



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

Michael R. Pence
Governor

Carol S. Comer
Commissioner

January 7, 2016

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

Re: Indiana Sources Subject to Air Quality
Characterization under Round 3
Designations for the 2010 Primary 1-Hour
Sulfur Dioxide National Ambient Air Quality
Standard

Dear Ms. Hedman:

This letter is in response to United States Environmental Protection Agency's (U.S. EPA's) Data Requirements Rule (DRR) that was finalized on August 10, 2015 (80 FR 51052). The DRR was created in order to further implement the 2010 primary 1-hour SO₂ National Ambient Air Quality Standard (NAAQS). Implementation of the 2010 SO₂ NAAQS was initiated in 2013 when U.S. EPA established nonattainment areas based on monitoring data above the 2010 SO₂ standard (Round 1 Designations). Subsequently, in 2015, U.S. EPA entered into a consent decree with the Sierra Club and Natural Resources Defense Council (NRDC) to characterize SO₂ air quality, and establish attainment/nonattainment designations, in the vicinity of specific high-emitters of SO₂ (Round 2 Designations). Commonly referred to as "Round 3 Designations", the DRR is the next step in implementing the 2010 SO₂ NAAQS by establishing minimum criteria for identifying the emission sources and associated areas for which each state air agency is required to characterize SO₂ air in order to support designations under Round 3.

By January 15, 2016, the DRR requires each air agency to submit a list to U.S. EPA that identifies all sources within its jurisdiction around which SO₂ air quality must be characterized. This characterization will be performed for sources that exceeded 2,000 tons of SO₂ emissions per year (tpy) during the most recent year for which emissions data for the applicable sources are available. In addition, SO₂ characterization must be performed for areas identified by the air agency or by U.S. EPA as also warranting air quality characterization (ex. clusters of sources where no single source emits greater than 2,000 tpy of SO₂). This is considered a permanent list of sources that excludes sources in areas designated as nonattainment before January 2016 and shall not be altered by designations after January 2016.

Based on annual SO₂ emissions data for the year 2014, IDEM identified the following eleven facilities in Indiana as being subject to air quality characterization in conjunction with the Round 3 designation process for the 2010 primary 1-hour SO₂ standard:

**Table 1:
Indiana SO₂ Sources Subject to Air Quality Characterization
for the Round 3 Designation Process**

County	Facility Name	2014 SO ₂ Emissions (tons)
Floyd	Gallagher Generating Station	3,524
Jasper	Schahfer Generating Station	8,412
Lake	Coke Energy LLC	4,952
Lake	U.S. Steel – Gary Works	3,285
Lake	Arcelormittal USA	2,163
Porter	Arcelormittal Burns Harbor LLC	12,189
Posey	SABIC Innovative Plastics	4,030
Sullivan	Merom Generating Station	3,318
Vermillion	Cayuga Generating Station	3,448
Warrick	ALCOA – Warrick Power Plant	4,993
Warrick	ALCOA – Warrick Operations	3,500

Note that this table represents those sources around which SO₂ air quality will be characterized. Additional sources of SO₂ emissions in close proximity to the listed source will be included in the characterization.

Two additional sources were initially identified as being subject to the DRR: ESSROC Cement Corporation (ESSROC) in Cass County and Tate & Lyle Ingredients Americas LLC – South Plant (Tate & Lyle – South) in Tippecanoe County. Each source initially reported 2014 SO₂ emissions greater than the DRR threshold of 2,000 tpy. Further analysis showed that annual SO₂ emissions for ESSROC for the year 2014 and Tate & Lyle – South for the years 2010 – 2014 were calculated incorrectly. ESSROC recalculated 2014 SO₂ emissions to account for revisions made to emission calculations for Kilns 1 and 2. Tate & Lyle recalculated 2010 – 2014 SO₂ emissions to account for SO₂ control of emissions not previously taken into account. Table 2 shows that recalculated 2014 and historical SO₂ emissions for ESSROC and recalculated 2010 – 2014 SO₂ emissions for Tate & Lyle – South are well below 2,000 tpy and, therefore, are not subject to air quality characterization under the DRR. Correspondence from ESSROC and Tate & Lyle – South explaining the reasons for recalculating these emissions, as well as revised annual emission statements and Air Emission Statement Certifications for these years are enclosed with this letter (Enclosures 1 and 2).

**Table 2:
ESSROC and Tate & Lyle Annual SO₂ Emissions (tons)**

County	Facility Name	2010	2011	2012	2013	2014
Cass	ESSROC	677	635	602	743	270
Tippecanoe	Tate & Lyle - South	1,351	1,370	1,309	1,323	1,612

By July 1, 2016, each air agency is required to notify U.S. EPA, for each source-area identified on its list, the approach (ambient monitoring or air quality modeling) it will use to characterize air quality. In lieu of characterizing areas around listed sources, air agencies may indicate by July 1, 2016, that they will adopt permanent and enforceable emission limitations that will limit those source(s) emissions below the DRR 2,000 tpy threshold. These limits must be adopted and effective by January 13, 2017. A modeling protocol must be provided to U.S. EPA by July 1, 2016, for source-areas in which modeling will be used to characterize air quality. The modeling analysis must be submitted to U.S. EPA by January 13, 2017. If ambient monitoring is chosen for source-areas to characterize air quality, relevant information concerning monitoring sites must be submitted to U.S. EPA by July 1, 2016, to ensure ambient monitors are operational by January 1, 2017.

An electronic version of this letter, in PDF format, has been transmitted to Doug Aburano of U.S. EPA Region 5. IDEM looks forward to continued coordination with Region 5 staff as the Round 3 designation process moves forward.

I would like to thank you for this opportunity to provide feedback to U.S. EPA regarding Round 3 air quality designations for the 2010 primary 1-hour SO₂ NAAQS. We look forward to working with your staff as U.S. EPA moves forward with the designation process.

If you have any questions regarding Indiana's list of identified sources subject to air quality characterization for the Round 3 designation process for the 2010 primary 1-hour SO₂ standard, please feel free to contact me at (317) 232-8611 or by email at ccomer@idem.IN.gov or Keith Baugues, Assistant Commissioner, Office of Air Quality, at (317) 232-8222 or by e-mail at kbaugues@idem.IN.gov.

Sincerely,



Carol S. Comer
Commissioner

Ms. Susan Hedman
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CSC/kb/sd/bc/gf
Attachments

cc: George Czerniak, U.S. EPA Region 5
Chris Panos, U.S. EPA Region 5
John Summerhays, U.S. EPA Region 5
Doug Aburano, U.S. EPA Region 5
Keith Baugues, IDEM-OAQ
Scott Deloney, IDEM-OAQ
Brian Callahan, IDEM-OAQ
Mark Derf, IDEM-OAQ
Gale Ferris, IDEM-OAQ
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