



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
AUG 22 2017

The Honorable Bruce V. Rauner
Governor
207 State Capitol Building
Springfield, Illinois 62706

REPLY TO THE ATTENTION OF:

Dear Governor Rauner:

The purpose of this letter is to inform you of the U.S. Environmental Protection Agency's intended designations for certain areas in Illinois for the 2010 Primary National Ambient Air Quality Standard (NAAQS) for sulfur dioxide (SO₂). The designations for this NAAQS are an important part of EPA's commitment to a clean, healthy environment. These intended designations are a response to designations-related recommendations and information your state submitted in letters dated June 2, 2011, September 18, 2015, April 19, 2016, January 12, 2017, and July 6, 2017.

On July 25, 2013, EPA designated certain areas in 16 states as nonattainment,¹ but did not at that time designate other areas. Additional areas were designated on June 30, 2016,² and November 29, 2016.³ Pursuant to a March 2, 2015, court-ordered schedule,⁴ the agency must complete the remaining SO₂ designations by two specific deadlines: December 31, 2017, and December 31, 2020. Accordingly, this letter is to notify you of EPA's assessment of your state's recommended designations for all remaining undesignated areas in Illinois except areas that are associated with sources for which Illinois elected to install and begin operating a new SO₂ monitoring network. While we are in agreement with your recommendations for many of these areas, some areas warrant further discussion as explained below and in the accompanying technical support document. We stand ready to assist and hope to resolve any differences regarding the proper designation for these areas with this 120-day period provided by the Clean Air Act.

To this end, if you or your staff have additional information that EPA should consider prior to finalizing the designations, please submit it as soon as possible but no later than October 23, 2017. You may submit additional information by sending it to EPA's public docket for these designations, EPA-HQ-OAR-2017-0003, located at www.regulations.gov, and sending a copy to EPA Region 5. EPA also will publish a notice in the *Federal Register* announcing a 30-day comment period for the public to provide input on EPA's intended designations.

¹ The Lemont area, including portions of Cook and Will Counties, and the Pekin area, including portions of Peoria and Tazewell Counties, were designated as nonattainment in this action.

² In this action, EPA designated the Alton Township area, including a portion of Madison County, and Williamson County as nonattainment, and designated Bureau, Jasper, Massac, Putnam, and another portion of Madison County as unclassifiable/attainment.

³ This action only affected Texas.

⁴ *Sierra Club v. McCarthy*, No. 3-13-cv-3953 (SI) (N.D. Cal. Mar. 2, 2015).

Illinois has recommended that a portion of Madison County indicated below be designated attainment. EPA regulations for implementing the SO₂ NAAQS required Illinois to characterize SO₂ air quality in this area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Illinois or by a third party. Our review of this information indicates that it is not consistent with your recommendation due to limitations reflected in your modeling not yet being in place or enforceable, which would require a modification to the recommended designation. We invite Illinois to review the available information and further discuss this issue with EPA in order to inform an appropriate final designation.

Intended Unclassifiable Area	Included Area
Madison County (p)*	Chouteau (part), Nameoki, Granite City, and Venice Townships

“(p)” indicates portion of county. An asterisk (*) indicates that EPA’s intended designation for these portions of this county represents a modification to the designation that you have most recently recommended.

Illinois recommended a designation of attainment for the areas indicated below. EPA regulations for implementing the SO₂ NAAQS required Illinois to characterize SO₂ air quality in each listed area. In considering your recommendation, we have taken into account all available information, including any current (2014-2016) air monitoring data, and any air dispersion modeling analyses provided by Illinois or by a third party. Our review of this information indicates that it is consistent with your recommendation, and we intend to designate these areas unclassifiable/attainment.

Intended Unclassifiable/Attainment Areas	Included Counties
Christian County	Christian, Macoupin, Montgomery, and Sangamon Counties
Crawford County	Entirety of Crawford County
Lake County	Entirety of Lake County
Randolph County	Monroe, Randolph, and St. Clair Counties
Washington County	Perry and Washington Counties

The enclosure to this letter provides the information that supports the intended designation decisions for these areas in Illinois.⁵

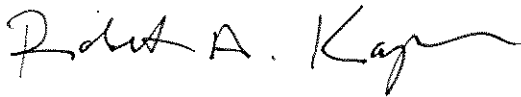
⁵ Enclosure 1 is Chapter 12 of the Technical Support Document for the designations EPA plans to complete by December 31, 2017, that addresses areas in Illinois. The Technical Support Document is also available at <https://www.epa.gov/sulfur-dioxide-designations>

EPA intends to defer designating Macon County, where operation of a new SO₂ monitoring network has recently begun. Finally, EPA intends to designate as unclassifiable/attainment all remaining areas of Illinois, which were not required to be characterized and for which EPA does not have information that suggests the area may not be meeting the NAAQS or contributing to air quality in a nearby area that does not meet the NAAQS. A list of these remaining areas is included in the last section of the enclosure.

EPA will promulgate the final designations for the areas identified in this letter by December 31, 2017. We are prepared to work with you to resolve any disagreements with respect to the available information or information gaps. We are then required to designate the last remaining undesignated area in Illinois, in Macon County, by December 31, 2020, consistent with the prescribed timing of the court order.

We share your goal to provide cleaner air for citizens in your state. Thank you for Illinois' efforts throughout the designations process. We look forward to a continued dialogue with you and your staff as we work together to complete the area designations and implement the 2010 primary SO₂ NAAQS. For additional information regarding designations under the SO₂ NAAQS, please visit our website at <https://www.epa.gov/sulfur-dioxide-designations>. Should you have any questions, please do not hesitate to call me, or have your staff contact Ed Nam of my staff at 312-353-2192 or Nam.Ed@epa.gov.

Sincerely,



Robert A. Kaplan
Acting Regional Administrator

Enclosure

Cc Alec Messina, Director, Illinois Environmental Protection Agency
Julie Armitage, Director, Bureau of Air, Illinois Environmental Protection Agency