



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

**AUG 22 2017**

The Honorable Eric J. Holcomb  
Governor  
Office of the Governor, State of Indiana  
200 West Washington Street  
Indianapolis, Indiana 46204

REPLY TO THE ATTENTION OF:

Dear Governor Holcomb:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for certain areas in Indiana for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO<sub>2</sub>). The designations for this NAAQS are an important part of EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated May 11, 2011, January 2012, April 2012, January 2013, March 2013, September 2015, and, more recently, January 13, 2017.<sup>1</sup>

On July 25, 2013, EPA designated certain areas in 16 states as nonattainment,<sup>2</sup> but did not at that time designate other areas. Additional areas were designated on June 30, 2016,<sup>3</sup> and November 29, 2016.<sup>4</sup> In Indiana, the following areas were designated in these previous actions: Gibson County, LaPorte County, and portions of Daviess, Jefferson, Marion, Morgan, Pike, Posey, Spencer, and Vigo Counties. Pursuant to a March 2, 2015, court-ordered schedule,<sup>5</sup> the agency must complete the remaining SO<sub>2</sub> designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, pursuant to section 107(d)(1)(B)(ii) of the Clean Air Act, this letter is to notify you of EPA's assessment of your state's recommended designations for all remaining undesignated areas in Indiana except areas that are associated with sources for which Indiana elected to install and begin operating a new SO<sub>2</sub> monitoring network. While we are in agreement with your recommendation for many of these areas, some warrant further discussion as explained below and in the accompanying technical support document. We stand ready to assist and hope to resolve any differences regarding the proper designation for these areas within this 120-day period provided by the Clean Air Act.

To this end, if you or your staff have additional information that EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to EPA's public docket for these designations, EPA-HQ-

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<sup>1</sup> Indiana also provided information relevant to these designations on May 10, 2017 (addressing Lake County) and on June 23, 2017 (addressing Warrick County).

<sup>2</sup> The Indianapolis area (including portions of Marion County), the Morgan County area (including portions of Morgan County), the Southwest Indiana area (including portions of Daviess and Pike Counties), and the Terre Haute area (including portions of Vigo County) were designated as nonattainment in this action.

<sup>3</sup> In this action, EPA designated Gibson and LaPorte Counties and portions of Jefferson, Posey and Spencer Counties as unclassifiable/attainment.

<sup>4</sup> This action only affected Texas.

<sup>5</sup> *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

OAR-2017-0003, located at [www.regulations.gov](http://www.regulations.gov), and sending a copy to EPA Region 5. The EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on EPA's intended designations.

Indiana has recommended a designation of unclassifiable for Huntington County and attainment for Warrick County. EPA regulations for implementing the SO<sub>2</sub> NAAQS require Indiana to characterize SO<sub>2</sub> air quality in these areas. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any available air dispersion modeling analyses. The air dispersion modeling data, however, show either that these areas may be violating the 2010 primary SO<sub>2</sub> NAAQS or contain sources that may be contributing to air quality in a nearby area that may be violating the 2010 primary SO<sub>2</sub> NAAQS, which would require a modification of the recommended designation. We invite Indiana to review the available information and further discuss this issue with EPA in order to inform an appropriate final designation. EPA intends to designate each listed area as a separate area, as indicated.

Area	Included Counties
Huntington County*	Huntington (p)
Warrick*	Warrick (p)

(p) indicates portion of county

An asterisk (\*) indicates that EPA's review of the available information is not consistent with your recommendation for a portion of this county.

Your staff has recently shared a protocol for modeling relevant to the Warrick County area. We have not completed our review of this protocol, but we will continue to consult with your staff as our review proceeds, and we will evaluate any appropriate and timely additional information that would inform our final designation.

Indiana has recommended a designation of attainment for the areas indicated below. EPA regulations for implementing the SO<sub>2</sub> NAAQS require Indiana to characterize SO<sub>2</sub> air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Indiana or by a third party. Our review of this information indicates that it is consistent with your recommendation. EPA intends to designate each listed area as a separate unclassifiable/attainment area, as indicated.

Unclassifiable/Attainment Area	Included Counties
Floyd County	Entirety of Floyd County
Jasper County	Entirety of Jasper County
Lake County	Entirety of Lake County
Posey County (p)	Posey County(p)
Sullivan County	Entirety of Sullivan County
Vermillion County (p)	Vermillion County (p)

(p) indicates portion of county

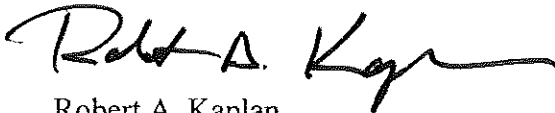
The enclosure to this letter provides the information that supports the intended designation decisions for these areas in Indiana.<sup>6</sup>

Finally, we intend to designate as unclassifiable/attainment all remaining areas of Indiana that were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the last section of the enclosure.

The EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. We are then required to designate the last remaining undesignated area in Indiana, in Porter County, by December 31, 2020, consistent with the prescribed timing of the court order.

We share your goal to provide cleaner air for citizens in your state. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO<sub>2</sub> NAAQS. For additional information regarding designations under the SO<sub>2</sub> NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Ed Nam of my staff at 312-353-2192 or [Nam.Ed@epa.gov](mailto:Nam.Ed@epa.gov).

Sincerely,



Robert A. Kaplan  
Acting Regional Administrator

Enclosures

Cc Bruno Pigott, Commissioner, Indiana Department of Environmental Management  
Keith Baugues, Assistant Commissioner, Office of Air Quality, Indiana Department of Environmental Management

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<sup>6</sup> Enclosure 1 is Chapter 13 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, that addresses areas in Indiana. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>