



Indiana Department of Environmental Management

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June 30, 2016

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

Re: Rounds 3 and 4 Designations for the
2010 Primary 1-Hour Sulfur Dioxide
National Ambient Air Quality Standard and
Air Quality Characterization Under the
Data Requirements Rule

Dear Mr. Kaplan:

This letter is in response to United States Environmental Protection Agency's (U.S. EPA's) *Data Requirements Rule (DRR) for the 2010 1-hour Sulfur Dioxide (SO₂) Primary National Ambient Air Quality Standard (NAAQS)*, which was published in the *Federal Register* on August 21, 2015 (80 FR 51052). The DRR was created in order to further implement the 2010 primary 1-hour SO₂ NAAQS.

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.

Round 2 designations addressed two groups of areas: areas with newly monitored violations based on the most recent three calendar years of certified monitored ambient air quality data; and previously undesignated areas that contain any stationary source not announced for retirement as of March 2, 2015 that according to U.S. EPA's Air Markets Database emitted in 2012 (a) more than 16,000 tons of SO₂ or (b) more than 2,600 tons of SO₂ and had an average emission rate of at least 0.45 lbs of SO₂/mmBtu. Round 3 designations address previously undesignated areas not addressed in Round 2 where modeling will be used to characterize air quality as well as other areas without ambient air monitors. Round 4 designations address all remaining areas of the country where ambient air monitors will be used to characterize air quality.

Schedules are in place for states to provide U.S. EPA with information for each round of designations. The final DRR contains requirements for the characterization of air quality near sources with SO₂ emissions at or greater than 2,000 tons per year (tpy) and guidance for Rounds 3 and 4 designations.

On September 16, 2015, Indiana provided initial recommendations for the two groups of areas being addressed in Round 2. Attainment was recommended for all monitored areas based on 2012-2014 ambient air monitoring data showing that no new areas of Indiana monitored concentrations above the standard. Attainment was also recommended for areas around five sources identified by U.S. EPA as meeting Round 2 criteria. These sources are referred to as "consent decree sources" and include Gibson Generating Station in Gibson County, Clifty Creek Generating Station in Jefferson County, Michigan City Generating Station in LaPorte County, A.B. Brown Generating Station in Posey County, and Rockport Generating Station in Spencer County.

On January 7, 2016, Indiana submitted to U.S. EPA a list of 11 stationary sources for air quality characterization under the DRR thus beginning the Round 3 designation process. Air dispersion modeling and ambient air monitoring are both considered appropriate ways to assess local SO₂ concentrations and the DRR gives states flexibility to select the approach for each listed source. The DRR also provides states with a third option of establishing a permanent and federally enforceable limit for emissions from a listed source to below 2,000 tpy resulting in the source not being subject to requirements for air quality characterization. In addition to sources with emissions above the 2,000 tpy threshold, the state air agency and/or U.S. EPA may also require air quality characterization around a source or sources with emissions below 2,000 tpy if it is believed that the source(s) may be contributing to a violation of the NAAQS. The list is a permanent list of prioritized sources that excludes sources in areas designated as nonattainment before January 2016 and shall not be altered by designations after January 2016.

On March 25, 2016, U.S. EPA identified six additional sources as being subject to the DRR. Five of these sources are consent decree sources previously addressed during Round 2 designations. U.S. EPA also listed Isolatek (U.S. Minerals) in Huntington County. U.S. EPA added this source based on stack testing and production data obtained by the agency's Office of Air Enforcement and Compliance Assurance and preliminary modeling, conducted by U.S. EPA, indicating a need for further characterization.

It should be noted that Indiana and U.S. EPA have been working closely together to complete assessments for the five consent decree sources and U.S. EPA's final Round 2 designations for the source areas should be issued by July 2, 2016. In a February 16, 2016, letter to the Indiana Department of Environmental Management (IDEM) concerning Indiana's initial Round 2 recommendations, U.S. EPA stated its intention to designate Gibson County, LaPorte County and Ohio Township in Spencer County as attainment/unclassifiable. U.S. EPA also noted that emission limits for Clifty Creek Generating Station and A.B. Brown Generating Station must be made permanent and federally enforceable to support a designation of attainment/unclassifiable for the

relevant portions of Jefferson and Posey counties. IDEM issued Commissioner's Orders for A.B. Brown Generating Station on January 11, 2016, and Clifty Creek Generating Station on February 1, 2016, making the emission limits for both sources permanent and enforceable. On May 6, 2016, U.S. EPA finalized approval of revisions to Indiana's State Implementation Plan (81 FR 27330) making federally enforceable the emission limits in the Commissioner's Orders for both sources.

By July 1, 2016, states must inform U.S. EPA which of the three approaches are selected for characterizing air quality around the sources that are subject to the DRR: 1) conducting new modeling to characterize the ambient air quality in the area of the source; 2) conducting ambient monitoring to characterize ambient air quality in the area of the source; or 3) providing federally enforceable and permanent emission limits of less than 2,000 tpy or documentation of a permanent shut down for the source.

Table 1 provides a complete list of sources identified as being subject to the DRR and Indiana's selected approach for characterizing air quality in the vicinity of the source.

- Air dispersion modeling is selected for 11 sources. Indiana is following guidance in U.S. EPA's SO₂ NAAQS Designations Modeling Technical Assistance Document (TAD) for model selection, receptor grid and modeling domain, meteorological data, background concentrations, emission sources, and analysis. U.S. EPA granted Indiana approval to process meteorological data with the latest version of the AERMOD meteorological data preprocessor program AERMET (version15181). IDEM may request U.S. EPA's approval at a later date to use the adjusted U* Beta option for certain sources to address underprediction of the surface friction velocities that could lead to overprediction of ambient air impacts of SO₂.
- Ambient air monitoring is selected for one source: the ArcelorMittal – Burns Harbor facility in Northwest Indiana. Indiana is following guidance in U.S. EPA's SO₂ NAAQS Source-Oriented Monitoring TAD as well as U.S. EPA's SO₂ NAAQS Designations Modeling TAD for model selection, receptor grid and modeling domain, meteorological data, background concentrations, emission sources, and analysis to assist with the selection of the number and location of monitoring sites to characterize air quality surrounding ArcelorMittal – Burns Harbor.
- Selected approaches are not indicated for the five consent decree sources addressed in the Round 2 process because U.S. EPA's final designations for these sources will be issued by July 2, 2016.

Table 1: Indiana SO₂ Sources Subject to the Data Requirements Rule

Facility	County	2014 SO ₂ Emissions (Tons)	Selected Approach
Duke – Gallagher	Floyd	3,524	Modeling
Duke – Gibson	Gibson	22,055	Consent decree source ^a
Isolatek (U.S. Minerals)	Huntington	< 2,000 ^b	Modeling
NIPSCO – R.M. Schahfer	Jasper	8,412	Modeling
Indiana-Kentucky Electric Corporation - Clifty Creek	Jefferson	3,731	Consent decree source ^a
ArcelorMittal – Indiana Harbor	Lake	2,163	Modeling
Coke Energy	Lake	4,952	Modeling
U.S. Steel – Gary Works	Lake	3,285	Modeling
NIPSCO – Michigan City	LaPorte	15,991	Consent decree source ^a
ArcelorMittal – Burns Harbor	Porter	12,189	Monitoring
SABIC Innovative Plastics	Posey	4,030	Modeling
Vectren – A.B. Brown	Posey	8,080	Consent decree source ^a
AEP – Rockport	Spencer	54,979	Consent decree source ^a
Hoosier Energy – Merom	Sullivan	3,318	Modeling
Duke – Cayuga	Vermillion	3,448	Modeling
Alcoa – Warrick Power Plant	Warrick	4,993	Modeling
Alcoa – Warrick Operations	Warrick	3,500	Modeling

^a IDEM has completed a characterization for this source under Round 2 designation requirements. Designation by U.S. EPA is pending (81 FR 27330).

^b Added by U.S. EPA.

States must include with their notification appropriate modeling protocols and plans for new ambient air monitoring. Information provided with this letter includes modeling protocols for DRR sources that remain to be characterized under Round 3 designation requirements, details about ambient monitoring planned around one source, ArcelorMittal—Burns Harbor, for designations under Round 4, and proposed changes to Indiana’s 2017 ambient monitoring network for the characterization of air quality under the requirements of the DRR. The following documents are enclosed:

- Enclosure 1 – Indiana’s Air Quality Modeling Protocol – Data Requirements Rule for the 2010 1-hour Sulfur Dioxide Primary NAAQS
- Enclosure 2 – ArcelorMittal – Burns Harbor Modeling Protocol to Support Monitoring Approach for the Data Requirements Rule
- Enclosure 3 – Appendix C SO₂ DRR – Data Requirements Rule from the Proposed Indiana 2017 Ambient Air Monitoring Network Plan¹.

By January 1, 2017, each state air agency must ensure that new ambient air monitors are operational where air monitoring is selected to inform Round 4 designations. By January 13, 2017, each state air agency must provide to U.S. EPA its modeling analysis for source-areas where modeling is used to determine Round 3 designations. Where permanent and enforceable emission limitations are selected to

¹ The Proposed Indiana 2017 Ambient Air Monitoring Network Plan is available in its entirety at http://www.in.gov/idem/airquality/files/monitoring_network_review_2017.pdf

limit source(s) emissions below the DRR 2,000 tpy threshold, states must ensure the limits are adopted and effective by January 13, 2017.

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.

Thank you for this opportunity to submit Indiana's modeling and monitoring protocols for Rounds 3 and 4 air quality designations for the 2010 primary 1-hour SO₂ NAAQS. If you have any questions or need additional information, please contact Brian Callahan, Chief, Air Quality Standards and Implementation Section, Office of Air Quality, at (317) 232-8244 or bcallaha@idem.IN.gov.

Sincerely,



Keith Baugues
Assistant Commissioner
Office of Air Quality

KB/sd/bc/gf/as
Enclosures

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John Summerhays, U.S. EPA Region 5 (no enclosures)
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Enclosure 1

Indiana's Air Quality Modeling Protocol - Data Requirements Rule for the 2010 Primary 1-Hour Sulfur Dioxide Addressing the National Ambient Air Quality Standard (NAAQS)

June 2016

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Indiana’s Air Quality Modeling Protocol - Data Requirements Rule for the 2010 Primary 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

1.0 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

The United States Environmental Protection Agency (U.S. EPA) established the 1-hour primary sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) of 75 parts per billion (ppb), based on the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations, as stated in the Federal Register Volume 75, Number 119, page 35520, published June 22, 2010. For air quality modeling purposes, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) will use an equivalent 1-hour SO₂ NAAQS of 196.2 micrograms per cubic meter (µg/m³) as stated in the November 7, 2011, Federal Register, Volume 76, Number 215. This is based on the 5-year average of the annual 99th percentile of the 1-hour daily maximum modeled SO₂ concentrations, representing the fourth high of the 1-hour daily maximum SO₂ modeled concentrations.

Implementation of the standard began in 2013, when U.S. EPA made initial designations based on monitoring data. Subsequently, on March 2, 2015, U.S. EPA entered into a consent decree with the Sierra Club and the Natural Resources Defense Council concerning designations for other areas. Under the court order, U.S. EPA must complete the designations on a schedule that contains four specific rounds with specific deadlines. Each round of designations directly affects each state; the following areas must be addressed.

- 1) Areas that have current monitored design values in violation of the 2010 1-hour SO₂ NAAQS of 75 ppb;
- 2) As addressed in the “Round 2” Sierra Club and Natural Resources Defense Council consent decree: areas that contain sources that, according to U.S. EPA’s Air Markets Database, either emitted more the 16,000 tons of SO₂ in 2012 or had emissions more than 2,600 tons of SO₂ and an emission rate of at least 0.45 lbs SO₂/MMBtu (pounds per one million British thermal units) in 2012;
- 3) Areas addressed under the Data Requirements Rule (DRR), which set an emissions threshold limit of 2,000 tons of SO₂ per year in 2014. Sources meeting this emission threshold will need to characterize air quality in the areas surrounding the source.
 - a.) The court’s order directs U.S. EPA to complete area designations for the areas where states have not installed and begun operating a new SO₂ monitoring network under “Round 3” of the DRR by December, 2017.
 - b.) The court’s order directs U.S. EPA to designate all remaining areas of the country under “Round 4” of the DRR by December, 2020.

2.0 Data Requirements Rule

This air quality modeling protocol will address requirements specific to the Data Requirements Rule (DRR) (Federal Register Vol. 80, No. 162, published August 21, 2015). Indiana identified eleven sources within the state that met the criteria established in the DRR of emitting 2,000 tons or more of SO₂ in 2014. This submittal was sent to U.S. EPA – Region V on January 7, 2016. On March 25, 2016, U.S. EPA subsequently identified six additional sources meeting the criteria for air quality characterizations under the DRR. Five of these sources are “consent decree” sources, which were modeled and analyzed as part of Round 2 designations. These sources have been listed since their 2014 SO₂ emissions exceeded the DRR threshold of greater than 2,000 tons per year. Information required for the designation of the areas around these consent decree sources has been previously submitted to U.S. EPA for review/consideration. Those DRR sources, the counties in which they reside and their 2014 SO₂ emissions are listed in Table 1:

Table 1: Indiana Sources Subject to the Data Requirements Rule

Facility	County	2014 SO₂ Emissions (tons)
Duke – Gallagher	Floyd	3,524
Duke - Gibson	Gibson	Air Markets Database source ^a
Isolatek (U.S. Minerals)	Huntington	< 2,000 ^b
NIPSCO – R.M. Schahfer	Jasper	8,412
Indiana-Kentucky Electric Corporation—Clifty Creek Generating Station	Jefferson	Air Markets Database source ^a
ArcelorMittal – Indiana Harbor	Lake	2,163
Coke Energy	Lake	4,952
US Steel – Gary Works	Lake	3,285
NIPSCO - Michigan City	LaPorte	Air Markets Database source ^a
ArcelorMittal - Burns Harbor	Porter	12,189
SABIC Innovative Plastics	Posey	4,030 ^c
Vectren—A.B. Brown Generating Station	Posey	Air Markets Database source ^a
AEP - Rockport	Spencer	Air Markets Database source ^a
Hoosier Energy – Merom	Sullivan	3,318
Duke – Cayuga	Vermillion	3,448
Alcoa – Warrick Power Plant	Warrick	4,993
Alcoa – Warrick Operations	Warrick	3,500 ^d

^a IDEM completed a characterization for this source under Round 2 designation requirements

^b U.S. EPA added Isolatek to the list of Indiana sources subject to DRR on March 25, 2016

^c SABIC is undergoing plant changes which will reduce their SO₂ emissions by January 13, 2017

^d Alcoa – Warrick Operations shut down its smelter operations on March 31, 2016, reducing SO₂ emissions to < 1 ton

As per the requirements of the DRR, air agencies are required to indicate whether they will rely on 1) air quality modeling, 2) ambient monitoring or 3) establishing a limit of a source's total SO₂ emissions to below 2,000 tons per year, to characterize air quality in the area surrounding the DRR sources. Indiana has reviewed SO₂ modeled impacts from each source identified by the state and U.S. EPA as subject to the DRR and determined that eleven sources will conduct air dispersion modeling to characterize air quality in each area; one source, ArcelorMittal – Burns Harbor, has opted to rely on ambient monitoring to characterize air quality in the area.

U.S. EPA has established deadlines for each step of the 1-hour SO₂ designation process in the DRR. Indiana met the first deadline by submitting its list of DRR sources on January 7, 2016.

- **January 15, 2016** - States were required to submit their list of SO₂ sources for characterizing air quality under the DRR to U.S. EPA.
- **July 1, 2016** – States are required to submit modeling protocols for sources characterizing air quality in the area with air dispersion modeling.
- **July 1, 2016** – Annual Monitoring Network Plans due to U.S. EPA and should include SO₂ monitoring network modifications intended to satisfy the DRR.
- **January 1, 2017** – SO₂ monitors intended to satisfy the DRR are required to be operational.
- **January 13, 2017** – States electing to characterize air quality by air dispersion modeling are required to provide modeling analyses to U.S. EPA.
- **January 13, 2017** – Federally enforceable and permanent emission limits to keep source emissions below 2,000 tons of SO₂ must be adopted and effective by this date.
- **August 2017** – Expected date by which U.S. EPA would notify states of intended designations.
- **December 2017** – Intended date by which U.S. EPA would issue final designations for the majority of the country.
- **August 2019** – Anticipated due date for state attainment plans for areas designated as nonattainment in 2017.
- **May 2020** – Required certification of 2019 monitoring data; states have the opportunity to provide updated state recommendations to U.S. EPA.
- **August 2020** – Expected date by which U.S. EPA would notify states of intended designations for remainder of the country not yet designated.
- **December 2020** – Intended date by which the U.S. EPA would issue final designations for the remainder of the country.
- **August 2022** – Anticipated due date for state attainment plans for areas designated nonattainment in 2020.

3.0 Methodology for the DRR Air Quality Modeling

The modeling methodology will resemble modeling used to evaluate New Source Review (NSR) and Prevention of Significant Deterioration (PSD) sources. However, U.S. EPA provided further guidance in order to conduct an appropriate air dispersion modeling analysis to support 1-hour SO₂ designation recommendations. U.S. EPA's SO₂ NAAQS Designations Modeling Technical Assistance Document (TAD) guidance has several recommendations for modeling methodology for determining attainment designations, including:

- 1) Use of actual emissions to assess modeled concentrations to reflect current air quality.
- 2) Use of 3 years of modeling results to calculate a simulated 1-hour SO₂ design value consistent with the 3-year monitoring period to develop 1-hour SO₂ design values.
- 3) Placement of receptors only in locations where an air quality monitor could be placed.
 - Based on the SO₂ NAAQS Designations Modeling TAD, Section 4.2; Indiana will only place modeling receptors where feasible to place a monitor. Therefore, in bodies of water or an area where monitor citing criteria would not be reasonably met, Indiana will not place receptors in those locations.
 - Indiana will match up the modeling domain with Google maps projections to ensure the proximity of the receptors to shorelines and provide details for each modeling analysis in the technical support document.
- 4) Use of actual stack heights rather than relying on Good Engineering Practice (GEP) stack heights when modeling actual emissions.

Indiana will follow U.S. EPA's designation modeling recommendations to conduct the 1-hour SO₂ designation modeling to determine whether there are modeled violations of the 1-hour SO₂ NAAQS. Modeling results will look at the 4th high maximum daily 1-hour SO₂ concentrations averaged over the 3-year modeled period with representative temporally varying seasonal SO₂ background concentrations included within the AERMOD modeling run to determine the attainment status of the area where the emission source resides.

4.0 Model Selection

4.1 AERMOD Dispersion Model

In accordance with Appendix A of Appendix W to 40 Code of Federal Regulations (CFR) Part 51, Indiana will use the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) version 15181 for all dispersion modeling of the SO₂ emission sources mentioned in the DRR, and located in Floyd, Huntington, Jasper, Lake, Porter, Posey,

Sullivan, Vermillion and Warrick counties. U.S. EPA's SO₂ NAAQS Designations Modeling TAD, specific to the attainment designation modeling, recommends using actual stack heights when modeling actual emissions instead of following the good engineering practice (GEP) requirement. BPIPPRIME will be used to account for any building downwash concerns.

4.2 AERMAP

The AERMOD terrain preprocessor mapping program, AERMAP, will be used to determine all the terrain elevation heights for each receptor, building, and source locations using the Universal Transverse Mercator (UTM) coordinate system. The most recent AERMAP version 11103 will assign the elevations from the National Elevation Dataset (NED) using the North American Datum (NAD) 1983 as recommended in the, "40 CFR Part 51, Revision to the Guideline on Air Quality Models" Appendix W and later revised in the "AERMOD Implementation Guide." The Auer Land Use Classification Scheme will be used to determine land use in the area.

5.0 Receptor Grid and Modeling Domain

The receptor grid and modeling domain will be based on guidance provided in the memorandum "Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standards", dated March 20, 2015 and the SO₂ NAAQS Designations Modeling TAD. Indiana proposes a multi-nested rectangular receptor grid with appropriate spacing of receptors based on the distance from the modeled emission points to detect significant concentration gradients. Indiana has conducted exploratory modeling on each of the DRR sources and does not anticipate maximum modeled 1-hour SO₂ impacts or source-culpable modeled violations to extend out beyond 10 kilometers from each source. In situations where multiple sources covered by the DRR must be evaluated in the same area, the modeling domain may be extended to include all sources and the appropriate distances to model maximum 1-hour SO₂ impacts to determine attainment designations for the area. Indiana proposes the following multi-nested rectangular receptor grid:

- Receptor spacing at the fence line for each facility will be placed every 50 meters.
- Receptor spacing at 100 meters out to a distance of 3,000 meters (3 kilometers) beyond each facility (grid may be extended if modeling results warrant).
- Receptor spacing at 250 meters out to a distance of 5,000 meters (5 kilometers) beyond each facility (grid may be extended if modeling results warrant).
- Receptor spacing at 500 meters out to a distance of 10,000 meters (10 kilometers) beyond each facility (grid may be extended if modeling results warrant).

6.0 Meteorological Data

6.1 AERMET

As stated in 40 CFR Part 51, Appendix W, section 8.3.1.2 and the SO₂ NAAQS Designations Modeling TAD, Indiana proposes to use three years (2012-2014) of National Weather Service (NWS) and on-site surface data and upper air meteorological data processed with the latest version of the AERMOD meteorological data preprocessor program AERMET (version 15181). Table 2 below lists the modeled facilities as mentioned in the DRR and the corresponding surface and upper air meteorological stations that will be used to conduct modeling.

Table 2: National Weather Service Stations/Onsite Meteorological Stations

Facilities	Surface Meteorology	Upper Air Meteorology
SABIC Innovative Plastics Alcoa – Warrick Power Plant Alcoa – Warrick Operations Hoosier Energy - Merom	Evansville, IN NWS	Lincoln, IL NWS
Duke – Gallagher	Louisville, KY NWS	Wilmington, OH NWS
Arcelormittal – Indiana Harbor Coke Energy US Steel – Gary Works ArcelorMittal Burns Harbor	Gary ITRI onsite meteorological data processed with South Bend, IN NWS	Lincoln, IL NWS
NIPSCO – R.M. Schahfer	South Bend, IN NWS	Lincoln, IL NWS
Duke –Cayuga	Indianapolis, IN NWS	Lincoln, IL NWS
Isolatek	Fort Wayne, IN NWS	Wilmington, OH NWS

Indiana will request the use of the adjusted surface friction velocity (adj_U*) beta option in order to more accurately model 1-hour SO₂ concentrations from DRR sources located in Lake and Warrick Counties.

6.2 AERMINUTE/AERSURFACE

The 1-minute wind speeds and wind directions, taken from the Automated Surface Observing System (ASOS) NWS stations and onsite meteorological stations, were processed with the U.S. EPA 1-minute data processor program AERMINUTE version 15272.

The U.S. EPA program AERSURFACE version 13016 was used to determine the surface characteristics; albedo, Bowen ratio, and surface roughness for the Indianapolis, Evansville, South Bend, Indiana and Louisville, Kentucky NWS meteorological tower locations. Surface

characteristics were determined at each NWS location for each of 12 wind direction sectors with a recommended default radius of one kilometer.

The albedo and the Bowen ratio surface characteristics were adjusted during the three winter months of January, February, and December in accordance with the U.S. EPA Region V document, “Regional Meteorological Data Processing Protocol,” dated May 6, 2011. Additionally, a dry or wet Bowen ratio value was used during months when soil moisture conditions were abnormally dry or wet; otherwise the Bowen ratio value for average soil moisture conditions was used. The surface roughness value for snow cover was used if more than half of the month had days with at least one inch of snow on the ground. Otherwise, the no snow cover surface roughness value was used.

7.0 SO₂ Background Concentrations

The modeling of all DRR sources will use adjusted temporally varying seasonal background concentrations or concentrations without upwind major source SO₂ impacts. Each source will use 1-hour SO₂ monitoring data, taken from nearby monitors, considered representative of background concentrations for the area. Since most SO₂ monitoring sites located in the state are downwind of large SO₂ sources, impacts from the upwind direction of the large SO₂ source were removed from the monitoring data. The 99th percentile SO₂ concentrations by season (winter, spring, summer and fall) for each hour of the day were calculated to determine the temporally varying seasonal SO₂ background, which were directly input into the model and were part of the final modeled results. This procedure was used to prevent double counting of SO₂ sources within the background concentration values used for this attainment designation modeling.

Temporally varying seasonal SO₂ background concentrations were developed in accordance with the recommended U.S. EPA guidance for establishment of such background concentrations in Section 8.2 of 40 CFR Part 51, Appendix W and considered appropriate and representative of the area. The latest three years of SO₂ air quality monitoring data (2012-2014) were used to develop background concentrations for each of the areas mentioned in the DRR, with the exception of the Larwill monitoring data in Whitley County. These data were taken from 2013 – 2015; the monitor began operation in January 1, 2013. The procedures used to develop the SO₂ background concentrations will be included as Appendix A. Table 3 shows the DRR facility and corresponding 1-hour SO₂ monitoring sites used for representative background concentrations in the air quality characterization.

Table 3: Indiana DRR Sources and Counties and Nearby Background Monitoring Sites

Facility	County	Monitoring Sites
SABIC Innovative Plastics	Posey	Evansville – Buena Vista
Alcoa – Warrick Power Plant Alcoa – Warrick Operations	Warrick	Evansville – Buena Vista / onsite data
Duke – Gallagher	Floyd	New Albany – Green Valley
NIPSCO – R.M. Schahfer	Jasper	Wheatfield
Hoosier Energy – Merom	Sullivan	Terre Haute – North Lafayette Road
Duke – Cayuga	Vermillion	Fountain County -North of State Road 234
ArcelorMittal – Indiana Harbor Coke Energy U.S. Steel – Gary Works	Lake	Gary IITRI and Hammond
ArcelorMittal - Burns Harbor	Porter	Dunes Acres Substation
Isolatek	Huntington	Larwill

8.0 SO₂ Emissions Sources to be Modeled

8.1 DRR Sources

Indiana proposes to model the hourly continuous emissions monitoring (CEM) data taken from the electric generating units (EGUs) sources subject to the DRR. Along with the hourly SO₂ emission data, any hourly variable stack gas flow rate, and temperature of the exhaust stream may also be modeled if available. This variation in parameters may influence dispersion characteristics of the exhaust stream and impact modeled 1-hour SO₂ concentrations.

For the emission sources which do not have CEM data, actual emissions taken from the latest available emissions reporting will be used. The SO₂ NAAQS Designations Modeling TAD, Section 5 will be referenced to best characterize any temporal and/or seasonal variability of emissions. This would include any seasonal, monthly, or daily variations that can be quantified. Specific emissions characterization that will be modeled will be addressed for each DRR source later in this document.

There are instances where sources emitted less than 2,000 tons of SO₂ in 2014 and are not listed as a DRR source, but are located in the vicinity of a DRR source and the modeling receptor grid. This will be considered a cluster source and the source will be evaluated along with the DRR source in the air quality modeling analysis.

8.2 Inventory Sources

Based on the U.S. EPA memo, “Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO₂ National Ambient Air Quality Standard, page 16”, dated

March 1, 2011; Indiana is focused on the characterization of air quality within 10 kilometers or less for each of the DRR sources. U.S. EPA's SO₂ NAAQS Designations Modeling TAD Section 4.1, page 7 mentions the number of sources to be explicitly modeled should cause a significant concentration gradient and the number of those sources to be modeled would generally be small. Indiana retrieved a list of all SO₂ emission sources in the county of the DRR source, as well as larger SO₂ emission sources in adjacent counties and states that were determined to be explicitly modeled.

Emission sources near the DRR source will be evaluated to determine if those sources could cause or contribute to a NAAQS violation. Indiana proposes to use the following thresholds: sources with SO₂ emissions greater than 250 tons per year and located within 30 kilometers of the DRR source will be used as a screening method to narrow the focus of sources which would have realistic modeled impacts that would impact attainment designations. While this method is applied on an area by area basis, Indiana feels this is an accurate representation of air quality in the area, especially since the hourly seasonal background concentrations would adequately capture surrounding source SO₂ impacts. IDEM identified sources with emissions less than 250 tons that were included in DRR modeling due to their proximity within the DRR source receptor grid used in the dispersion modeling. Actual emissions taken from the latest available emissions inventories will be modeled for sources identified by these threshold levels to determine air quality characteristics in the area.

8.3 Intermittent Sources

Emergency generators, fire pumps, and startup/shutdown emissions will be handled consistent to the March 1, 2011 guidance "Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO₂ NAAQS" from Tyler Fox, dated March 1, 2011. This guidance will be followed to assess the 1-hour SO₂ attainment designations as well. U.S. EPA recommends using appropriate data based on emissions scenarios that are continuous enough or frequent enough to contribute significantly to the annual distribution of maximum daily 1-hour concentrations. Review of the hours of operations for combustion turbines, emergency generators, startup/shutdown, fire pumps, and other auxiliary operations associated with the sources mentioned in the DRR have been determined to operate much less than 500 hours per year and have random and infrequent schedules that cannot be controlled. Indiana feels the intent of the DRR is to determine the attainment status of the area surrounding large SO₂ emission sources, based on the actual emissions coming from the large units will be Indiana's main focus of the designation determinations. This approach is consistent with previous 1-hour SO₂ nonattainment and designation modeling submitted by IDEM to U.S. EPA.

9.0 Analysis of Modeling Results

The purpose of this modeling demonstration is to characterize air quality and determine area designations as it relates to attainment of the 1-hour SO₂ NAAQS in accordance with the DRR. The 99th percentile of the 1-hour daily maximum modeled concentrations represents the fourth high of the 1-hour daily maximum SO₂ modeled concentrations and will be averaged across three years to compare resulting concentrations to the 1-hour SO₂ NAAQS of 75 ppb (196.2 µg/m³ although U.S. EPA has listed 196.4 µg/m³ as the equivalent value to 75 ppb). Modeled concentrations include representative temporally varying seasonal 1-hour SO₂ background values to determine the overall impact from the DRR sources. This resulting concentration will be compared to the 1-hour SO₂ standard to indicate whether a modeled violation of the SO₂ NAAQS occurred. All concentrations that fall below the 1-hour SO₂ NAAQS will be determined to attain the standard and the area surrounding the DRR source will be recommended as attainment.

Appendix A

Indiana's 1-Hour SO₂

Data Requirements Rule

Source-Specific Modeling Protocol

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1.0 - Duke – Gallagher Generating Station (18-043-00004)

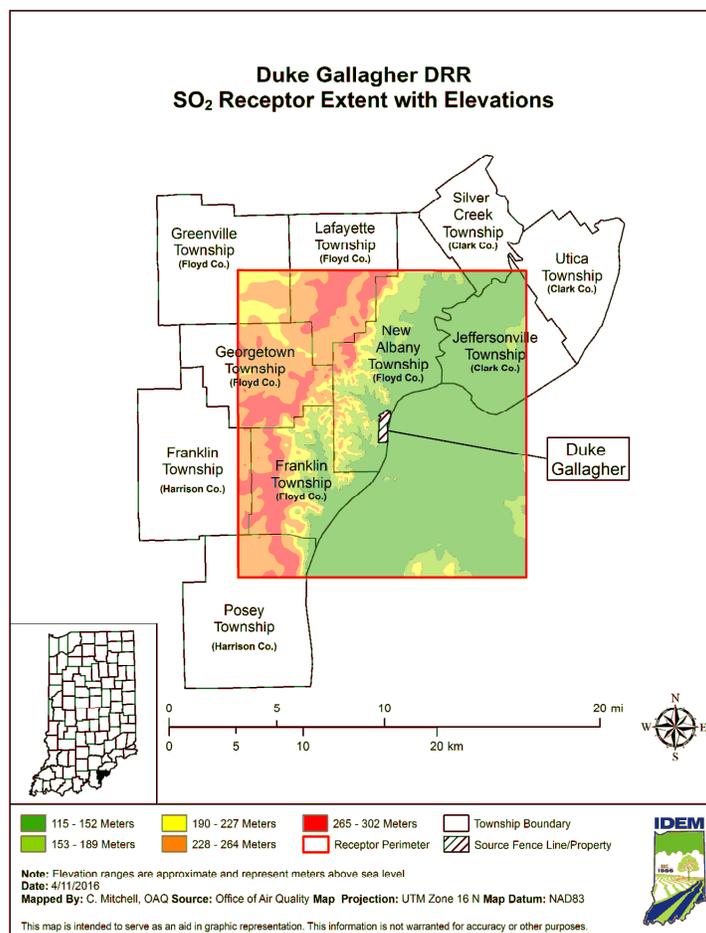
Source Description of DRR source

The Gallagher Generating Station (Gallagher Station) is a stationary electric utility generating station consisting of two units that have a capacity to generate 280 megawatts (MW) of electricity combined. Gallagher Station has two coal-fired boilers rated at 1,390 MMBtu/hr each. The plant is operated by Duke Energy Indiana, LLC.

Characterization of Modeled Area

The Gallagher Station is located at 30 Jackson Street, New Albany, New Albany Township, Floyd County, Indiana on the banks of the Ohio River; approximately 2 miles southwest of New Albany and 4 miles west of downtown Louisville, Kentucky. A map of the area and the receptor grid to be used for DRR modeling is shown below in Figure 10.1.

Figure 10.1 - Map of the Duke – Gallagher Generating Station and Surrounding Area



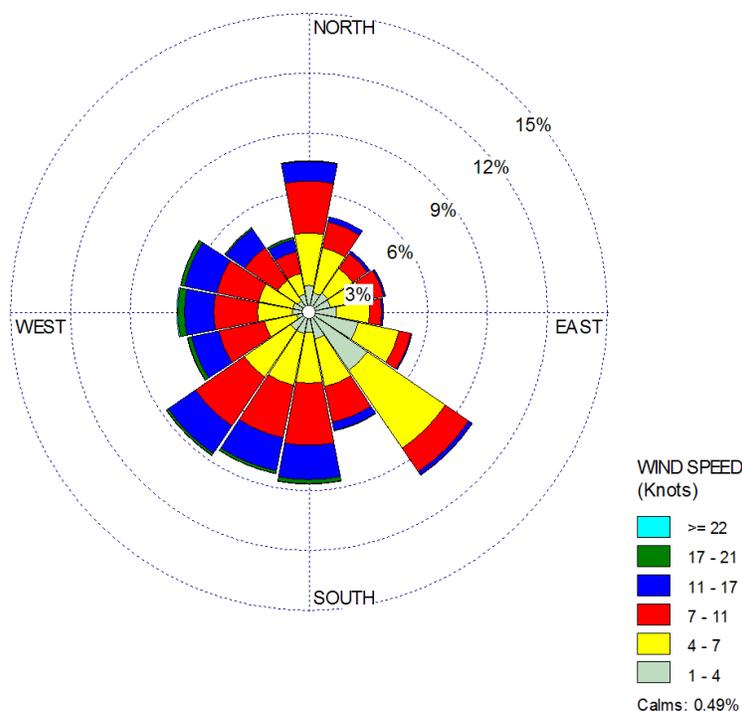
Model Options

All regulatory default options within AERMOD will be used to determine the air quality characteristics surrounding Gallagher Station. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b).

Meteorology/Wind Roses

Louisville, KY surface meteorological data and Wilmington, OH upper air meteorological data for the years 2012 – 2014 will be used to determine the air quality characteristics in the area surrounding Gallagher Station. Figure 10.2 shows the cumulative wind rose for 2012-2014 for the Louisville area.

Figure 10.2 – Louisville, Kentucky Wind Roses 2012-2014



Emissions Summary for Gallagher Station

Gallagher Station has two coal-fired units, Units 2 and 4 that have continuous emission monitoring (CEM) data for SO₂. This hourly CEM data from both units was formatted and used in the 1-hour SO₂ AERMOD model run.

Modeled Inventory Sources

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. The latest available actual emissions were input for ESSROC and Louisville Medical Center Steam Plant. Louisville Gas & Electric facilities at Cane Run and Mill Creek have reduced SO₂ emissions through conversion of the coal-fired units to a natural gas combined cycle unit for Cane Run. The following list of sources, found below in Table 10.1 will be included in the AERMOD run to determine overall air quality characteristics.

**Table 10.1 - Clark County, Indiana and Jefferson County, Kentucky:
1-Hour SO₂ Modeling Source Inventories**

Source	Source ID	Location	2014 SO ₂ Emissions (tpy)
ESSROC Cement Corporation	18-019-00008	Clark County, IN	416
Louisville Gas & Electric – Cane Run	21-111-00126	Jefferson County, KY	21
Louisville Gas & Electric – Mill Creek	21-111-00127	Jefferson County, KY	16,316
Louisville Medical Center Steam Plant	21-111-00148	Jefferson County, KY	451

Temporally Varying Seasonal 1-Hour SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the New Albany – Green Valley, Floyd County, Indiana monitor and input directly into the AERMOD model run for Gallagher Station. Table 10.2 below lists the hourly seasonal 1-hour SO₂ values used for representative background concentrations for the area surrounding Gallagher Station.

Table 10.2 - 99th Percentiles for Temporally Varying Seasonal SO₂ Background Values (ppb) from the New Albany – Green Valley, SO₂ Monitor for 2012-2014

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	6.61	7.81	5.50	5.57	4.25	5.09	4.89	5.95
Spring	8.10	5.36	7.03	8.25	5.64	4.85	3.51	5.39
Summer	6.84	4.05	3.99	5.35	4.14	3.10	4.40	4.62
Fall	3.34	3.50	3.69	3.64	2.80	3.36	3.39	4.62

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	6.01	6.62	8.56	12.67	14.03	10.43	12.31	10.94
Spring	9.24	8.91	9.18	9.57	10.90	11.08	11.34	9.04
Summer	6.16	15.60	11.77	11.11	12.21	10.80	8.75	9.50
Fall	5.98	6.91	9.44	9.38	11.14	11.24	8.95	8.96

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	10.38	8.80	8.90	6.90	6.15	8.28	6.28	8.04
Spring	10.25	11.20	11.93	11.96	9.41	7.69	5.08	9.02
Summer	7.80	8.64	10.04	10.26	8.10	6.14	7.44	6.50
Fall	10.81	12.77	7.85	6.35	3.90	3.30	4.70	5.55

2.0 - NIPSCO – R.M. Schahfer Generating Station (18-073-00008)

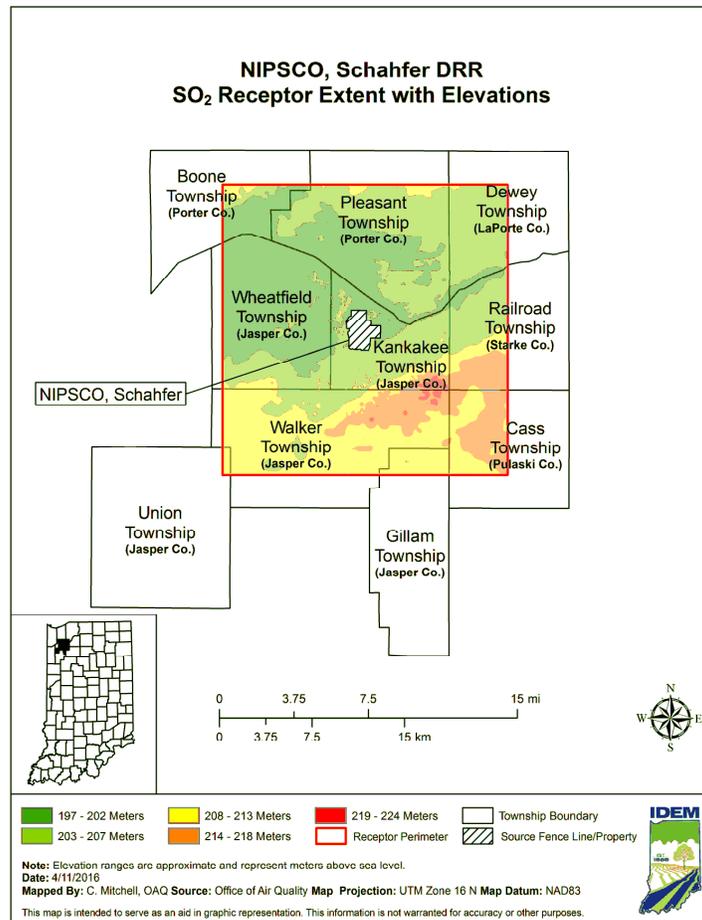
Source Description of DRR Source

The R.M. Schahfer Generating Station (Schahfer Station) is a stationary electric utility generating station consisting of four units that have a capacity to generate 1,943 megawatts (MW) of electricity combined. Schahfer Station has four coal-fired boilers; one boiler is rated at 4,650 MMBtu/hr, one boiler is rated at 5,100 MMBtu/hr, and two boilers are rated at 3,967 MMBtu/hr. The plant is operated by NiSource.

Characterization of Modeled Area

The Schahfer Station is located at 2723 East 1500 North, Wheatfield, in Kankakee Township, Jasper County, Indiana; approximately 5 miles west of State Road 421. A map of the area and the receptor grid used for DRR modeling is shown below in Figure 11.1.

Figure 11.1 - Map of the NIPSCO – Schahfer Generating Station and Surrounding Area



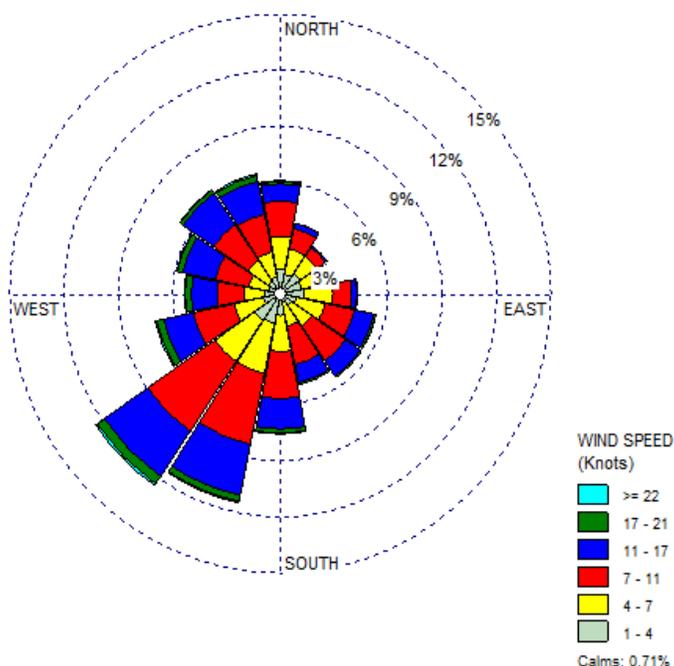
Model Options

All regulatory default options within AERMOD will be used to determine the air quality characteristics surrounding Schahfer Station. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b).

Meteorology/Wind Roses

South Bend, Indiana surface meteorological data and Lincoln, Illinois upper air meteorological data for the years 2012 through 2014 will be used to determine the air quality characteristics in the area surrounding Schahfer Station. Figure 11.2 shows the cumulative wind rose for 2012-2014 for the South Bend area.

Figure 11.2 - South Bend, Indiana 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for Schahfer Station

Schahfer Station has four units, Units BLR4, BLR15, BLR17, and BLR18 that have continuous emission monitoring (CEM) data for SO₂. This hourly CEM data from the four units were formatted and used in the 1-hour SO₂ AERMOD model run.

Modeled Inventory Sources

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions would impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. No inventory sources were found within 30 kilometers of Schahfer Station.

Temporally Varying Seasonal 1-Hour SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Wheatfield, Jasper County, Indiana monitor and input directly into the AERMOD model run for Schahfer Station. Table 11.1 below lists the hourly seasonal 1-hour SO₂ values used for representative background concentrations for the area surrounding Schahfer Station.

Table 11.1 - 99th Percentiles for Temporally Varying Seasonal SO₂ Background Values (ppb) from the Wheatfield SO₂ Monitor (2012-2014)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	4.75	5.00	4.71	4.68	4.00	5.00	5.40	4.00
Spring	5.54	4.57	5.60	6.16	4.55	5.00	4.47	7.00
Summer	2.44	3.43	3.00	3.45	3.00	3.00	3.49	6.53
Fall	5.26	4.00	4.00	4.00	9.00	7.41	5.29	5.49

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	5.00	7.00	7.00	7.00	7.64	7.00	7.00	7.00
Spring	9.52	8.53	8.06	8.00	7.57	7.00	7.98	6.71
Summer	10.16	8.63	8.00	8.86	9.00	9.28	7.66	7.00
Fall	9.00	7.00	7.69	7.64	5.00	6.00	6.62	5.62

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	7.00	7.00	6.32	5.00	5.68	6.66	6.00	6.00
Spring	5.00	4.66	7.18	7.60	6.57	5.00	4.57	4.55
Summer	4.56	4.54	6.00	7.44	5.00	3.00	3.40	2.52
Fall	5.00	6.18	6.02	5.48	4.00	5.00	4.00	7.99

3.0 - Lake County: ArcelorMittal – Indiana Harbor (18-089-00318)/ Coke Energy (18-089-00383)/U.S. Steel (18-089-00121)

Source Description of DRR Sources

ArcelorMittal - Indiana Harbor is an integrated steel mill consisting of two blast furnaces, one sinter plant, one basic oxygen furnace (BOF) complex, one hot metal Reladle/Desulf complex, an 84 inch hot strip mill with three reheat furnaces, mill finishing and sheet finishing operations, plate mill furnaces, two coke batteries, and five power station boilers. Some processes such as the BOF steel making processes have roof monitor emissions in addition to stack emissions. The blast furnaces also have non-point slag pit loadout fugitive emissions which are modeled as volume sources.

CokeEnergy is an integrated steel mill consisting of one lime spray dryer Flue Gas Desulfurization unit and baghouse for the heat recovery coal carbonization facility (HRCC) waste gas stream operated by Indiana Harbor Coke Company (IHCC).

U.S. Steel is an integrated steel mill consisting of three coke batteries, a coke plant by-product recovery plant, one coke oven gas desulfurization facility, a coke plant boiler house, a sinter plant, four blast furnaces, two Basic Oxygen Process (BOP) shops with hot metal transfer and desulfurization stations, an 84 inch hot strip mill, a boiler house, and a TurboBlower boiler house. Some processes such as the BOF steel making processes have roof monitor emissions in addition to stack emissions. The blast furnaces also have non-point slag pit fugitive emissions which are modeled as volume sources.

Characterization of Modeled Area

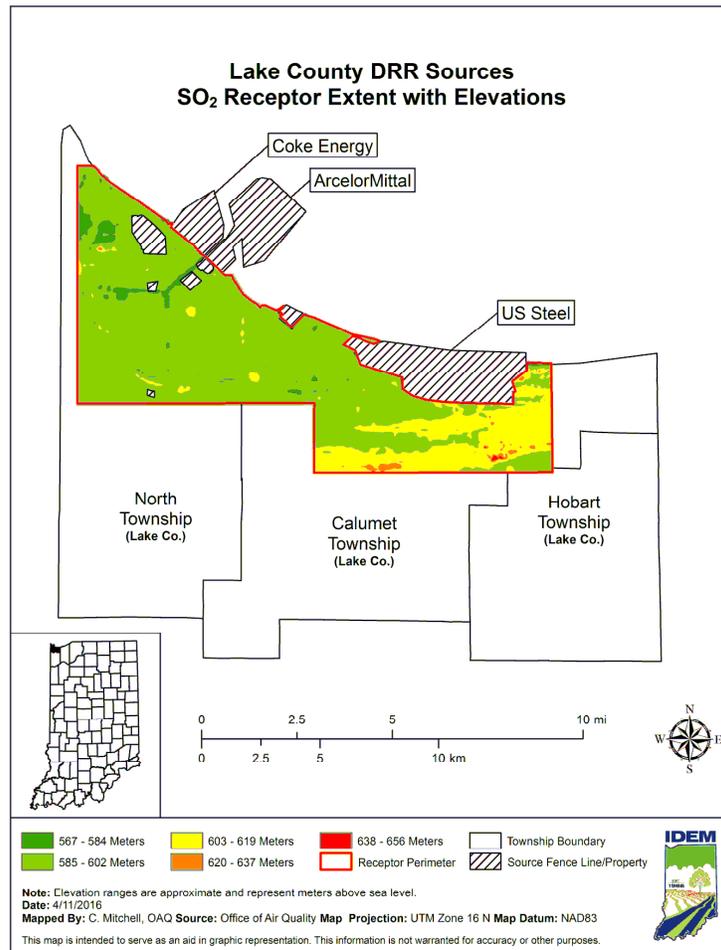
ArcelorMittal - Indiana Harbor is located at 3001 Dickey Road, East Chicago, in North Township, Lake County, Indiana. The northern end of the ArcelorMittal plant borders the southern shoreline of Lake Michigan.

Coke Energy is located at 3210 Watling Street, East Chicago, in North Township, Lake County, Indiana.

U.S. Steel is located at 1 North Broadway, Gary, in Calumet Township, Lake County, Indiana. The northern end of the U.S. Steel plant borders the southern shoreline of Lake Michigan.

Figure 12.1 below shows the property boundary of the facilities and the extent of the 10 kilometer modeling receptor grid into nearby townships. The 10 kilometer grid also extends northward into Lake Michigan. The receptor grid will be adjusted to remove the receptors which are located over Lake Michigan since this is an area where a SO₂ monitor could not be located as per the SO₂ NAAQS Designations Modeling Technical Assistance Document, Section 4.2.

Figure 12.1 - Map of the Lake County, Indiana DRR Sources and Surrounding Area



Model Options

ArcelorMittal - Indiana Harbor/Coke Energy/U.S. Steel will propose to use the adjustment to the surface friction velocity, (adj_U^*), AERMET beta option in their modeling analysis. This will provide better model performance. Otherwise, all other regulatory default options will be selected to perform the air quality analysis for the three Lake County DRR facilities.

Urban Population

Population and city area data were taken from the 2010 census and city-data.com, which has moved to www.usa.com. Population density was calculated from this website. At least one-fourth of Gary Indiana’s land area consists of a lime kiln facility and U.S. Steel. The density of Gary’s population, excluding the area of U.S. Steel, is greater than 750 people per kilometer. The cities with populations greater than 750 people per square kilometer (Gary,

Hammond, East Chicago, Whiting, Munster, and Highland) were added together to obtain a population density value of 242,238 for the modeled area.

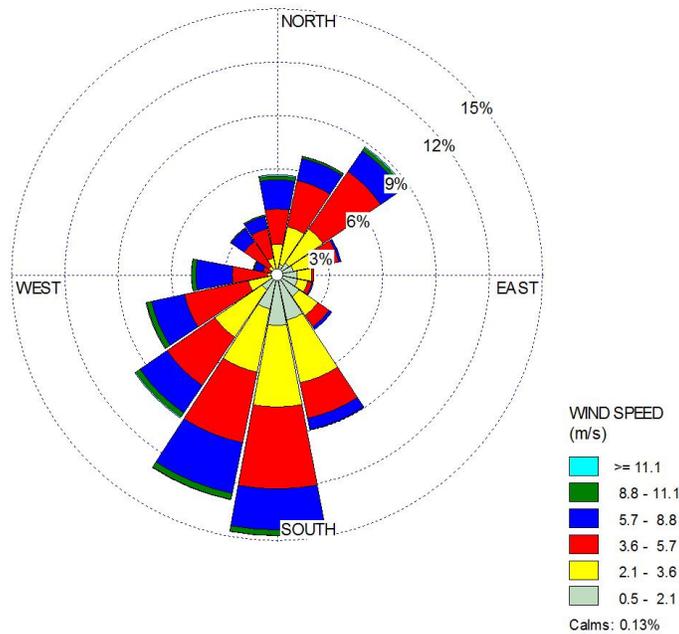
Receptors

Receptors are placed along each DRR source's plant property spaced 50 meters apart, and in a 100 meter grid out 5 kilometers from two points of peak impact. The first point is centered at the western modeled peak impact near Arcelor Mittal - Indiana Harbor, Coke Energy, and Indiana Harbor Coke Company; while the 2nd maximum modeled peak impact is centered at U.S. Steel. Beyond this is a 500 meter grid extending out 10 kilometers south and west of U.S. Steel. Beyond this, a coarser receptor grid of 1,000 meter grid extends out to the state and county lines.

Meteorology/Wind Rose

The Gary IITRI surface meteorological data and the Lincoln, Illinois upper air meteorological data taken from 2012 through 2014 will be used to determine the meteorological conditions surrounding the three Lake County, Indiana DRR sources in AERMOD. The Gary IITRI surface meteorological data will be used to more accurately include the influence of Lake Michigan on the meteorological conditions at and in the area immediately surrounding the three Lake County DRR facilities. The Gary IITRI wind rose for the 3-year modeled period is shown in Figure 12.2. The Gary IITRI wind rose depicts the predominant wind direction coming from the south to south southwest associated with the land breeze with the predominant wind direction associated with the lake breeze influence coming from the northeast.

Figure 12.2 - Gary IITRI 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for ArcelorMittal Indiana Harbor/Coke Energy/U.S. Steel

ArcelorMittal - Indiana Harbor will be modeled using several emission scenarios. The 201 stack has emission data collected by a continuous emission monitor; therefore, the CEM data will be modeled. There are several other processes with varying hourly emissions rates that will be based on a daily maximum emission rate. Emissions will be allocated for each hour of the day. Emission units without CEM data or daily emission records will be averaged across the three modeled years (2012-2014).

Modeled Inventory Facilities

The 2014 EMITS database of actual emissions for Lake County, Indiana was collected. Facilities in Lake County were included in this analysis if their 2014 SO₂ emissions totaled more than 40 tons of SO₂ per year. This approach accounts for 99.85% of SO₂ emissions from Lake County, Indiana for 2014. IDEM identified one source in the State of Illinois that emitted over 250 tons of SO₂ in 2014 located within 30 kilometers of the Lake County, Indiana sources. Two coal-fired power plants in Cook County, Illinois shut down in 2012, and as a result were not included in the modeling analysis. Two Porter County DRR SO₂ sources (ArcelorMittal – Burns Harbor and NIPSCO Bailly) were also included in the Lake County modeling analysis. The

following list of facilities in Table 12.1 will be included in the air quality modeling analysis to determine the overall SO₂ air quality impact in the area.

Table 12.1 - Lake County: 1-Hour SO₂ Modeling Inventory

Source	Source ID	Location	2014 SO ₂ Emissions (tpy)
BP Products, North America Inc.	18-089-00003	Lake County, IN	554.4
Carmeuse Lime, Inc	18-089-00112	Lake County, IN	353.8
Cargill, Inc	18-089-00203	Lake County, IN	26.8
Eco Services Corp/Rhodia/Sovay USA Inc.	18-089-00242	Lake County, IN	288.4
ArcelorMittal USA	18-089-00316	Lake County, IN	1,588.0
Indiana Harbor Coke Company	18-089-00382	Lake County, IN	2,813.3
Ironside Energy LLC	18-089-00448	Lake County, IN	242.7
ISPAT Inland LaFarge North America	18-089-00458	Lake County, IN	106.7
ArcelorMittal – Burns Harbor	18-127-00001	Porter County, IN	12,189
NIPSCO Bailly Generating Station	18-127-00002	Porter County, IN	2012-2014 CEMS Data
Koppers Inc.	170000035076	Cook County, IL	1,785.7

Temporal Varying Seasonal 1-Hour Seasonal SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Gary ITRI (18-089-0022), Lake County SO₂ monitor and input directly into the AERMOD model for the three Lake County DRR sources. Table 12.2 shows the hourly seasonal 1-hour SO₂ concentrations in parts per billion (ppb) which represents the background concentrations for the northern Lake County, Indiana area.

Table 12.2 - 99th Percentile Temporally Varying Seasonal SO₂ Background Concentrations (ppb) from Gary ITRI SO₂ Monitor (2012-2014)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	9.10	7.94	6.22	5.67	8.68	7.08	8.28	7.57
Spring	7.46	7.61	8.17	6.64	8.86	6.91	7.20	9.69
Summer	4.05	3.21	4.94	4.58	4.00	3.52	8.64	8.07
Fall	5.55	7.15	6.15	5.60	6.78	5.05	8.09	8.50

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	8.63	9.71	8.88	10.02	9.94	8.28	10.96	8.75
Spring	9.31	9.15	9.12	9.92	9.15	8.70	8.03	8.20
Summer	10.81	10.55	8.50	7.24	8.22	6.15	5.44	7.16
Fall	11.41	11.78	10.04	8.60	9.16	8.88	9.20	8.32

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	9.53	8.03	8.52	8.64	6.88	8.07	9.40	9.26
Spring	7.16	7.85	6.45	4.74	7.65	7.30	8.84	5.80
Summer	5.59	4.56	4.20	2.86	2.34	2.70	4.10	4.15
Fall	5.33	6.59	6.80	7.16	8.22	8.53	6.89	6.70

4.0 - ArcelorMittal – Burns Harbor (18-127-00001)

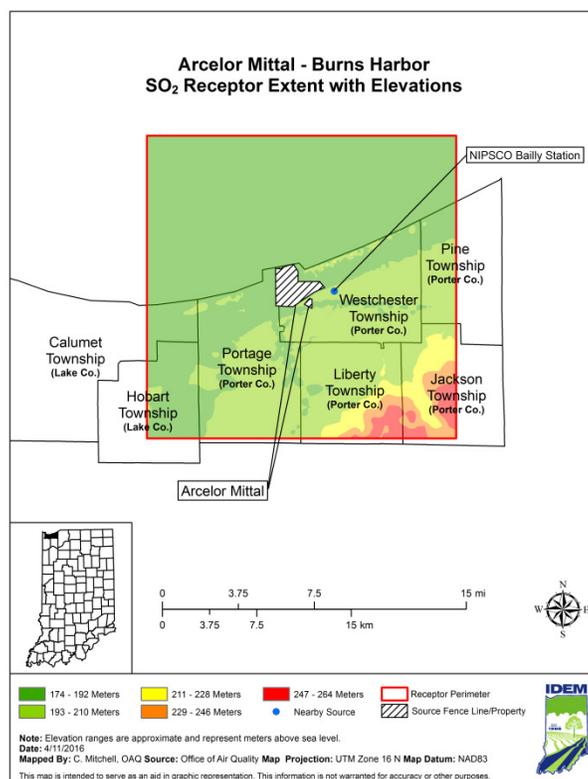
Source Description of DRR Source

ArcelorMittal - Burns Harbor (Burns Harbor) is an integrated steel mill consisting of two blast furnaces, three hot strip mill furnaces, plate mill furnaces, two coke batteries, three basic oxygen furnaces (BOF) hot metal desulfurization steel making processes, five power station boilers, and a sinter plant. There are also two blast furnace gas flares and a clean coke oven gas flare which emit a small amount of SO₂. Some processes, such as the BOF steel making processes, have roof monitor SO₂ emissions in addition to stack SO₂ emissions. The blast furnaces also have non-point slag pit loadout fugitive SO₂ emissions which are modeled as volume sources.

Characterization of Modeled Area

ArcelorMittal – Burns Harbor is located at 250 West U.S. Highway 12, Burns Harbor, in Westchester Township, Porter County, Indiana. The northern end of the Burns Harbor plant borders the southern shoreline of Lake Michigan. Figure 13.1 below shows the property boundary of the facility and the extent of the 10 kilometer modeling receptor grid into nearby townships and eastern Lake County, Indiana.

Figure 13.1 - Map of ArcelorMittal – Burns Harbor and Surrounding Area



The 10 kilometer grid also extends northward into Lake Michigan. The receptor grid will be adjusted to remove the receptors which are located over Lake Michigan since this is an area where an SO₂ monitor cannot be located.

Model Options

ArcelorMittal – Burns Harbor will propose to use the regulatory default options to perform the air quality analysis for the ArcelorMittal – Burns Harbor facility in order to appropriately site a SO₂ monitor to characterize air quality in the areas surrounding Burns Harbor.

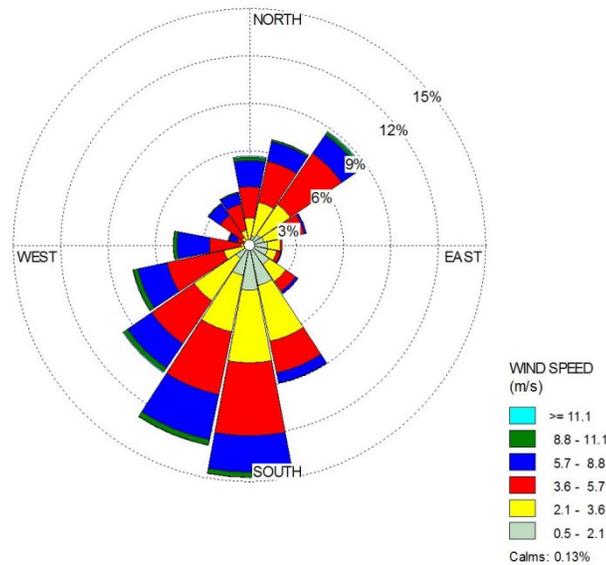
Air Quality Monitoring Approach for ArcelorMittal – Burns Harbor

ArcelorMittal will propose to use the air quality monitoring approach to meet the Data Requirements Rule with an air quality analysis designed to help determine the proper site location(s) of the SO₂ monitor(s) based on the locations of maximum 1-hour SO₂ modeled impacts. The Auer Land Use Classification scheme will not be used at this time to determine land use in the area and consequently the rural versus urban classification.

Meteorology/Wind Rose

The Gary IITRI surface meteorological data and the Lincoln, Illinois upper air meteorological data, taken from 2012 through 2014, will be used to determine the meteorological conditions surrounding Burns Harbor in AERMOD. The Gary IITRI surface meteorological data will be used to more accurately include the influence of Lake Michigan on the meteorological conditions at and in the area immediately surrounding the ArcelorMittal – Burns Harbor facility. The Gary IITRI wind rose for the 3-year modeled period 2012-2014 is shown as Figure 13.2 on the following page. The Gary IITRI wind rose depicts the predominant wind direction coming from the south to south southwest associated with the land breeze with the predominant wind direction associated with the lake breeze influence coming from the northeast.

Figure 13.2 - Gary IITRI 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for ArcelorMittal – Burns Harbor

ArcelorMittal – Burns Harbor will model several of their processes with varying hourly emissions rates based on a daily maximum emission rate. Emissions will be allocated for each hour of the day. Emission units without daily emission records will be averaged across the three modeled years. This is considered a conservative approach, especially with the modeled results to be used to locate SO₂ monitors in the area to characterize air quality.

Modeled Inventory Facilities

Table 13.1 lists the sources that will be included in the air quality modeling analysis to determine the overall SO₂ air quality impact in the area. NIPSCO – Michigan City, located in LaPorte County and U.S. Steel – Gary Works in Lake County would be included in the modeling, however, since Burns Harbor is opting for the monitoring approach, these facilities will be accounted for in the Dune Acres SO₂ background monitoring data.

Table 13.1 - Porter and LaPorte Counties, Indiana: 1-Hour SO₂ Modeling Inventory

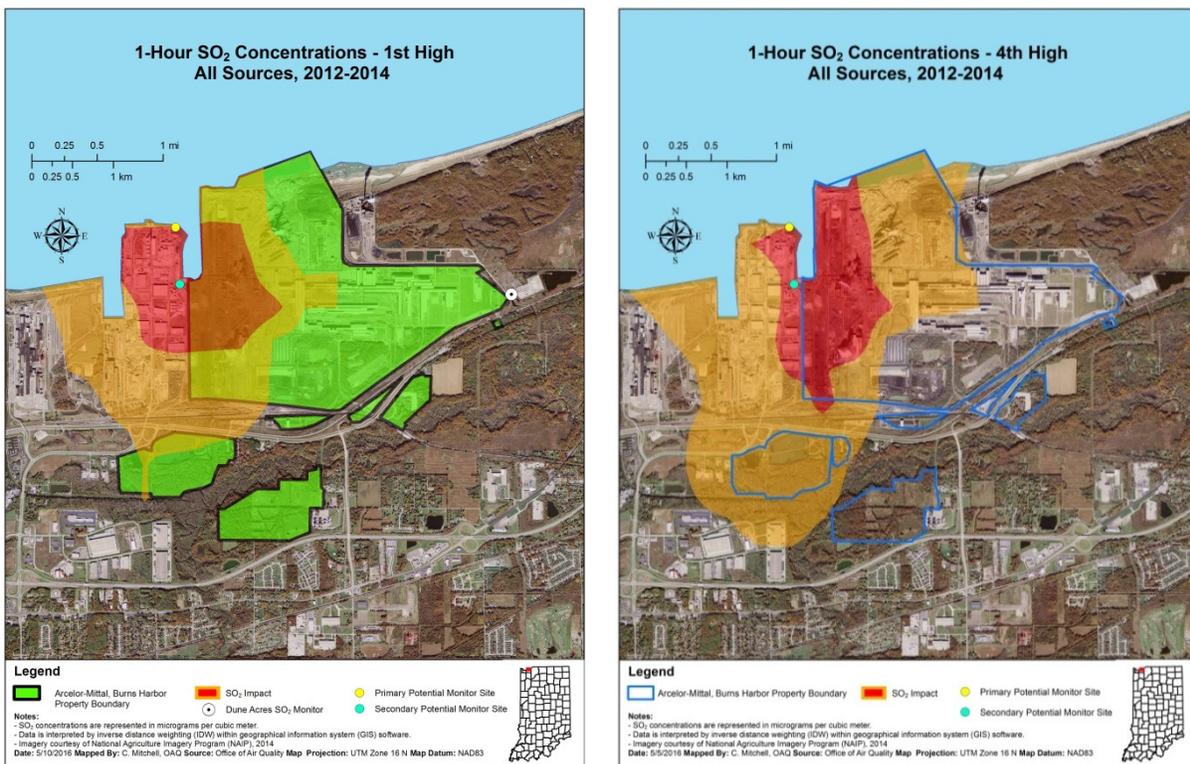
Source	Source ID	Location	SO ₂ Emissions (tpy)
NIPSCO - Bailly Generating Station	18-127-00002	Porter County	2012-2014 CEMS Data
NIPSCO - Michigan City	18-091-00021	LaPorte County	2012-2014 CEMS Data
U.S. Steel – Gary Works	18-089-00002	Lake County	3,285 (2014)

Temporal Varying Seasonal 1-Hour Seasonal SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Dune Acres Substation (18-127-0011), Porter County SO₂ monitor and input directly into the AERMOD model for ArcelorMittal – Burns Harbor. Figure 13.3 shows the ArcelorMittal – Burns Harbor maximum 4th high SO₂ concentration over a 3-year modeled period, indicating definite maximum concentration gradients along the western property boundary of Burns Harbor, over the Port of Indiana area.

ArcelorMittal and IDEM have researched the Port of Indiana to determine appropriate locations for a SO₂ monitor. Two potential monitoring sites were found: a fishing area in the northern portion of the port and an existing lead monitoring site located directly west of the power stations and blast furnaces located at ArcelorMittal – Burns Harbor. These two potential monitoring sites fall within the maximum modeled 1st high and 4th high concentration zones, as shown in Figure 13.3 and would adequately characterize the air quality in the area.

Figure 13.3 – SO₂ Modeling Results for ArcelorMittal – Burns Harbor



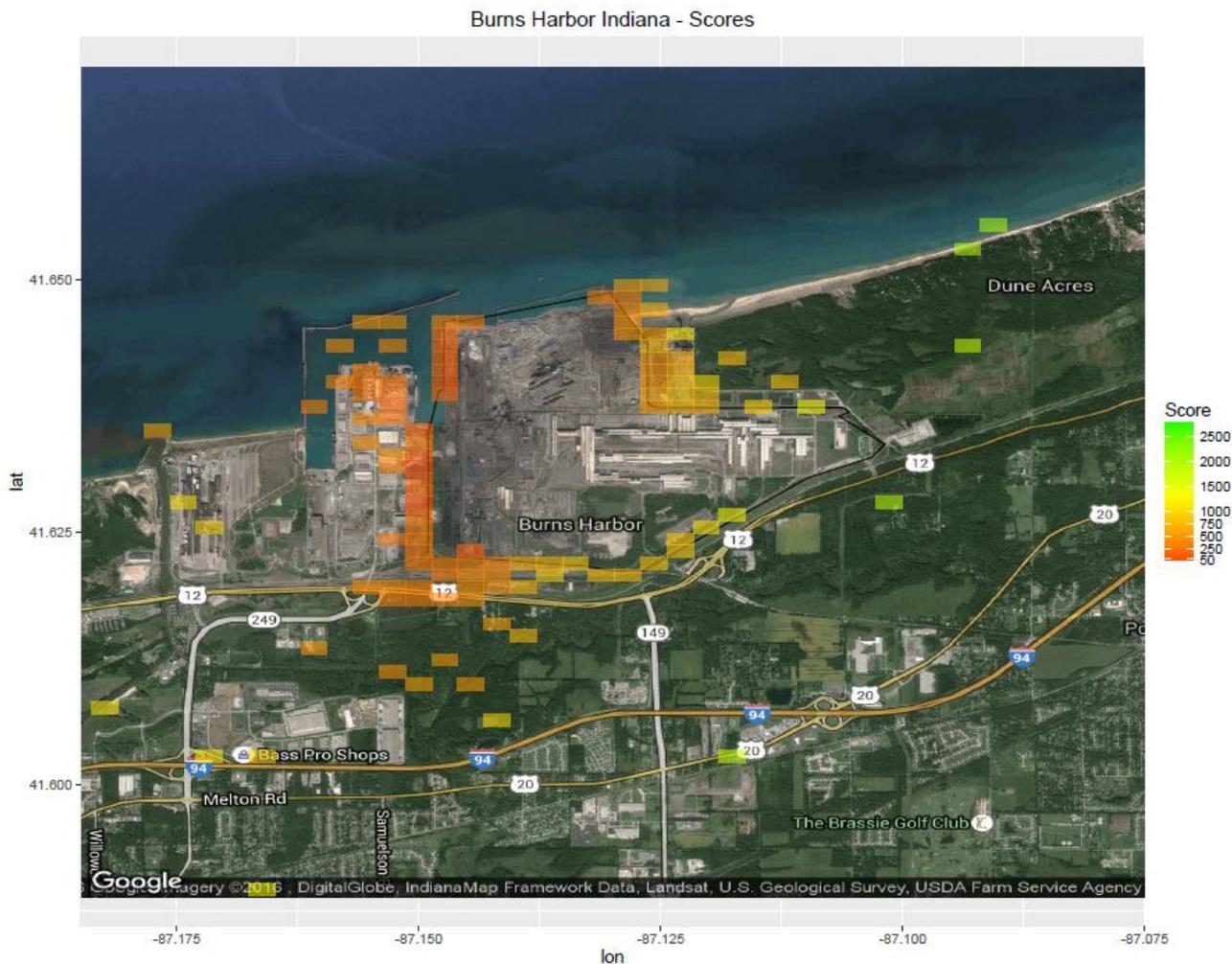
The modeling results for ArcelorMittal – Burns Harbor for both the maximum 1st and 4th high concentrations over the 3-year period of 2012 through 2014 match well with each other and

represents the impact from all SO₂ sources that best characterizes air quality in the area surrounding the facility.

Modeling to Inform Monitoring Placement

IDEM followed U.S. EPA's SO₂ NAAQS Designations Monitoring TAD, Appendix A to inform placement of ambient monitors. Elements of the Monitoring TAD, Appendix A, analysis were used to evaluate dispersion modeling results and the frequency of the highest maximum 4th high modeled concentrations occurring along the west-northwest and western property lines of Burns Harbor. Figure 13.4 shows the scoring results based on the location and rank of the receptors based on the guidance. This evaluation provided valuable information in helping to establish a monitoring site that best characterizes air quality in the area surrounding Burns Harbor.

Figure 13.4 - Plot Map of Overall Scoring of Maximum Design Value/Frequency of Maximum Days



Clearly, an SO₂ monitor along the western property line of Burns Harbor will be positioned to capture any high concentrations coming from Burns Harbor and properly characterize the air quality in the area. The Port of Indiana is adjacent to Burns Harbor and would be appropriate to locate an ambient air monitor.

5.0 - SABIC Innovative Plastics (18-129-00002)

Source Description of DRR Source

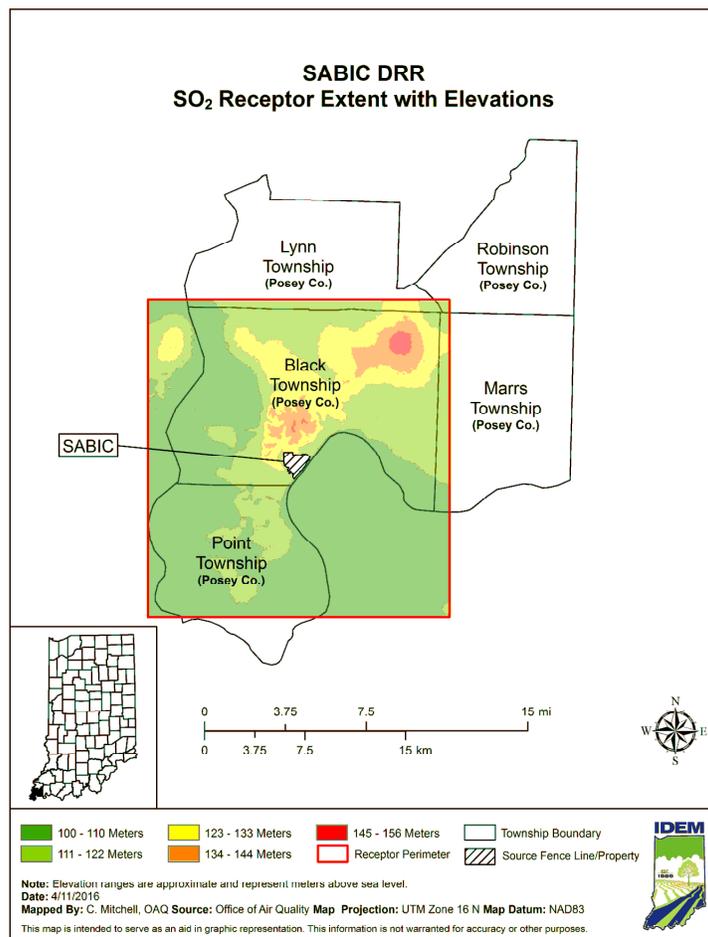
SABIC Innovative Plastics (SABIC) is a plastics manufacturing facility. SABIC makes plastics for industries such as automotive, consumer electronics and medical devices. SABIC is

currently in the process of building a cogeneration (CoGen) plant that will use natural gas instead of coal to create the majority of the steam for their operation.

Characterization of Modeled Area

SABIC is located at 1 Lexan Lane, Mt. Vernon, Indiana, less than a mile from the Ohio River in Black Township, Posey County, Indiana. A map of the area and the receptor grid used for DRR modeling is shown below in Figure 14.1.

Figure 14.1 - Map of SABIC Innovative Plastics and Surrounding Area



Model Options

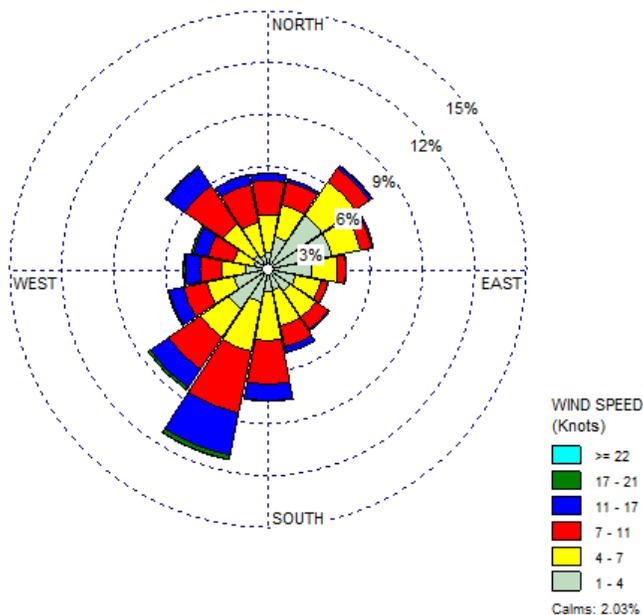
All regulatory default options within AERMOD will be used to determine the air quality characteristics surrounding SABIC. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural

classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b). No variation of the population selection will be necessary.

Meteorology/Wind Roses

Evansville, Indiana surface meteorological data and Lincoln, Illinois upper air meteorological data for the years 2012 through 2014 will be used to determine the air quality characteristics in the area surrounding SABIC. Figure 14.2 shows the cumulative wind rose for 2012-2014 for the Evansville/Southwest Indiana area.

Figure 14.2 - Evansville 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for SABIC

As a result of the CoGen project, a number of SO₂ emission units will shut down. The unit that will still have significant SO₂ emissions will be the COS Vent Oxidizer. Other ancillary sources such as the liquid waste boilers will also be included in the inventory. Most of the other ancillary sources will have small SO₂ emissions but will also be included in the modeling. Their emissions will be based on fuel usage and emissions calculations taken from U.S. EPA's AP-42 emission factors. The COS Vent Oxidizer process has varying hourly emissions and will be based on the highest 1-hour performance test runs from 2009 and 2013. These performance tests

specifically tested the regeneration process among the six CO generators to determine the variability of SO₂ emissions during this process.

Modeled Inventory Sources

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. The latest available actual emissions were input for all inventory sources. Table 14.1 lists the sources that will be included in the AERMOD run to determine overall air quality characteristics.

**Table 14.1 - Posey County, Indiana
1-Hour SO₂ Modeling Source Inventories**

Source	Source ID	Location	SO ₂ Emissions (tpy)
CountryMark	129-00037	Posey County	477
A.B. Brown	129-00010	Posey County	9,427

Temporally Varying Seasonal 1-Hour SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Evansville – Buena Vista Road monitor and input directly into the AERMOD model run for SABIC. The hourly seasonal 1-hour SO₂ values used for representative background concentrations for the area surrounding SABIC are listed below in Table 14.2.

Table 14.2 - 99th Percentiles for Temporally Varying Seasonal SO₂ Background Values (ppb) from the Evansville – Buena Vista Road SO₂ Monitor for (2012-2014)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	6.00	4.22	3.88	4.27	6.02	4.95	5.25	7.43
Spring	4.99	3.83	4.30	4.34	3.30	4.47	7.75	9.52
Summer	2.71	2.22	1.00	1.00	2.87	3.45	3.34	5.99
Fall	3.46	3.30	2.85	3.52	4.00	4.35	4.80	5.28

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	8.89	11.94	13.62	10.29	14.74	19.17	19.48	19.76
Spring	9.82	9.05	13.37	13.25	15.49	12.02	9.34	10.70
Summer	10.12	12.58	9.14	7.55	7.47	4.65	4.08	6.05
Fall	7.73	11.66	15.88	11.70	11.26	10.28	10.03	9.08

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	16.64	16.70	9.18	6.89	8.01	6.59	6.74	6.22
Spring	13.01	12.93	11.32	8.26	5.59	3.81	5.90	6.10
Summer	7.88	8.56	7.12	2.71	2.72	2.22	2.86	3.40
Fall	10.11	9.85	8.87	8.51	5.70	2.59	3.06	3.31

Due to the cogeneration project, several coal-fired boilers will be removed from service and overall SO₂ emissions from SABIC will be reduced. However, since this project was permitted in 2015 and the completion of construction is due to occur in the fall of 2016, SABIC may need to establish emissions limits that including the shutdown of the BW, E and H boilers that will demonstrate compliance with the 1-hour SO₂ NAAQS. IDEM will be discussing this approach with U.S. EPA.

6.0 - Hoosier Energy – Merom Generating Station (18-153-00005)

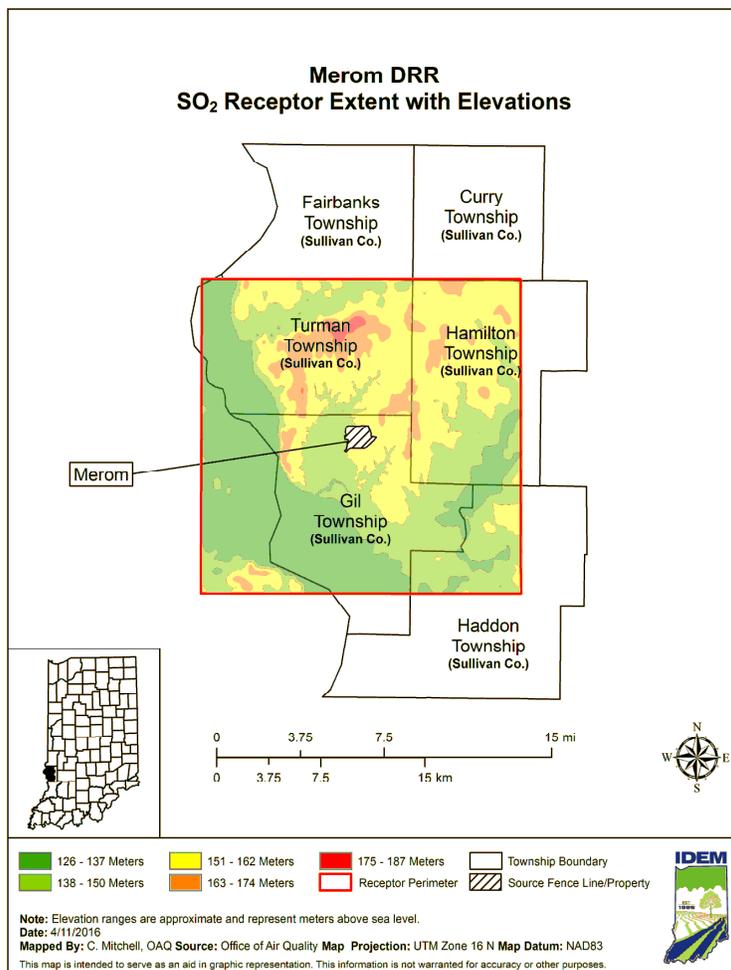
Source Description of DRR Source

Merom Generating Station (Merom Station) is a stationary electric utility generating station consisting of two units that have a generating capacity of 980 megawatts (MW) combined. Merom Station has two coal-fired boilers, each rated at 5,088 MMBtu/hr. The plant is operated by Hoosier Energy REC.

Characterization of Modeled Area

Merom Generating Station is located at 5500 West Old 54, Sullivan, Indiana in Gill Township, Sullivan County, Indiana; approximately 6 miles west of Sullivan, IN in southwest Indiana. A map of the area and the receptor grid used for DRR modeling is shown in Figure 15.1.

Figure 15.1 - Map of Merom Station and Surrounding Area



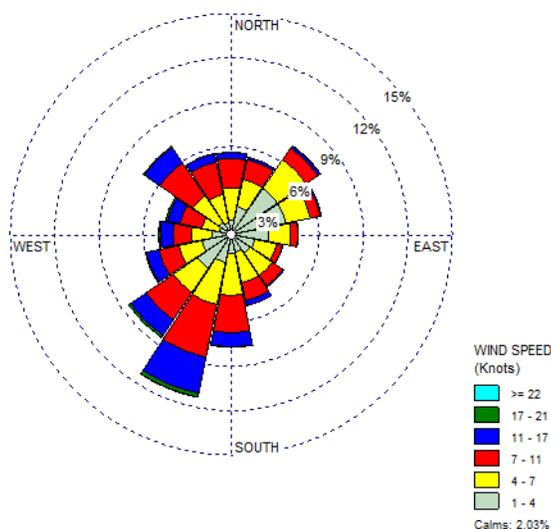
Model Options

All regulatory default options within AERMOD will be used to determine the air quality characteristics surrounding Merom Station. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b). No variation of the population selection will be necessary. Figure 15.2 shows the cumulative wind rose for 2012-2014 for the Evansville/Southwest Indiana area.

Meteorology/Wind Roses

Evansville, Indiana surface meteorological data and Lincoln, Illinois upper air meteorological data for the years 2012 through 2014 will be used to determine the air quality characteristics in the area surrounding SABIC. Figure 15.2 shows the cumulative wind rose for 2012-2014 for the Evansville/Southwest Indiana area.

Figure 15.2 – Evansville – Buena Vista 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for Merom Station

Merom Station has two units, Units 1 and 2, which have continuous emission monitoring (CEM) data for SO₂. This hourly CEM data from both units was formatted and used in the 1-hour SO₂ AERMOD model run.

Modeled Inventory Sources

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. The latest available actual emissions were input for all inventory sources. The following list of sources will be included in the AERMOD run to determine overall air quality characteristics. There were no Indiana SO₂ sources with significant emissions within 30 kilometers that would be considered to have an impact on the air quality surrounding Merom Station. Illinois Environmental Protection Agency (IEPA) supplied emissions and modeling information for the Rain CII Carbon facility that falls within the 30 kilometer radius of Merom Station. Table 15.1 lists the Illinois source to be included in the AERMOD run to determine overall air quality characteristics.

**Table 15.1 - Crawford County, Illinois:
1-Hour SO₂ Modeling Source Inventories**

Source	Source ID	Location	2014 SO ₂ Emissions (tpy)
Rain CII Carbon	33-025-AAJ	Crawford County, IL	6,180

Temporally Varying Seasonal 1-Hour SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the North Lafayette Avenue, Terre Haute, Vigo County monitor and input directly into the AERMOD model run for Merom Station. Table 15.2 below lists the hourly seasonal 1-hour SO₂ values used for representative background concentrations for the area surrounding Merom Station.

Table 15.2 - 99th Percentiles for Temporally Varying Seasonal SO₂ Background Values (ppb) from North Lafayette Ave SO₂ Monitor (2012-2014)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	4.52	4.04	5.25	3.63	4.36	3.47	2.97	4.02
Spring	4.36	5.82	3.98	4.12	3.88	3.06	4.51	4.86
Summer	1.00	1.00	1.00	1.00	1.00	1.00	1.82	3.47
Fall	3.99	4.20	4.75	3.35	3.29	2.1	2.29	2.50

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	4.05	4.98	8.47	9.50	8.17	7.42	7.67	5.63
Spring	6.70	6.02	9.42	9.67	6.35	7.42	7.03	5.49
Summer	4.02	5.55	7.70	9.00	7.78	9.28	4.82	3.98
Fall	5.02	5.164	5.4	9.72	8.39	7.30	4.57	8.68

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	5.76	8.26	5.83	7.23	6.46	5.58	5.69	5.16
Spring	6.58	6.63	5.89	4.30	3.90	3.15	3.64	5.06
Summer	2.71	3.50	5.13	3.34	1.00	4.00	2.00	2.11
Fall	4.96	5.45	5.01	3.54	7.78	4.55	6.31	5.51

7.0 - Duke – Cayuga Generating Station (18-165-00001)

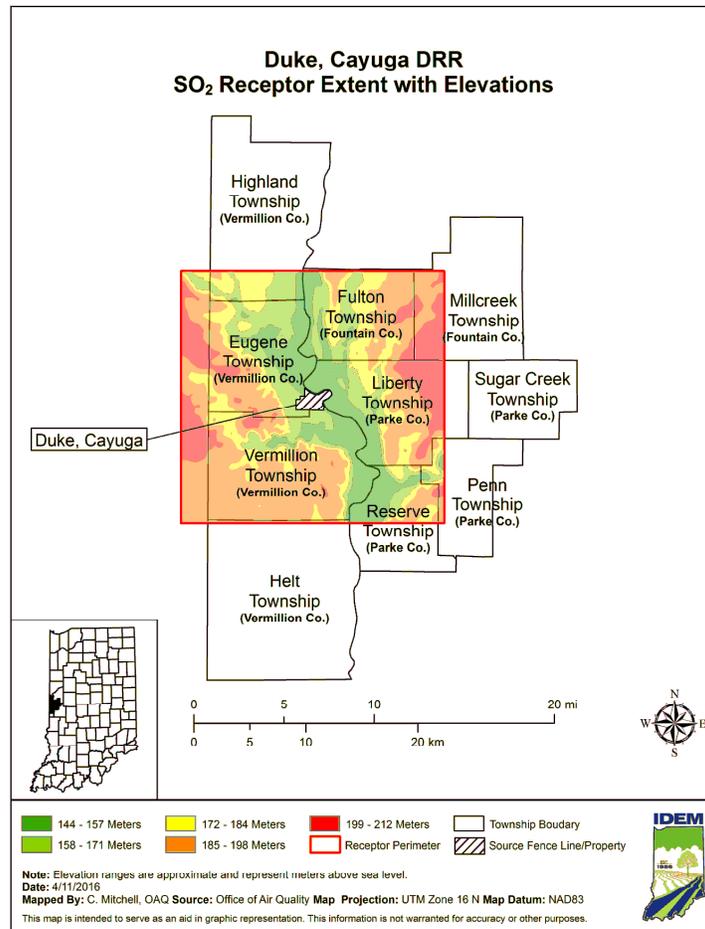
Source Description of DRR Source

The Duke - Cayuga Generating Station (Cayuga Station) is a stationary electric utility generating station consisting of two units that have a capacity to generate 1,104 megawatts (MW) of electricity combined. Cayuga Station has two coal-fired boilers that are rated at 4,802 MMBtu/hr each. The plant is operated by Duke Energy Indiana, LLC.

Characterization of Modeled Area

The Cayuga Station is located off of State Road 63, Cayuga, Indiana on the banks of the Wabash River, Eugene Township, Vermillion County, Indiana. A map of the area and the receptor grid used for DRR modeling is shown in Figure 16.1.

Figure 16.1 - Map of the Duke – Cayuga Generating Station and Surrounding Area



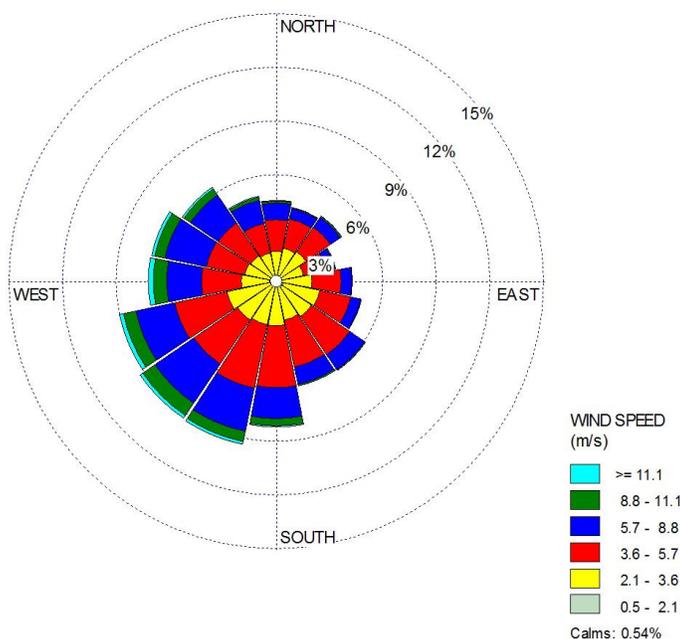
Model Options

All regulatory default options within AERMOD will be used to determine the air quality characteristics surrounding Cayuga Station. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b). No variation of the population selection will be necessary.

Meteorology/Wind Roses

Indianapolis, Indiana surface meteorological data and Lincoln, Illinois upper air meteorological data for the years 2012 through 2014 will be used to determine the air quality characteristics in the area surrounding Cayuga Station. Figure 16.2 shows the cumulative wind rose for 2012-2014 for the Central/West Central Indiana area.

Figure 16.2 - Indianapolis 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for Cayuga Station

Cayuga Station has two units, Units BLR1 and BLR2 that have continuous emission monitoring (CEM) data for SO₂. This hourly CEM data from both units was formatted and used in the 1-hour SO₂ AERMOD model run. The auxiliary boiler will also be modeled based on the 2014 emissions reporting.

Modeled Inventory Sources

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. The latest available actual emissions were input for all inventory sources. The following list of sources will be included in the AERMOD run to determine overall air quality characteristics. Table 16.1 lists the inventory source to be included in the AERMOD run to determine overall air quality characteristics for the area surrounding Cayuga Station.

**Table 16.1 - Vermillion County, Indiana:
1-Hour SO₂ Modeling Source Inventories**

Source	Source ID	Location	2014 SO ₂ Emissions (tpy)
Eli Lilly	165-00009	Vermillion County	1,851

Temporally Varying Seasonal 1-Hour SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Fountain County monitor and input directly into the AERMOD model run for Cayuga Station. Table 16.2 below lists the hourly seasonal 1-hour SO₂ values used for representative background concentrations for the area surrounding Cayuga Station.

**Table 16.2 - 99th Percentiles for Temporally Varying Seasonal SO₂
Background Values (ppb) from Fountain County SO₂ Monitor for 2012-2014**

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	7.76	7.52	7.00	6.49	8.00	7.00	6.00	6.51
Spring	7.69	8.00	7.55	8.00	8.00	7.53	7.54	6.56
Summer	4.50	5.00	4.00	3.48	3.42	3.00	3.00	3.00
Fall	6.58	5.62	6.00	5.00	7.56	6.57	7.18	6.55

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	8.55	9.60	9.98	9.00	9.00	8.26	7.65	8.30
Spring	8.63	9.00	10.00	8.00	8.63	9.00	9.00	7.64
Summer	6.22	7.24	8.62	8.00	9.00	8.00	6.57	6.60
Fall	6.60	6.63	9.00	8.67	8.00	7.62	9.00	8.68

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	6.00	8.42	8.62	11.00	8.00	8.18	8.85	8.00
Spring	8.00	8.00	9.00	8.60	9.00	7.00	8.00	7.38
Summer	6.58	5.56	6.58	5.00	4.00	4.00	6.52	4.00
Fall	8.63	8.14	7.55	7.56	6.48	7.53	8.00	7.53

8.0 - ALCOA – Warrick Power Plant (18-173-00002)

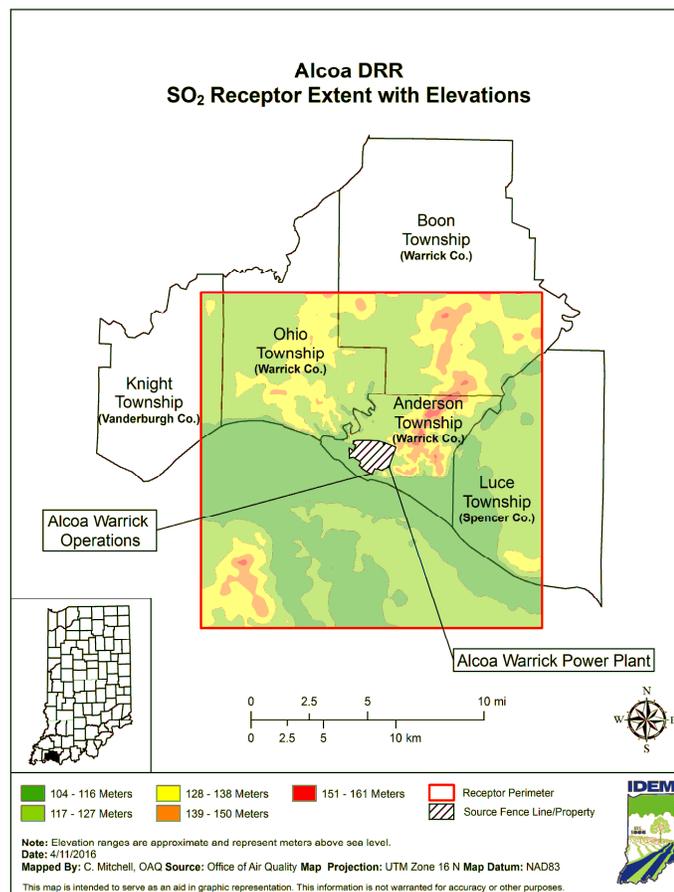
Source Description of DRR Source

The ALCOA-Warrick Power Plant (Warrick Power) is a power generating station which provides electric power for the ALCOA-Warrick Operation Aluminum smelter operations. A total of four coal fired boilers with scrubber control for SO₂ provide the power generation for the ALCOA Warrick Operations with a total heat input capacity of 7,725 MMBtu/hr.

Characterization of Modeled Area

The ALCOA-Warrick Power Plant is located along the northern bank of the Ohio River at 4700 Darlington Road, Newburgh, Indiana, in Anderson Township, Warrick County, Indiana. Figure 17.1 shows the property boundary of the Warrick Power Plant and the extent of the 10 kilometer modeling receptor grid into nearby townships and adjacent areas of northern Kentucky on the southern bank of the Ohio River.

Figure 17.1 - Map of ALCOA Warrick Power Plant and Surrounding Area



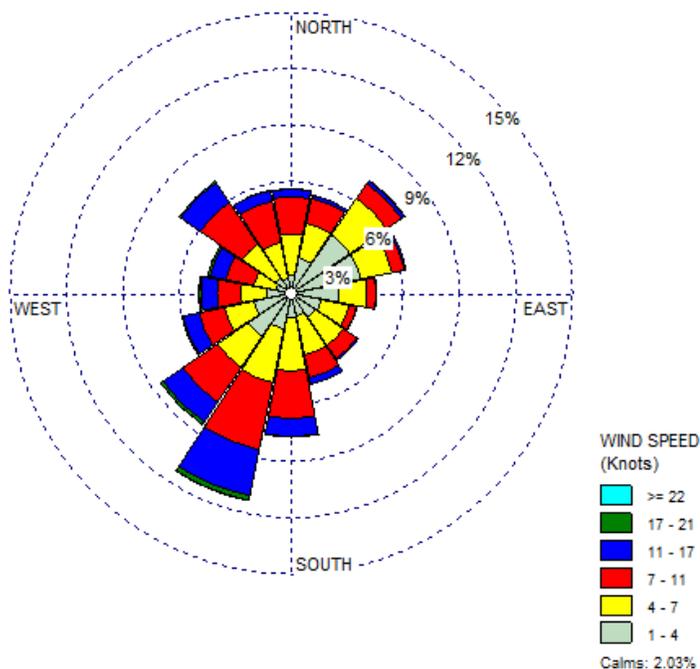
Model Options

Warrick Power will propose to use the adjustment to the surface friction velocity, (adj_U^*), AERMET beta option in their modeling analysis. This will provide better model performance. Otherwise, all other regulatory default options will be selected to perform the air quality analysis for the area surrounding Warrick Power. The Auer Land Use Classification Scheme was used to determine land use in the area. The area is considered primarily rural; therefore, a rural classification was used, as provided for in the Guideline on Air Quality Models, Section 7.2.3 (EPA, 2005b). No variation of the population selection will be necessary.

Meteorology/Wind Rose

The Evansville National Weather Service (NWS) surface meteorological data and the Lincoln, Illinois upper air meteorological data taken from 2012 through 2014 will be used to determine the meteorological conditions for the area surrounding Warrick Power in AERMOD. The Evansville NWS wind rose for the 3-year modeled period 2012-2014 is shown as Figure 17.2 below. The Evansville NWS wind rose depicts the predominate wind direction as from the southwest for the 3-year modeled period 2012-2014.

Figure 17.2 - Evansville 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for ALCOA Warrick Power Plant

Warrick Power will be modeled with 2012-2014 continuous emissions monitoring data (CEM) across the three year period. Boiler units 1, 2, and 3 will be modeled through a common stack and boiler unit 4 will be modeled as a separate stack. In addition, since the Vectren F.B. Culley Generating Station is located next door to Warrick Power, the Culley Generating Station will be evaluated with Warrick Power to determine the air quality characteristics of the area.

Modeled Inventory Facilities

SO₂ sources from the surrounding area were evaluated to determine if their SO₂ emissions impact the air quality surrounding the DRR source, beyond what is captured through background monitoring data. The latest available actual emissions were input for all inventory sources. The following list of sources will be included in the AERMOD run to determine overall air quality characteristics. Table 17.1 lists the 2014 emissions from the inventory sources in Indiana and Kentucky to be included in the AERMOD run to determine overall air quality characteristics for the area surrounding Warrick Power Plant.

Table 17.1 –Warrick and Spencer Counties in Indiana and Daviess and Hancock Counties in Kentucky: 1-Hour SO₂ Modeling Inventory

Source	Source ID	Location	2014 SO ₂ Emissions (tpy)
Vectren F.B. Culley Generating Station Units 2 and 3	18-173-00001	Warrick County, IN	2012-2014 Hourly CEMS Data
AEP Rockport Power Boiler Units 1 and 2	18-147-00020	Spencer County, IN	54,979
Owensboro Municipal Utilities Elmer Smith Station	21-059-00027	Daviess County, KY	8,064
Big Rivers Electric Corporation Coleman Station	21-091-00003	Hancock County, KY	8,146
Century Aluminum of KY LLC	21-091-00004	Hancock County, KY	2,088
Owensboro Grain Company	21-059-00039	Daviess County, KY	382

Temporal Varying Seasonal 1-Hour Seasonal SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Evansville Buena Vista Road (18-163-0021), Vanderburgh County SO₂ monitor and input directly into the AERMOD model for Warrick Power. Table 17.2 shows the hourly seasonal 1-

hour SO₂ concentrations in parts per billion (ppb) which represents the background concentrations for the area surrounding Warrick Power.

Table 17.2 - 99th Percentile Temporally Varying Seasonal SO₂ Background Concentrations (ppb) from Evansville Buena Vista SO₂ Monitor (2012-2014)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	6.00	4.25	3.81	4.20	5.75	4.76	5.66	7.41
Spring	4.48	3.87	3.57	4.06	2.91	3.31	4.47	8.25
Summer	2.37	2.38	1.00	1.00	3.60	3.90	3.83	4.26
Fall	2.23	2.28	2.22	3.20	3.54	3.00	3.99	5.26

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	8.86	10.80	12.58	10.87	14.64	19.51	19.33	19.31
Spring	8.36	8.89	13.01	11.98	8.85	11.87	10.46	12.29
Summer	5.55	12.12	8.41	8.80	5.72	4.40	4.81	5.27
Fall	7.56	11.32	11.34	11.68	10.07	10.39	7.16	7.79

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	15.65	17.13	9.25	10.40	8.60	8.35	6.29	6.12
Spring	12.28	13.04	11.68	8.29	5.26	3.81	5.76	6.06
Summer	6.35	9.76	7.11	4.74	4.04	2.21	3.04	1.00
Fall	10.68	10.11	6.67	4.68	4.42	2.59	2.80	2.79

9.0 - ALCOA – Warrick Operations (18-173-00007)

Source Description of DRR Source

ALCOA - Warrick Operations is an aluminum smelter operation with SO₂ stack emissions from smelter potlines and line source emissions vented through smelter potline rooms. Additionally, there are SO₂ emissions from an anode baking ring furnace. The ALCOA – Warrick Operations aluminum smelter ceased operations on March 31, 2016, with only the rolling mill continuing to operate (see ALCOA press release dated January 7, 2016). An extremely small amount of SO₂ emissions will occur from the operation of the rolling mill due to natural gas combustion, however, it is anticipated the total annual SO₂ emissions from the entire ALCOA Warrick Operations will be less than one ton per year. As a result, the DRR will be addressed by ALCOA Warrick Operations with a signed revocation of their Part 70 operating permit for the smelting operations.

Summary

Due to the fact that the main SO₂ emission source for Alcoa – Warrick Operations was the smelter and the smelting operations were permanently shut down on March 31, 2016, IDEM will provide documentation to demonstrate the smelter is in fact permanently shut down and will not restart at a future date. The area will be characterized by air dispersion modeling for the Alcoa – Warrick Power Plant which includes the Vectren – F.B. Culley Generating Station.

10.0 - Isolatek (18-069-00021)

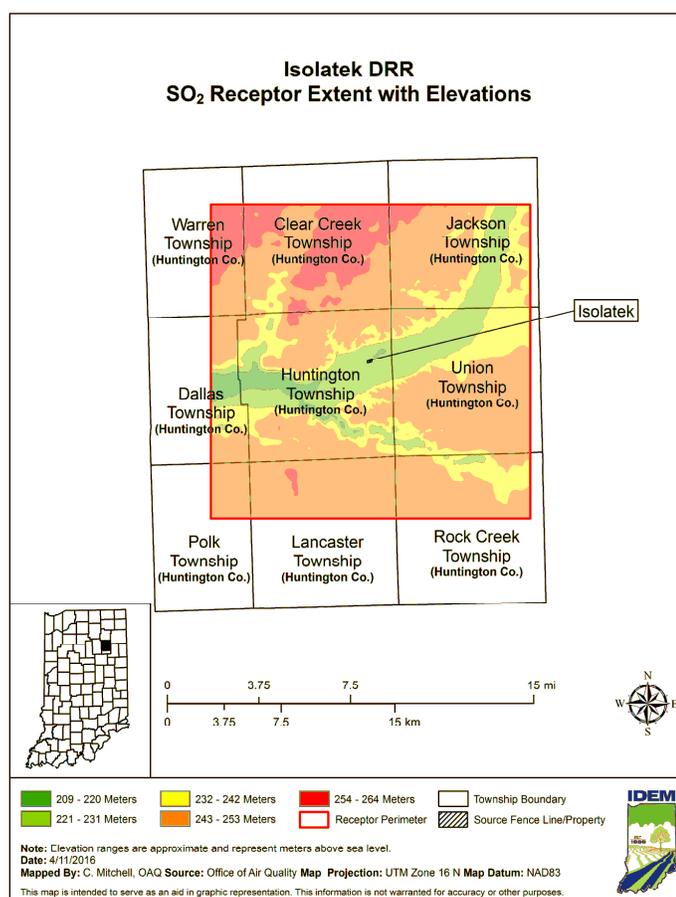
Source Description of DRR Source

Isolatek (aka U.S. Minerals) is a stationary acoustic and thermal insulation manufacturing plant. There are two short stack cupolas, two blow chambers, process lines, baggers and blenders. While IDEM did not initially list Isolatek on the state list of DRR sources due to annual SO₂ emissions well below 2,000 tons, U.S. EPA has concerns about air quality in the vicinity of the source and requested the facility be listed.

Characterization of Modeled Area

Isolatek is located at 701 North Broadway Street, Huntington, in Huntington Township, in Huntington County, Indiana. Figure 19.1 below shows the property boundary of the Isolatek facility and the extent of the 10 kilometer modeling receptor grid into nearby townships and adjacent areas.

Figure 19.1 - Map of Isolatek and Surrounding Area



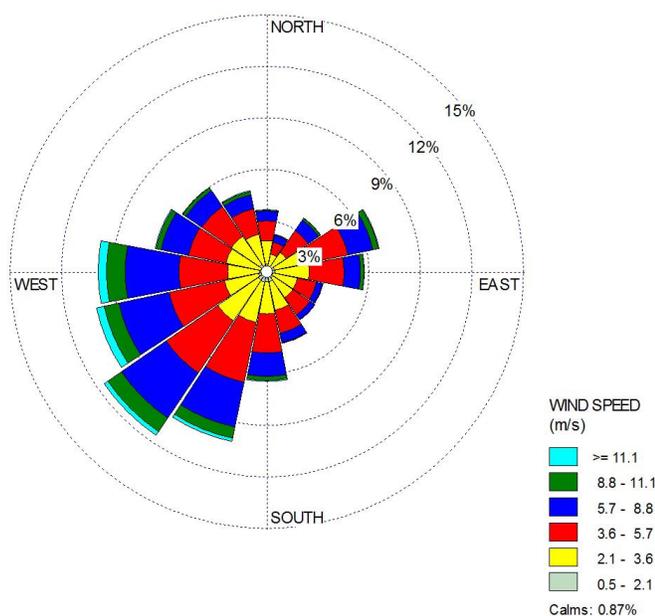
Model Options

Isolatek will use the regulatory default options for the air quality modeling analysis. The Auer Land Use Classification scheme was used to determine the urban versus rural option in AERMOD. It was determined the land use classification for an area within a three kilometer radius surrounding the Isolatek facility was primarily a rural classification.

Meteorology/Wind Rose

The 2012 through 2014 Fort Wayne National Weather Service (NWS) surface meteorological data and the Wilmington, Ohio upper air meteorological data will be used to determine the meteorological conditions for the area surrounding the Isolatek facility in AERMOD. The Fort Wayne NWS wind rose for the 3-year modeled period 2012-2014 is shown as Figure 19.2 below. The Evansville NWS wind rose depicts the predominate wind direction as from the southwest and west - southwest for the 3-year modeled period 2012-2014.

Figure 19.2 - Fort Wayne 3-year Cumulative Wind Rose (2012 – 2014)



Emissions Summary for Isolatek

Isolatek will be modeled using an average of the 2012-2014 emissions data across the three year period. Cupola 1 and 2 and the two blow chambers emissions will be based on reported emissions and stack test information, where applicable.

Modeled Inventory Facilities

Table 19.1 lists the nearby SO₂ facility from Whitley County to be included in the air quality modeling analysis to determine the overall SO₂ air quality impact in the area surrounding Isolatek. The SO₂ emissions listed are the 2014 actual annual emissions.

**Table 19.1 – Whitley County, Indiana:
1-Hour SO₂ Modeling Source Inventories**

Source	Source ID	Location	SO ₂ Emissions (tpy)
Steel Dynamics Inc	18-183-00030	Whitley County, IN	146.9

Temporal Varying Seasonal 1-Hour Seasonal SO₂ Background

Temporally varying seasonal 1-hour SO₂ background concentrations were taken from the Larwill (18-183-0003), Whitley County SO₂ monitor and input directly into the AERMOD model for Isolatek. Table 19.2 shows the hourly seasonal 1-hour SO₂ concentrations in parts per billion (ppb) which represents the background concentrations for the area surrounding Isolatek.

Table 19.2 – 99th Percentile Temporally Varying Seasonal SO₂ Background Concentrations (ppb) from Larwill, Whitley County SO₂ Monitor (2013-2015)

	Hr 1	Hr 2	Hr 3	Hr 4	Hr 5	Hr 6	Hr 7	Hr 8
Winter	3.78	4.48	4.38	3.80	3.50	3.06	4.72	3.20
Spring	3.13	3.40	3.43	3.20	3.30	3.23	3.00	3.40
Summer	1.00	1.00	1.00	1.00	1.00	1.00	2.17	2.67
Fall	1.00	1.00	1.00	2.25	1.37	1.00	1.56	1.30

	Hr 9	Hr 10	Hr 11	Hr 12	Hr 13	Hr 14	Hr 15	Hr 16
Winter	3.76	3.80	4.54	4.76	5.18	6.20	5.20	5.04
Spring	3.70	3.60	3.57	3.57	3.24	3.10	3.46	3.20
Summer	3.17	3.00	3.20	2.60	2.17	1.00	1.00	1.00
Fall	2.47	3.14	2.57	2.94	3.11	3.00	1.41	1.00

	Hr 17	Hr 18	Hr 19	Hr 20	Hr 21	Hr 22	Hr 23	Hr 24
Winter	4.30	3.74	3.56	3.04	2.94	3.08	2.98	3.40
Spring	2.53	2.80	2.50	2.53	2.60	2.93	3.13	3.50
Summer	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Fall	1.00	1.00	1.00	1.00	1.37	1.00	1.00	1.00

Appendix B

1-Hour SO₂

Background Determination

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Indiana's 1-Hour SO₂ Background Determination

U.S. EPA revised the SO₂ National Ambient Air Quality Standard (NAAQS) by instituting a 1-hour primary standard of 75 parts per billion (ppb). Therefore, an analysis was necessary to determine ambient 1-hour SO₂ background concentrations representative for all regions in the state. This determination is needed in order to make attainment designations, attainment demonstrations and perform New Source Review (NSR) and Prevention of Significant Deterioration (PSD) modeling. Indiana has reviewed the 1-hour SO₂ monitoring and meteorological data from 2012 through 2014 to calculate representative ambient 1-hour SO₂ background concentrations. U.S. EPA's "SO₂ NAAQS Designations Modeling Technical Assistance Document, December 2013" was followed to calculate the background concentrations in order to eliminate overly conservative cumulative impacts from nearby major SO₂ emission sources when performing air quality dispersion modeling.

Overview

Indiana has 21 SO₂ monitors located throughout the state. Table 1 shows the 99th percentile for the years 2012, 2013, 2014, and 2015 and the 2012-2014 and 2013-2015 1-hour SO₂ design values for the 7 SO₂ monitors that the attainment designation are based on.

Table 1. 1-Hour SO₂ Design Values for SO₂ Monitors (ppb) in Indiana

County	Monitor ID	99 th Percentile				2012-2014 Design Value	2013-2015 Design Value
		2012	2013	2014	2015		
Floyd	18-043-1004	32.0	20.5	43.8	26.0	32	30
Fountain	18-045-0001	30.0	34.0	22.0	19.0	29	25
Jasper	18-073-0002	33.0	40.0	18.0	10.0	30	23
Lake	18-089-0022	47.0	43.2	53.1	35.0	48	44
Porter	18-127-0011	36.0	36.0	27.0	39.0	33	34
Vanderburgh	18-163-0021	16.5	18.6	32.3	18.0	22	23
Vigo	18-167-0018	72.5	79.1	85.0	71.0	79	78
Whitley	18-183-0003	N/A	5.8	13.3	12.0	N/A	10

N/A – Not Available

Data Retrieval

Monitoring data for the SO₂ monitors near the DRR sources were retrieved from U.S. EPA's AirData database. The concentration data were supplied for each hour and day of every month from 2012 through 2014. Meteorological data was collected in order to correlate the wind directions and concentrations for each hour of each day of every month. Meteorological data

was either collected at a monitor near the monitoring site or the nearest National Weather Service (NWS) station or Automated Surface Observation Stations (ASOS). This data was collected and distributed by the Midwest Regional Climate Center (mrcc.isws.illinois.edu). The nearest meteorological data to each of the SO₂ monitors is summarized below.

Table 2. Locations of SO₂ Monitors and Meteorological Stations for Background Analysis

County/Site	Monitor ID	Monitor Location	Meteorological Station	Station Location
Floyd Co. / New Albany	18-043-1004	38.31° N 85.83° W	Charlestown State Park meteorological station	38.39° N 85.66° W
Fountain Co. / North of S.R. 234	18-045-0001	39.96° N 87.42° W	Indianapolis NWS station	39.79° N 86.18° W
Jasper Co. / Wheatfield	18-073-0002	41.19° N 87.05° W	South Bend NWS station	41.69° N 86.25° W
Lake Co. / Gary ITRI	18-089-0022	41.72° N 86.91° W	Gary ITRI meteorological station	41.61° N 87.30° W
Porter Co. / Dunes Acres	18-127-0011	41.63° N 87.10° W	Gary ITRI meteorological station	41.61° N 87.30° W
Vanderburgh Co. / Buena Vista	18-063-0021	38.01° N 87.58° W	Evansville NWS station	38.05° N 87.52° W
Vigo Co. / Lafayette Ave	18-167-0018	39.49° N 87.40° W	Indianapolis NWS station	39.79° N 86.18° W
Whitley Co. / Larwill	18-183-0003	41.17° N 85.63° W	Fort Wayne NWS station	40.98° N 85.20° W

Methodology for Determining Ambient SO₂ Background Concentrations

Each set of SO₂ data was paired with the corresponding meteorological conditions for every hour of the year in order to determine the wind direction for each hour that SO₂ concentrations were recorded. Data was processed in chronological order with daily and seasonal trends analyzed.

The initial analysis created pollution roses to determine the wind directions from which the highest SO₂ concentrations were coming. This analysis helped to identify the nearest upwind SO₂ emission sources impacting the SO₂ monitor. With those wind directions identified, SO₂ concentrations (10 ppb and above) resulting from SO₂ emission sources from those wind directions were removed from the analysis, in order to calculate a representative ambient SO₂ background concentration for each SO₂ monitor. This analysis helps to prevent double-counting SO₂ emission source impacts in an air quality modeling analysis. Once data for the SO₂ monitors were processed, the data was re-formatted in order to calculate the hourly-seasonal 99th

percentile averages over a 3-year period, as detailed in U.S. EPA's "SO₂ NAAQS Designations Modeling Technical Assistance Document, December 2013 Section 8 – Background Concentrations". The 99th percentile concentrations, based on each hour of the day and each of the four seasons of the year, were calculated for each SO₂ monitor.

In order to calculate the seasonal hourly 99th percentile average, the data was grouped by the seasonal months. Spring was represented by concentrations recorded in March, April and May; summer represented by June, July and August; fall represented by September, October and November and winter represented by December, January and February. Once this data was grouped by seasons, the 99th percentile was calculated for each hour of the day, making 24 separate 99th percentiles for each SO₂ monitoring site per season. The average of these 99th percentiles over the three-year period represents the hourly-seasonal 1-hour SO₂ background.

Summary

For purposes of the modeling analysis related to the DRR, adjusted 1-hour SO₂ background values were used for the Posey, Warrick, Floyd, Sullivan, Vermillion, Jasper, Lake, Porter and Huntington counties DRR sources. Calculations to determine adjusted 1-hour SO₂ background concentrations were made according to U.S. EPA's "SO₂ NAAQS Designations Modeling Technical Assistance Document, February 2016 Section 8 – Background Concentrations". This approach calls for the removal of SO₂ concentrations emitted from large SO₂ emission sources located directly upwind of a SO₂ monitor. This allows for more representative ambient background values to be determined, not overly conservative values that could possibly double-count direct SO₂ source impacts and 1-hour SO₂ background concentrations when modeling inventory sources.

Enclosure 2

ArcelorMittal – Burns Harbor Modeling Protocol to Support Monitoring Approach for the Data Requirements Rule

June 2016

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Air Quality Modeling for Locating SO₂ Monitor for ArcelorMittal - Burns Harbor

1.0 1-Hour Sulfur Dioxide National Ambient Air Quality Standard

The United States Environmental Protection Agency (U.S. EPA) established the 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS) of 75 parts per billion (ppb), based on the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations, as stated in the Federal Register Volume 75, Number 119, page 35520, published June 22, 2010. For air quality modeling purposes, the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) will use an equivalent 1-hour SO₂ NAAQS of 196.2 micrograms per cubic meter (µg/m³) as stated in the November 7, 2011 Federal Register, Volume 76, Number 215. This is based on the 5-year average of the annual 99th percentile of the 1-hour daily maximum modeled SO₂ concentrations, representing the fourth high of the 1-hour daily maximum SO₂ modeled concentrations.

U.S. EPA must complete the designations on a schedule that contains three rounds with specific deadlines. Each round of designations directly affects each state and must be addressed.

- 1) Areas that have current monitored design values in violation of the 2010 1-hour SO₂ NAAQS of 75 ppb;
- 2) As addressed in the “Round 2” Sierra Club and Natural Resources Defense Council consent decree: areas that contain sources that, according to U.S. EPA’s Air Markets Database, either emitted more the 16,000 tons of SO₂ in 2012 or had emissions of more than 2,600 tons of SO₂ and an emission rate of at least 0.45 lbs SO₂/MMBtu in 2012;
- 3) Areas around sources subject to the Data Requirements Rule (DRR), which set an emissions threshold limit of 2,000 tons of SO₂ per year in 2014. Sources meeting this emission threshold will need to characterize air quality in the area surrounding the source.
 - a.) The court’s order directs U.S. EPA to complete area designations for the areas where states have not installed and begun operating a new SO₂ monitoring network under the DRR (Round 3) by December, 2017.
 - b.) The court’s order directs U.S. EPA to designate all remaining areas of the country addressed under the DRR (Round 4) by December, 2020

2.0 Methodology for the DRR Air Quality Modeling for ArcelorMittal – Burns Harbor

This air quality modeling protocol addresses requirements specific to the DRR. ArcelorMittal - Burns Harbor (Burns Harbor) was identified by IDEM as one of eleven sources within the state

that met the DRR criteria of emitting 2,000 tons or more of SO₂ in 2014; Burns Harbor emitted 12,189 tons of SO₂. U.S. EPA has since included six additional DRR sources to Indiana's DRR list; five sources were addressed through the Round 2 – Consent Decree order and one source was added based on U.S. EPA's review of their SO₂ emissions.

As per the requirements of the DRR, air agencies are required to indicate by July 1, 2016 which of the following three options they will rely on to characterize air quality in the area surrounding the DRR sources: 1) ambient monitoring, 2) air quality modeling or 3) establishing a permanent and federally enforceable emission limit of a source's total SO₂ emissions to below 2,000 tons per year. Burns Harbor wishes to characterize air quality in the vicinity of the facility through the use of ambient air quality monitoring.

Burns Harbor is an integrated steel mill consisting of two blast furnaces, three hot strip mill furnaces, plate mill furnaces, two coke batteries, three basic oxygen furnaces (BOF) hot metal desulfurization steel making processes, five power station boilers, and a sinter plant. There are also two blast furnace gas flares and a clean coke oven gas flare which emit a small amount of SO₂. Some processes such as the BOF steel making processes have roof monitor emissions in addition to stack emissions. The blast furnaces also have non-point slag pit loadout fugitive SO₂ emissions which are modeled as volume sources.

U.S. EPA provided guidance in order to conduct an appropriate air dispersion modeling analysis to aid in determining the number and location of monitors necessary to accurately characterize the air quality in the area surrounding Burns Harbor. U.S. EPA's SO₂ NAAQS Designations Modeling Technical Assistance Document (TAD) guidance has several recommendations for modeling methodology for determining attainment designations, including:

- 1) Use of actual emissions to assess modeled concentrations to reflect current air quality.
- 2) Use of 3 years of meteorology and modeling results to calculate a simulated 1-hour SO₂ design value consistent with the 3-year 1-hour SO₂ monitored design values.
- 3) Placement of receptors only in locations where an air quality monitor could be placed.
 - Based on the SO₂ NAAQS Designations Modeling TAD, Section 4.2; IDEM will only place modeling receptors where feasible to place a monitor. Therefore, in bodies of water or an area where monitor citing criteria would not be reasonably met, IDEM will not place receptors in those locations.
- 4) Use of actual stack heights rather than following the Good Engineering Practice (GEP) stack height policy when modeling actual emissions for area designations to address the DRR.

IDEM will follow U.S. EPA’s designation modeling and monitoring recommendations to conduct 1-hour SO₂ modeling to determine the appropriate number of monitors and the placement of the monitor(s). Modeling results will look at the 4th high maximum daily 1-hour SO₂ concentrations averaged over the 3-year modeled period of 2012 - 2014.

2.1 Area Characterization

The ArcelorMittal - Burns Harbor facility is located at 250 West U.S. Highway 12, Burns Harbor, Westchester Township in Porter County, Indiana. The northern end of the Burns Harbor plant borders the southern shoreline of Lake Michigan. The receptor grid was adjusted to remove the receptors which are located over Lake Michigan since this is an area where monitors could not be located. Figure 1 shows the property boundary of the facility and the extent of the 10 kilometer modeling receptor grid into nearby townships and eastern Lake County, as well as SO₂ sources in the proximity of Burns Harbor.

Figure 1: Map of ArcelorMittal - Burns Harbor and Extent of Receptor Grid

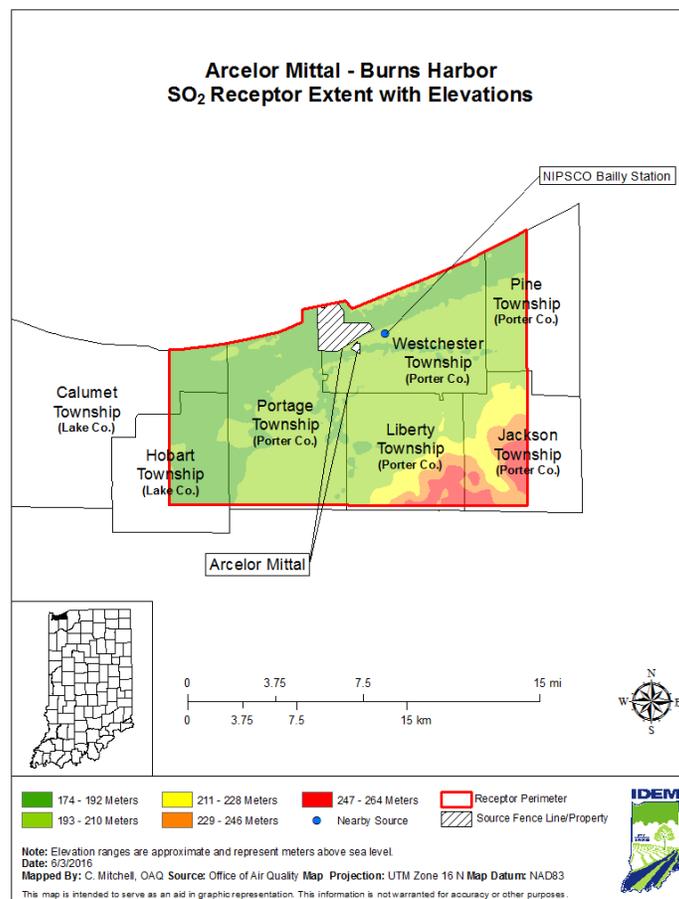


Figure 2 shows an overhead view of Burns Harbor, with Lake Michigan bordering Burns Harbor to the north, the NIPSCO - Bailly Generating Station is the adjacent property to the east, U.S. Highway 12 borders Burns Harbor to the south, and the industrialized Port of Indiana is located to the west.

Figure 2: ArcelorMittal - Burns Harbor: Overview of Site and Surrounding Area



3.0 SO₂ Emissions Sources to be Modeled

IDEM modeled the worst-case daily actual emissions taken from fuel usage and production data records as provided by Burns Harbor. Burns Harbor processed emissions from several of their operations with varying hourly emissions rates based on a maximum daily emission rate. The 24-hour daily average emissions were based on those maximum daily emission rates. The SO₂

NAAQS Designations Modeling TAD, Section 5 is referenced to best characterize any temporal and/or seasonal variability of emissions. This included any seasonal, monthly or daily variations that could be quantified. For all other Burns Harbor emission units without adequate daily emissions records, the annual emissions taken from 2012 – 2014 will be averaged.

NIPSCO – Bailly Generating Station is located adjacent to Burns Harbor. Bailly Generating Station emitted less than 2,000 tons of SO₂ in 2014 and is not listed as a DRR source. NIPSCO – Bailly’s 2012-2014 continuous emission monitoring (CEM) data will be evaluated along with Burns Harbor in the modeling analysis.

In order to get an accurate representation of air quality, NIPSCO’s Michigan City Generating Station in LaPorte County and U.S. Steel – Gary Works in Lake County were included in the modeling. These sources had actual 2014 emissions that could potentially impact air quality in the vicinity of the Burns Harbor facility. Actual 2014 emissions were modeled from both of these facilities. A summary of modeled facility emissions is found in Table 1 while a summary of all the emission units modeled for the Burns Harbor analysis can be found in Appendix A.

Table 1: 1-Hour SO₂ Modeling Inventory for ArcelorMittal - Burns Harbor

Source	Source ID	Location	SO ₂ Emissions (tpy)
NIPSCO - Bailly Generating Station Units 7 and 8	18-127-00002	Porter County	2012-2014 Hourly CEMS Data
NIPSCO - Michigan City Generating Station Boiler 12	18-091-00021	LaPorte County	15,991 (2014)
U.S. Steel – Gary Works	18-089-00002	Lake County	3,285 (2014)

4.0 Information Gathering for Monitoring Site Analysis

4.1 Monitoring Site Overview

IDEM currently does not operate any SO₂ monitoring sites in Porter County. However, NIPSCO - Bailly operates the Dune Acres Substation SO₂ monitor (18-127-0011), located immediately east of Burns Harbor, at Latitude 41.6341096° N, Longitude - 87.101478° W. Figure 3 shows the Burns Harbor property with the Dune Acres Substation SO₂ monitor located to the east.

Figure 3: Burns Harbor – Overview of Site with Dune Acres Substation SO₂ Monitor



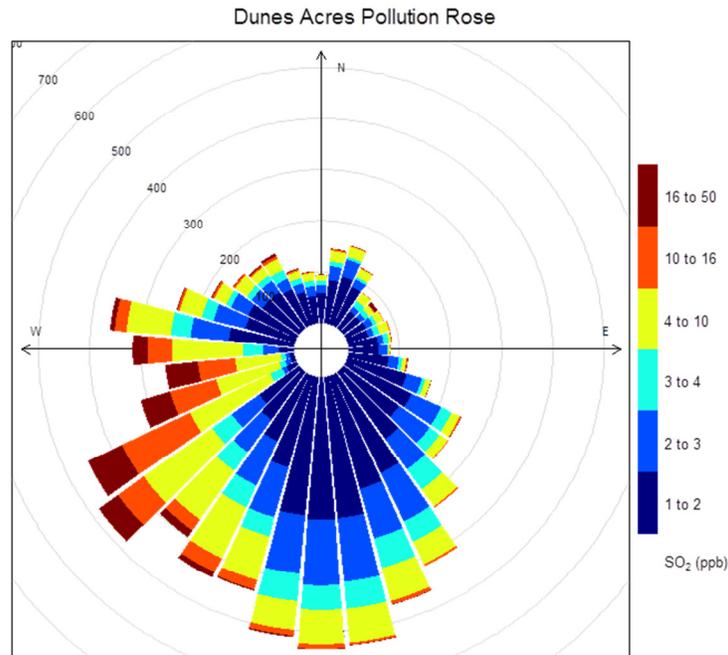
The Dune Acres Substation SO₂ monitor has been in operation for several decades. Table 2 reflects the overall reduction in SO₂ concentrations in the area as the 1-hour SO₂ design values have been trending downward consistently over the past ten years at the Dune Acres monitor. Design values represent the 99% percentile of the 1-hour daily maximum concentrations, averaged over three years. The Dune Acres monitored 1-hour SO₂ design values have been less than 50% of the 1-hour SO₂ NAAQS of 75 ppb over the past several years.

**Table 2: 1-Hour SO₂ Design Values (ppb)
for the Dune Acres Monitor (2006 – 2015)**

Monitor ID	06 - 08	07 - 09	08 - 10	09 - 11	10 - 12	11 - 13	12 - 14	13 - 15
18-127-0011	66	65	65	52	47	39	33	34

Figure 4 shows the pollution roses from 2012 through 2014, indicating higher SO₂ concentrations monitored at Dune Acres, while well below the 1-hour SO₂ standard, come from the west and west-southwest.

Figure 4: Pollution Rose for Dune Acres SO₂ Monitor – 2012-2014



Burns Harbor is proposing to locate an SO₂ monitoring station along the western property boundary at the Port of Indiana Fishing Area based on the 1-hour SO₂ modeling results. This monitor in addition to the existing NIPSCO's Dune Acres SO₂ monitor will constitute an adequate SO₂ monitoring network for the area surrounding Burns Harbor and NIPSCO-Bailly.

5.0 Model Selection

5.1 AERMOD Dispersion Model

In accordance with Appendix A of Appendix W to 40 Code of Federal Regulations (CFR) Part 51, IDEM used the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) version 15181 to model Burns Harbor. U.S. EPA's SO₂ NAAQS Designations Modeling TAD, specific to the attainment designation modeling, recommends using actual stack heights when modeling actual emissions instead of following the GEP stack height requirement. U.S. EPA's Building Profile Input Program-PRIME (BPIP-PRIME) will be used to account for any building downwash concerns.

5.2 AERMAP

The AERMOD terrain preprocessor mapping program, AERMAP, was used to determine the elevation terrain heights for the receptor, building, and source locations using the Universal Transverse Mercator (UTM) coordinate system. AERMAP version 11103 assigned the elevations from the National Elevation Dataset (NED) using the North American Datum (NAD)

1983 as recommended in 40 CFR Part 51, Revision to the Guideline on Air Quality Models, Appendix W and later revised in the AERMOD Implementation Guide. The Auer Land Use Classification Scheme was used to determine a rural land use in the area.

6.0 Receptor Grid and Modeling Domain

The receptor grid and modeling domain was based on guidance provided in the memorandum “Updated Guidance for Area Designations for the 2010 Primary Sulfur Dioxide National Ambient Air Quality Standards”, dated March 20, 2015, and the SO₂ NAAQS Designations Modeling TAD. IDEM used a multi-nested rectangular receptor grid with appropriate spacing of receptors based on the distance from the modeled emission points to detect significant concentration gradients. IDEM did not have maximum modeled 1-hour SO₂ impacts or source-culpable modeled violations that extended out beyond 10 kilometers from Burns Harbor.

- Receptor spacing at the Burns Harbor fence line was placed every 50 meters
- Receptor spacing at 100 meters out to a distance of 3,000 meters (3 kilometers)
- Receptor spacing at 250 meters out to a distance of 5,000 meters (5 kilometers)
- Receptor spacing at 500 meters out to a distance of 10,000 meters (10 kilometers)

Based on the SO₂ NAAQS Designations Modeling TAD, Section 4.2, IDEM only placed modeling receptors where it is feasible to place a monitor. Areas over bodies of water or areas where a monitor could not be located and operated were not included as part of the receptor grid.

7.0 Meteorological Data

7.1 AERMET

As stated in 40 CFR Part 51, Appendix W, Section 8.3.1.2 and the SO₂ NAAQS Designations Modeling TAD, Indiana used three years (2012-2014) of on-site meteorological data taken from the Gary-IITRI surface data and upper air meteorological data from the Lincoln, Illinois National Weather Service station which were processed with the latest version of the AERMOD meteorological data preprocessor program AERMET (version 15181).

Surface meteorological data from the Gary-IITRI site and upper air meteorological data from Lincoln, Illinois were used to accurately account for the influence of lake breezes from Lake Michigan on the meteorological conditions in the area immediately surrounding the Burns Harbor facility. Besides the influence from the lake breezes on pollutant transport and dispersion, synoptic meteorology dominates pollutant dispersion in the area surrounding Burns

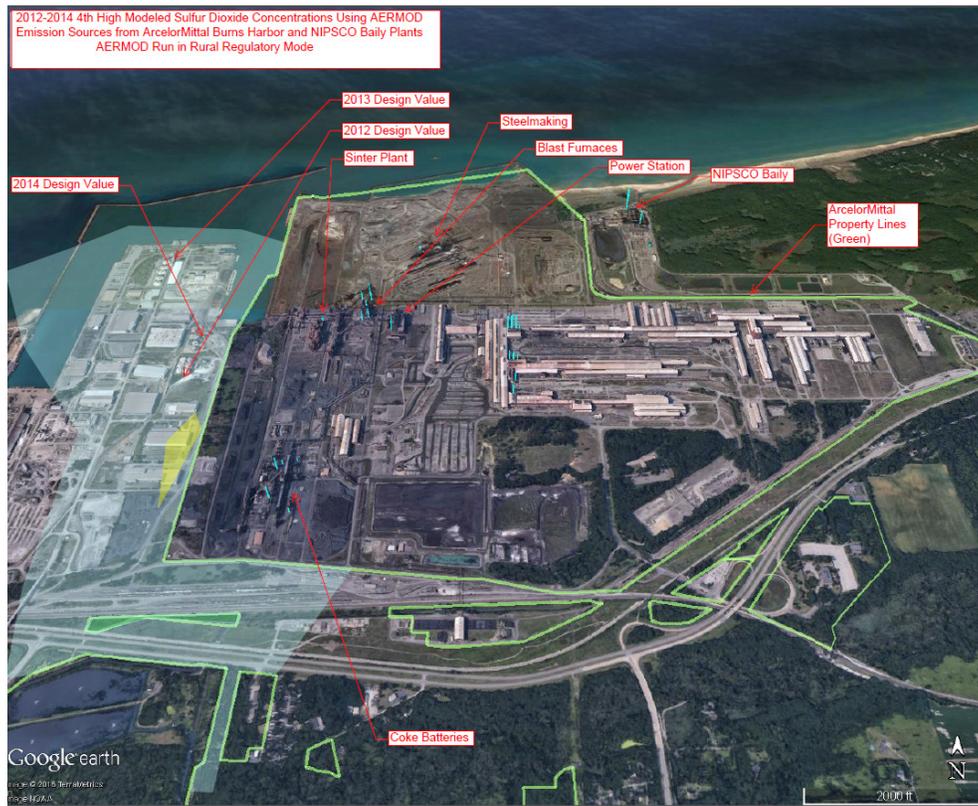
The albedo and the Bowen ratio surface characteristics were adjusted during the three winter months of January, February, and December in accordance with the U.S. EPA Region V document, “Regional Meteorological Data Processing Protocol,” dated May 6, 2011.

8.0 Modeling Results

Figure 6 shows the maximum modeled 4th high concentrations, based on modeling conducted by OCS Environmental, Inc., the consulting firm representing Burns Harbor. The results indicate a maximum concentration “hot spot” along the western property boundary of Burns Harbor extending west over the Port of Indiana. Emission source groups are indicated on the map as well as the highest modeled concentrations over the three-year modeled period. Highest concentrations were shown to occur to the west-northwest and west of the facility in the vicinity of the potential SO₂ monitoring site.

The Port of Indiana owns the area west of Burns Harbor. The Port of Indiana represents an industrialized area with numerous businesses located in the area. There is limited property available to properly site an ambient air monitor. Locations in which to place an SO₂ monitor, within the maximum modeled concentration area, have been determined but a location has not yet been secured for leasing to install the monitoring equipment and shelter. Each of these locations have the accessibility and available resources to meet the DRR monitoring deadline to procure, install and operate the monitoring equipment to adequately characterize air quality in the area immediately surrounding Burns Harbor.

Figure 6: ArcelorMittal Modeled Results with Emission Sources and Maximum Impacts



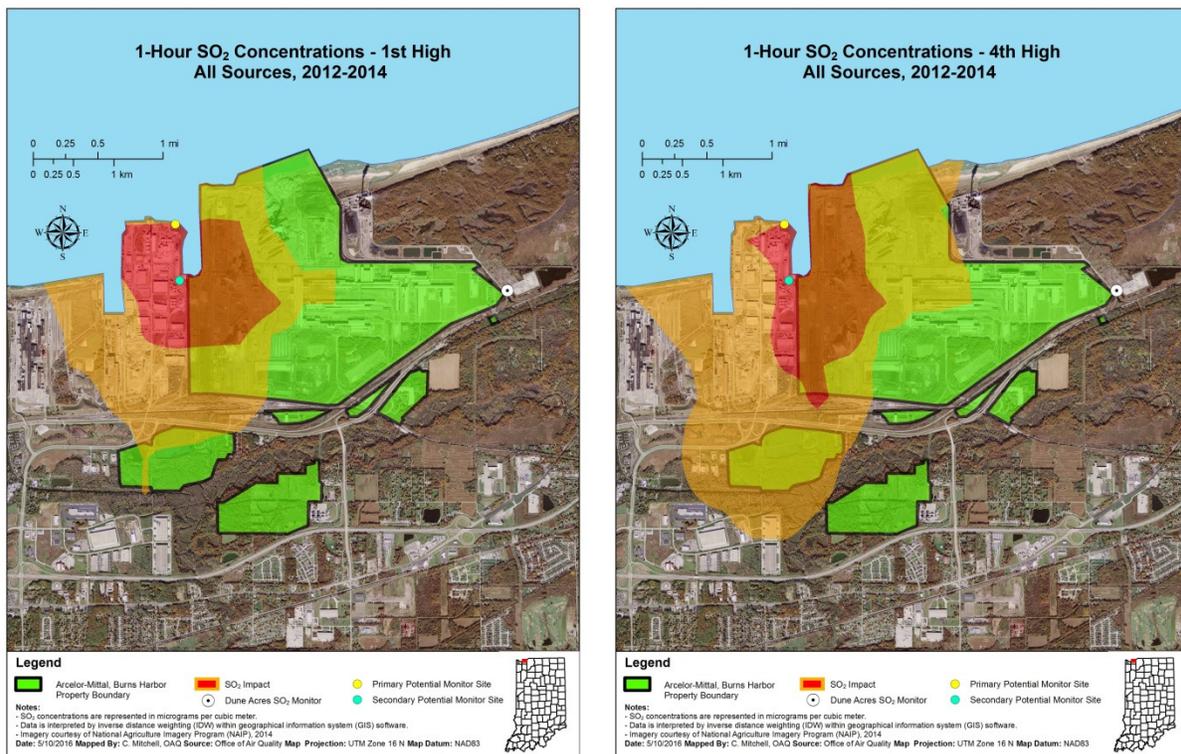
A culpability study was conducted to determine which emission source groups had the largest modeled impact in the maximum concentration “hot spot” zone. The Burns Harbor emission units culpable for the maximum SO₂ impacts are the Power Station Boilers #8 – 12, with approximately 44% of the modeled concentrations coming from these units, as shown in Table 3. All other Burns Harbor emission units contribute less than 10% for each emission unit grouping. Therefore, locating an ambient SO₂ monitor near the Power Station Boilers, where the maximum modeled 1-hour SO₂ impacts from Burns Harbor occur, would be appropriate. The proposed SO₂ monitoring location, west and west-northwest of the Power Station Boilers, would adequately capture SO₂ impacts from the majority of the largest contributing SO₂ emission sources and characterize the air quality in the area.

Table 3: Burns Harbor Culpable Source SO₂ Modeling

Source	Percent Contribution
Power Station Boiler Nos. 8 through 12	43.8%
C Furnace Stoves	9.3%
Background	8.3%
D Furnace Stoves	7.8%
Sinter Plant Windbox Scrubber Stack	6.5%
C Furnace BFG Flare	6.5%
D Furnace BFG Flare	4.8%
NIPSCO Bailly Unit 7/8: Main Stack at 2012-2014 Actual CEM Emissions File Main Stack	3.4%
ALL OTHERS LESS THAN 3% CONTRIBUTION	

Figure 7 shows the maximum modeled 1st and 4th high concentration isopleths as modeled by IDEM, indicating clear maximum concentration gradients along the western and west-northwest property boundary of Burns Harbor. The modeling results compare favorably with the Burns Harbor modeling, conducted by OCS Environmental, Inc., shown previously in Figure 5.

Figure 7: Map of Burns Harbor Modeling Results for Potential SO₂ Monitors Sites: 1st and 4th High Maximum Daily 1-hour SO₂ Concentrations



Burns Harbor has researched the Port of Indiana area to determine appropriate locations for an SO₂ monitor within the maximum 1-hour SO₂ concentration “hot spot”. Two potential monitoring sites were found: a fishing area in the northern portion of the port and an existing

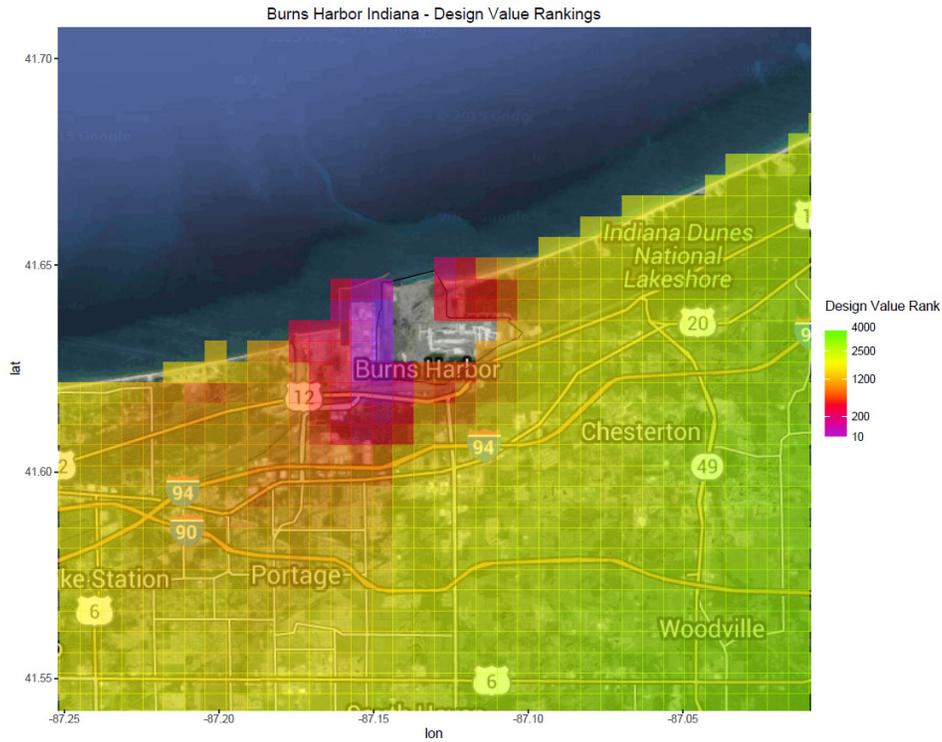
lead monitor site located in the Port of Indiana, directly west of the Power Stations and Blast Furnaces emission units at Burns Harbor. These two sites fall within the maximum modeled 1st and 4th high concentration zones and would provide accurate assessment of the 1-hour SO₂ air quality in the area. The sites are located close to each other, representing a similar localized air shed and should not be considered for two separate monitoring sites. There are concerns with locating an SO₂ monitor at the lead monitoring site due to its proximity to a rail line and service roadway. There is also concern about the time necessary to secure a lease agreement with the Port of Indiana in order to acquire the land needed to set up the ambient air SO₂ monitor by January 1, 2017.

8.1 Modeling to Inform Monitoring Placement

IDEM conducted modeling that closely followed U.S. EPA's SO₂ NAAQS Designations Monitoring TAD, Appendix A guidance, which provided an example of using dispersion modeling to inform monitoring placement of ambient monitors. The Burns Harbor hourly emissions were modeled, but emissions were not normalized due to the fact that variable emission rates at several of the emission units within Burns Harbor were modeled. Elements of the Monitoring TAD, Appendix A, analysis were used to evaluate the modeling results and the frequency of the highest maximum 4th high modeled concentrations which occur along the west-northwest and western property lines of Burns Harbor. With Lake Michigan to the north of Burns Harbor and no modeling receptors placed over the lake, the maximum modeled impacts occur directly west of the facility, over the Port of Indiana. This area will be the focus of the analysis for Data Requirement Rule purposes.

The first step in the analysis was to model Burns Harbor and all other large SO₂ emission sources in the area to determine the design values at each receptor. This provided a means to understand the relative magnitude of ambient SO₂ concentration across the area. The design value represents the 3-year average of each year's 4th daily highest 1-hour maximum concentration. This is the equivalent of the 99th percentile of the daily 1-hour maximum concentrations. Figure 8 shows the plot map of the area surrounding Burns Harbor. The design values were ranked from highest to the lowest. The rankings were plotted on the map which shows the highest modeled design values occurred on the western property lines of Burns Harbor and over the industrialized Port of Indiana area.

Figure 8: Plot Map of SO₂ Design Values for the Area Surrounding Burns Harbor



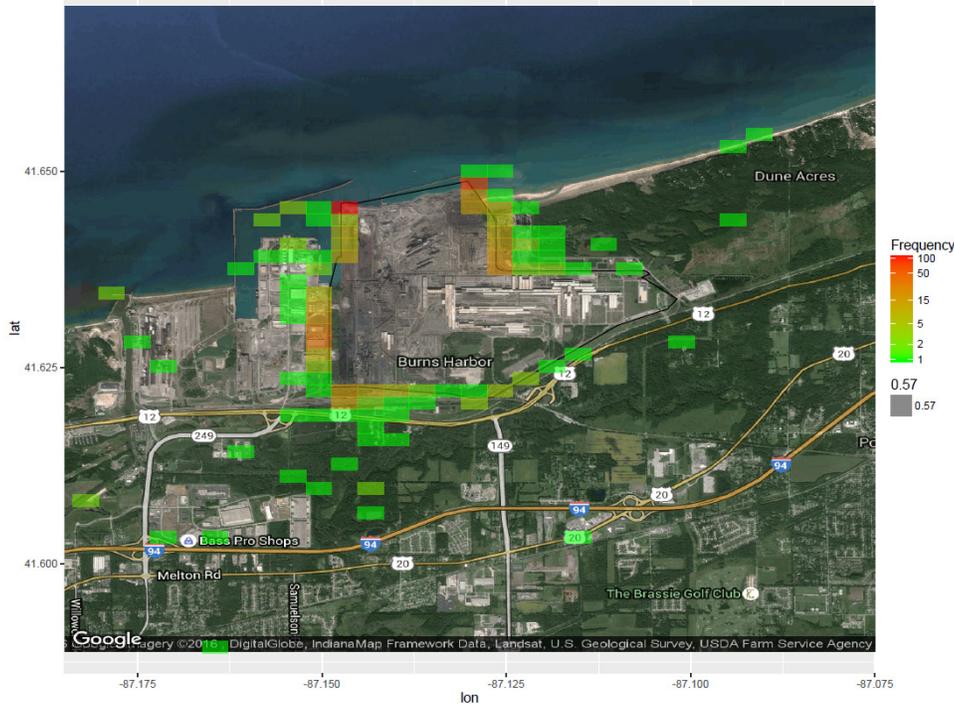
Step Two in the analysis was to determine the receptors with the highest frequency of days having the daily 1-hour maximum concentrations. Table 4 shows the receptors with the highest frequency of days with the maximum modeled SO₂ impacts and their ranking.

Table 4: Top 20 Ranking of Receptors With Highest Frequency of Days with Maximum Modeled SO₂ Impacts

Rank	UTM E	UTM N	Number of Days	Rank	UTM E	UTM N	Number of Days
1	487879.6	4610468	110	10	487582.8	4608824	17
2	489155	4610783	78	10	489205	4610696	17
3	487582.6	4608574	36	13	487850	4607750	16
4	487582.7	4608624	28	13	487582.6	4608474	16
4	487582.8	4608724	28	13	487582.9	4608924	16
6	487582.6	4608524	21	13	489230	4610653	16
6	487582.7	4608674	21	17	489472.2	4609649	15
6	489564.5	4609514	21	17	489472.5	4609699	15
9	489472.8	4609749	18	19	487582.9	4608873.9	14
10	487582.8	4608774	17	19	489473.1	4609799.1	14

Figure 9 shows the cumulative number of days for each receptor that modeled the highest frequency of days with the daily 1-hour maximum concentration among all receptors. The receptors with the highest frequencies of the daily 1-hour maximum concentrations occur northwest, west and northeast of Burns Harbor. The area adjacent to Burns Harbor is the NIPSCO – Bailly Generating Station property, located east and northeast. NIPSCO – Bailly operates an SO₂ monitoring station, along the east property line of Burns Harbor.

Figure 9: Map of Cumulative Number of 1-Hour SO₂ Daily Maximum Days



Priority was given to creating a list of receptors for consideration for locating an SO₂ ambient air monitoring site that would characterize air quality in the area immediately surrounding Burns Harbor. The scoring strategy recommended in Appendix A of the Monitoring TAD was followed. There are several steps in the process:

- Calculate the modeled design values for each of the receptors
- Rank the receptors from highest to lowest modeled design value (Concentration Rank)
- Using the MAXDAILY output option in AERMOD to determine each modeled day's highest concentration at each receptor
- Determine the number of days each receptor is the highest concentration for that day
- Rank the results (from highest to lowest) of the number of days each receptor had the highest concentration for each day during the 3-year modeled period (Frequency Rank)

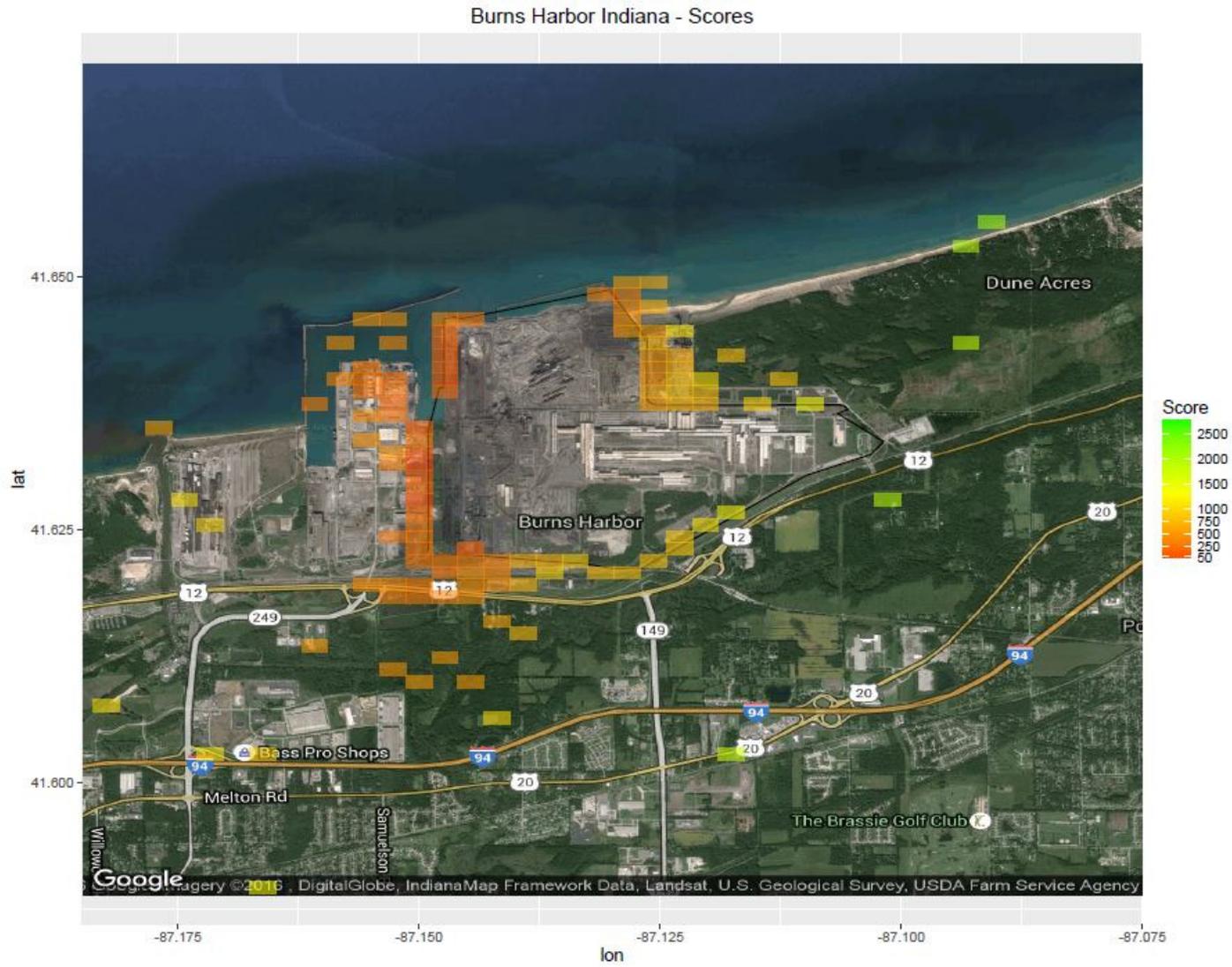
- For each receptor, add the Concentration Rank and Frequency Rank scores to determine which receptor had an overall score where the lowest possible score would have the highest overall design value and highest number of days where the receptor had the highest modeled concentration. Those receptors would represent prime locations for an ambient air monitor.

This analysis can be used to define specific receptors that are more prone to encounter higher modeled concentrations and would be prime candidates for siting an ambient air monitor. Table 5 below details the overall scoring results while Figure 10 shows the scoring results based on the location and rank of the receptors. This evaluation provided valuable information in helping to establish a monitor that will best characterize air quality in the area near Burns Harbor.

Table 5: Overall Scoring of Maximum Design Value/Frequency of Maximum Days

UTM E	UTM N	Concentration	Frequency	Frequency	Overall	Score
X receptor	Y receptor	Rank	Rank	of Max Days	Score	Rank
487582.7	4608623.9	3	4	28	7	1
487582.8	4608723.9	7	5	28	12	2
487582.6	4608573.9	9	3	36	12	2
487582.7	4608673.9	8	7	21	15	4
487582.8	4608773.9	6	10	17	16	5
487582.9	4608923.9	2	15	16	17	6
487582.6	4608523.9	12	6	21	18	7
487582.8	4608823.9	11	11	17	22	8
487582.9	4608873.9	4	19	14	23	9
487582.6	4608473.9	16	14	16	30	10
487724	4609770.9	1	30	10	31	11
487582.5	4608423.9	17	22	13	39	12
487582.9	4608973.9	14	29	10	43	13
487582.5	4608373.9	24	36	8	60	14
487879.6	4610467.9	70	1	110	71	15
487679.4	4609703.6	18	54	5	72	16
487850	4607850	49	26	11	75	17
487724.1	4609870.9	36	40	7	76	18
487583	4609073.9	27	53	5	80	19
487724.1	4609820.9	26	63	4	89	20

Figure 10: Plot Map of Overall Scoring of Maximum Design Value/Frequency of Maximum Days



9.0 Summary for Results for Burns Harbor Monitor Placement

ArcelorMittal - Burns Harbor is located at 250 West US Highway 12, Burns Harbor, Westchester Township in Porter County, Indiana. Burns Harbor is an integrated steel mill consisting of two blast furnaces, three hot strip mill furnaces, plate mill furnaces, two coke batteries, three basic oxygen furnaces (BOF) hot metal desulfurization steel making processes, five power station boilers, and a sinter plant. Burns Harbor was identified as one of the Indiana sources that met the Data Requirements Rule criteria of emitting 2,000 tons or more of SO₂ in 2014 (12,189 tons).

As per the requirements of the DRR, air agencies are required to indicate by July 1, 2016 which of the following three options they will rely on to characterize air quality in the area surrounding the DRR source: 1) ambient monitoring, 2) air quality modeling or 3) establishing a limit of a source's total SO₂ emissions to below 2,000 tons per year. Burns Harbor wishes to characterize air quality in the area immediately surrounding the facility through the use of ambient air quality monitoring. Burns Harbor has submitted its SO₂ DRR Monitoring Quality Assurance Project Plan (QAPP) to IDEM's monitoring branch in order for it to be included in IDEM's 2017 Ambient Air Monitoring Network Plan. This plan will be submitted to U.S. EPA by July 1st.

IDEM conducted air dispersion modeling, consistent with U.S. EPA's SO₂ NAAQS Designations Modeling and Monitoring Technical Assistance Documents (TADs) to determine the most appropriate location for the SO₂ monitor that is representative of ambient air accessible to the public and best characterizes ambient air quality in the area. Based on the recommended analysis in Appendix A of the Monitoring TAD for conducting modeling to inform monitoring placement, scoring results concluded maximum SO₂ impacts and receptors with frequencies of highest number of days with the highest concentration for each modeled day occurred most often along Burns Harbor's western property line. The adjacent area west of Burns Harbor is the Port of Indiana, an industrialized area with limited accessibility and few viable options for appropriately locating an ambient air monitor.

Burns Harbor has identified two locations that fall within the highest ranked area to capture the highest SO₂ impacts from Burns Harbor and surrounding SO₂ emission sources impacting the area. As mentioned previously, air quality is fairly consistent throughout the area west of Burns Harbor based on the 1st and 4th high modeling results. One of the two proposed sites would suffice in characterizing air quality in the area.

Options for a proposed monitoring site location along with approximate coordinates are presented in Appendix B. Either of these sites will adequately characterize air quality in the area and support designation of the area for 1-hour SO₂ under the Data Requirements Rule provisions.

Appendix A

Point and Volume Source Emissions Inventory Modeled for Burns Harbor DRR Analysis

Table A.1 Point Sources Modeled for the Data Requirements Rule Air Quality Characterization for Burns Harbor

Source ID	Source Description	Easting (X) (m)	Northing (Y) (m)	Base Elevation (m)	Stack Height (ft)	Temperature (°F)	Exit Velocity (m/s)	Stack Diameter (ft)	SO2 (tpy)
6	Burns Harbor - POWER STATION BOILER #9 (8-12 INCLUDED)	488403	4609297	201.63	223.0	450.0	13.9	11.5	7324.1
59	Burns Harbor - STEELMAKING HMD STATION #2	488512	4609940.1	176.66	85.0	90.0	5.9	10.0	12.4
2501	Burns Harbor - Power Station Boiler #7	488405.1	4609254.67	200.52	223.0	450.0	14.4	10.5	1555.4
3018	Burns Harbor - BATTERY #1 PECS	488053.26	4608389.39	198.69	100.0	190.0	25.3	8.0	60.1
3024	Burns Harbor - BATTERY #2 PECS	488059.09	4608115.47	196.57	88.0	190.0	25.3	8.0	63.1
3026	Burns Harbor - #1 Underfire Coke Oven	487967.91	4608346.21	195.67	252.0	550.0	9.1	12.4	2332.7
3027	Burns Harbor - #2 Underfire Coke Oven	487958.62	4608190.52	193.96	249.0	550.0	9.1	13.3	2696.0
3091	Burns Harbor - Coke Oven Export Gas Flare	487988	4608372	195.96	100.0	3000.0	9.4	3.0	2.1
3513	Burns Harbor - SINTER PLANT WINDBOX SCRUBBER STACK	488038.33	4609328.76	200.37	79.0	120.0	13.9	17.0	1193.2
3540	Burns Harbor - C Furnace BFG Flare 2 flareheads	488274.8	4609359	207.62	210.0	1500.0	41.6	5.0	775.8
3547	Burns Harbor - C Furnace Stoves/Stacks (4 stoves)	488244.31	4609338.62	208.42	201.0	500.0	15.8	11.4	660.4
3553	Burns Harbor - D Furnace BFG Flare 2 flareheads	488278.28	4609495.5	199	210.0	1500.0	41.6	5.0	775.8
3560	Burns Harbor - D Furnace Stoves/Stacks (4 stoves)	488229.23	4609495.55	197.3	201.0	500.0	14.9	11.8	392.0
4002	Burns Harbor - STEELMAKING HMD STATION #1	488512.1	4609935.55	176.71	85.0	90.0	12.9	6.7	12.2
4008	Burns Harbor - STEELMAKING HMD STATION #3	488514.6	4609952.1	176.53	40.0	115.0	12.9	8.7	12.4
6502	Burns Harbor - 160" PM #7 IN/OUT REHEAT FURNACE	489042.18	4608913.72	197	108.0	950.0	10.0	7.3	0.2
6503	Burns Harbor - 160" Plate Mill #1 Slab Reheat Furnace	489013.97	4609042.93	197	178.0	750.0	4.4	10.2	201.4

6504	Burns Harbor - 160" Plate Mill #2 Slab Reheat Furnace	489035	4609042.91	197	178.0	750.0	4.1	10.5	0.5
6505	Burns Harbor - 160" PM #8 BATCH FURNACE	489042.16	4608893.61	197	167.0	750.0	3.0	5.7	0.0
6509	Burns Harbor - 160" PM #5 IN/OUT REHEAT FURNACE	489053.88	4609038.63	197	131.0	950.0	12.5	6.4	0.0
7001	Burns Harbor - 110" Plate Mill #1 & 2 Stack	489029.59	4608810.75	197	179.0	1050.0	2.1	14.6	1.0
90A	Burns Harbor - HOT STRIP MILL #1 WALKING BEAM FCE E	489029.2	4609235.4	197	315.0	1000.0	7.1	10.5	118.4
90B	Burns Harbor - HOT STRIP MILL #1 WALKING BEAM FCE W	489009	4609235	197	315.0	1000.0	7.1	10.5	118.4
91A	Burns Harbor - HOT STRIP MILL #2 WALKING BEAM FCE E	489051.1	4609235.7	197	315.0	1000.0	7.0	10.5	125.8
91B	Burns Harbor - HOT STRIP MILL #2 WALKING BEAM FCE W	489030.1	4609235.4	197	315.0	1000.0	7.0	10.5	125.8
92A	Burns Harbor - HOT STRIP MILL #3 REHEAT FURNACE STACK E	489069	4609235.6	197	136.0	1000.0	8.8	13.0	122.7
92B	Burns Harbor - HOT STRIP MILL #3 REHEAT FURNACE STACK W	489053.1	4609235.7	197	136.0	1000.0	8.8	13.0	122.7
BOIL12	Michigan City	507543	4618923	177.84	505.0	293.7	30.4	21.0	15990.6
U78FGD	NIPSCO Baily	489738	4610321	186.28	480.0	130.0	26.6	20.5	1116.8
U10CT	NIPSCO Baily	489833	4609968	188.09	40.0	829.0	18.8	14.0	0.0
AUX12	NIPSCO Baily	489805	4610184	188.22	300.0	550.0	17.8	6.0	0.0
BFCCHBH	NIPSCO Baily	488262	4609414	204.53	213.3	500.0	24.7	5.1	130.7
BFDCGBG	NIPSCO Baily	488263	4609553	193.75	231.8	500.0	24.7	5.1	130.7
94011	Sinter Plant Windbox	473218	4607057	182.33	185.0	235.0	20.2	11.3	700.5
940541	TBBH Boiler 1	472661	4607149	181.7	150.0	570.0	14.5	12.0	69.6
940542	TBBH Boiler 2	472661	4607136	181.69	150.0	570.0	14.5	12.0	123.0
940543	TBBH Boiler 3	472661	4607123	181.69	150.0	570.0	14.5	12.0	117.2

940545	TBBH Boiler 5	472661	4607096	181.7	150.0	570.0	14.5	12.0	61.8
94017	84 HSM Reheat Furnaces	468755	4608668	179.65	163.0	803.0	50.8	8.1	63.7
940121	No. 4 BH Boiler 1	472592	4607817	181.01	116.0	370.0	18.8	9.5	146.9
940122	No. 4 BH Boiler 2	472592	4607792	181.7	116.0	370.0	18.8	9.5	168.1
940123	No. 4 BH Boiler 3	472592	4607767	181.7	116.0	370.0	18.8	9.5	112.5
940401	CPBH Boiler 8	474393	4606802	184.13	309.0	505.0	5.7	10.0	23.5
940402	CPBH Boiler 9	474436	4606850	183.77	200.0	505.0	5.7	9.2	12.7
940403	CPBH Boiler 10	474436	4606866	183.9	200.0	505.0	5.7	9.2	12.7
94070	Tail Gas Incinerator	474470	4606815	183.01	320.0	1150.0	22.9	1.9	37.9
94026	No. 2 Underfiring	473903	4606522	183.01	350.0	204.0	3.2	20.0	118.3
94038	CPBH Boiler 6	474362	4606775	184.12	133.0	505.0	5.3	8.5	23.5
94037	CPBH Boilers 4 an 5	474337	4606775	184.1	133.0	505.0	5.3	8.5	23.5
94066	No. 14 BF Casthouse	472643	4607841	180.63	165.0	134.0	20.4	13.0	736.9
94020	No. 14 BF Stoves	472696	4607680	181.8	250.0	126.0	6.2	15.5	85.6
94053	TBBH Boiler 6	472655	4607079	181.6	150.0	440.0	12.2	12.0	73.8
94039	Coke Plant Boiler No. 7	474370	4606803	184.1	105.0	505.0	5.1	8.5	23.5
94036	Coke Plant Boiler No. 3	474315	4606782	184.1	129.0	505.0	9.3	6.2	23.5
94021	No. 4 BF Stoves	472694	4606861	181.37	225.0	107.0	3.5	12.8	64.8
94022	No. 6 BF Stoves	472697	4607006	181.48	225.0	116.0	8.1	12.8	108.1
94023	No. 8 BF Stoves	472701	4607166	181.72	250.0	105.0	5.9	12.8	43.2

94041	No. 1 BOP HM Desulf	472325	4606631	180.56	80.0	80.0	22.8	10.2	43.4
94007	Sinter Cooler	473194	4607100	182.2	100.0	360.0	18.9	18.0	101.4
USPRECA	Precarbon #2 (by Coke Battery #2) includes CASP C	473933	4606552	183	164.0	440.3	10.0	6.6	4.2
USBFGFL	BFG Flare Stacks (closer to BF #4)	472724	4606895	181.5	656.2	1200.0	10.0	16.4	63.3
94045	No. 2 QBOP HM Desulf	472524	4607641	181.9	55.0	137.0	16.3	3.8	34.7
940TBBOIL6		472665	4607079	181.6	150.0	440.0	12.2	12.0	73.8
94045QBOP2		472524	4607641	181.87	55.0	137.0	16.3	3.8	34.7
940CB5	Coke Battery #5	473200	4606400	181.87	250.0	440.0	4.4	10.0	58.2
940CB7	Coke Battery #7	473200	4606600	181.9	250.0	500.0	5.6	10.0	70.6

Table A.2 Volume Sources Modeled for the Data Requirements Rule Air Quality Characterization for Burns Harbor								
Source ID	Source Description	Easting (X)	Northing (Y)	Base Elevation	Release Height	Horizontal Dimension	Vertical Dimension	SO2
		(m)	(m)	(m)	(ft)	(ft)	(ft)	(tpy)
133	Burns Harbor - C Furnace Slag Pit Loadout Fugitives	488222	4609449	200.7	164.0	52.5	12.0	1114.5
134	Burns Harbor - D Furnace Slag Pit Loadout Fugitives	488220	4609591	190.0	164.0	52.5	12.0	1088.1
FE101	Burns Harbor - Fugitives	488022.5	4608137.9	195.2	53.9	44.6	25.1	0.5
FE102	Burns Harbor - Fugitives	488023.4	4608163.5	195.5	53.9	44.6	25.1	0.5
FE103	Burns Harbor - Fugitives	488022.8	4608185.1	195.8	53.9	44.6	25.1	0.5
FE104	Burns Harbor - Slab Yard 3 Hot Strip Mill Roof Monitor	488023.1	4608208.7	196.0	53.9	44.6	25.1	0.5
FE105	Burns Harbor - Slab Yard 2 Hot Strip Mill Roof Monitor	488024.3	4608231.3	196.3	53.9	44.6	25.1	0.5
FE201	Burns Harbor - Hot Strip Mill Furnace 1 Fugitive	488012.9	4608305.6	196.6	55.0	44.7	25.6	0.5
FE202	Burns Harbor - Hot Strip Mill Furnace 2 Fugitives	488013.2	4608327.3	196.9	55.0	44.7	25.6	0.5
FE203	Burns Harbor - Hot Strip Mill Furnace 3 Fugitives	488012.7	4608349.1	196.9	55.0	44.7	25.6	0.5
FE204	Burns Harbor - Hot Strip Mill Roof Monitor	488013.1	4608375.5	197.0	55.0	44.7	25.6	0.5
FE205	Burns Harbor - Fugitives	488013.9	4608397.5	197.0	55.0	44.7	25.6	0.5
BFDCHFUG	Burns Harbor - Blast Furnace D Casthouse Fugitives	488240.5	4609560.6	192.6	81.1	70.2	11.5	14.5
BFCCHFUG	Burns Harbor - Blast Furnace C Casthouse Fugitives	488242.5	4609426.3	203.2	81.1	70.2	11.5	14.5
447110	#4 Blast Furnace Casthouse Fugitives (1)	472679.54	4606687.39	179.8	59.4	14.1	28.9	6.7
447210	#4 Blast Furnace Casthouse Fugitives (2)	472685.4	4606667.67	179.8	59.4	14.1	28.9	6.7
447310	#4 Blast Furnace Casthouse Fugitives (3)	472691.27	4606647.95	179.8	59.4	14.1	28.9	6.7
447410	#6 Blast Furnace Casthouse Fugitives (1)	472683	4606847.98	179.8	57.4	14.1	28.9	6.5
447510	#6 Blast Furnace Casthouse Fugitives (2)	472688.87	4606828.26	179.8	57.4	14.1	28.9	6.5

447610	#6 Blast Furnace Casthouse Fugitives (3)	472694.73	4606808.54	179.8	57.4	14.1	28.9	6.5
447710	#8 Blast Furnace Casthouse Fugitives (1)	472686.66	4606991.88	179.8	56.4	14.1	27.5	5.9
447810	#8 Blast Furnace Casthouse Fugitives (2)	472692.52	4606972.16	179.8	56.4	14.1	27.5	5.9
447910	#8 Blast Furnace Casthouse Fugitives (3)	472698.38	4606952.44	179.8	56.4	14.1	27.5	5.9
448110	#13 Blast Furnace Casthouse Fugitives (1)	472710.63	4607478.29	179.8	112.9	21.0	52.5	13.0
448210	#13 Blast Furnace Casthouse Fugitives (2)	472713.07	4607461.22	179.8	112.9	21.0	52.5	13.0

Appendix B

Potential Monitoring Site: Map and Coordinates

Figure B.1: Map of Burns Harbor Property Lines and SO₂ Monitor Location Options



Primary SO₂ monitoring site is the Port of Indiana Fishing Area:

Latitude 41.641466° Longitude -87.1510663°

UTM coordinates: 487419.09 E 4609980.87 N

Secondary SO₂ monitoring location (co-located with Pb monitor (18-127-0027):

Latitude 41.63518° Longitude -87.150367°

UTM coordinates: 487476.09 E 4609283.00 N

Enclosure 3

Appendix C from the Proposed Indiana 2017 Ambient Air Monitoring Plan

June 2016

Appendix C

SO₂ DRR – Data Requirements Rule

Introduction

The SO₂ primary NAAQS was strengthened June 22, 2010. The 1-hour standard is 75 ppb. After U.S. EPA establishes or revises a primary and/or secondary NAAQS, the Clean Air Act requires U.S. EPA to designate areas as "attainment" (meeting), "nonattainment" (not meeting), or "unclassifiable" (insufficient data) after monitoring data is collected by state, local and tribal governments. Once SO₂ nonattainment area designations take effect, state and local governments have 18 months to develop State Implementation Plans, (SIPs) outlining how areas will attain and maintain the standards by reducing air pollutant emissions contributing to SO₂ concentrations.

Overview

In the initial round (Round 1) of nonattainment designations in 2010 parts of five Indiana counties were deemed nonattainment for SO₂ (see Figure 11, page 57 of the 2017 ANP).

In response to court-order, the U.S. EPA must complete remaining 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 will complete these designations by designating areas as either nonattainment, attainment, or unclassifiable.

The court-order directs U.S. EPA to designate two groups of areas under Round 2 air quality designations for the 2010 primary 1-hour SO₂ NAAQS: (1) areas that have current monitored design values in violation of the NAAQS not previously designated during Round 1, and (2) areas containing stationary sources that had not been announced as of March 2, 2015 for retirement and that according to the U.S. EPA's Air Markets Database emitted in 2012 either more than 16,000 tons of SO₂, or more than 2,600 tons of SO₂ with an annual average emission rate of at least 0.45 pounds of SO₂ per one million British thermal units (lbs SO₂/mmBTU).

On August 10, 2015 U.S. EPA established a timetable and other requirements for state, local and tribal air agencies to: (1) characterize current air quality in areas with large sources of sulfur dioxide (SO₂) emissions through monitoring or modeling techniques and (2) provide such air quality data to the U.S. EPA. At a minimum, air agencies must characterize air quality around sources that emit 2,000 tons per year (tpy) or more of SO₂. These data will be used in designations in Round 3 and Round 4.

This rule gives air agencies the flexibility to characterize air quality using either modeling of actual source emissions or using appropriately sited ambient air quality monitors. Indiana's SO₂ sources have been allowed to determine whether they will use modeling or monitoring to demonstrate compliance with the SO₂ Data Requirements Rule (DRR).

An air agency may avoid the requirement for air quality characterization near a source by adopting enforceable emission limits that ensure that the source will not emit more than 2,000 tpy of SO₂. These limits must be adopted and effective by January 13, 2017.

Indiana SO₂ Sources

Table 1 lists the major emission sources of SO₂ in Indiana and how the air quality characterization plan will be handled by the DRR. The colored highlighted sources have already been accounted and are not subject to the DRR. In Round 1, Townships in five counties have been designated nonattainment. In Round 2, five additional counties or portions of counties are Intended Nonattainment Areas or Intended Unclassifiable/Attainment Areas. The U.S. EPA will make the determination by July 2, 2016.

Two sources initially reported 2014 SO₂ emissions above 2,000 tpy making them subject to the DRR. After further analysis it was determined their 2014 SO₂ emissions were calculated incorrectly placing their 2014 emissions below the 2,000 tpy threshold. ESSROC Cement Corp. in Cass County and Tate & Lyle in Tippecanoe County corrected their 2014 emissions and provided the necessary documentation to support their claims.

ALCOA – Warrick Operations announced January 7, 2016 they would close their smelting operations in Warrick County by March 31, 2016. They missed the announced retirement deadline of March 2, 2015 and are subject to the DRR.

Isolatek International in Huntington has been added to the DRR list by the U.S. EPA due to an unresolved enforcement action.

Table 1 - Indiana Major SO₂ Sources & Air Quality Characterization Plans

County	Facility Name	2014 TPY	Approach																	
Cass	ESSROC Cement Corp	270																		
Cass	Logansport Municipal Utilities	1,715																		
Dearborn	Tanners Creek Generating Station	18,109																		
Floyd	Gallagher Generating Station	3,524	Modeling																	
Gibson	Gibson Generating Station	22,055																		
Huntington	Isolatek International	164	Modeling																	
Jasper	Schahfer Generating Station	8,412	Modeling																	
Jefferson	Clifty Creek Generating Station	3,731																		
Lake	Coke Engery LLC	4,952	Modeling																	
Lake	U.S. Steel - Gary Works	3,285	Modeling																	
Lake	Arcelomittal USA	2,163	Modeling																	
Lake	Indiana Harbor Coke	1,838																		
Lake	Arcelomittal Indiana Harbor	1,587																		
LaPorte	Michigan City Generating Station	15,991																		
Marion	Harding Street Generating Station	29,855																		
Monroe	Indiana University	1,740																		
Morgan	Eagle Valley Generating Station	7,959																		
Pike	Petersburg Generating Station	66,252																		
Pike	Ratts Generating Station	8,550																		
Porter	Arcelomittal Burns Harbor LLC	12,189	Monitoring																	
Porter	Bailey Generating Station	1,117																		
Posey	AB Brown Generating Station	8,404																		
Posey	SABIC Innovative Plastics	4,030	Modeling																	
Spencer	Rockport Generating Station	54,979																		
Sullivan	Merom Generating Station	3,318	Modeling																	
Tippecanoe	Tate & Lyle	1,612																		
Tippecanoe	Purdue University	1,118																		
Vermillion	Cayuga Generating Station	3,448	Modeling																	
Vermillion	Eli Lilly - Clinton Labs	1,851																		
Vigo	Wabash River Generating Station	26,828																		
Warrick	ALCOA - Warrick Power Plant	4,993	Modeling																	
Warrick	ALCOA - Warrick Operations	3,500	Modeling																	
Warrick	Culley Generating Station	1,896																		
Wayne	IMPA (RPL) Generating Station	1,158																		

By January 15, 2016, the DRR requires each air agency to submit to the relevant U.S. EPA Regional Administrator a final list identifying the sources in the state around which SO₂ air quality is to be characterized. This characterization will be performed for sources that exceeded 2,000 tpy of SO₂ emissions 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, such as 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. Table 2 is taken from Table 1 and is a listing of the 12 sources of SO₂ in Indiana subject to the DRR.

**Table 2:
Indiana SO₂ Sources Subject to Air Quality Characterization for the Round 3 Designation Process**

County	Facility Name	2014 SO₂ Emissions (tons)
Floyd	Gallagher Generating Station	3,524
Huntington	Isolatek International	164
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.

Only ArcelorMittal - Burns Harbor LLC will operate SO₂ air quality monitoring. The remaining sources will model to meet the DRR.

ArcelorMittal - Burns Harbor LLC SO₂ Air Quality Monitoring.

ArcelorMittal - Burns Harbor LLC will establish one SO₂ air quality monitoring site at the Port of Indiana Fishing Area; Lat. 41.641466, Long. -87.1510663. Address: Ship Dr., Portage, IN 46368. The placement of this site was determined through modeling. ArcelorMittal will be its own PQA responsible for their data's accuracy and collecting their data under approved methods and standards as stated in their individual monitoring plan, the State Quality Assurance Manual, and U.S. EPA requirements. Clean Air Engineering, Palatine, Illinois will provide program and project management. The QAPP has been submitted to IDEM for review and approval. The site will be collecting SO₂ data by January 1, 2017.

Meteorological data will be supplied by NIPSCO Bailly's Dunes Acres (181270011) monitoring site.

Modeling

ArcelorMittal - Burns Harbor is located at 250 West US Highway 12, Burns Harbor, in Westchester Township, Porter County, Indiana. Burns Harbor is an integrated steel mill consisting of two blast furnaces, three hot strip mill furnaces, plate mill furnaces, two coke batteries, three basic oxygen furnaces (BOF) hot metal desulfurization steel making processes, five power station boilers, and a sinter plant. There are also two blast furnace gas flares and a clean coke oven gas flare which emit a small amount of SO₂. The northern end of the Burns Harbor plant borders the southern shoreline of Lake Michigan. The mill borders Lake Michigan and Indiana Dunes National Lakeshore to the north and east respectively, with woodlands, residential, and lighter industry to the south. The terrain is mostly flat to slightly rolling. Several additional SO₂ sources were modeled, including the NIPSCO - Bailly and NIPSCO – Michigan City Generating Stations to appropriately characterize air quality in the area.

The modeling results indicate that maximum modeled 1-hour SO₂ concentrations fall directly west and northwest of the Burns Harbor facility. Locating an SO₂ monitor in this general area would capture the maximum concentrations from the source. Based on the modeling results, the most culpable emission sources at Burns Harbor contributing to the maximum 1-hour SO₂ concentrations are the Power Station

boilers and C & D furnaces. These emission sources are located directly east of the proposed SO₂ monitoring site. Figure 1 provides an overview of the Burns Harbor facility and the surrounding area.

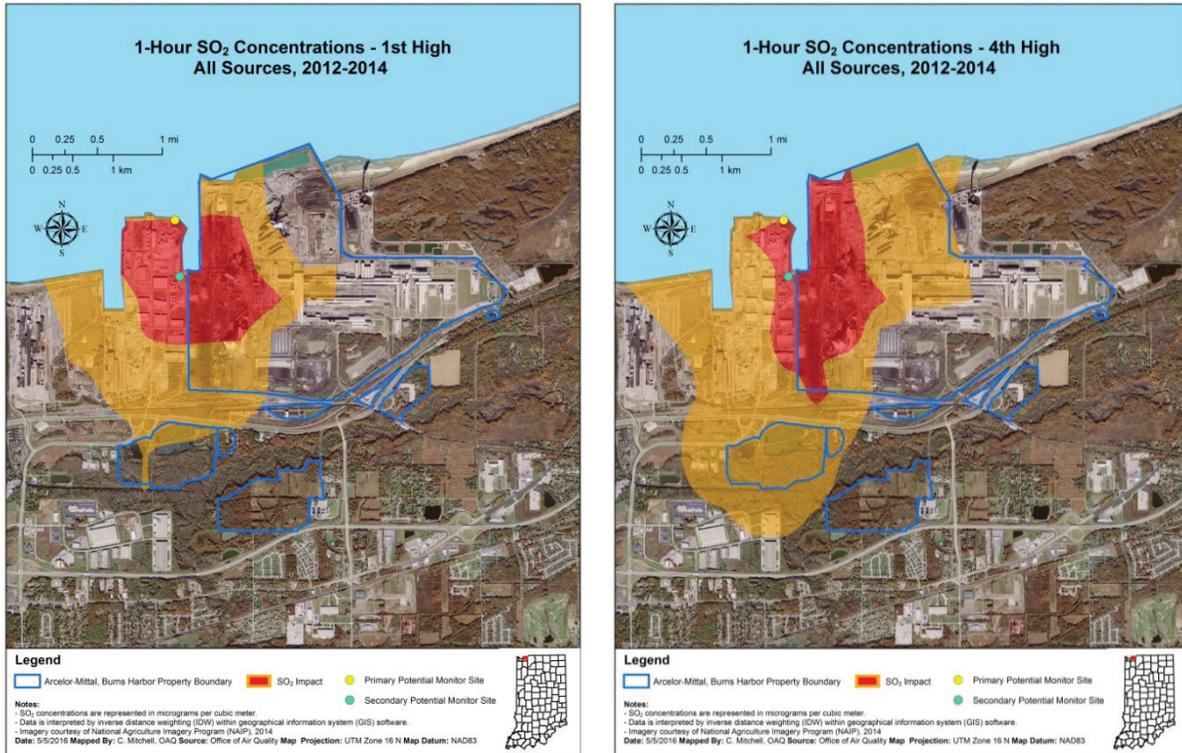
Figure 1
ArcelorMittal - Burns Harbor – Overview of Site



Meteorology/Wind Rose

The Gary - IITRI surface meteorological data and the Lincoln, Illinois upper air meteorological data, taken from 2012 through 2014, was used to determine the meteorological conditions surrounding Burns Harbor in AERMOD. The Gary - IITRI surface meteorological data will be used to more accurately include the influence of Lake Michigan on the meteorological conditions at and in the area immediately surrounding the ArcelorMittal - Burns Harbor facility. The Gary - IITRI and Dune Acres wind roses for the 3-year modeled period 2012 - 2014 are shown as Figure 2. Both wind rose depicts the north and northeast wind direction associated with the lake breeze influence and the predominate wind from the southerly direction.

Figure 3:
Map of ArcelorMittal - Burns Harbor and Surrounding Area for Potential SO₂ Monitoring Sites



IDEM feels that the modeling results for both the maximum 1st and 4th high concentrations over the 3-year period of 2012 through 2014 match well with each other and represents the impact from all SO₂ sources in the area to best characterize the air quality in the area surrounding the identified Data Requirements Rule source.