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July 10, 2026

Sarah Brubaker
Illinois EPA
2520 W Iles Ave
P. O. Box 19276
Springfield, IL 62794-9276

Re: Illinois Ambient Air Monitoring Network Plan for 2027

Dear Ms. Brubaker:

In June of 2026, the Illinois Environmental Protection Agency Bureau of Air (IL EPA) published a public notice seeking comments on its Ambient Air Monitoring 2027 Network Plan (Plan). The comment deadline is July 10, 2026.

The Midwest Ozone Group ("MOG")¹ is pleased to provide comments² regarding the proposed Plan. 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

¹ The members of the Midwest Ozone Group include: 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, Hoosier Energy REC, Inc., Indiana Energy Association, Indiana-Kentucky Electric Corporation, Indiana Municipal Power Agency, LGE/ KU, Marathon Petroleum Company, Monongahela Power 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 Alpine Geophysics, LLC.

operate numerous stationary sources that are affected by air quality requirements including the ozone NAAQS.

The Plan states that “[a] predominant goal of the air monitors within Illinois’ network is to collect data with which to assess compliance with the NAAQS,” adding that “Illinois has designed its ambient air monitoring network to accomplish more than this primary goal, including to provide timely air pollution data to the public, support compliance with ambient air quality standards and emissions strategy development, and support air pollution research studies.”

MOG Comments

1. The Plan discusses representative spatial scale of monitors at page 3, defining middle scale monitors as monitors experiencing PM_{2.5} concentrations “typical of areas up to several city blocks in size with dimensions ranging from about 100 meters to 0.5 kilometers,” and neighborhood scale monitors as monitors experiencing PM_{2.5} concentrations “within some extended area of the city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometers range.”

On page 6 of the proposed Plan, IL EPA describes the number of monitors required to be operated, noting that it “must operate at least one FRM or FEM PM_{2.5} site monitoring regional background and at least one FRM or FEM PM_{2.5} site to monitor regional transport. Additionally, 20 other PM_{2.5} monitoring sites are operated for purposes of supporting the basic monitoring objectives of public data reporting, air quality mapping, compliance, and supporting air pollution research studies,” adding that, “[i]ncluded in these totals are 2 source orientated PM_{2.5} sites, Granite City Gateway and Lyons Township. Granite City Gateway is a middle scale site situated in an industrial area with multiple sources. Another PM_{2.5} site not far away at 23rd and Madison in Granite City is sited for neighborhood scale to help satisfy area monitoring requirements.” MOG assumes that the monitor referenced at 23d and Madison as a neighborhood scale monitor is the monitor located at Fire Station #1.

IL EPA appears to have determined that the monitor located at Fire Station #1 is a neighborhood scale monitor. However, MOG understands that the Fire Station #1 monitor is only approximately 0.5 km from the Granite City Gateway PM_{2.5} monitor that is identified as a middle scale (source oriented) monitor and that monitoring data from the two suggests that there is only a slight gradient in measurements. Accordingly, MOG requests clarification regarding the basis for the apparent IL EPA determination that the monitor located at Fire Station #1 monitor is a neighborhood scale monitor.

In addition, MOG suggests that the elevation of the Fire Station #1 monitor probe on top of the fire station should be documented in the Plan as height of the probe inlet is one of the specifications set forth in 40 CFR 58 Appendix E. Because the fire station has some obstructions on the top of the building, MOG also requests that IL DEP explain how the monitor probe placement meets the obstruction limitations set forth in 40 CFR 58 Appendix E.

2. MOG notes that there doesn't appear to be annual PM_{2.5} data for either the Granite City Gateway or Fire Station #1 monitor for 2022 or 2023 in the EPA AQS system. Annual 2024 data for the Granite City Gateway monitor is missing as well. MOG therefore requests that IL EPA add the missing data to the EPA AQS system.
3. The Plan notes at page 10 that Iowa runs one of the required PM₁₀ monitors and states that one of 4 days with PM₁₀ levels measured above 120 ug/m³ was due to a known wildfire smoke event that occurred on June 28, 2023. MOG is aware that the entire Midwest was affected by Canadian Wildfire smoke on numerous days in 2023 and 2025.

Indeed, when amending the Clean Air Act in 2005, Congress intended to provide regulatory relief for NAAQS nonattainment resulting from exceptional events negatively affecting air quality that were outside of a state's control. That concern led to enactment of provisions specifically establishing the process by which U.S. Environmental Protection Agency ("U.S. EPA") could exclude air quality monitoring data directly related to an exceptional event. See 42 U.S.C. § 7619. Subsequently, U.S. EPA promulgated the exceptional events rule. 40 C.F.R. § 50.14.

IL EPA has already requested that data for one day affected by wildfire smoke in 2023 be excluded from calculations of annual ozone design values and from other regulatory determinations.³ There is myriad data indicating that Canadian Wildfires and other qualifying events that occurred in 2023 adversely affected ambient air quality in the Midwest.⁴ It is well known that 2023 and 2025 wildfire impacts have skewed the 2023-2025 Design Values across the Upper Midwest, including the Chicago and St. Louis areas, upwards.

Wildfire-impacted data should be excluded from data used to calculate Design Values. To that end, US EPA has significantly streamlined the exceptional event process through updated guidance and tools. Significantly, on June 26, 2026, US EPA released what it characterized as “three enhanced user-friendly tools to help state, local, and Tribal air agencies expedite, develop, and prepare demonstrations of exceptional events. One of the tools, an update to the AirNow Fire and Smoke Map, is being issued in conjunction with the U.S. Forest Service. Exceptional events are unusual or naturally occurring events outside an air agency’s control, such as wildfires, that affect air quality. Under Section 319(b) of the Clean Air Act (CAA) and EPA’s Exceptional Events Rule (EER), air quality monitoring data from these events may be excluded in certain regulatory determinations regarding the National Ambient Air Quality Standards (NAAQS).”

EPA stated that it “developed these tools to reduce burdens on state, local, and Tribal agencies, to streamline the identification of monitoring data affected by an exceptional event, and to increase transparency for the public. By doing so, EPA’s partner air agencies can effectively implement the EER, while freeing up valuable time and resources to focus on providing clean air based on emission sources within their control.”

³ <https://epa.illinois.gov/content/dam/soi/en/web/epa/public-notice/documents/general-notice/2025/st.-louis-exceptional-events-public-notice.pdf>

⁴ [“Supporting Materials Demonstrating Enhanced Ozone Concentrations in the Chicago Ozone Nonattainment Area Resulting From Canadian Wildfire Influence in 2023”](#)

4. MOG notes that the proposed Plan does not mention either the exceptional events rule or the manner in which IL EPA will assess data that is influenced by exceptional or atypical events. MOG therefore urges IL EPA to include a section in the final Plan describing the method by which it evaluates data quality for all days, but especially days on which ambient standards are exceeded, including the impacts of wildfires and other atypical events. MOG also urges IL EPA to prepare exceptional events demonstrations to request exclusion of data for the additional numerous days in 2023 and in 2025 on which ambient air quality was adversely affected by Canadian Wildfire smoke and other qualifying events.

MOG appreciates the opportunity to comment on the Plan and looks forward to continuing to support the efforts of the IL EPA to provide timely air pollution data to the public, support compliance with ambient air quality standards and emissions strategy development, and support air pollution research studies.

Very truly yours,



Edward "Skip" Kropp
Counsel
Midwest Ozone Group