



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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September 29, 2008

Ms. Lynn Buhl
Regional Administrator
U.S. EPA, Region 5
77 West Jackson Blvd. R-19J
Chicago, IL 60604-3590

Re: Regional Haze State Implementation Plan
Submittal for Indiana

Dear Ms. Buhl,

This letter serves as Indiana's submittal to meet requirements of 40 CFR 51.308(b) regarding implementation plans to address Regional Haze. The Indiana Department of Environmental Management (IDEM) has prepared a draft Regional Haze State Implementation Plan (SIP) for the State of Indiana which is attached.

IDEM has worked closely with the Midwest Regional Planning Organization (MRPO), other regional planning organizations, Federal Land Managers (FLMs), United States Environmental Protection Agency (U.S. EPA), and other states to address the requirements of the Regional Haze rule. In this letter, IDEM will describe Indiana's current status on this project, including Best Available Retrofit Technology (BART), and the schedule for completing the remaining work.

At this time, IDEM has completed the following tasks related to the Regional Haze SIP project:

- Identification of BART-eligible units
- Modeling to determine sources subject to BART
- Developed and adopted BART rule, effective on February 22, 2008
- Initiated discussions with sources subject to BART for submittal of BART analysis to IDEM (due November 2008)
- Four of the five sources that IDEM determined to be subject to BART have submitted analyses indicating they are not subject to BART; IDEM is reviewing these analyses
- Participated in discussions and coordinated work with the MRPO on regional efforts and on visibility impacts on MRPO Class I areas
- Provided updated emission inventories and modeling for Indiana sources

- Consulted with the following other regional planning organizations and states:
 - Central Regional Air Planning Association (CENRAP) (complete),
 - Visibility Improvement State and Tribal Association of the Southeast (VISTAS) (complete),
 - Mid-Atlantic/Northeast Visibility Union (MANE-VU) (on-going)
 - Michigan and Minnesota (Complete)
- Determined that the Clean Air Interstate Rule (CAIR) satisfies BART requirements for NO_x and SO₂ for electric generating units that participate in CAIR
- Compiled information on Indiana's Prescribed Burning Guidance

Indiana's CAIR rule was effective February 25, 2007. However, with the vacatur of CAIR, the status of these units with regard to BART is uncertain. It is unclear at this time whether the vacatur will stand or what may happen at the Federal level, but IDEM is evaluating various alternatives to resolve this issue. The following schedule may be revised if it is necessary to address BART for EGUs for NO_x and SO₂.

IDEM plans to complete the remaining tasks described below and anticipates completion by the dates given:

- August 2008 Send draft SIP to Federal Land Managers for their mandatory 60-day comment period
- September 2008 Initiate 30-day public comment period
- October 2008 Hold public hearing on SIP, incorporating responses to FLM comments
- November 2008 BART analyses due from sources
- October 2009 IDEM BART determinations complete
- April 2011 BART rulemaking complete establishing permanent, enforceable limits to be operational by February 2013

In addition, IDEM is committed to continue working with other regions and states on improving visibility in Class I areas, including the following:

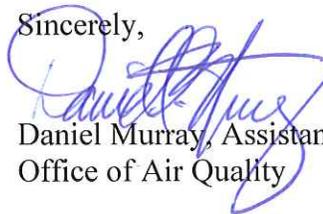
- Address any comments from the FLMs and public concerning Indiana's draft Regional Haze SIP
- Submit a SIP report 5 years from the initial SIP submittal to update and review the status of impacts to visibility in Class I areas
- Implement permanent, enforceable emission limits and associated requirements within 5 years of the effective date of Indiana's BART rule for affected sources (February 2013)
- If needed, implement permanent, enforceable emission limits and associated requirements for other Indiana sources that are demonstrated to be causing a significant impact on visibility in a Class I area within 5 years of approval of the Regional Haze SIP
- Submit a Regional Haze SIP revision by July 31, 2018

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Indiana's draft Regional Haze SIP includes information on much of the work mentioned in this letter. IDEM will continue to work with U.S. EPA and all other affected agencies, states, and organizations to complete Indiana's Regional Haze SIP in accordance with the schedule outlined above.

If you have any questions regarding this submittal, please contact Ken Ritter, Chief, Technical Support and Modeling Section, Office of Air Quality at 317-233-5682.

Sincerely,



Daniel Murray, Assistant Commissioner
Office of Air Quality

DM/knr
Attachments

cc: John Mooney, U.S. EPA Region 5 (no enclosure)
John Summerhays, U.S. EPA Region 5 (w/enclosures)
Chuck Sams, U. S. Forest Service, Eastern Region (w/enclosures)
Tim Allen, U.S. Fish & Wildlife Service (w/enclosures)
Bruce Polkowsky, National Park Service (w/enclosures)
Ken Ritter, IDEM