



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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ROD R. BLAGOJEVICH, GOVERNOR      RENEE CIPRIANO, DIRECTOR

217/782-3397

March 5, 2004

Thomas V. Skinner, Regional Administrator  
Office of the Regional Administrator  
USEPA Region 5, R-19J  
77 West Jackson Boulevard  
Chicago, IL 60604-3507

Dear Mr. Skinner: *Tom*

On behalf of Governor Blagojevich and in response to your letter of June 2, 2003, I am submitting our recommendations for attainment/nonattainment designations for the PM2.5 National Ambient Air Quality Standards for the State of Illinois. Also included with Illinois' recommendations is a support document prepared by the Illinois Environmental Protection Agency (IEPA). The IEPA will also provide this document to your staff in electronic format to facilitate your timely review.

Specifically, the following designations are recommended for Illinois:

Cook	Nonattainment	Chicago
DuPage	Nonattainment	Chicago
Kane	Nonattainment	Chicago
Lake	Nonattainment	Chicago
Will	Nonattainment	Chicago
McHenry	Nonattainment	Chicago
Kendall: Oswego Township All Other Townships	Nonattainment Attainment	Chicago
Grundy: Aux Sable Township Goose Lake Township All Other Townships	Nonattainment Nonattainment Attainment	Chicago Chicago
Madison	Nonattainment	Metro-East
Monroe	Nonattainment	Metro-East
St. Clair	Nonattainment	Metro-East

Randolph: Baldwin Township All Other Townships	Unclassifiable Attainment	Randolph
Jersey	Unclassifiable	Jersey
All Other Counties	Attainment	

We are recommending that portions of the Chicago and Metro-East metropolitan areas be designated as nonattainment for the PM2.5 National Ambient Air Quality Standards. As violations of the annual PM2.5 standard have been measured in these areas, designating them as nonattainment is appropriate. The remainder of Illinois is attaining the PM2.5 standards and should, therefore, be designated as attainment, with the following two exceptions.

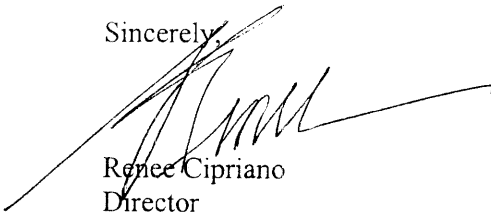
We are recommending that Jersey County, which is located in the Metro-East area in southwestern Illinois, be designated as unclassifiable for the PM2.5 standards. Jersey County is rural, with virtually no emission sources, and does not contribute to nearby nonattainment areas. The IEPA has recently installed a PM2.5 ambient monitor in this county. Jersey County should be designated as unclassifiable until IEPA has collected sufficient ambient air monitoring data to clarify its attainment status.

Randolph County, which is also located in the Metro-East area, is the location of the Baldwin power plant, a large source of PM2.5 precursor emissions. As you are aware, the Baldwin plant may be subject, in the very near future, to significant new emission reduction requirements as a result of litigation and new State and Federal regulatory initiatives. Since the plant will be required to substantially reduce emissions regardless of the area's PM2.5 designation, IEPA recommends that Baldwin Township, where the Baldwin plant is located, be designated as unclassifiable for the PM2.5 standards. If the anticipated emission reduction requirements are substantially delayed, the IEPA may seek to designate Baldwin Township in Randolph County as a nonattainment area in the future.

Given the potential scope and impact of these designations, Illinois is concerned that U.S. EPA has not yet finalized its implementation strategy for the PM2.5 standard. We may choose to revise our recommendations when U.S. EPA's implementation strategy is proposed.

If there are any questions, please feel free to contact me.

Sincerely,



Renee Cipriano  
Director

cc: Steve Rothblatt, Chief  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5

Julie Curry, Deputy Chief of Staff  
Labor and Economy  
Governor's Office