



## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Michael R. Pence*  
Governor

*Thomas W. Easterly*  
Commissioner

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March 28, 2013

Ms. Susan Hedman  
Regional Administrator  
U.S. Environmental Protection Agency  
Region V  
77 West Jackson Boulevard  
Chicago, IL 60604-3950

Dear Ms. Hedman:

Re: Technical Addendum to Provide an Updated  
Response to Preliminary Designations under the  
2010 National Ambient Air Quality Standard for  
Sulfur Dioxide (SO<sub>2</sub>)

The Indiana Department of Environmental Management (IDEM) has prepared this technical addendum to provide updated recommendations to the United States Environmental Protection Agency (U.S. EPA), in response to the February 6, 2013 letter concerning proposed designations for the 2010 National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). U.S. EPA has stated that multiple rounds of nonattainment designations will take place for the 2010 SO<sub>2</sub> NAAQS.

U.S. EPA initially proposed a designation of nonattainment for Wayne Township in Wayne County for the 2010 SO<sub>2</sub> NAAQS. Since that time, revised data have become available for Wayne County (monitor 18-177-0006 in Richmond, IN), and Indiana would like to update its nonattainment recommendations. The SO<sub>2</sub> monitor in question is owned by Richmond Power and Light (RPL), as a condition of their Title V permit, and is operated by a consultant. IDEM staff held a meeting with RPL, in which further details of the nonattainment status and the opportunity to further evaluate the 2010 through 2012 ambient air quality data within the 120-day timeframe were discussed. After a review of days with high values, it was discovered that, on some dates and hours, the data submitted to IDEM should have been null and void because the monitor was either being calibrated or quarterly audits were being performed by RPL or their consultant. Proper reason codes were not entered to void the data. The 10-second data obtained from their videographic recorder as received from the data logger and monitor site log book, which documents the maintenance activity on those dates, were made available to IDEM Monitoring Branch staff. IDEM staff agreed with these changes and data were resubmitted to AQS and subsequently recertified, as can be seen in Enclosure 1. The result from the changes to the data is that for the period of 2010 through 2012, Wayne County meets the SO<sub>2</sub> NAAQS. With the revised data, the design value for Wayne County is 66 parts per billion, which is significantly below the standard of 75 ppb. Therefore, Wayne County should not be designated as nonattainment.

U.S. EPA's February 6, 2013 letter with proposed designations was in accordance with Indiana's initial recommendation that Wayne Township in Wayne County be designated as nonattainment for the 2010 SO<sub>2</sub> NAAQS. U.S. EPA's proposed nonattainment areas are also consistent with Indiana's recommendation that nonattainment areas be limited to areas where a monitored violation occurs. Therefore, in light of updated 2010 through 2012 data for Wayne County, Indiana respectfully asks U.S. EPA to reconsider its initial designation of nonattainment for Wayne County and move forward with nonattainment designations per Indiana's refined boundary recommendations as illustrated in Enclosure 2.

I would like to thank you for the opportunity to provide feedback to U.S. EPA regarding the proposed designations for the 2010 SO<sub>2</sub> NAAQS. We look forward to working with your staff as U.S. EPA moves forward with future designations. If you have any questions regarding IDEM's response, please feel free to contact me at (317) 232-8611 or Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222.

Sincerely,



Thomas W. Easterly  
Commissioner

TE/kb/sd/jrg  
Enclosures

1. AQS Report with Revised Data for Wayne County Sulfur Dioxide (SO<sub>2</sub>)
2. Map of Updated State Nonattainment Recommendations

cc: John Summerhays, U.S. EPA  
Doug Aburano, U.S. EPA  
Keith Baugues, IDEM  
Scott Deloney, IDEM  
Jennifer Geisenhaver, IDEM

**Enclosure 1:  
AQS Report with Revised Data for Wayne County Sulfur Dioxide (SO<sub>2</sub>)**

Sulfur dioxide (42401)

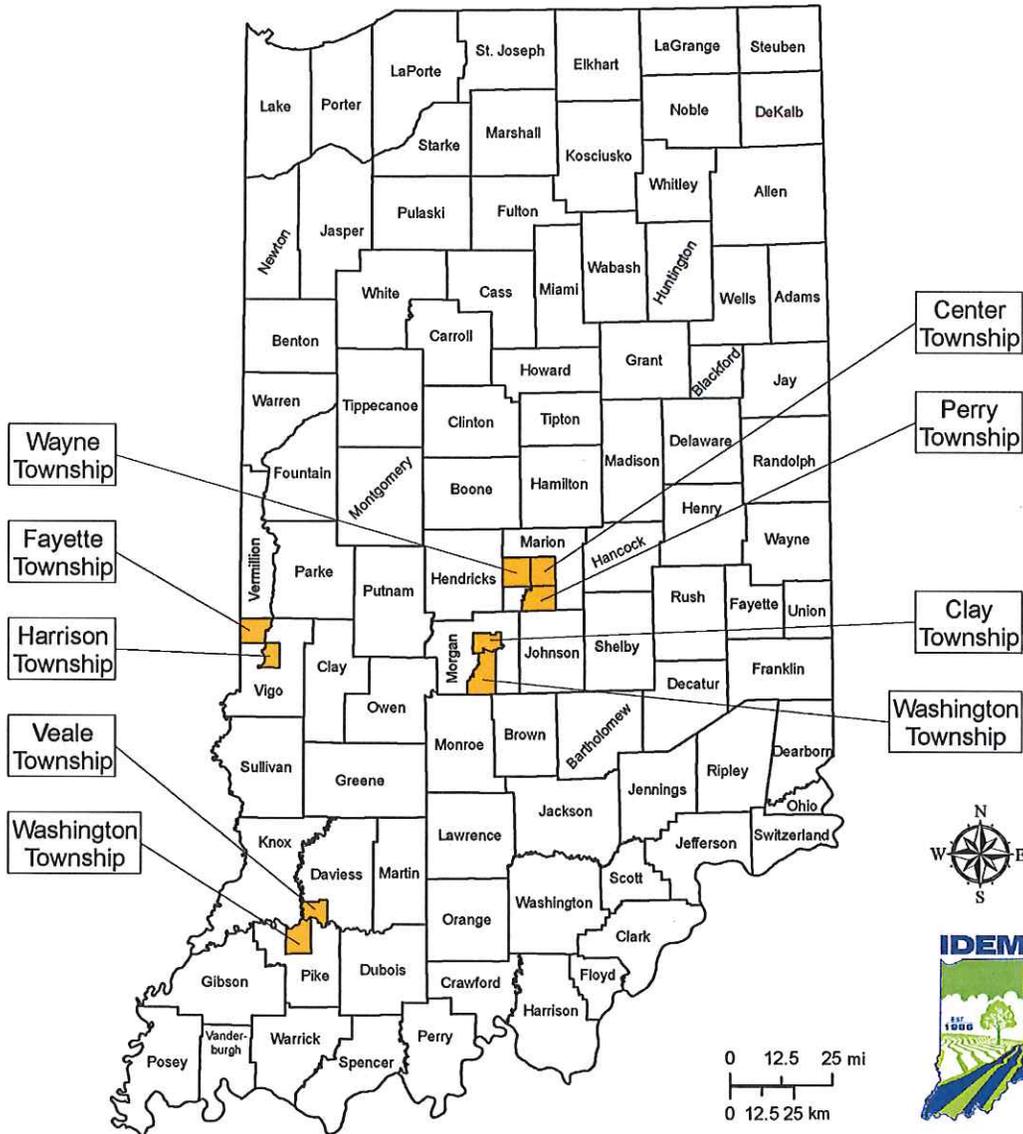
Indiana

Parts per billion

SITE ID	POC	PQAO	CITY	COUNTY	ADDRESS	YEAR	METH	OBS	COMP QTRS	1ST MAX 1-HR	2ND MAX 1-HR	99TH PCTL 1-HR	1ST MAX 24-HR	2ND MAX 24-HR	Days >24HR STD	ARITH MEAN AN-STD	CERT	EDT
18-177-0006	1	0909	Richmond	Wayne	School Kitchen 1321 South 9th Street	2010	039	8190	4	133.2	111.1	95.2	25.5	21.8	0	2.80		0
18-177-0006	1	0909	Richmond	Wayne	School Kitchen 1321 South 9th Street	2011	039	8543	4	93.7	83.7	79.1	30.4	26.5	0	2.54		0
18-177-0006	1	0909	Richmond	Wayne	School Kitchen 1321 South 9th Street	2012	039	8543	4	68.8	30.7	22.4	10.8	8.2	0	3.08	M	0

**Enclosure 2:  
Map of State Proposed SO<sub>2</sub> Nonattainment Recommendations**

**Indiana SO<sub>2</sub> Boundary Recommendations  
as of March 19, 2013**



This map is intended to serve as an aid in graphic representation only. This information is not warranted for accuracy or other purposes.

Date: 03/19/2013  
 Mapped By: C. Mitchell, OAQ  
 Sources: Office of Air Quality  
 Map Projection: UTM Zone 16 N  
 Map Datum: NAD83

**Legend**

- Proposed Nonattainment Area
- Attainment/Unclassifiable Area