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December 6, 2004

Steve Rothblatt Office of Air and Radiation U.S. Environmental Protection Agency, Region V 77 West Jackson Boulevard Chicago, Illinois 60604

Re: PM2.5 Nonattainment Designations

Dear Mr. Rothblatt:

On December 2, 2004, I and others from the Indiana Department of Environmental Management, discussed with members of your staff USEPA's upcoming decision on PM2.5 attainment and nonattainment designations, with particular attention on counties in southwestern Indiana. This letter provides additional data and analysis for your consideration.

We understand that USEPA is evaluating whether to consider data from the first three quarters of 2004 in addition to the 2001-2003 annual averages as a further indicator of whether air quality in a given area meets the PM2.5 health standard. We strongly urge USEPA to take these data into account, as it is clear that utility and other clean air reduction programs implemented in recent years are resulting in cleaner air in several Indiana regions. Recognizing that progress now, through either an attainment or unclassifiable designation, will avoid unnecessary imposition of requirements on counties where air quality meets health standards and emissions are not contributing to nonattainment downwind. And, given the likelihood that these areas will attain the standard once 2004 data are fully quality assured, it does not make sense to designate these areas in December, only to begin a public process of redesignation several months later.

One of the areas where monitoring data show a downward trend, and where 2004 data to date strongly suggest that the 2002-2004 annual average will show compliance with the health standard is Evansville. The data show not only that air quality is meeting the standard in the Evansville area, but also that emissions from Vanderburgh County are not contributing to high PM2.5 values in Dubois County. Enclosed with this letter is further information on this issue for your consideration that supports the following conclusions:



Wind rose analysis shows that on those days where values are particularly high, driving up the annual average, winds are generally not from the south/southwest (i.e. Evansville) direction;

On days with high values, PM2.5 concentrations at the Jasper monitor do not appear to increase relative to other sites when the wind is directly from Vanderburgh County;

The Jasper monitor shares the same regional background as all other sites; Local influences such as nearby highway and emissions from local industry are possible causes of differences in Jasper values relative to other sites; Power plant emissions, which are clearly a substantial contributor to regional values, are just as high in surrounding counties relative to Vanderburgh County.

Indiana is fully committed to improving air quality for all Hoosiers. Regardless of the outcome of the nonattainment designations, there are clean air measures on the way, but not yet implemented, that will continue to improve air quality across our state. We strongly urge USEPA to consider all the data presented, including this most recent information, prior to making these critical policy determinations. If you or your staff have questions about the information in this letter or the nonattainment determinations, please contact me at 317-232-8222 or Ken Ritter at 317-233-5682.

Very truly yours,

Janet G. McCabe Assistant Commissioner

Enclosure

cc: Cheryl Newton Jay Bortzer John Summerhays Joanne Alexandrovich Dona Bergman

Analysis of impact of Evansville Urban Area on Dubois County PM 2.5 Concentrations

<u>Summary</u>

The Jasper, Indiana monitoring site, in Dubois County, currently has a design value exceeding the $PM_{2.5}$ National Ambient Air Quality Standard (NAAQS). Jasper is located approximately 45 miles northeast of Evansville. Because the Evansville (Vanderburgh County) design value from 2001 - 2003 also exceeded the NAAQS, that area is also being considered for nonattainment designation. However, it appears that 2004 data will drive the design value below the NAAQS in Vanderburgh County. Discussions have recently centered around whether or not EPA should proceed with a nonattainment designation of Vanderburgh County (and other Evansville Urban Area counties) because of its possible impact on the Dubois County monitor value.

The Dubois County monitor is one of three non-urban $PM_{2.5}$ sites operated by IDEM in southwest Indiana. Additional sites are in Knox and Spencer Counties. In addition, there is an Interagency Monitoring of Protected Visual Environments (IMPROVE) site operated at Livonia in Washington County. The site in Spencer County is in Dale, approximately 15 miles due south of Jasper, almost on the southern Dubois County border. There is a map of the monitoring locations on the following page.

The Dubois County site has consistently averaged higher than any other non-urban sites in southwest Indiana. Table 1 shows these differences from 2001 - 2003.

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|---|-------|-------|-------|--|--|--|
| County | 2001 | 2002 | 2003 | | | |
| Dubois | 16.54 | 16.34 | 15.72 | | | |
| Knox | 13.39 | 14.20 | 13.96 | | | |
| Spencer | 14.52 | 14.06 | 14.63 | | | |
| Livonia | 13.30 | 12.26 | 12.30 | | | |

Table 1 Design values for southwestern Indiana PM_{2.5} sites

In attempting to determine why Dubois County has had higher values, several analyses have been performed. Regionally, there are significant amounts of emissions from large utilities in southwestern Indiana, as well as utilities in southern Illinois and Kentucky. There are a significant number of wood furniture manufacturers located in the Jasper area. Many of these burn scrap wood in boilers. Emissions from these sources are not large annually, but wood is generally burned when supplies accumulate. These sources could impact the monitoring site on certain days, but this has not been clearly established. Emissions from heavy-duty diesel trucks and other traffic along US 231, a major north-south highway which passes several hundred yards west of the site, may also be impacting monitored values, but data to quantify such an impact are not available. Therefore, an analysis of meteorological data and monitoring values at nearby sites was performed.

The following conclusions about Dubois County data were reached based upon this analysis:

- 1. Average wind directions for the 2002 2003 time period were primarily from the south and southwest.
- 2. <u>Background levels at the other sites were all $12 14 ug/m^3$ for an annual average</u>.

3. Wind directions from days with high $PM_{2.5}$ values at Dubois County are seldom from Vanderburgh County. An analysis of wind direction on days with the highest values, e.g. over 20 ug/m^3 , at the Jasper site in Dubois County showed that the wind direction seldom was from the south or southwest (origin of Vanderburgh County). 4. <u>On days with high values at Dubois County, the other sites are usually high also</u>. This analysis also showed that generally when one non-urban site in southwest Indiana was over $20 ug/m^3$, the others were also. On these days, these sites were seldom impacted by an air mass that moved over the Evansville area. On days in which Evansville was directly upwind of Dubois County, the Dubois values were relatively the same as the other sites not impacted by Evansville. For the Dubois County site, the mass for the days with values above $20 ug/m^3$ contributed about $3 ug/m^3$ to the annual average.

5. $\underline{PM_{2.5}}$ values for this area are greatly impacted by regional transport. Speciated data are not available from sites operated by IDEM. However, the Livonia IMPROVE site and others in the general area show that sulfate is the predominate portion of the sample, followed by organic carbon. This indicates emissions from regional transport sources, such as utilities, is a major contributor to concentrations in the area. For Vanderburgh County, SO2 emissions for the past three years have averaged less than 40 tons per year. Reducing these emissions to zero would likely have little to no impact on Dubois County.



Detailed Analysis

Data Used for Analysis

Information was gathered through the Indiana climate page on the Purdue Applied Meteorology Group - Department of Agronomy website <u>http://shadow.agry.purdue.edu/sc.hly-geog.html</u>. Southern Purdue Agricultural Research Center in Dubois, Dubois County was selected.

Graph 1 shows the wind rose from Dubois County for 2002. The wind blows most frequently from the south, south-southwest, north-northwest, south-southwest and northwest.



<u>Graph 1</u> Wind Rose Analysis for Dubois County for 2002

Graph 2 shows the wind rose from Dubois County for 2003. The wind blows most frequently from the south-southwest, south, south-southeast, west-northwest, northwest, southeast and north-northwest.



<u>Graph 2</u> Wind Rose Analysis for Dubois County for 2003

Analysis of data values 20 ug/m3 and over

An analysis was performed to determine if high values were associated with different wind directions. IDEM had made wind roses for 2002 and 2003 high days earlier, so these were used for the analysis. The days used for this analysis are in Table 2.

Table 2

| | 2002 | | | | | 2003 | | | | | |
|------------|--------|------|---------|---------|-------------------|------------|--------|------|---------|---------|-------------------|
| | Dubois | Knox | Spencer | Livonia | Wind Direction | | Dubois | Knox | Spencer | Livonia | Wind Direction |
| | | | | | | | | | | | |
| 1/2/2002 | 21.6 | 13.2 | 20.2 | | NW - NE | 1/30/2003 | 38.2 | 27.2 | | 23.9 | NE-S |
| 1/20/2002 | 20.6 | 15.6 | 18.6 | 15.2 | SE-S | 2/26/2003 | 29.1 | 24.0 | 22.4 | 16.8 | NE-S |
| 3/18/2002 | 23.9 | 18.0 | | 18.3 | N-NE | 3/1/2003 | 52.9 | 49.8 | | 29.6 | NW |
| 6/4/2002 | 24.7 | | | 28.0 | S-SW | 3/7/2003 | 18.1 | 21.6 | | 11.5 | SE-SW |
| 6/10/2002 | 21.9 | 21.9 | | 18.9 | SE-S | 3/13/2003 | 50.0 | 29.3 | | 22.3 | NW-SE |
| 6/19/2002 | 28.2 | 28.3 | 27.8 | | SE-S | 4/18/2003 | 30.2 | 28.3 | | 23.5 | SW-NW |
| 6/22/2002 | 31.6 | 38.6 | | 32.0 | E-SE | 6/17/2003 | 25.1 | 27.7 | | 22.0 | NW-NE |
| 6/25/2002 | 20.8 | 15.5 | 20.5 | 14.3 | SE-SW | 6/23/2003 | 16.4 | 24.2 | | 20.2 | SE |
| 7/1/2002 | 27.2 | 25.3 | 27.2 | 27.2 | N* | 6/29/2003 | 21.4 | 22.1 | | 17.7 | SE-SW |
| 7/4/2002 | 33.9 | 35.9 | | 27.8 | NE* | 7/2/2003 | 21.4 | 34.4 | 24.7 | 18.2 | NW |
| 7/10/2002 | 22.0 | 19.9 | | 18.0 | NE* | 7/5/2003 | 20.8 | 18.6 | | 24.2 | SW |
| 7/13/2002 | 29.4 | 28.7 | 26.5 | 24.4 | NE* | 7/14/2003 | 22.0 | 25.7 | 22.9 | 22.1 | SE |
| 7/16/2002 | 43.1 | 43.8 | | 33.7 | SE* | 7/20/2003 | 38.0 | 29.0 | | 35.3 | S-SW |
| 7/22/2002 | 23.5 | | | 23.9 | | 7/26/2003 | 24.6 | 22.0 | 24.8 | 25.6 | S-SW |
| 7/25/2002 | 20.3 | 21.4 | 25.3 | 15.7 | NE-SE* | 8/1/2003 | 31.4 | 26.4 | 27.9 | 27.3 | SW |
| 7/31/2002 | 23.3 | 18.9 | 26.7 | | | 8/13/2003 | 38.0 | 33.9 | 34.6 | 37.2 | NE-SE |
| 8/3/2002 | 45.6 | | | | SE* | 8/16/2003 | 26.0 | 21.9 | | 27.0 | NW |
| 8/12/2002 | 24.5 | 24.0 | 24.3 | 22.6 | SE-SE* | 8/19/2003 | 24.4 | 22.7 | | 24.0 | N-SE |
| 8/21/2002 | 25.1 | 26.2 | | 22.0 | SE-S | 8/22/2003 | 25.7 | 25.7 | | 22.1 | S-SW |
| 8/27/2002 | 23.8 | | | 20.3 | N-NE | 8/25/2003 | 31.6 | 27.8 | 31.0 | 31.6 | SW |
| 8/30/2002 | 25.5 | | 22.3 | 19.9 | NE-E | 8/28/2003 | 21.7 | 18.6 | | 20.4 | S-SW |
| 9/2/2002 | 21.3 | | | 21.1 | SE-SW | 9/12/2003 | 39.5 | 37.9 | 38.1 | 32.2 | SE |
| 9/8/2002 | 36.3 | | | 31.0 | SE-SW | 9/18/2003 | 20.5 | 19.7 | 20.0 | 21.2 | NE |
| 9/17/2002 | 27.8 | 24.7 | 28.4 | 22.0 | SE | 9/21/2003 | 20.8 | 17.4 | | 22.8 | NE-SE |
| 9/29/2002 | 21.7 | 25.2 | 20.6 | 19.9 | E-SE | 10/9/2003 | 24.2 | 28.5 | | 18.3 | SE |
| 11/28/2002 | 20.4 | | 18.2 | 13.7 | SW | 11/11/2003 | 22.0 | 22.4 | 18.9 | 16.6 | SW |
| 12/7/2002 | 31.5 | | | 19.7 | S-SW | | | | | | |
| 12/10/2002 | 25.0 | | 21.5 | 16.2 | NF | | | | | | |

*Wind directions taken from Evansville NWS site. See the attachments for a complete set of wind roses for Dubois and Evansville meteorological sites. Data from the two sites are comparable so Evansville data was substituted where Dubois County data was unavailable.

 $PM_{2.5}$ data used for the Livonia site is from <u>http://vista.cira.colostate.edu/improve/</u>. This sampler uses a different protocol than the FRM sites, but results are similar. The Dubois, Knox, and Livonia sites operate on a 1 in 3 day schedule, while Spencer County is 1 in 6 days. Therefore, the analysis was done on a 1 in 6 day schedule so that data would be comparable.

This analysis showed:

- When Dubois County site was high, generally, so also were the other non-urban sites, indicating a regional contribution to the samples

- The days with values over $20 ug/m^3$ contributed nearly 3 ug/m3 to the annual average. This was calculated by the following method:

- 1. summing the values of the 28 days for 2002, sum = 744.5, 26 days for 2003 = 734
- 2. calculating the baseline of 15 ug/m^3 for those days; 28 x 15 = 420 for 2002, 26 x 15=390 for 2003
- 3. subtracting the baseline from the sum of the values; 744.5 420 = 324.5, 734 390 = 344
- 4. dividing each by 122 sample days for an entire year; 324.5/122=2.66 for 2002, 2.82 for 2003

When these values are removed from the 2001 - 2003 design value of $16.2 ug/m^3$ for Dubois County, it can be seen that the value would be well below the NAAQS of $15 ug/m^3$. While an impact from Vanderburgh County could be included in the background concentrations, clearly there is a regional component that needs to be examined. Available data does not show that high values are more likely to occur at the Jasper site when the air mass is from the Evansville area.

Speciation information

No speciated data is available for Dubois County. However, it is available for Livonia and several other sites in the area. The map below shows the results. Sulfates are a major component of the sample in this area, impacted greatly by the regional transport of emissions from large utilities. In this area, most pie charts look similar. While Evansville emissions could impact Dubois County, the point source emissions from Vanderburgh County have averaged under 40 tons/year from 2001 - 2003. See the attachments for the inventory spreadsheet. Reducing these emissions to zero will not likely solve the attainment problems in Dubois County. Several of the counties in the area have large utilities. Addressing their regional impact through the NOx SIP Call and the Clean Air Interstate Rule will provide a better means of achieving attainment in this area. Another source of emissions impacting the samples could be mobile source emissions. These emissions are also properly addressed by a regional process, which EPA has already started with heavy duty diesel engine and diesel fuel rules, for both on- and off-road vehicles.

Annual Average Species Contribution to Fine

Data from EPA Speciation Network, July 2002-June 2003



Attachments to Dubois County Analysis

Dubois County Wind Roses, 2002 Dubois County Wind Roses, 2003 Evansville Wind Roses, 2002 Evansville Wind Roses, 2003 Vanderburgh County SO2 Emissions Inventory

Dubois County Wind Rose Analysis - 2002







CALM WINDS 54.17%

WIND SPEED (KNOTS) 1-3 4-6 7-10 11-16 17-21 +21

CALMS

WIND SPEED (KNOTS)

1-3 4-6 7-10 11-16 17-21 +21



Dubois County Wind Rose Analysis - 2003

Evansville Wind Rose Analysis - 2002

Evansville Wind Rose Analysis - 2003

Vanderburgh County SO2 sources, tons per year

| Facility | | | | | |
|----------|--|------|------|------|------|
| ID | Facility Name | 2000 | 2001 | 2002 | 2003 |
| 00001 | SIGECO - OHIO RIVER | 1.0 | 0.9 | 1.2 | 0.2 |
| 00003 | WHITE CAP, LLC | 0.0 | 0.0 | 0.1 | 0.1 |
| 00005 | EVANSVILLE STATE HOSPITAL | | 0.0 | 0.0 | |
| 00007 | HAHN EQUIPMENT CO. | 0.0 | 0.0 | | |
| 00009 | HOOSIER STAMPING & MFG. CORP | 0.0 | 0.0 | 0.0 | |
| 00011 | BOOTZ MFG CO | 0.0 | 0.0 | 0.0 | 0.0 |
| 00013 | KOCH ORIGINALS | 0.0 | 0.0 | 0.0 | |
| 00014 | GEO KOCH SONS INC | 0.0 | 0.0 | 0.0 | |
| 00015 | MEAD JOHNSON AND COMPANY | 3.0 | 8.2 | 0.3 | 3.5 |
| 00017 | GUARDIAN AUTOMOTIVE TRIM, INC. | 0.0 | 0.1 | 0.0 | |
| 00018 | RED SPOT PAINT & VARNISH CO., INC. | 0.0 | 0.0 | 0.0 | |
| 00020 | A ASPHALT CO. INC. | 1.8 | 1.2 | 1.0 | |
| 00022 | WHIRLPOOL CORP | 0.2 | 0.3 | 0.2 | 1.2 |
| 00026 | INLAND PAPERBOARD AND PACKAGING, INC. | 0.0 | 0.0 | 0.0 | |
| 00029 | DEACONESS HOSPITAL | 0.5 | 11.8 | 0.1 | |
| 00036 | KARGES FURNITURE CO., INC. | 0.0 | 0.0 | 0.0 | |
| 00040 | HARTFORD BAKERY INC. | 0.0 | 0.0 | 0.0 | 0.0 |
| 00041 | ST. MARY'S MEDICAL CENTER | 0.0 | 0.0 | 0.0 | |
| 00045 | EVANSVILLE METAL PROD | 0.0 | 0.0 | 0.0 | |
| 00064 | UNIV OF EVANSVILLE | 0.5 | 0.1 | 0.0 | |
| 00067 | GENERAL ELECTRIC I&RS | 0.0 | 0.0 | 0.0 | |
| 00069 | ST. MARY'S MEDICAL CENTER-WELBORN | 0.1 | 0.0 | 0.0 | |
| 00070 | FAULTLESS CASTER CORP | 0.0 | 0.0 | 0.0 | |
| 00071 | INTRAMETCO PROCESSING INC. | 2.0 | 2.1 | 3.4 | |
| 00078 | ROBUR CORPORATION | 0.0 | 0.0 | 0.0 | |
| 00081 | INDIANA TUBE CORP. | 0.0 | 0.0 | 0.0 | |
| 00084 | SIGECO - BERGDOLT ROAD - NEGT | 0.1 | 0.1 | 0.0 | 0.0 |
| 00087 | OBRYAN BARREL CO., INC. | 0.0 | 1.2 | 1.0 | |
| 00094 | PPG INDUSTRIES, INC. WKS #28 | 0.0 | 0.0 | 0.0 | |
| 00095 | INDUSTRIAL CONTRACTORS, INC. METAL FAB | 0.0 | 0.0 | 0.0 | |
| 00096 | FLANDERS ELECTRIC MOTOR SERVICE | 0.0 | 0.0 | 0.0 | |
| 00107 | AZTECA MILLING. L.P. | 0.1 | 0.1 | 0.1 | |
| 00112 | AMERIQUAL FOODS, INC. | 0.0 | 0.0 | 0.0 | |
| | BFI WASTE SYSTEMS OF NORTH AMERICA, | | | | |
| 00114 | INC. | 5.7 | 5.7 | 6.9 | 6.9 |
| 00115 | MASTER MANUFACTURING CO., INC. | 0.0 | 0.0 | 0.0 | |
| 00116 | KRIEGER & RAGSDALE CO., INC. | 0.0 | 0.0 | 0.0 | |
| 00123 | J. TROCKMAN & SONS, INC. | 0.0 | 0.0 | | |
| 00129 | KERRY INGREDIENTS | 0.0 | 0.0 | 0.0 | |
| 00139 | FLANDERS ELECTRIC MOTOR SERVICE | | | 0.0 | |
| 00147 | UNIVERSITY OF SOUTHERN INDIANA | 0.0 | 0.0 | 0.0 | |
| 00148 | UNISEAL, INC.; PLANT #2 | 0.0 | 0.0 | 0.0 | |
| 00156 | SKY CYLINDER TESTING, INC. | | 0.0 | 0.0 | |
| 00163 | COLLIS,INC. | | | 0.0 | |
| 00165 | DECORING SUPPLIES & EQUIPMENT, INC. | | | 0.0 | |
| 00888 | BRAKE SUPPLY | | 0.0 | 0.0 | |
| 03146 | JERRY DAVID ASPHALT | 4.6 | 5.2 | 5.2 | |
| 03408 | J.H.RUDOLPH & CO | 0.0 | 0.0 | 0.0 | |
| | Totals | 19.9 | 37.4 | 19.8 | 12.0 |