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October 31, 2025

Sarah Brubaker, Sarah.Brubaker@illinois.gov
Illinois EPA
2520 West Iles Avenue
PO Box 19276
Springfield, IL 62974-9276

Re: Comments to Draft "Illinois Initial Area
Designation Recommendation for the 2024
Revised Secondary Annual SO₂ National
Ambient Air Quality Standard"

Dear Ms. Brubaker

This comment letter is offered on behalf of the Midwest Ozone Group¹ in response to the Public Outreach notice of October 1, 2025 announcing that Illinois EPA is accepting written comments on the draft "Illinois Initial Area Designation Recommendation for the 2024 Revised Secondary Annual SO₂ National Ambient Air Quality Standard" until October 31, 2025.

MOG supports the proposed recommendation that all areas of the State be designated as attainment/unclassifiable of the revised SO₂ secondary NAAQS based on ambient air quality monitoring from 2022 – 2024 for filing by November 11, 2025. The SO₂ data from fourteen monitoring sites listed in Table 1; the 2022 emissions data of Table 2 and the calculated design values for SO₂ Monitoring Sites provided in Table 3 produce clear technical support for the recommendation that all areas in the State of Illinois are in attainment of the 2024 revised secondary SO₂ NAAQS of 10 ppb on an

¹ The membership of the Midwest Ozone Group includes: Ameren, American Electric Power, American Forest & Paper Association, American Iron and Steel Institute, American Wood Council, Appalachian Region Independent Power Producers Association, Associated Electric Cooperative, Berkshire Hathaway Energy, Big Rivers Electric Corp., Citizens Energy Group, City Water, Light & Power (Springfield, IL), Cleveland-Cliffs Inc., Council of Industrial Boiler Owners, Duke Energy Corp., East Kentucky Power Cooperative, ExxonMobil, Monongahela Power Company, Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, Indiana Utility Group, Hoosier Energy REC, Inc., LGE/KY, Marathon Petroleum Company, National Lime Association, North American Stainless, Nucor Corporation, Ohio Utility Group, Ohio Valley Electric Corporation, Olympus Power, Steel Manufacturers Association, and Wabash Valley Power Alliance.

annual average basis, averaged over three consecutive years. The monitored values of zero to 2 ppb are significantly below the standard on a state-wide basis.

MOG supports the timely submittal of a final designation recommendation as presented in the October 1, 2025 draft.

MOG values the opportunity to provide comment to the public notice.

Very truly yours,

Kathy G. Beckett

Kathy G. Beckett
Counsel to the Midwest Ozone Group