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March 26, 2025

Sarah Brubaker
Illinois EPA
2520 West Iles Avenue
PO Box 19276
Springfield, IL 62794-9276

Submitted by email at: Sarah.Brubaker@Illinois.gov

Re: Technical Support Document: Recommended Initial Attainment/Nonattainment Designations in Illinois for the 2024 Revised Primary Annual PM2.5 National Ambient Air Quality Standard.

Dear Ms. Brubaker:

The Midwest Ozone Group¹(“MOG”) is pleased to have the opportunity to offer these comments² on the March 3, 2025, Notice of Public Information that was published on the Illinois Environmental Protection Agency’s (IEPA) General Public Notice website opening a public comment/outreach period on a draft document titled “Technical Support Document: Recommended Initial Attainment/Nonattainment Designations in Illinois for the Revised Primary Annual PM2.5 National Ambient Air Quality Standard” (“Draft Recommendation”). Illinois EPA intends to submit a

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., Buckeye Power, Inc., 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/ KU, 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.

² These comments were prepared with the technical assistance of Gregory M. Stella of Alpine Geophysics LLC; gms@alpinegeophysics.com.

final version of these recommendations to the United States Environmental Protection Agency (USEPA) to provide the basis for determining the attainment area designations for the subject area with respect to PM_{2.5} National Ambient Air Quality Standard (“NAAQS”) promulgated on February 7, 2024. The deadline for commenting on the Draft Recommendation is March 31, 2025.

MOG is an affiliation of companies and associations that draws upon its collective resources to seek solutions to the development of legally and technically sound air quality programs that may impact on their facilities, their employees, their communities, their contractors, and the consumers of their products. MOG's primary efforts are to work with policy makers in evaluating air quality policies by encouraging the use of sound science. MOG has been actively engaged in a variety of issues and initiatives related to the development and implementation of air quality policy, including the development of transport rules (including exceptional events demonstrations, implementation of NAAQS standards, nonattainment designations, petitions under Sections 126, 176A and 184(c) of the Clean Air Act (“CAA”), NAAQS implementation guidance, the development of Good Neighbor State Implementation Plans (“SIPs”), the development of greenhouse gas and Mercury and Air Toxics Standards Rules and related regional haze issues. MOG Members and Participants own and operate numerous stationary sources that are affected by air quality requirements including those related to the application of PM_{2.5} NAAQS to the subject area.

The Draft Recommendation of IEPA proposes that the Chicago metropolitan area and the Metro-East St. Louis (Metro-East) metropolitan area to be classified as nonattainment for the PM_{2.5} NAAQS. As IEPA notes in its related Technical Support Document (“TSD”)³ this recommendation is based on the most recent three years of ambient monitoring data (2021-2023), which indicates that the counties of Cook, DuPage, Kane, and Will in the Chicago metropolitan area and Madison and St. Clair in the Metro-East metropolitan area are violating the PM_{2.5} NAAQS. In addition, the IEPA Draft Recommendation proposes that the surrounding counties of Lake, McHenry, and portions of Kendall and Grundy County are significantly

³ <https://epa.illinois.gov/content/dam/soi/en/web/epa/public-notices/documents/general-notices/2025/PM25%202024%20Annual%20NAAQS%20Recommendation.pdf>

contributing to the violating counties in the Chicago area and that the additional county of Monroe and a portion of Randolph County are contributing to the violating counties in the Metro-East area. IEPA notes in its TSD that its recommended boundaries are consistent with previous Chicago and Metro-East PM2.5 nonattainment area boundaries when the areas were designated nonattainment for the 1997 PM2.5 standard, were based on the 2021-2023 ambient monitoring data, and reflect USEPA guidance. The IEPA Draft Recommendation states that the remaining areas of Illinois should be classified as attainment/unclassifiable areas for the PM2.5 standard.

1. USEPA Five Factor Analysis

As IEPA acknowledges in its TSD, in making its nonattainment area boundary designation recommendations, it followed USEPA guidance⁴, noting that “USEPA recommends that states consider the following five factors in assessing the designated nonattainment area boundary:”

- a. Air Quality Data
- b. Emissions and Emissions Related Data
- c. Meteorology
- d. Geography/Topography
- e. Jurisdictional Boundaries

These five factors offer a series factors that must be considered in making these recommendations including recognition of the availability of 2024 monitoring data to be considered when USEPA makes its final determination. The IEPA recommended nonattainment area boundary designations must therefore be based on these criteria and the cumulative evaluation of the five factors for each county which is part of the recommended nonattainment areas.

USEPA guidance allows states great discretion in analyzing these five factors. The guidance at Page 5, Footnote 9 states that “[t]hese factors are derived, in part, from the CAA's ozone pollution provisions identifying factors the Administrator is

⁴ “Initial Area Designations for the 2024 Revised Primary Annual Fine Particle National Ambient Air Quality Standard”, Office of Air and Radiation, February 7, 2024, available at: https://www.epa.gov/system/files/documents/2024-02/pm-naaqs-designations-memo_2.7.2024-_jg-signed.pdf

to consider in determining portions of metropolitan areas that may be excluded from an ozone nonattainment area. (CAA section 107(d)(4)(A)(v)). These CAA factors include population density, traffic congestion, commercial development, industrial development, meteorological conditions, and pollution transport. The EPA finds these factors, and other information as indicated in this memorandum, relevant to evaluating areas potentially contributing to NAAQS violations more generally, including in the context of PM2.5 pollution.”

In assessing the five factors, air quality monitoring data, exclusive of data impacted by exceptional events such as wildfires, should be the primary factor considered by IEPA and urges IEPA not to default to the CBSA boundaries because they are inconsistent with the CAA language for designating fine particulate matter (including PM10 and PM2.5) in the case of this geographic area.

2. IEPA’s recommendations should not, by default, show the PM2.5 NAAs to be the same as the NAAs for 1997 PM2.5 NAAQS or the NAAs for the current ozone NAAQS.

IEPA recommendations for these PM2.5 NAA boundaries should not automatically align with the 1997 PM2.5 standards or replicate those set for ozone (O3) NAAs. PM2.5 and O3 are distinct pollutants with different transport characteristics, and PM2.5 has much lower transport distances than ozone. Therefore, the boundaries for PM2.5 NAAs in Illinois should be carefully considered based on these differences, rather than simply adopting historical PM2.5 or ozone NAA boundaries for convenience.

Historically, Illinois has established smaller NAAs for areas like McCook and Granite City⁵, where the state has successfully met the fine PM standards. This precedent shows that it is possible to establish smaller NAA boundaries without compromising air quality standards. The recommendation is to continue this approach, using studies like that from Alpine Geophysics⁶, which evaluates air quality in cities like Chicago and St. Louis, to support the creation of smaller, more accurate PM2.5 NAAs. These studies provide valuable data to demonstrate that a

⁵ 63 Fed. Reg. 11842

⁶https://www.midwestozonegroup.com/_files/ugd/7ec07f_744eb1e14e444b2b93dff141fadee7b8.pdf

more localized approach to PM2.5 regulation is effective and appropriate, considering the distinct transport properties of the pollutant.

MOG urges IEPA not to default to larger, less specific NAA boundaries and instead prioritize scientifically informed, smaller NAAs that reflect the unique characteristics of PM2.5 and the state's air quality challenges. This strategy could lead to more effective regulation and better public health outcomes.

3. Based on the information presented by IEPA, at a minimum, Monroe County and Baldwin Township should not be included in the recommendation for the East St. Louis NAA.

Based on the information provided by IEPA, it is recommended that Monroe County and Baldwin Township should not be included in the designation of the East St. Louis NAA for PM2.5.

The primary reasoning for this recommendation stems from several key points in the IEPA's TSD. The TSD suggests that both Monroe County and Baldwin Township, located near the southwestern and southern edges of St. Clair County, respectively, should be designated as nonattainment for the annual PM2.5 standards. However, Baldwin Township in Randolph County, which is south of St. Clair County, has a monitoring site that shows attainment with the PM2.5 standard. This fact undermines the justification for including Baldwin Township in the nonattainment area, as the data from this monitor indicates that air quality in the area is in attainment with the standards.

Additionally, the closest nonattainment monitors are in the far northwest corner of St. Clair County (Figure 1). The TSD does not provide evidence or demonstrate that emissions from either Monroe County or Baldwin Township are significantly contributing to the nonattainment areas in northern St. Clair County. There is no substantial indication that pollution from these areas is affecting the air quality in the northern part of St. Clair County.

Moreover, trends in emissions data show that PM2.5, SO2, NOx, and other pollutants are all trending downward in both Monroe County and Baldwin Township and Illinois in total (Figure 2), which suggests improvements in air quality in these areas. Given these factors, there is insufficient evidence to justify including Monroe

County and Baldwin Township in the East St. Louis PM2.5 nonattainment designation.

Finally, the emissions of nitrogen oxides (NO_x) and sulfur dioxide (SO₂) from sources in Monroe County or Baldwin Township are unlikely to be transported to the northwest corner of St. Clair County, further reducing the possibility that either Monroe County or Baldwin Township is contributing to nonattainment in the region.

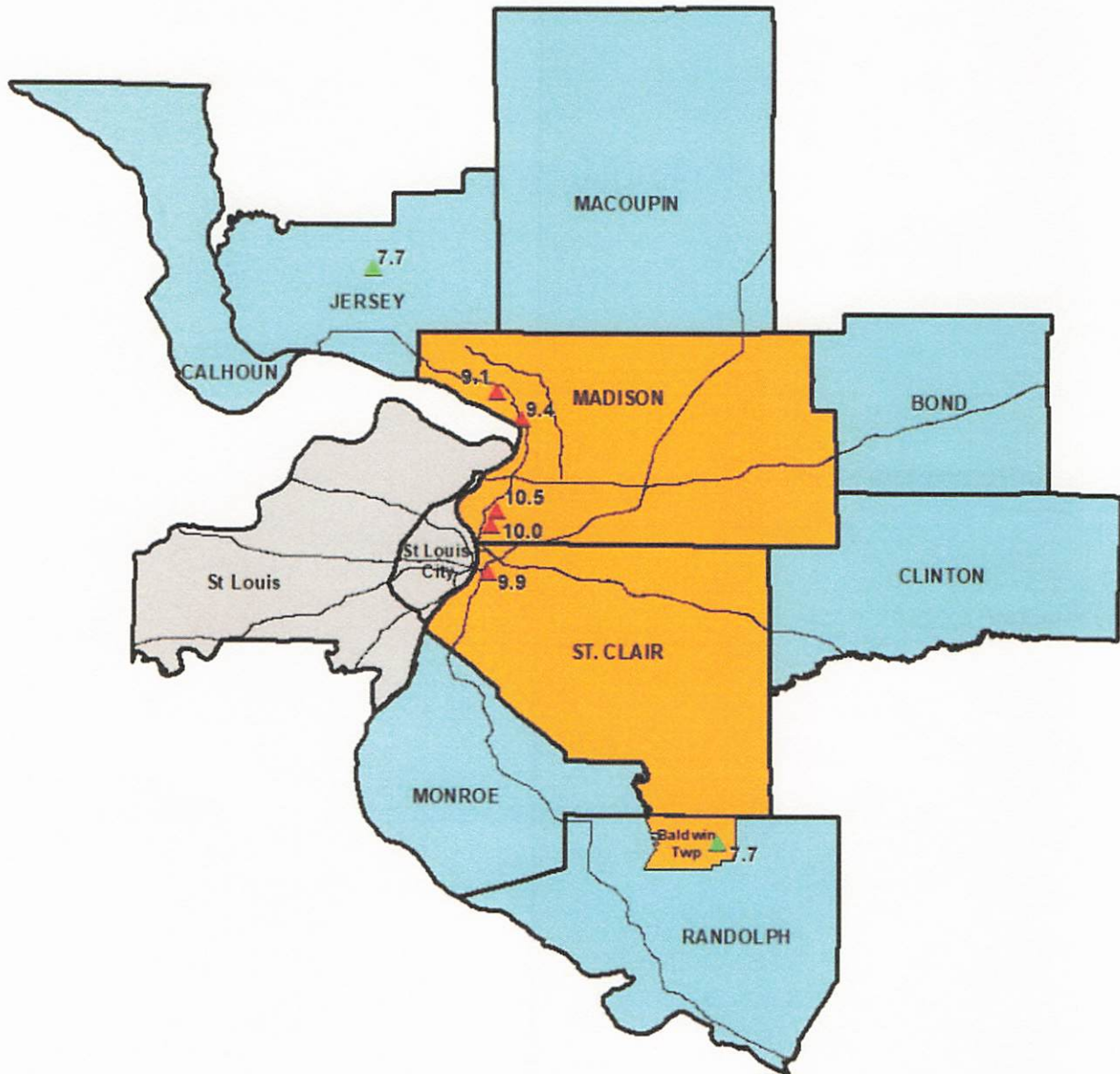


Figure 1. Metro-East St. Louis Area 2021-2023 PM2.5 Design Values

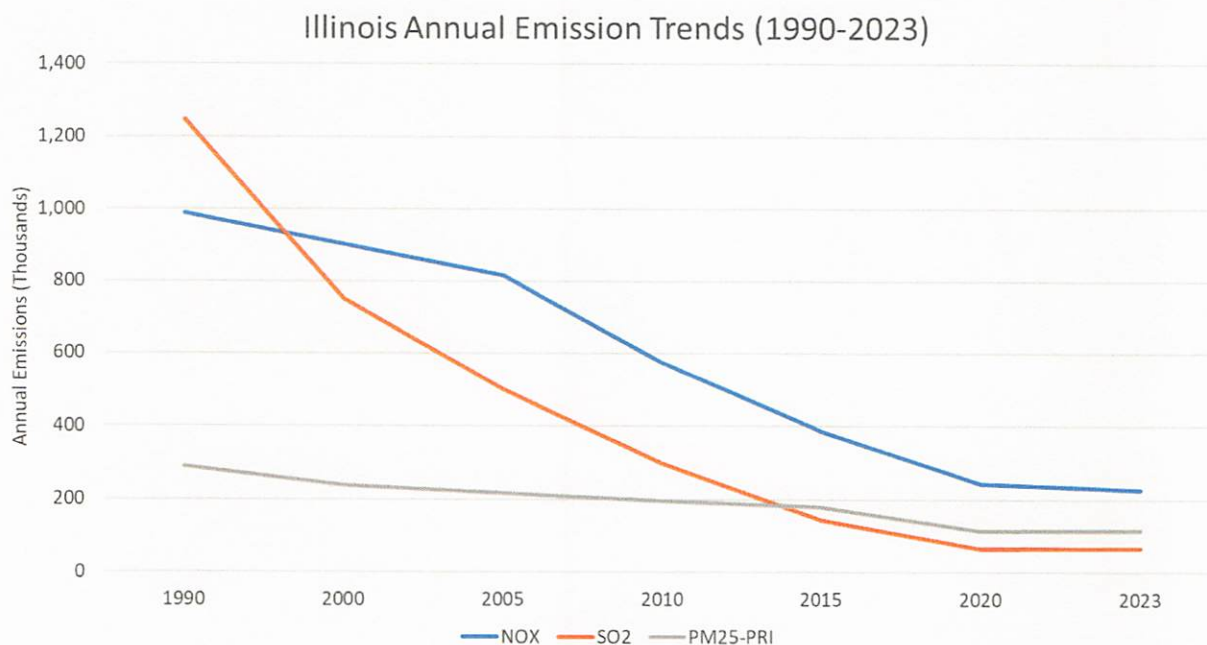


Figure 2. Annual Emissions Trends in Illinois (1990-2023)

4. In making these PM2.5 NAA recommendations, IEPA should consider assessing and correcting PM2.5 data from Teledyne monitors as addressed by AAPCA.

In the context of making PM2.5 NAA recommendations, the IEPA should consider assessing and correcting PM2.5 data from Teledyne monitors, as highlighted by the Association of Air Pollution Control Agencies (AAPCA)⁷ in December 2024. Illinois has invested heavily in the installation of Teledyne monitors across the state in the past several years. The AAPCA has raised concerns regarding the bias adjustment algorithm used in the Teledyne T640/X instruments, which may not be adequately aligned with the Federal Reference Method (FRM) measurements, resulting in an overall positive bias in the data. To improve the accuracy and comparability of the measurements, AAPCA recommends that Teledyne Technologies re-evaluate and update the bias adjustment algorithm for these instruments. Without such an update, state and local air agencies may continue to

⁷ <https://cleanairact.org/wp-content/uploads/2024/12/AAPCA-Letter-Regarding-Teledyne-Bias-FINAL-12-20-24.pdf>

invalidate the Teledyne T640/X measurements and seek alternative monitoring instruments.

AAPCA also calls on the USEPA to consider retroactively correcting particulate matter with a diameter of 10 microns or smaller (PM10) data. While Teledyne's Network Data Alignment is currently applicable to PM2.5 measurements, AAPCA argues that correcting the bias in PM10 data, though potentially less significant, would contribute to a more accurate and reliable dataset for regulatory, scientific, and public purposes. Addressing PM10 data bias would enhance the quality of air quality assessments and ensure that regulatory decisions are based on the best available information.

While AAPCA agrees with the USEPA's prioritization of the Network Data Alignment for PM2.5, given the impending implementation deadlines for the 2024 revised annual PM2.5 NAAQS, it urges USEPA to begin working with air agencies to extend the alignment to PM10 data as well. This would ensure consistency and improve the accuracy of all particulate matter measurements.

Additionally, the development and implementation of the bias adjustment algorithm for PM2.5 data was a resource-intensive process that delayed the release of 2023 PM2.5 design values. Moving forward, AAPCA emphasizes the importance of transparent and early engagement with state and local co-regulators as the USEPA continues to evaluate and enhance the performance of Federal Equivalent Methods (FEMs) in the national regulatory monitoring network. This collaborative approach will help improve the overall quality and reliability of air quality data used for regulatory decisions.

5. IEPA should strongly consider early certification and incorporation of 2024 design value data into their calculations prior to making final draft recommendations for NAAs in Metro Chicago and East St. Louis.

IEPA should strongly consider the early certification and incorporation of 2024 design value data into its calculations before making final recommendations for the PM2.5 NAAs in these regions. Preliminary analyses using the most recent data suggest that multiple monitors in both Chicago and East St. Louis may show attainment of the current annual PM2.5 NAAQS or at least exhibit lower design values than those presented in the draft recommendation.

The Clean Air Act (CAA) Section 319(b)(3)(A)(v) stipulates that air quality data should be carefully screened to ensure that events unlikely to recur—such as temporary pollution spikes—are accurately represented in monitoring data and analyses. In the case of the recent PM_{2.5} evaluations, wildfire smoke has significantly affected air quality, particularly in the years 2021 and 2023, which experienced the highest wildfire smoke-day frequencies in the Upper Midwest and Great Lakes states in recent years.

The Lee & Jaffe 2024 paper⁸, “Wildfire Impacts on O₃ in the Continental US Using PM_{2.5} and a Generalized Additive Model (2018-2023)”, underscores the significant impact of wildfires on air quality during these years. Figure 2 of that paper specifically highlights that these years have elevated wildfire smoke days that are not representative of typical air quality conditions. As such, the inclusion of data from these years in regulatory decisions may distort the evaluation of air quality. Therefore, it is crucial that the IEPA uses accurate, representative data when analyzing air quality and formulating recommendations.

The core recommendation is that the IEPA should prioritize the certification and use of 2024 data in its analyses for the final recommendations. The data from 2024 is more current and more accurately reflects typical air quality conditions, free from the anomaly of wildfire smoke that affected previous years. Preliminary calculations show that, when incorporating 2024 data and rolling 2021 out of the three-year average, multiple monitors in both Chicago and East St. Louis will likely indicate attainment of the PM_{2.5} standards or present design values substantially lower than those suggested in the draft recommendations. This indicates that the air quality in these areas is likely better than initially represented, which could significantly alter the regulatory outlook for these regions.

A significant portion of the 2021 data has been impacted by wildfire smoke, which does not reflect typical air quality conditions. Including these data points in regulatory decisions could lead to misrepresentations of the actual air quality. It is, therefore, proposed that the IEPA simply discard 2021 data entirely from its analysis and focus on the more recent, certified 2022 through 2024 data. By doing so, the agency can base its recommendations on the most accurate and current information,

⁸ <https://pubs.acs.org/doi/10.1021/acs.est.4c05870>

which would provide a more realistic assessment of the state of air quality in these regions.

While understanding that the exceptional event demonstrations can be time-consuming, the most efficient solution would be to exclude the problematic 2021 data and rely on the certified data from 2024. This approach would streamline the process and ensure that the air quality evaluations reflect the most up-to-date conditions, avoiding the complications introduced by the wildfire smoke events of 2021.

The IEPA's TSD outlines that the agency's demonstration, which evaluates air quality data, will not be submitted until at least February 2025, and possibly as late as April. Given that this demonstration is already delayed, the inclusion of outdated 2021 data in the evaluation could unnecessarily complicate the process and lead to incorrect conclusions. It is, therefore, critical for the IEPA to avoid using this soon to be outdated data and instead focus on the more recent and certified data that accurately reflects the air quality conditions of the current period.

MOG conducted an evaluation using uncertified AIRNOW data for 2022 to 2024 for both Chicago and St. Louis. The results from this evaluation indicate that design values for both cities would be considerably lower than those presented in the draft recommendation, even without addressing the impacts of wildfire smoke in 2023. For Chicago (Table 1), MOG estimates show that design values could fall from fourteen violating monitors to just 4 violating monitors (plus a source-oriented monitor) in Cook County, plus one in adjacent Kane County (Elgin). No violating monitors were found in DuPage, Grundy, Kendall, McHenry, Lake, or Will counties. This indicates a significant improvement in air quality compared to previous years. In addition, the highest design value is only slightly above 9 at 9.4 ug/m³.

In St. Louis (Table 2), the MOG evaluation similarly suggests a reduction in violating monitors from 4 (plus a source-oriented monitor) to 2, located in Madison and St. Clair counties. This also points to improved air quality conditions in the area, supporting the case for incorporating more recent data in the final NAAQS recommendation. The lower design values demonstrated by the MOG analysis, even without considering wildfire impacts, indicate that current air quality is likely better

than previously assessed, further justifying the need for the IEPA to consider early 2024 data.

Monitor ID#	Name/Location	County	2021-2023 Ann PM2.5 DV*	2022-2024 Ann PM2.5 DV*
170310001	Alsip Village Garage	Cook	9.4	8.6
170310022	Chicago Washington HS	Cook	9.6	9.0
170310052	Chicago Mayfair	Cook	9.4	8.7
170310057	Chicago Springfield	Cook	9.4	8.9
170310076	Chicago ComEd	Cook	9.3	8.7
170310119	Kingery Near Road	Cook	10.0	9.2
170311016**	McCook Village Hall	Cook	11.3	10.2
170313103	O'Hare IEPA Trailer	Cook	10.2	9.4
170313301	Summit	Cook	9.8	9.1
170314007	Des Plaines	Cook	9.1	8.3
170314201	Northbrook	Cook	8.3	7.7
170316005	Cicero	Cook	9.6	9.2
170434002	Naperville	DuPage	9.4	8.9
170890003	Elgin	Kane	9.7	9.1
170890007	Aurora	Kane	9.4	8.4
171110001	Cary	McHenry	8.6	8.3
171971002	Joliet	Will	9.5	8.8
171971011	Braidwood	Will	8.6	8.0
*Does not include any data exceptions for Wildfires				
** Source-oriented monitor				

Table 1. PM2.5 Design Values at Chicago Monitors Utilizing 2022, 2023, and Uncertified 2024 Data.

Monitor ID#	Name/Location	County	2021-2023 Ann PM2.5 DV*	2022-2024 Ann PM2.5 DV*
171190024**	Gateway Medical Ctr	Madison	10.5	10.1
171190120	Alton HM Elem School	Madison	9.1	8.6
171191007	Granite City Fire Station	Madison	10.0	9.6
171193007	Wood River	Madison	9.4	8.5
171630010	East St. Louis	St. Clair	9.9	9.4
*Does not include any data exceptions for Wildfires				
** Source-oriented monitor				

Table 2. PM2.5 Design Values at East St. Louis Monitors Utilizing 2022, 2023, and Uncertified 2024 Data.

The IEPA should prioritize the early certification and inclusion of 2024 design value data in its calculations for final draft recommendations regarding PM2.5 NAAs in the Metro Chicago and East St. Louis regions. By discarding the 2021 data, which was heavily influenced by wildfire smoke, and incorporating more accurate, current data from 2022 to 2024, the agency can provide a more realistic and informed assessment of air quality. The preliminary MOG analysis shows promising results, with design values significantly lower than initially presented, suggesting that these areas may be closer to meeting the current PM2.5 NAAQS than previously thought. This approach will ensure that the IEPA's final recommendations are based on the most accurate and representative air quality data available.

6. Every effort should be undertaken to address the heavy wildfires that have occurred in recent years for Illinois and the region (Great Lakes/Upper Midwest), including the development of wildfire exceptional events demonstrations for monitors in the state.

To ensure the accuracy and fairness of air quality assessments, it is essential for the IEPA to address the significant impact of wildfires on air quality data in Illinois and the surrounding Great Lakes/Upper Midwest region, particularly regarding the 2023 wildfire events. A key recommendation is for the IEPA to develop exceptional event demonstrations for the state's monitors to account for the influence of these wildfires on air quality measurements.

The CAA Section 319(b) mandates that air quality data should be carefully analyzed to ensure that short-term, non-recurring events like wildfires do not distort the evaluation of ambient air quality standards. As part of this obligation, the IEPA must not only certify and move forward with the design values from 2022 to 2024 but also ensure that the impact of the 2023 wildfires is properly addressed within its regulatory framework. Early certification of data from the 2022 to 2024 period is critical, but this is only the first step. The agency must then consider the significant influence of the 2023 wildfires, which are considered a regulatorily significant event, in its analysis.

In its TSD, the IEPA has already acknowledged the extreme impact of the 2023 wildfires on air quality in the region. These events resulted in substantial increases in particulate matter, particularly PM2.5, affecting air quality across

Illinois and neighboring states. Given the magnitude of these impacts, the development of exceptional event demonstrations for the Chicago and St. Louis areas is necessary. These demonstrations would provide evidence to exclude the wildfire-related data from regulatory assessments, ensuring that the overall evaluation of air quality does not unfairly reflect the short-term, irregular effects of these events.

Fortunately, USEPA has made available streamlined tools to assist in the process of developing and submitting exceptional event demonstrations. These tools simplify the process of identifying, documenting, and excluding exceptional event days from air quality analyses. The use of these resources will significantly aid the IEPA in addressing the 2023 wildfire events in a timely and effective manner.

Additionally, neighboring states such as Wisconsin and Indiana, as well as the Lake Michigan Air Directors Consortium (LADCO), have already undertaken efforts to address the impact of Canadian wildfire events on air quality in the region. These states and organizations have identified several exceptional event days, many of which were classified as Tier III, which is the highest level of event classification. MOG has reviewed and commented on these demonstrations, providing valuable feedback. Given that other states and agencies have successfully navigated this process for wildfire events, the IEPA has a clear path forward and can easily progress the 2023 wildfire days as exceptional events in its own analysis.

The IEPA must take comprehensive action to address the impact of the 2023 wildfires on air quality in Illinois and the surrounding region. By certifying the 2022 to 2024 design values early and developing exceptional event demonstrations for the 2023 wildfire days, the agency can ensure that air quality assessments are based on accurate and representative data. With the help of USEPA's streamlining tools and the efforts of neighboring states, the IEPA can efficiently address these exceptional event days and provide a fair and accurate representation of air quality in Illinois.

7. As necessary, the NAA recommendations should be delayed allowing these tasks to be performed.

The IEPA faces a critical decision regarding the timing and scope of its NAAQS designation recommendations for PM_{2.5} in the state. Given recent

developments, the recommendation timeline should be delayed ensuring that necessary tasks are fully addressed.

On March 12, 2025, the new USEPA administration announced plans to reconsider the 2024 PM_{2.5} NAAQS. This is a significant development that could impact the overall approach to air quality regulation, including the NAAQS for particulate matter. Given the potential changes in national standards, it may be prudent for the IEPA to delay submitting its NAAQS recommendations until the revised USEPA standards are clarified. This delay would allow the IEPA to adjust its recommendations to reflect the most current regulatory framework. Also, this would be an opportunity for IEPA to join the call of other state agencies in asking Teledyne and USEPA to progress further corrections to the Teledyne monitors and release another firmware update or other measure to correct the remaining positive bias.

Additionally, the IEPA needs to consider the impact of the 2021 and 2023 wildfire events, which have distorted air quality data in the state. The continued efforts to correct and eliminate the influence of wildfire events on the data, especially in the years 2021 and 2023, will likely result in significant changes to the designation landscape. Wildfire smoke has had a considerable impact on air quality measurements, and it is essential to ensure that such events are properly accounted for or excluded from the analysis. The IEPA's consideration of these additional corrections will help ensure that air quality data more accurately reflects typical conditions, rather than being skewed by unusual and transient pollution events.

The agency must also address the further evaluations provided by MOG before filing its final NAAQS recommendations. The MOG has raised important points about air quality monitoring data, and these evaluations need to be carefully reviewed and incorporated into the agency's final recommendations. If the IEPA proceeds with making recommendations before addressing MOG's comments, it should recommend attainment for the balance of the state, excluding the Chicago and St. Louis areas. This would allow the agency more time to adequately evaluate and address the specific concerns regarding air quality in these urban areas, where pollution levels may differ significantly from other parts of the state.

The IEPA should delay its final NAAQS recommendations to allow time to address the recent developments regarding the reconsideration of the 2024 PM_{2.5}

NAAQS, correct the influence of the 2021 and 2023 wildfire events, and carefully review MOG's further evaluations. If the agency decides to proceed with the recommendations before completing these tasks, it should at least focus on recommending attainment for the remainder of the state and request additional time to finalize its recommendations for the Chicago and St. Louis areas. This approach would help ensure that the final recommendations are based on the most accurate and representative data available.

MOG appreciates the opportunity to offer these comments and urges IEPA to carefully consider these comments and the agency assess both the timing and content of its final recommendation.

Very truly yours,



David M Flannery
Legal Counsel
Midwest Ozone Group