



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
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Toll Free (800) 451-6027
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December 10, 2010

«AddressBlock»

Re: 326 IAC 2-6-5
Emissions Information Request

«GreetingLine»

The Indiana Department of Environmental Management's (IDEM) Office of Air Quality is beginning the process of conducting air quality studies in response to the United States Environmental Protection Agency's (U.S. EPA) updated air quality standards. As the most immediate project, IDEM is required to assess the air quality near every large SO₂ source in order to determine if the county meets the new standard. As part of the SO₂ final rule, U.S. EPA decreased the number of monitors that would have been required, instead relying upon an approach using extensive modeling in conjunction with existing monitoring. Almost concurrently, new standards for ozone and fine particles will be introduced and information for those pollutants and their precursors will also be needed.

To ensure reliability of the dispersion modeling results to the extent possible, IDEM must use comprehensive validated emissions-related information. Therefore, it is important to gather and validate the necessary information to the extent possible.

In order to perform the air quality dispersion modeling, IDEM is collecting information concerning emission rates of SO₂, NO_x, filterable PM₁₀, filterable PM_{2.5}, and condensable PM. IDEM is also collecting information regarding the structures at your facility including stack parameters and data about buildings.

Identified stakeholders should provide information based on measured emissions, testing, reasonable estimates, and best available information to the preparers. All submissions should be verified by an authorized representative of your company. In an attempt to make the data gathering process easier for all involved, IDEM is providing current information for your facility in the enclosed attachment.

IDEM is requesting this information pursuant to the Emission Reporting Rule, 326 IAC 2-6-5 (Additional Information Requests), which allows IDEM to request emissions and emissions-related information from all sources permitted by the State. Though entities are allowed ninety (90) days from the mailing of this request to respond, IDEM would appreciate a response as soon as possible in order to support a timely review of the updated air quality standards. If you feel that any of the information provided to IDEM may be considered confidential, please specify what information and the grounds for that determination in accordance with 326 IAC 17.1. The information submitted to IDEM is not intended to be used for compliance purposes; it is solely for the purpose of the completion U.S. EPA's modeling requirements.

The data being requested include the following;

- The location, designation, and dimensions (height, width, length) of all buildings and structures at your facility.
- Property boundary locations and the means, if any, by which the general public is precluded access to plant property (e.g., security fences, guard stations, physiographic barriers, etc.).
- Specific locations for all stacks and release points, along with information pertaining to the manner in which emissions are discharged to the atmosphere (e.g., stacks with “rain caps”, stacks with unobstructed vertical releases, “gooseneck” stacks, lateral discharges, vents, and fugitive releases).
- Potential or permitted allowable emissions per emission release point

A current plot plan or site map with a sufficient level of detail would be the preferred means for providing the information requested above. In addition, any existing coordinate data related to the locations of buildings, stacks, and property boundaries would also be very helpful.

The emissions release point information requested is included on the attachment. Units with potential to emit below one ton per year need not be included. There are additional instructions in the spreadsheet. For technical questions or assistance, please contact Jay Koch (317-2333-0581 or jkoch@idem.in.gov).

All information and data requested should be emailed to jkoch@idem.in.gov or mailed to the following address:

Jay Koch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, Room N1001 MC-61-50
Indianapolis, IN 46206-6015

Thank you in advance for your assistance and cooperation with this matter, as it will help facilitate accurate and timely results from this study that will be useful to your community.

Sincerely,

Keith Baugues
Assistant Commissioner
Office of Air Quality