



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ROD R. BLAGOJEVICH, GOVERNOR

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September 1, 2004

Bharat Mathur
Acting Regional Administrator
United States Environmental Protection Agency
Region 5
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Dear Mr. Mathur:

Bharat

This letter is in response to your letter to Governor Rod R. Blagojevich, dated June 29, 2004, regarding the proposed nonattainment area boundaries in Illinois for the fine particulate (PM_{2.5}) National Ambient Air Quality Standard. You indicated in your letter that USEPA intends to modify Illinois' recommended designations and boundaries. We appreciate the opportunity to comment on USEPA's modifications and offer the following responses for your consideration.

In our March 5, 2004 recommendation, we proposed that a portion of Randolph County, specifically Baldwin Township, be designated as unclassified for the PM_{2.5} standard. Instead, USEPA intends to designate Randolph County, in its entirety, as nonattainment, and include it in the Metro-East/St. Louis nonattainment area. Although we believe that our recommendation to designate Baldwin Township as unclassified was justified for the reasons specified in our March 5th submittal, we recommend that only Baldwin Township in Randolph County be designated as nonattainment.

The Baldwin power plant, which is located in Baldwin Township, accounts for almost all of the precursor emissions from Randolph County. From Figure 7a of our March 5, 2004 submittal, countywide SO₂ emissions from all source categories are 27,061 tons per year, virtually all of which (26,267 tons per year) are emitted by the Baldwin power plant. Similarly, countywide NO_x emissions from all source categories (see Figure 7b from IEPA's March 5, 2004 submittal) are 26,729 tons per year, 22,367 tons per year of which are emitted by the Baldwin power plant. Obviously the Baldwin power plant is responsible for most of the precursor emissions in Randolph County, and emissions in the portions of Randolph County outside of Baldwin Township are too small to justify inclusion in the nonattainment area. It should also be noted that Baldwin Township is located directly adjacent to St. Clair County, Illinois (see Figure 18 from IEPA's March 5, 2004 submittal,

a copy of which is attached). St. Clair County will be included as part of the Metro-East/St. Louis PM2.5 nonattainment area so the nonattainment area would have a contiguous boundary even if Baldwin Township were included.

USEPA has also proposed to include counties in Indiana and Wisconsin as part of the Chicago PM2.5 nonattainment area. We recommend that the Counties of Kenosha in Wisconsin, and Lake and Porter in Indiana not be included in the Chicago PM2.5 nonattainment area. In a recent letter, Governor Jim Doyle of Wisconsin recommended that Kenosha County be designated as an attainment area. We agree with Wisconsin's recommendation regarding Kenosha County. The ambient air monitoring data collected in Kenosha County indicates that PM2.5 air quality in the county easily meets the PM2.5 NAAQS. We also agree that, because of the relatively infrequent occurrence of northerly winds, Kenosha County has a minimal impact on monitors in Illinois that are violating the NAAQS.

Regarding Lake and Porter Counties in Indiana, should USEPA and the State of Indiana agree that these two counties be designated as nonattainment, the Illinois EPA urges USEPA to designate them as a separate nonattainment area, not a part of the Chicago nonattainment area. Our concern stems from USEPA's policy regarding transportation conformity in multi-state areas. As we understand it, until formal motor vehicle emissions budgets are established, which are not required until 2008, the Chicago Area Transportation Study (CATS), the Metropolitan Planning Organization (MPO) for the Northeastern Illinois Area, would have to coordinate its transportation conformity determinations with the Northwestern Indiana Regional Planning Commission (NIRPC), the MPO for Lake and Porter Counties. This would be required even though the MPOs operate independently of each other, do not have any jurisdiction over planning or projects in the other's area, and heretofore have been allowed to adopt Regional Transportation Plans and Transportation Improvements Programs (TIP). This policy could jeopardize the ability of one MPO to adopt a plan or TIP independent of the other MPO, resulting in the possible loss of federal transportation funding. We strongly believe that each respective MPO should continue to be able to conduct its transportation planning responsibilities independently, and request that Lake and Porter Counties be designated, as a separate nonattainment area should USEPA and the State of Indiana agree that a nonattainment designation is warranted.

Again, we appreciate the opportunity to comment on USEPA's modifications to our recommended nonattainment area boundaries. Please contact Laurel Kroack, Manager of the Division of Air Pollution Control at 217/524-7636 if you have any questions.

Sincerely,



Renee Cipriano
Director

cc: Steve Rothblatt, USEPA
Dave Kolaz
Laurel Kroack

Attachment

Figure 18

Location of Baldwin Power Plant

