



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Governor

Thomas W. Easterly
Commissioner

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May 11, 2011

Ms. Susan Hedman
Regional Administrator
U.S. Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3950

Re: Preliminary Recommendations Concerning
Air Quality Designations for the 1-Hour
Sulfur Dioxide National Ambient Air Quality
Standard

Dear Ms. Hedman:

This letter is in response to the United States Environmental Protection Agency's (U.S. EPA's), March 24, 2011, guidance memorandum concerning air quality designations for the 1-hour sulfur dioxide (SO₂) National Ambient Air Quality Standard (NAAQS). The guidance indicates U.S. EPA's intention to propose designations by February 2012, and finalize them by June 2, 2012, and requests that states submit their recommendations for area designations by June 2, 2011.

Enclosed you will find quality-assured monitoring data from 2008 through 2010 for Indiana's SO₂ monitoring network. Twelve monitors in nine counties within Indiana have SO₂ monitored concentrations above the new 1-hour standard. SO₂ monitored concentrations have decreased over time and additional counties, such as Gibson, may attain prior to final designations. Indiana expects monitoring data to decline even further over the next few years with the implementation of federal regulations such as the Clean Air Transport Rule. Indiana also encourages U.S. EPA to take 2009 through 2011 data into consideration when issuing final designations.

The following enclosures are included with this letter:

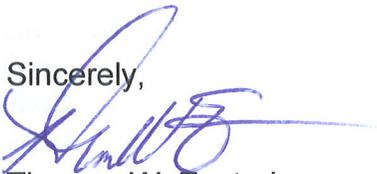
- Enclosure 1 Indiana Sulfur Dioxide (SO₂) 2008 through 2010 Monitoring Data Summary Compared to the 1-Hour Standard
- Enclosure 2 Indiana's Assessment of the Sulfur Dioxide (SO₂) Standard for Nonattainment Designation



Ms. Susan Hedman
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The nine counties that currently have monitors measuring ambient concentrations above the 1-hour SO₂ standard are Daviess, Floyd, Fountain, Gibson, Marion, Morgan, Pike, Vigo, and Wayne. Indiana is recommending these nine counties be classified as nonattainment. Indiana is also recommending Vermillion County be classified as nonattainment based upon the contribution of a source(s) in that county to the monitor in Fountain County. Indiana is requesting that any county not outlined in Enclosure 2 be classified as unclassifiable.

Indiana reserves the right to supplement and/or revise the recommendations contained herein as additional monitoring and modeling information becomes available. Thank you for this opportunity to provide recommendations on this important matter. If you have any questions, please feel free to contact me at (317) 232-8611 or by email at teasterly@idem.in.gov.

Sincerely,

Thomas W. Easterly
Commissioner

TWE/sad/skr
Enclosures

cc: Cheryl L. Newton, U.S. EPA Region 5
John Summerhays, U.S. EPA Region 5
Keith Baugues, IDEM-OAQ
Scott Deloney, IDEM-OAQ
Christine Pedersen, IDEM-OAQ
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Enclosure 1

Indiana Sulfur Dioxide (SO₂) 2008 through 2010 Monitoring Data Summary Compared to the 1-Hour Standard

County	Monitor Site ID	2008	2009	2010	2008-2010 Design Value
Daviess	18-027-0002	122	138	115	125
Floyd	18-043-0004	117	87	72	92
Floyd	18-043-0007 ^	192	68	75	112
Floyd	18-043-1004	138	125	123	129
Fountain	18-045-0001	236	38	26	100
Gibson	18-051-0001 ^	56	44	45	48
Gibson	18-051-0002	90	65	74	76
<i>Wabash, IL</i>	<i>17-185-0001</i>	<i>90</i>	<i>69</i>	<i>66</i>	<i>75</i>
Hendricks	18-063-0002	32	34*		33*
Jasper	18-073-0002	61	88	39	63
Lake	18-089-0022	67	59	57	61
Lake	18-089-2008	37	37	34	36
LaPorte	18-091-0005	29	23	30	27
Marion	18-097-0057	79	75	103	86
Marion	18-097-0073	29	61	48	46
Morgan	18-109-1001	91	98	105	98
Pike	18-125-0005	205	194	211	203
Porter	18-127-0011	82	51	62	65
Vanderburgh	18-163-0012/21	41	17	19	26
Vanderburgh	18-163-1002	43	14	18	25
Vigo	18-167-0018	120	115	61	99
Vigo	18-167-1014	137	142	169	149
Warrick	18-173-0002^	111	38	18	56
Wayne	18-177-0006	109	70	109	96
* Not a complete year of data					
^ Monitor was discontinued at the end of 2010					
Design Value greater than or equal to 76 ppb					
Illinois Monitor					

Indiana SO₂ 2000 through 2010 Monitoring Data Summary Compared to the 1-Hour Standard

Note: U.S. EPA established a new 1-hour primary SO₂ standard on June 2, 2010. The new 1-hour standard is met when the 3-year average of the 99th percentile (4th high) of the daily maximum 1-hour average at each monitor within an area does not exceed 75 parts per billion (ppb). Only the 2008 through 2010 design values over the new 1-hour standard are highlighted below. Data prior to this was compared to the annual and 24-hour SO₂ standards. The 2000 through 2007 data compared to the new 1-hour standard is included for reference purposes only.

County	Site ID	99 th Percentile Values (4 th High)(ppb)											3-year Design Value (ppb)									
		2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	00-02	01-03	02-04	03-05	04-06	05-07	06-08	07-09	08-10	
Daviess	18-027-0002	120	119	119	107	131	91	135	112	122	138	115	119	115	119	110	119	113	123	124	125	
Floyd	18-043-0004	130	98	115	151	152	159	123	139	117	87	72	114	121	139	154	145	140	126	114	92	
Floyd	18-043-0007	170	120	68	67	74	157	158	164	192	68	75	119	85	70	99	130	160	171	141	112	
Floyd	18-043-1004	163	151	119	173	174	158	177	194	138	125	123	144	148	155	168	170	176	170	152	129	
Fountain	18-045-0001	104	118	114	127	125	180	169	200	236	38	26	112	120	122	144	158	183	202	158	100	
Gibson	18-051-0001	103	106	86	82	135	122	101	103	56	44	45	98	91	101	113	119	109	87	66	48	
Gibson	18-051-0002	279	203	194	266	226	154	265	136	90	65	74	225	221	229	215	215	185	164	97	76	
Wabash, IL	17-085-0001	179	138	131	125	172	187	161	109	90	69	66	149	131	142	161	173	152	120	89	75	
Hendricks	18-063-0002	Monitor began operation in 2004				49	40	37	46	32	34			Monitor began operation in 2004		49	45	42	41	38	37	33
Jasper	18-073-0002	74	60	44	66	44	58	64	49	61	88	39	59	57	51	56	55	57	58	66	63	
Lake	18-089-0022	79	87	80	75	111	115	78	66	67	59	57	82	81	89	100	101	86	70	64	61	
Lake	18-089-2008	105	115	53	72	39	42	36	50	37	37	34	91	80	55	51	39	43	41	41	36	
LaPorte	18-091-0005	32	37	33	31	31	29	27	26	29	23	30	34	34	32	30	29	27	27	26	27	
Marion	18-097-0057	89	98	111	122	116	103	127	122	79	75	103	99	110	116	114	115	117	109	92	86	
Marion	18-097-0073	66	73	82	78	92	79	69	51	29	61	48	74	78	84	83	80	66	50	47	46	
Morgan	18-109-1001	Monitor began operation in 2004				130	141	108	140	91	98	105				130	136	126	130	113	110	98
Pike	18-125-0005	107	155	130	183	151	119	161	172	205	194	211	131	156	155	151	144	151	179	190	203	
Porter	18-127-0011	62	53	57	53	59	74	55	62	82	51	62	57	54	56	62	63	64	66	65	65	
Vanderburgh	18-163-0012/21	97	82	64	85	72	66	67	69	41	17 ¹	19	81	77	74	74	68	67	59	43 ²	26 ³	
Vanderburgh	18-163-1002	33	33	33	45	79	60	21	27	43	14	18	33	37	52	61	53	36	30	28	25	
Vigo	18-167-0018	99	104	69	83	130	100	99	90	120	115	61	91	85	94	104	110	96	103	108	99	
Vigo	18-167-1014	143	204	129	143	134	138	104	133	137	142	169	159	159	135	138	125	125	125	137	149	
Warrick	18-173-0002	253	233	202	217	238	143	199	103	111	38	18	229	217	219	199	193	148	138	84	56	
Wayne	18-177-0006	101	107	109	96	101	126	95	100	109	70	109	106	104	102	108	107	107	101	93	96	

One Year of Data

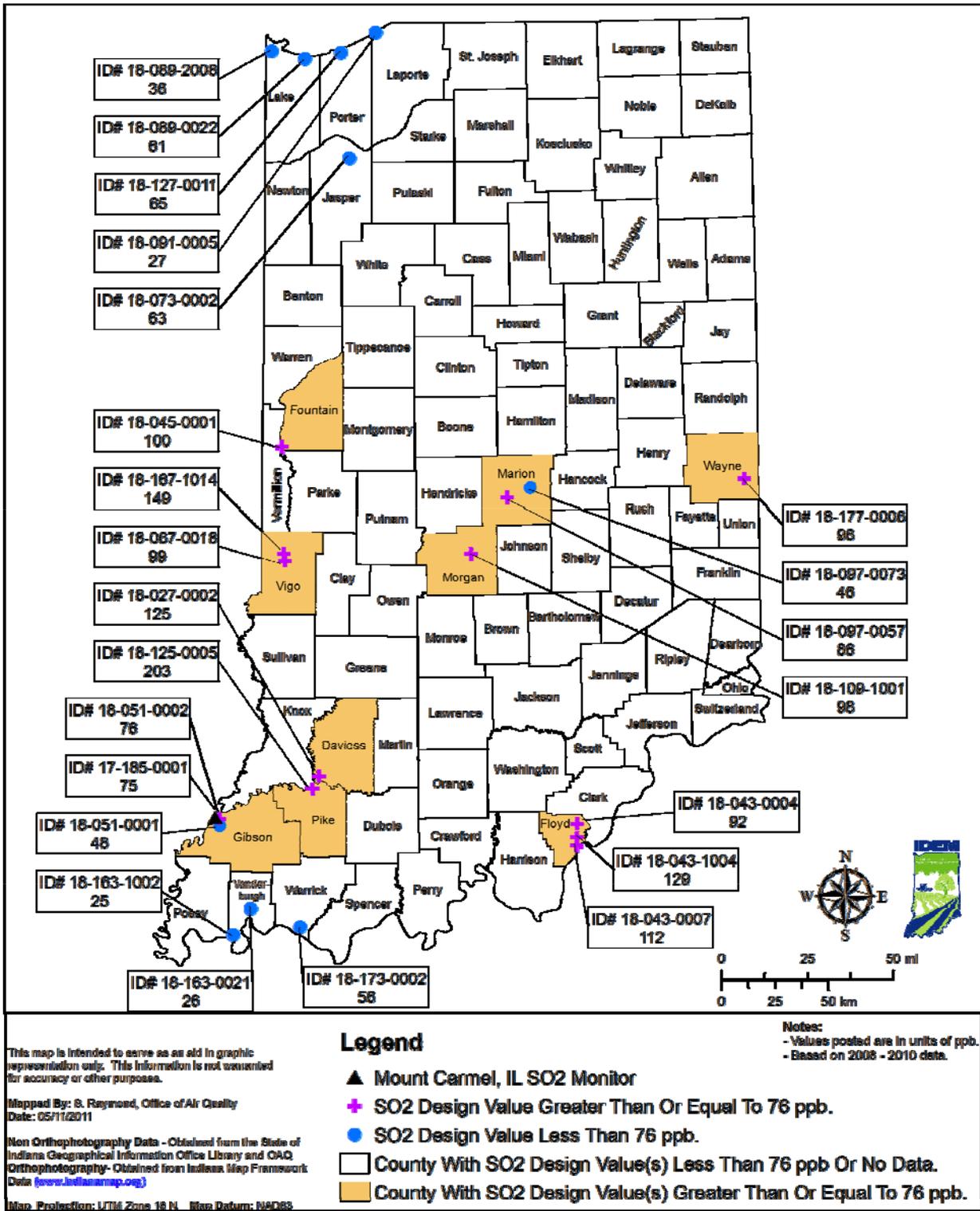
Two Years of Data

Incomplete Data

Illinois Monitor

Design Value greater than or equal to 76 ppb

Indiana SO₂ Monitor Locations



The monitor in Hendricks County is not included on this map since the 2008-2010 data is incomplete.

Enclosure 2

Indiana's Assessment of the Sulfur Dioxide (SO₂) Standard for Nonattainment Designation

Background

On June 2, 2010, the United States Environmental Protection Agency (U.S. EPA) revised the primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂) [75 FR 35520]. U.S. EPA revoked both the previous 24-hour and annual primary SO₂ standards and established a new 1-hour SO₂ standard at a level of 75 parts per billion (ppb), based on the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations.

In accordance with Clean Air Act (CAA) Section 107(d), U.S. EPA must designate areas as attainment, nonattainment, or unclassifiable for the new 1-hour SO₂ standard within two years following promulgation of the new standard, or June 2, 2012. States are expected to submit initial areas designation recommendations by June 2, 2011.

U.S. EPA's final area designations are expected to be based principally on 2008 through 2010 air quality data reported from SO₂ monitors currently in place, and any refined modeling states choose to conduct specifically for area designations. U.S. EPA expects to designate areas in the following manner:

- Nonattainment if either monitoring data or appropriate refined modeling results show a violation.
- Attainment if monitoring and appropriate modeling data show no violations. For an area to be designated as attainment, appropriate dispersion modeling regarding such sources needs to show the absence of violations even if monitoring does not show a violation.
- Unclassifiable for all other areas lacking monitoring data and air quality modeling results showing no violations.

Indiana's Assessment

Consistent with the U.S. EPA's March 24, 2011 guidance memorandum titled "Area Designations for the 2010 Revised Primary Sulfur Dioxide National Ambient Air Quality Standards", the Indiana Department of Environmental Management (IDEM) has conducted a thorough review of the affected areas in Indiana. IDEM's review focused on the following analysis criteria outlined in the guidance:

- **Air quality monitoring data:** Indiana's core evaluation is based on 2008 through 2010 monitoring data and is presented in the tables below. The air quality analysis looks at the three-year average of the 99th percentile of the yearly distribution of 1-hour daily maximum SO₂ concentrations for each county. A three-year design value over the new SO₂ standard is highlighted in yellow. Data was retrieved from the U.S. EPA's Air Quality System (AQS). IDEM is also requesting that U.S. EPA use 2009 through 2011 monitoring data when making final designations.
- **Emissions-related data:** Indiana received detailed emissions information from each source emitting over 10 tons of SO₂ per year. This data is detailed below for each county recommended as nonattainment. Tables identified in this analysis show all stationary sources with reported SO₂ emissions in tons per year at the facility level within each county. U.S. EPA's Designation Guidance identifies that significant emission levels in nearby areas may indicate the potential for the area to contribute to a violation of the SO₂ standard. U.S. EPA also suggests states consider sources within 50 kilometers (km) of a violating monitor to support nonattainment recommendations. Therefore, for counties with violating monitors, Indiana sources within 50 km of the monitor are included in the analysis.
- **Geography/topography:** The geography and topography analysis looked at physical features and land use that might have an effect on the air shed and, therefore, the distribution of pollutants over an area. Indiana does not have any significant topographic features that significantly influence the distribution of SO₂ concentrations within the state.
- **Jurisdictional boundaries:** The analysis of jurisdictional boundaries looks at the planning structure of an area to determine if the implementation of controls in a potential nonattainment area can be carried out in a cohesive manner. Indiana is recommending the entire county as the nonattainment area boundary which encompasses any Core Based Statistical Area (CBSA), Metropolitan Statistical Area (MSA), and/or any Combined Statistical Area (CSA) boundaries.

Indiana is recommending counties with a 2008 through 2010 design value above the new 1-hour SO₂ standard as nonattainment. In accordance with U.S. EPA's final rule, the expected presumptive boundary for any area designated nonattainment is the county boundary associated with the violation unless additional information is provided to U.S. EPA demonstrating a different boundary is appropriate. Indiana is recommending the county boundary as the nonattainment area. In addition, Indiana is recommending all other counties where monitoring is lacking and modeling is not available as unclassifiable.

As a result of thorough analysis, IDEM has developed the following evaluation of nonattainment area boundaries for designating areas under the revised 1-hour NAAQS for SO₂.

Indiana's Recommendations

East Central Indiana: Wayne County

Within East Central Indiana there is only one SO₂ monitor located at 1321 South 9th Street in Richmond in Wayne County, Indiana. Monitoring data for the Richmond monitor is listed below. The 2008 through 2010 design value for the Richmond monitor is above the new 1-hour standard.

East Central Indiana Monitoring Data					
County	Site ID	2008	2009	2010	2008-2010 Design Value
Wayne	18-177-0006	109	70	109	96
Design Value greater than or equal to 76 ppb					

Indiana evaluated sources that had over 10 tons of SO₂ per year within 50 km of a violating monitor. The Richmond Power and Light facility in Richmond, Indiana is the only SO₂ source within Wayne County contributing to the monitor violation in Richmond.

Indiana is recommending Wayne County as nonattainment based upon the monitor violation. The county boundary encompasses the only source contributing to the monitor violation.

East Central Indiana Emissions				
County	Facility	Address	City	2008 Actual SO₂ Emissions (Tons Per Year)
Wayne	Richmond Power and Light	2000 U.S. 27 South	Richmond	8,681

Central Indiana: Marion and Morgan Counties

Within Central Indiana there are two SO₂ monitors located in Marion County and one SO₂ monitor located in Morgan County. The monitors in Marion County are located at 1321 South Harding Street and 6125 East 16th Street, both in Indianapolis, Indiana. The monitor in Morgan County is located at 6075 High Street in Martinsville, Indiana. Monitoring data for the three Central Indiana monitors are listed below. The 2008 through 2010 design values for two of the three monitors in Central Indiana are above the new 1-hour standard.

Central Indiana Monitoring Data					
County	Site ID	2008	2009	2010	2008-2010 Design Value
Marion	18-097-0057	79	75	103	86
Marion	18-097-0073	29	61	48	46
Morgan	18-109-1001	91	98	105	98
Design Value greater than or equal to 76 ppb					

Indiana evaluated sources that had over 10 tons of SO₂ per year within 50 km of a violating monitor. Within Marion and Morgan counties there are ten sources contributing SO₂ emissions above 10 tons per year; these are listed in the table below. In nearby Hendricks County there is one source, Steel Dynamics, emitting over 10 tons of SO₂ per year. However, Indiana does not believe that Steel Dynamics contributes to the monitor violations in Marion or Morgan counties. The limited monitoring data in Hendricks County also shows values below the new 1-hour SO₂ standard.

Therefore, Indiana is only recommending Marion and Morgan counties as nonattainment based upon the monitor violations. The county boundaries encompass the ten sources contributing to the monitor violations.

Central Indiana Emissions				
County	Facility	Address	City	2008 Actual SO ₂ Emissions (Tons Per Year)
Marion	Indianapolis Power and Light-Harding Street Station	3700 South Harding Street	Indianapolis	19,578
Morgan	Indianapolis Power and Light-Eagle Valley Station	4040 Blue Bluff Road	Martinsville	13,102
Marion	C.C. Perry K Steam Plant	366 Kentucky Avenue	Indianapolis	4,493
Morgan	Hydraulic Press Brick Company	6618 North Tidewater	Mooreville	515
Marion	Rolls-Royce Corporation, Plant 5 & 8	2355 & 2001 S. Tibbs Avenue	Indianapolis	142
Marion	Covanta Indianapolis, Inc.	2320 South Harding Street	Indianapolis	110
Marion	Quemetco, Inc.	7870 W. Morris Street	Indianapolis	74
Marion	Vertellus Agriculture & Nutrition Specialities, LLC	1500 South Tibbs Avenue	Indianapolis	30
Marion	Indianapolis Belmont Waste Water Treatment Plant	2700 South Belmont Avenue	Indianapolis	16
Marion	National Starch, LLC	1515 S. Drover Street	Indianapolis	12
<i>Hendricks*</i>	<i>Steel Dynamics, Inc.</i>	<i>8000 N. County Road 225 E.</i>	<i>Pittsboro</i>	<i>272</i>

*Other source within 50 km of violating monitors, but excluded from recommended nonattainment area.

West Central Indiana: Fountain, Vermillion and Vigo Counties

Within West Central Indiana there are two SO₂ monitors located in Vigo County and one SO₂ monitor located in Fountain County. The monitors in Vigo County are located at 961 North Lafayette Avenue and Ft. Harrison Road, both in Terre Haute, Indiana. The monitor in Fountain County is located North of State Route 234 and East of the Wabash River. Monitoring data for the three West Central Indiana monitors are listed below. The 2008 through 2010 design values for all three monitors in West Central Indiana are above the new 1-hour standard.

The monitor in Fountain County located near the Duke Energy-Cayuga Generating Station was discontinued for a short period of time at the end of 2010. The temporary shutdown of the monitor was based on a decrease in SO₂ emissions due to the installation of a flue-gas desulfurization (FGD) scrubber in 2008. This control mechanism drastically reduced the SO₂ emissions from the Duke Energy-Cayuga Generating Station to approximately 2,500 tons per year, meaning the facility was no longer subject to monitoring requirements under 326 IAC 7-3-2. The source has agreed to continue monitoring.

West Central Indiana Monitoring Data					
County	Site ID	2008	2009	2010	2008-2010 Design Value
Fountain	18-045-0001	236	38	26	100
Vigo	18-167-0018	120	115	61	99
Vigo	18-167-1014	137	142	169	149
Design Value greater than or equal to 76 ppb					

Indiana evaluated sources that had over 10 tons of SO₂ per year within 50 km of a violating monitor. Within Vigo County there are five sources contributing SO₂ emissions emitting above 10 tons per year; these are listed in the table below. There are no SO₂ sources in Fountain County. Indiana evaluated three sources over 10 tons of SO₂ per year in nearby Vermillion County. The three sources in Vermillion County have the potential to contribute to the monitor violation in Fountain.

Indiana is recommending Fountain and Vigo counties as nonattainment based upon the monitor violation. Indiana is also recommending Vermillion County as nonattainment based upon the source contribution to the monitor in Fountain County. The county boundaries encompass the sources contributing to the monitor violations in Fountain, Vermillion and Vigo counties.

West Central Indiana Emissions				
County	Facility	Address	City	2008 Actual SO ₂ Emissions (Tons Per Year)
Vigo	Duke Energy Indiana-Wabash River	450 Bolton Road	West Terre Haute	75,822
Vermillion	Duke Energy Indiana-Cayuga	State Road 63	Cayuga	50,118

Vermillion	Eli Lilly & Company-Clinton Labs	10500 South State Road 63	Clinton	1,779
Vigo	Duke Energy Wabash River Combined Cycle Plant	445 Bolton Road	Terre Haute	414
Vigo	Danisco Sweeteners	160 West Dallas Drive	Terre Haute	370
Vermillion	Colonial Brick Corporation	817 West Park	Cayuga	140
Vigo	Boral Brick Manufacturing Facility	5601 East Price Drive	Terre Haute	82
Vigo	SG Solutions LLC	444 West Sandford Avenue	West Terre Haute	41

Southeast Indiana: Floyd County

Within Southeast Indiana there are three SO₂ monitors located in Floyd County. The monitors in Floyd County are located at Wiley Tower on Bald Knob Road, Falling Run, and 2230 Green Valley Road all in New Albany, Indiana. Monitoring data for the three Southeast Indiana monitors are listed below. The 2008 through 2010 design values for all three monitors in Southeast Indiana are above the new 1-hour standard.

IDEM operates a SO₂ monitoring site at the Green Valley Elementary School (site ID 18-043-1004) downwind of the Duke Energy Indiana-Gallagher Generating Station in Floyd County. This monitor records approximately the same ambient levels of SO₂ as the Falling Run monitor (site ID 18-043-0007), also located at the generating station. The Falling Run site does not support meteorological monitoring and was discontinued at the end of 2010 since it would not be suitable in terms of cost effectiveness to meet the requirements of the new 1-hour SO₂ standard monitoring requirements. With the continuation of monitoring at the Green Valley Elementary School monitor and the Bald Knob monitor (site ID 18-043-0004) located at the Gallagher Generating Station, all monitoring requirements in Southeast Indiana will be met for the 1-hour SO₂ standard.

Southeast Indiana Monitoring Data					
County	Site ID	2008	2009	2010	2008-2010 Design Value
Floyd	18-043-0004	117	87	72	92
Floyd	18-043-0007	192	68	75	112
Floyd	18-043-1004	138	125	123	129
Design Value greater than or equal to 76 ppb					

Indiana evaluated sources that had over 10 tons of SO₂ per year within 50 km of a violating monitor. The Duke Energy Indiana-Gallagher Generating Station is the only SO₂ source within Floyd County contributing to the monitor violation in New Albany.

Indiana is recommending Floyd County as nonattainment based upon the monitor violation. The county boundary encompasses the only source contributing to the monitor violation.

Southeast Indiana Emissions				
County	Facility	Address	City	2008 Actual SO ₂ Emissions (Tons Per Year)
Floyd	Duke Energy Indiana-Gallagher	Jackson Street	New Albany	40,438

Southwest Indiana: Daviess, Gibson and Pike Counties

Within Southwest Indiana there is one SO₂ monitor in Daviess County, two monitors in Gibson County, and one monitor located in Pike County. The monitor in Daviess County is located on State Road 57. The monitors in Gibson County are located at the Gibson Generating Station southeast of the plant and on Gibson Coal Road. The monitor in Pike County is located at 1587 East Arda Lane. Monitoring data for the four Southwest Indiana monitors are listed below. The 2008 through 2010 design values for three of the four monitors in Southwest Indiana are above the new 1-hour standard.

An additional monitor is located in Mount Carmel, Illinois, near the Gibson Generating Station in Gibson County. With the permission of U.S. EPA, the Gibson Tower monitor (site ID number 18-051-0001) in Gibson County was discontinued at the end of 2010 with the stipulation that a meteorological monitoring site in Mount Carmel, IL be established. This will satisfy all monitoring requirements in Southwest Indiana.

With the implementation of new federal measures, such as the Clean Air Transport Rule, Gibson County may attain by the end of 2011.

Southwest Indiana Monitoring Data					
County	Site ID	2008	2009	2010	2008-2010 Design Value
Daviess	18-027-0002	122	138	115	125
Gibson	18-051-0001	56	44	45	48
Gibson	18-051-0002	90	65	74	76
Wabash, IL	17-185-0001	90	69	66	75
Pike	18-125-0005	205	194	211	203
Design Value greater than or equal to 76 ppb					
Illinois Monitor					

Indiana evaluated sources that had over 10 tons of SO₂ per year within 50 km of a violating monitor. Pike County has two sources and both Gibson and Daviess counties have one source contributing SO₂ emissions above 10 tons per year; these are listed in the table below. The two large sources in Pike County heavily influence the monitor violations in Daviess County, more so than the small SO₂ source within Daviess County. There are no other sources within 50 km of the monitor violations occurring in Gibson, Pike or Daviess counties.

Therefore, Indiana is recommending Gibson, Pike, and Daviess counties as nonattainment based upon the monitor violations. The county boundaries encompass the sources contributing to the monitor violations in Gibson, Pike and Daviess counties.

Southwest Indiana Emissions				
County	Facility	Address	City	2008 Actual SO₂ Emissions (Tons Per Year)
Pike	Hoosier Energy-Ratts Generating Station	6825 North Blackburn Road	Petersburg	27,335
Pike	Indianapolis Power and Light-Petersburg Generating Station	Highway 57 North	Petersburg	22,494
Gibson	Duke Energy Indiana-Gibson	State Road 64	Princeton	20,527
Daviess	Grain Processing Corporation	1443 South 300 West	Washington	42

Summary of Recommendations

The nine counties that currently measure ambient concentrations above the new 1-hour SO₂ standard are Daviess, Floyd, Fountain, Gibson, Marion, Morgan, Pike, Vigo, and Wayne counties. Indiana is recommending these nine counties to be classified as nonattainment based on the monitored violations. Indiana is also recommending Vermillion County be classified nonattainment based on contributions to the monitor in Fountain County. Indiana feels that these ten counties incorporate all sources likely contributing to monitored violations of the standard within 50 km of a monitoring site. Indiana is requesting that any county not outlined in this enclosure be designated as unclassifiable.