Unclassifiable
Bartholomew	Unclassifiable
Benton	Unclassifiable
Blackford	Unclassifiable
Boone	Unclassifiable
Brown	Unclassifiable
Carroll	Unclassifiable
Cass	Unclassifiable
Clark	Unclassifiable
Clay	Unclassifiable
Clinton	Unclassifiable
Crawford	Unclassifiable
Daviess	Unclassifiable
Dearborn	Unclassifiable
Decatur	Unclassifiable
DeKalb	Unclassifiable
Delaware	Unclassifiable
Dubois	Unclassifiable
Elkhart	Unclassifiable
Fayette	Unclassifiable
Floyd	Unclassifiable
Fountain	Unclassifiable
Franklin	Unclassifiable
Fulton	Unclassifiable
Gibson	Attainment
Grant	Unclassifiable
Greene	Unclassifiable
Hamilton	Unclassifiable
Hancock	Unclassifiable
Harrison	Unclassifiable
Hendricks	Unclassifiable
Henry	Unclassifiable
Howard	Unclassifiable
Huntington	Unclassifiable
Jackson	Unclassifiable
Jasper	Unclassifiable

County	Recommendation
Jay	Unclassifiable
Jefferson	Unclassifiable
Jennings	Unclassifiable
Johnson	Unclassifiable
Knox	Unclassifiable
Kosciusko	Unclassifiable
LaPorte	Unclassifiable
LaGrange	Unclassifiable
Lake	Attainment
Lawrence	Unclassifiable
Madison	Unclassifiable
Marion	Attainment
Marshall	Unclassifiable
Martin	Unclassifiable
Miami	Unclassifiable
Monroe	Unclassifiable
Montgomery	Unclassifiable
Morgan	Unclassifiable
Newton	Unclassifiable
Noble	Unclassifiable
Ohio	Unclassifiable
Orange	Unclassifiable
Owen	Unclassifiable
Parke	Unclassifiable
Perry	Unclassifiable
Pike	Unclassifiable
Porter	Attainment
Posey	Unclassifiable
Pulaski	Unclassifiable
Putnam	Unclassifiable
Randolph	Unclassifiable
Ripley	Unclassifiable
Rush	Unclassifiable
St. Joseph	Unclassifiable
Scott	Unclassifiable
Shelby	Unclassifiable
Spencer	Unclassifiable
Starke	Unclassifiable
Steuben	Unclassifiable
Sullivan	Unclassifiable

County	Recommendation
Switzerland	Unclassifiable
Tippecanoe	Unclassifiable
Tipton	Unclassifiable
Union	Unclassifiable
Vanderburgh	Attainment
Vermillion	Unclassifiable
Vigo	Attainment
Wabash	Unclassifiable
Warren	Unclassifiable
Warrick	Unclassifiable
Washington	Unclassifiable
Wayne	Unclassifiable
Wells	Unclassifiable
White	Unclassifiable
Whitley	Unclassifiable

This page left intentionally blank.