



Indiana Department of Environmental Management

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Michael R. Pence
Governor

Carol S. Comer
Commissioner

August 19, 2016

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

Re: Revised Request for Redesignation and
Maintenance Plan for Indiana's Portion
(Lawrenceburg Township, Dearborn County) of
the Cincinnati-Hamilton, OH-KY-IN, 1997
Annual PM_{2.5} Nonattainment Area

Dear Mr. Kaplan:

The Indiana Department of Environmental Management (IDEM) submits a Revised Redesignation Petition and Maintenance Plan for Indiana's portion (Lawrenceburg Township, Dearborn County) of the Cincinnati-Hamilton, Ohio-Kentucky-Indiana (OH-KY-IN), Nonattainment Area in reference to the 1997 annual fine particle (PM_{2.5}) National Ambient Air Quality Standard (NAAQS), attached hereto. IDEM provided opportunity for a public hearing concerning this Redesignation Petition and Maintenance Plan on August 10, 2016. There were not any requests for a hearing to be held, therefore it was canceled. The public comment period began on June 29, 2016, and concluded on August 15, 2016.

This submittal documents the public review process, including a detailed summary of and response to substantive comments.

The attached document consists of the following:

Redesignation Petition and Maintenance Plan

- A formal request that Indiana's portion of the Cincinnati-Hamilton, OH-KY-IN, Nonattainment Area for the 1997 Annual PM_{2.5} standard be redesignated to "attainment" and reclassified as "maintenance". It contains and meets the requirements set forth in Section 107 of the Clean Air Act (CAA) and in United States Environmental Protection Agency's (U.S. EPA's) Redesignation Guidance.
- Monitoring values through 2015.

- A projected-year of 2020 is established for ammonia (NH₃) and volatile organic compounds (VOCs) projections. It is representative of the previous nitrogen oxides (NO_x), sulfur dioxides (SO₂), and direct PM_{2.5} projected year of 2021 and is reasonably applicable out to 2026.
- The appendices of the document contain historical air quality trend data for NO_x, SO₂, and direct PM_{2.5} from Indiana's January 25, 2011 redesignation petition and maintenance plan submittal (Appendix B, C, and D) as well as a Regulatory Impact Analysis (RIA) projected emissions inventory for NH₃ and VOCs (Appendix E).

IDEM submitted a final Redesignation Petition and Maintenance Plan for Lawrenceburg Township, Dearborn County, Indiana, to U.S. EPA for review and approval on January 25, 2011, and was classified as maintenance under the 1997 annual fine particle standard on December 23, 2011 (76 FR 80253). On March 18, 2015, the federal Sixth Circuit Court of Appeals' vacated U.S. EPA's conclusion that the Cincinnati-Hamilton metropolitan area had attained the 1997 annual PM_{2.5} standard.

On February 11, 2016, in response to the court's decision, IDEM submitted supporting information, pursuant to Section 172(c)(1) of the Clean Air Act (CAA), regarding reasonably available control measures (RACMs) and reasonably available control technology (RACT) in Indiana's portion of the nonattainment area. Section 172(c)(1) of the CAA requires a demonstration that the State has adopted all reasonable and available control measures to demonstrate attainment as expeditiously as practicable. IDEM determined that there are not any additional reasonably available measures that will, or would have, advanced the attainment date.

The American Electric Power (AEP) – Tanners Creek Generating Station was the primary source of PM_{2.5} precursor emissions within Indiana's portion of the nonattainment area. As the result of a settlement with U.S. EPA to resolve violations of the CAA's new source review (NSR) requirements, AEP permanently retired its Tanners Creek Generating Station located in Lawrenceburg Township, Dearborn County (i.e. all four coal-fired electric generating units) on June 1, 2015. As a result of the closure of this facility, direct PM_{2.5} and fine particle precursor emissions in Dearborn County, Indiana, have decreased significantly further improving air quality in the Cincinnati-Hamilton, OH-KY-IN, nonattainment area, above and beyond what Indiana demonstrated as necessary to support ongoing attainment of the area.

The revised redesignation petition and maintenance plan supports Indiana's February 11, 2016, request for U.S. EPA to act on the RACM/RACT portion of the Annual PM_{2.5} Attainment Demonstration and Technical Support Document for the Indiana Portion of the Cincinnati-Hamilton, OH-KY-IN, Fine Particle Nonattainment Area, Dearborn County (Lawrenceburg Township), Indiana submitted to U.S. EPA on July 3, 2008.

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IDEM believes that this revised Redesignation Petition and Maintenance Plan for Indiana's Portion (Lawrenceburg Township, Dearborn County) of the Cincinnati-Hamilton OH-KY-IN, 1997 Annual PM_{2.5} Nonattainment Area, the RACM/RACT Determination submitted to U.S. EPA on February 11, 2016, the Redesignation Petition and Maintenance Plan for Lawrenceburg Township submitted to U.S. EPA on January 25, 2011, and the Attainment Demonstration and Technical Support Document submitted to U.S. EPA on July 3, 2008, meet the requirements for redesignation under Section 107(d)(3) of the CAA and U.S. EPA guidance.

This submittal consists of one (1) hard copy 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. EPA Region 5.

IDEM requests that U.S. EPA proceed with review and approval of this submittal contingent upon approval of the February 11, 2016, RACM/RACT determination for Lawrenceburg Township, Dearborn County, Indiana. If you have any questions or need additional information, please contact Brian Callahan, Section Chief, Air Quality Standards and Implementation, Office of Air Quality, IDEM, at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,



Keith Baugues
Assistant Commissioner
Office of Air Quality
Indiana Department of Environmental
Management

KB/sd/bc/gf/lf

Enclosure: Revised Redesignation Petition and Maintenance Plan for Indiana's Portion (Lawrenceburg Township, Dearborn County) of the Cincinnati-Hamilton OH-KY-IN, 1997 Annual PM_{2.5} Nonattainment Area

cc: Doug Aburano U.S. EPA Region 5 (no enclosure)
Chris Panos, U.S. EPA Region 5 (no enclosure)
John Mooney, U.S. EPA Region 5 (no enclosure)
John Summerhays, U.S. EPA Region 5 (no enclosure)
Keith Baugues, IDEM-OAQ (no enclosure)
Scott Deloney, IDEM-OAQ (no enclosure)
Brian Callahan, IDEM-OAQ (no enclosure)
Leslie Ferguson, IDEM-OAQ (w/ enclosure)
File Copy

