



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

June 26, 2017

Mr. Robert Kaplan
Acting Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

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

Dear Mr. Kaplan:

The Indiana Department of Environmental Management (IDEM) submits the following assessment of sulfur dioxide (SO₂) emissions for facilities located in Indiana that have been designated by United States Environmental Protection Agency (U.S. EPA) as attaining the 2010 primary 1-hour SO₂ National Ambient Air Quality Standard (NAAQS) as a result of dispersion modeling based on actual emissions data. IDEM scheduled a public hearing concerning the assessment on June 19, 2017, and the public comment period concluded on June 23, 2017. No comments were received during the public comment period. Additionally, there was no request for a public hearing during the comment period, thus a hearing was not held.

The purpose of this assessment is to determine whether sources designated under Round 2 of the 1-hour SO₂ designations process have increased SO₂ emissions during 2015 that would threaten the attainment status, which was originally based on dispersion modeling that relied on 2012 – 2014 SO₂ emissions data.

Implementation of the 2010 primary 1-hour SO₂ standard began in 2013 when U.S. EPA established nonattainment areas based on 2010 – 2012 monitoring data. Subsequently, on March 2, 2015, U.S. EPA entered into a consent decree with the Sierra Club and Natural Resources Defense Council (NRDC) establishing a timeline for the completion of air quality characterizations and designations in all remaining areas of the country. The court order directed U.S. EPA to complete the designations in three additional rounds: Round 2 by July 2, 2016, Round 3 by December 31, 2017, and Round 4 by December 31, 2020.

U.S. EPA identified five coal-fired electric power plants in Indiana, as shown in Table 1, as meeting Round 2 criteria established in the Consent Decree.

Table 1: Facilities Subject to the Round 2 Designation Process

County	Facility
Spencer	American Electric Power (AEP) – Rockport Generating Station
LaPorte	Northern Indiana Public Service Company (NIPSCO) – Michigan City Generating Station
Posey	Vectren – A.B. Brown Generating Station
Jefferson	Indiana-Kentucky Electric Corporation (IKEC) – Clifty Creek Generating Station
Gibson	Duke Energy – Gibson Generating Station

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).

To complete the designation process, on August 10, 2015, U.S. EPA announced the Data Requirements Rule (DRR), 40 Code of Federal Regulations (CFR) Part 51, Subpart BB. Under the DRR, states must submit air quality information to U.S. EPA according to timeframes that coincide with the court-ordered dates for designations in all remaining areas under Rounds 3 and 4.

The five sources listed above, although already designated, are subject to the ongoing data requirements of 40 CFR Part 51, Subpart BB 51.1205. Of the five sources, only the AEP – Rockport and NIPSCO – Michigan City generating stations incorporated actual hourly continuous emissions monitoring (CEM) data from 2012 – 2014 as the basis for establishing designations pertaining to the 1-hour SO₂ NAAQS and are therefore required to assess their emissions annually pursuant to 40 CFR Part 51, Subpart 51.1205(b). The Duke Energy – Gibson Generating Station used monitoring data as the basis for establishing its attainment designation and is therefore, pursuant to 40 CFR Part 51, Subpart BB 51.1205(a), required to continue operation of its ambient SO₂ monitoring program. The Vectren – A.B. Brown and IKEC – Clifty Creek generating stations accepted federally enforceable and permanent SO₂ emission limits used as the basis for establishing designations and therefore, pursuant to 40 CFR Part 51, Subpart BB 51.1204 and 51.1205(c) are not required to perform an annual emissions evaluation.

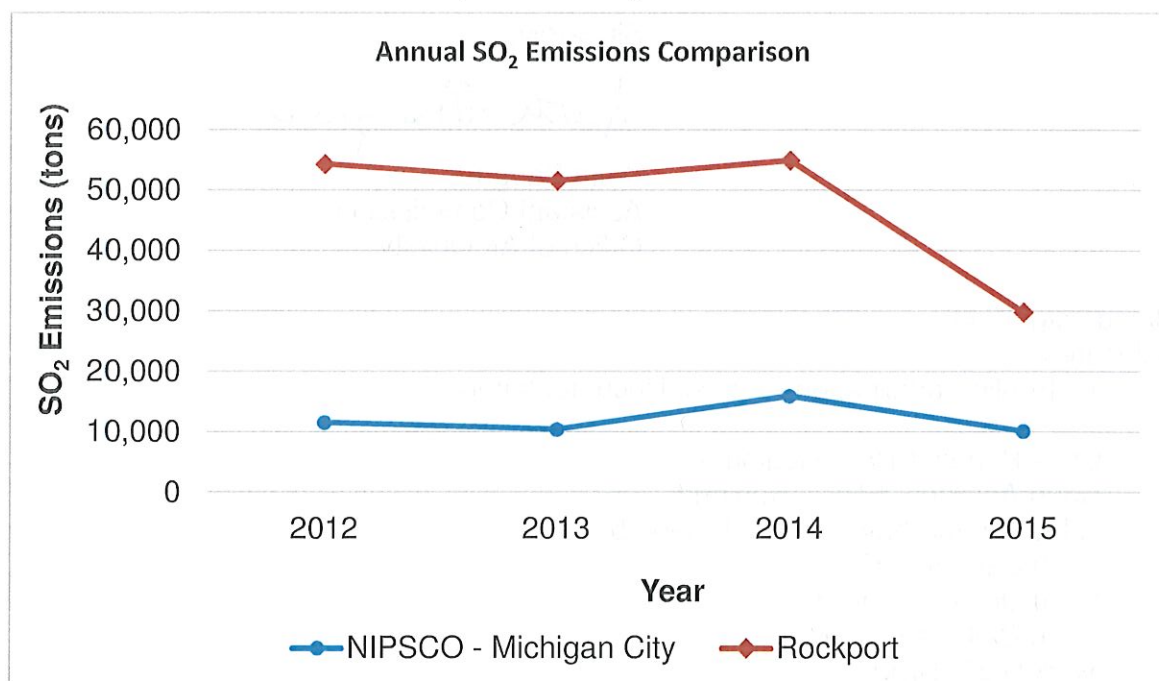
In order to conduct the assessment, annual SO₂ emissions reported for the years 2012, 2013, 2014, and 2015 were obtained from IDEM's Emission Inventory Tracking System (EMITS) system from the AEP – Rockport and NIPSCO – Michigan City generating stations, listed below in Table 2 for comparison to determine if SO₂ emissions had increased in 2015.

Table 2: Yearly Comparison of SO₂ Emissions for the AEP – Rockport and NIPSCO – Michigan City Generating Stations

County	Source Name	2012 Emissions (tons)	2013 Emissions (tons)	2014 Emissions (tons)	Averaged Emissions 2012-2014 (tons)	2015 Emissions (tons)
Spencer	AEP – Rockport Generating Station	54,390	51,636	54,979	53,669	29,890
LaPorte	NIPSCO – Michigan City Generating Station	11,584	10,429	15,991	12,668	10,148

Results of the emission assessment show 2015 SO₂ emissions from the AEP – Rockport Generating Station decreased by more than 44% from the averaged SO₂ emissions from 2012 – 2014. 2015 SO₂ emissions from the NIPSCO – Michigan City Generating Station have decreased by approximately 20% from the averaged SO₂ emissions from 2012 – 2014. As outlined in Table 2, 2015 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 – 2015 with a noticeable decrease in SO₂ emissions at both sources in 2015.

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 2015 than what was modeled to demonstrate attainment of the 2010 primary 1-hour SO₂ NAAQS. Both areas are currently designated as “attainment” and no changes to their classification are necessary at this time.

The ongoing data requirements for the Duke Energy – Gibson Generating Station are the continued operation of the SO₂ monitors used to characterize and designate the area surrounding the source, as well as the continued reporting of such data. Duke Energy continues to operate the SO₂ monitoring network and data is reported to U.S. EPA's Air Quality System (AQS) database. It is worth noting that the monitoring data through 2016 continues to demonstrate attainment of the 2010 primary 1-hour SO₂ standard.

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 Mark Derf, Chief, Technical Support and Modeling Section, Office of Air Quality at (317) 233-5682 or mderf@idem.IN.gov.

Sincerely,



Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sad/bc/gf/mad
Enclosures

1. Public Participation Process Documentation

cc: Chris Panos, EPA – Region 5
Doug Aburano, EPA – Region 5
John Summerhays, EPA – Region 5
Keith Baugues, IDEM
Scott Deloney, IDEM
Brian Callahan, IDEM
Mark Derf, IDEM

APPENDIX A

Public Participation Process Documentation

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LEGAL NOTICE OF PUBLIC HEARING

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

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 Emissions Assessment for Ongoing Data Requirements in association with the 2010 primary 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). All interested persons are invited and will be given reasonable opportunity to express their views concerning the submittal of the Draft Emissions Assessment for Ongoing Data Requirements.

On June 30, 2016, United States Environmental Protection Agency (U.S. EPA) completed designations for Round 2 designating all of Indiana's identified sources as unclassifiable/attainment. U.S. EPA identified five coal-fired electric power plants in Indiana as meeting Round 2 criteria established in the Consent Decree. The purpose of the emissions assessment was to determine whether sources designated under Round 2 of the 1-hour SO₂ designations process have increased SO₂ emissions during 2015 that would threaten the attainment status, which was originally based on dispersion modeling that relied on 2012 – 2014 SO₂ emissions data.

Of the five sources, only the American Electric Power (AEP) – Rockport Generating Station in Spencer County and Northern Indiana Public Service Company (NIPSCO) – Michigan City Generating Station in LaPorte County incorporated actual hourly continuous emissions monitoring data from 2012 – 2014 as the basis for establishing designations pertaining to the 1-hour SO₂ NAAQS and are therefore required to assess their emissions annually pursuant to 40 CFR, Subpart 51.1205(b).

In order to conduct the assessment, annual SO₂ emissions reported for the years 2012, 2013, 2014, and 2015 were obtained from IDEM's Emission Inventory Tracking System (EMITS) system from the AEP – Rockport and NIPSCO – Michigan City generating stations for comparison to determine if SO₂ emissions had increased in 2015. Based on this SO₂ emissions assessment, IDEM recommends no additional modeling is needed to further characterize air quality in the areas surrounding these sources. Both sources reported lower SO₂ emissions in 2015 than what was modeled to demonstrate attainment of the 2010 primary 1-hour SO₂ NAAQS. Both areas are currently designated as attainment and no changes to their classification is necessary at this time.

Copies of the Draft Emissions Assessment for Ongoing Data Requirements in association with the 2010 primary 1-hour SO₂ NAAQS will be available on or before May 12, 2017 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
- 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 Draft Emissions Assessment for Ongoing Data Requirements in association with the 2010 primary 1-hour SO₂ NAAQS. Written comments should be directed to:

Mr. Mark Derf
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 mderf@idem.IN.gov. Comments must be submitted by June 23, 2017. 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 Emissions Assessment for Ongoing Data Requirements in association with the 2010 primary 1-hour SO₂ NAAQS will be held if a public hearing request is received by June 12, 2017. If a hearing is requested, the hearing will be held on June 19, 2017. The hearing will convene at 6:00 p.m. local time at 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 12, 2017, the hearing will be cancelled. Interested parties can check the online IDEM calendar at <http://www.in.gov/activecalendar/EventList.aspx> or contact Mr. Mark Derf at (317) 233-5682, after June 12, 2017, to see if the hearing has been cancelled or will convene.

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 Mr. Mark Derf, 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) 233-5682 or (800) 451-6027 ext. 3-5682 (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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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

May 9, 2017

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 Emissions Assessment for 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 9, 2017. It is expected that it and the draft documents will remain posted until at least June 23, 2017.

The notice in full was available online at the following web address, under "Statewide".

<http://www.in.gov/idem/5474.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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Gov. Eric J. Holcomb

				Energy
				Permit Number: 84-UP-09
				VFC Document Number: 80398553
Clear Creek WC WWTP	NPDES Final Renewal [PDF]	04/28/2017 - 05/16/2017	No	Project Manager: Lynn Riddle
				Permit Number: IN0056154
Fci & Fpc - Terre Haute	Wellhead Protection Plan Phase 2 [PDF]	04/24/2017 - 05/15/2017	Yes	Project Manager: Jim Sullivan
				Permit Number: PWSID 5284018
Warren				
No current public notices.				
White				
Vectren Corp. - Wolcott Gas Storage Field	Renewal of a Minor Source Operating Permit (MSOP) [PDF]	04/26/2017 - 05/26/2017	Yes	Permit Number: M181-38157-00037

Statewide

Public Notices: Statewide				
Name or Facility	Type of Notice/Event	Publication Dates	Public Comment?	Additional Information
Draft Emissions Assessment for Ongoing Data Requirements for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard	Legal Notice and Opportunity for Public Hearing [PDF]	05/12/2017 - 06/12/2017	Yes	Project Manager: Gale Ferris, IDEM Contact Additional information is available on the IDEM Air Quality in Indiana: Sulfur Dioxide (SO2) Air Quality Attainment/Nonattainment Designations page under "Round 2 Nonattainment Designations" as "Draft Emission Assessment for Sources Subject to the Data Requirements Rule".

Date and Time

Date and Time

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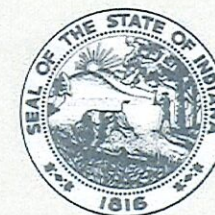
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