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March 27, 2026

Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Re: Proposed Rule, Air Plan Approvals; Illinois;
Regional Haze Plan for the Second Implementation Period;
Interstate Transport of Air Pollution for the 2012 PM2.5
and 2015 Ozone NAAQS. Docket ID No. EPA-R05-OAR-
2024-0261 (Regional Haze)

Dear Administrator Zeldin,

The Midwest Ozone Group¹ (“MOG”) is pleased to offer these comments with respect to the U.S. Environmental Protection Agency (“EPA”) proposed rule, “Air Plan Approvals; Illinois; Regional Haze Plan for the Second Implementation Period,” (“Proposed Rule”). 91 Fed. Reg. 9779. MOG is pleased to support EPA’s approval of the Illinois’s Regional Haze SIP for the second implementation period. The comment period for this rulemaking ends on March 30, 2026.

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.

As noted by EPA, Illinois EPA submitted a revision to the Illinois SIP on June 3, 2024, to address its regional haze obligations for the second implementation period, which runs through

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, East Kentucky Power Cooperative, ExxonMobil, Monongahela Power Company, Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, 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.

2028. 91 Fed. Reg. 9783. Illinois EPA initiated FLM consultation and provided a public comment period for the second implementation period. *Id.*

The Illinois EPA 2024 SIP submission included the following key elements:

1. **Identification of Class I Areas** – Illinois has no Class I areas within its borders that are among the 156 mandatory Class I Federal areas where the EPA deemed visibility to be an important value. Thus, Illinois EPA only evaluated the State’s impact on out-of-state mandatory Class I Federal areas covered under the RHR. MOG supports EPA’s conclusion that Illinois EPA correctly projected greater improvements in visibility than those modeled by EPA and LADCO.
2. **Calculations of Baseline, Current, and National Visibility Conditions; Progress to Date; and the Uniform Rate of Progress.** EPA’s conclusion that Illinois has no mandatory Class I areas within its borders to which the visibility protection program applies, therefore 40 CFR 51.308(f)(1) and its requirements do not apply is legally and factually correct.
3. **Long-Term Strategy for Regional Haze**
 - a. **Selection of Sources for Analysis.** EPA’s proposal that Illinois EPA designed its source selection methodology to capture a meaningful portion of Illinois’ total contribution to visibility impairment in the Class I areas, including the largest sources in the State is legally, factually and technically correct. *Id.* at 9785. Noteworthy is the fact that of the 30 units identified, 14 are no longer operating. Illinois then engaged in determining that the existing controls on 7 of the units are effective based upon a full four-factor analysis. The remaining 9 units were selected for four-factor analyses. MOG supports this conclusion as legally and factually correct.
 - b. **Emission Measures Necessary to Make Reasonable Progress.** EPA proposed approval of Illinois EPA’s demonstration that the 7 units do not warrant additional control measures to make reasonable progress in the second implementation period. For the remaining 9 units and the four-factor analysis, EPA proposed approval of Illinois EPA’s determination that no additional controls were necessary to make reasonable progress in the second implementation period and that pursuing additional emission reductions through new emission control equipment or emissions limitations is not cost-effective. EPA proposed approval of the Illinois EPA conclusion that the existing emission control measures for each of these units are adequate to demonstrate reasonable progress for the second implementation period and do not need to be included in the regulatory portion of the SIP beyond where they are already included. MOG supports these approvals as legally and factually correct.

- c. Illinois Long Term Strategy.** EPA proposed to approve Illinois EPA's long-term strategy for the second implementation period which lists state regulations and SIP provisions and federal measures beyond what the State deemed necessary for reasonable progress. Of all the measures in the list, Illinois EPA specified the State/SIP regulations for MPS, CPS and Stationary Rice and Turbines as necessary for reasonable progress in the second implementation period. EPA proposed approval of the determination by Illinois EPA that no additional measures were necessary for reasonable progress nor were any additional measures to be incorporated by reference into the regulatory portion of Illinois' SIP. MOG supports these approvals as legally and factually correct.
- d. EPA's Evaluations of Illinois' Compliance with 40 CFR 51.308(f)(2)(i).** EPA proposed to find that Illinois has satisfied the requirements of 40 CFR 51.308(f)(2)(i) based on the State's examination of its largest sources and consideration of the four statutory factors, the historical emissions data, the emission reductions that have already taken place during the second implementation period and the current control measures. MOG supports these approvals as legally and factually correct.
- e. EPA policy.** MOG applauds EPA's stated policy "that where visibility conditions for Class I areas impacted by a State are below the URP and the State has considered the four statutory factors, the State will have presumptively demonstrated reasonable progress for the second implementation period for that Class I area." MOG supports EPA's conclusion that this policy aligns with the purpose of the statute and RHR, which is achieving "reasonable" progress, not maximal progress, toward Congress' natural visibility goal. MOG supports the finding that Illinois EPA reasonably concluded that no additional measures are necessary to achieve reasonable progress during the second implementation period.
- f. Consultation With Federal Land Managers and States.** EPA proposed to find that Illinois EPA met the consultation requirements of 40 CFR 51.308(f)(2)(ii) which provide that States must consult with other States that are reasonably anticipated to contribute to visibility impairment in a Class I area to develop coordinated emission management strategies containing the emissions reductions measures that are necessary to make reasonable progress. Section 51.308(f)(2)(ii)(A) and (B) require States to consider the emission reduction measures identified by other States as necessary for reasonable progress and to include agreed upon measures in their SIPs respectively. Section 51.308(f)(2)(ii)(C) speaks to what happens if States cannot agree on what measures are necessary to make reasonable progress. States may also satisfy the requirement of 40 CFR 51.308(f)(2)(ii) to engage in interstate consultation with other States that have emissions that are reasonably anticipated to contribute to visibility impairment in a given Class I area under the auspices of intra- and inter-RPO engagement. Illinois EPA consulted with other States to develop a coordinated emission management approach to its

regional haze SIP and to address Illinois' impact on nearby Class I areas. Consultation with LADCO and neighboring RPOs, including CenSARA and VISTA, developed the technical information needed for such coordinated strategies. Illinois EPA also received and responded to requests from MANE-VU, Arkansas, and Missouri concerning regional haze. MOG supports EPA's finding that Illinois has satisfied the consultation requirements of 40 CFR 51.308(f)(2)(ii); and that Illinois has met the 40 CFR 51.308(f)(2)(ii)(A) and (B) requirements with its participation in the LADCO consultation process plus its individual communication with contributing States and RPOs; and that there were no disagreements with any other State, therefore 40 CFR 51.308(f)(2)(ii)(C) does not apply to Illinois.

- g. Five Additional Factors.** EPA established five additional factors listed in 40 CFR 51.308(f)(2)(iv) that States must consider in developing their long-term strategies. MOG supports EPA's finding that Illinois adequately considered the five additional factors in developing the 2024 SIP submission. Illinois considered emissions reductions due to ongoing air pollution control programs; measures to mitigate the impacts of construction activities on visibility in Class I areas; other non-road requirements, source retirements, smoke and wildlife vegetation management practices; anticipated net effect on visibility due to projections as reflected in tables showing 2016 emissions of NO_x, PM_{2.5}, SO₂, and VOC from point, area, and mobile sources compared to projected 2028 emissions of the same pollutants by the same source categories.
- h. Reasonable Progress Goals.** Illinois' 2024 SIP submission shows that at each of the Class I areas impacted by emissions from Illinois, the 2028 projected visibility impairment is not above the adjusted URP glidepaths for the 20 percent most impaired days. Because no Class I areas impacted by emissions from Illinois have RPGs above the 2028 URP, Illinois is not required to demonstrate that there are no additional emission reduction measures for anthropogenic sources or groups of sources that would be reasonable to include in their long-term strategies. MOG supports EPA's proposal that the demonstration requirements under 40 CFR 51.308(f)(3)(ii)(B) do not apply to Illinois.
- i. Monitoring Strategy and Other Implementation Plan Requirements.** MOG supports EPA's finding that since Illinois does not have any mandatory Class I Federal areas located within its borders to which requirements of the visibility protection program apply in 40 CFR part 81, subpart D, 40 CFR 51.308(f)(6)(i) and (ii) do not apply. Illinois has included a description and a map of its monitoring network in its 2024 SIP revision and attached Illinois Ambient Monitoring 2023 network plan explaining that the procedures by which monitoring data and other information are used to determine the contribution of Illinois to visibility impairment at all affected Class I areas were established in conjunction with LADCO. Illinois has also provided its statewide inventories of 2024 and future 2028 and CAMPD information for 2018 and 2022 and

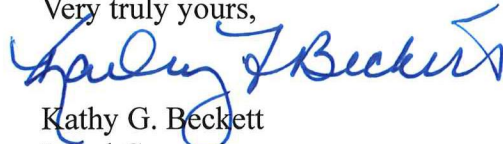
historical EGU emissions. For future emissions, Illinois relied upon LADCO's analysis. Illinois also committed to continue updating its emissions inventory and to continue working with LADCO to project future emissions of relevant pollutants. MOG supports the finding that the Illinois Monitoring Strategy is sufficient.

- j. Requirements for Periodic Reports Describing Progress Towards the Reasonable Progress Goal.** MOG supports EPA's finding that Illinois EPA has met the requirements of 40 CFR 51.208(f)(5) and (g)(1) – (5) citing to the first Illinois 5-year progress report of 2017; Illinois description of implementation status in the first implementation period; Illinois' summary of emission reductions achieved and on-the-books control strategies; tracking of changes in emissions; and no identified significant changes in anthropogenic emission since 2011, etc.

- k. Requirements for State and Federal Land Manager Coordination.** MOG supports EPA's conclusion that Illinois has satisfied the requirements to consult with the FLMs on its regional haze SIP for the second implementation period, citing to the outreach and comments of certain of the FLMs and its active participation with LADCO.

For the forgoing reasons, MOG supports EPA's approval of the Illinois Regional Haze SIP for the second planning period.

Very truly yours,



Kathy G. Beckett
Legal Counsel
Midwest Ozone Group