

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: 19 JUN 1987

SUBJECT: PSI Gibson Model Evaluation Study

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FROM: Michael Koerber
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TO: Dean Wilson (MD-14)
OAQPS, MDAD, SRAB

On February 4, 1987 (52 FR 3452), the United States Environmental Protection Agency (USEPA) proposed to disapprove the Indiana sulfur dioxide (SO₂) State Implementation Plan (SIP) for the entire State, including Gibson County. USEPA's proposed action for Gibson County was based on the lack of an attainment demonstration for the Public Service of Indiana (PSI) Gibson Generating Station, as well as an unacceptable compliance test method.

During the public comment period, the State submitted information concerning some recent measured ambient SO₂ exceedances and a model evaluation study performed by PSI. The State requested USEPA to review and to determine the validity of the monitored exceedances and the acceptability of the model evaluation study.

Based on Region V's review, we believe that: (1) the monitored exceedances are valid and should be considered in developing a revised SO₂ emission limitation, and (2) the model evaluation study is unacceptable and the State should use the appropriate USEPA guideline model (MPTEP) in developing a revised SO₂ emission limitation. Our draft letter to Indiana on these issues is attached. Also attached are copies of PSI's analysis of the monitored exceedances, and several documents related to the model evaluation study (i.e., initial State-PSI protocol, previous Region V comment letters, and the final study report).

Please review our draft letter and provide me with your comments. Since the State is awaiting our letter before taking further action on Gibson County, an expeditious review and response would be appreciated.