1440 W. Washington Blvd.
Chicago, IL 60607-1878
Phone: (312) 243-2000
Fax: (312) 243-3954
www.lungchicago.org

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October 29, 2003

Mr. Steve Rothblatt
Air Director
U.S. Environmental Protection Agency – Region V
77 West Jackson
Mail Code A-18J
Chicago, Illinois 60604

Dear Mr. Rothblatt,

Just as the Illinois EPA asked the public for feedback on which Illinois communities don't meet the federal 8-hour ozone smog health standard, as well as which communities cause air pollution to worsen in nearby communities, the first Ozone Action Day of 2003 was called. Despite spreading suburbia and the increased emissions that come with urban development, IEPA is proposing to exclude large portions of the Chicago Metropolitan Statistical Area (CMSA) from the area it is suggesting U.S. EPA designate as the 8-hour ozone nonattainment area (NAA). This excluded area includes DeKalb and Kankakee Counties, and most of Kendall and Grundy Counties. With population growth and increased residential and industrial development in the edges of the Chicago region since the original one-hour ozone NAA was set over a decade ago, The American Lung Association of Metropolitan Chicago disagrees with IEPA's suggestion to not expand pollution controls and programs beyond where they are required today.

With some progress in reducing smog-forming emissions from large industrial sources, emissions from vehicles and smaller pollution sources remain a problem with growing suburban developments in formerly rural areas that create huge driving distances for residents moving into those newly developed communities. Areas on the fringe of the Chicago region, where residents must drive large distances for access to jobs, services and other needs and who are not required to comply with many clean air programs now required in the one-hour NAA, are creating a disproportionate share of the pollution problem for the rest of the residents in the Chicago region.

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**Population Density**

IEPA uses population density as an excuse to exclude counties in the Chicago CMSA from inclusion in what should be the 8-hour NAA. Yet at the same time it does not note that areas already in existing one-hour ozone NAAs in the state already have lower population densities than the counties being excluded. Monroe County, included in the St. Louis Metro East NAA, has a lower population density than Kankakee, DeKalb and Grundy Counties.

It is also surprising that the IEPA does not take into effect the rate of population growth in areas excluded from their recommendation for an 8-hour NAA. IEPA contends that from 1995 to 2020, Kendall County will grow by approximately 22,000 people. Yet U.S. Census figures indicate that the population of Kendall County grew by 6,678 people (12.2 percent) from 2000 to 2002. This makes Kendall County the fastest growing county in Illinois. Having over 30 percent of estimated population growth projected over a 25-year period occurring in a TWO YEAR time span indicates that something is seriously wrong with the population figures IEPA is using and that at least this county is growing much faster than IEPA would assert. Area and mobile sources emissions in this county already have been growing faster, will likely continue to grow faster and will have much more of an impact on ozone levels in the NAA than IEPA is assuming. For this reason alone Kendall County should not be excluded from an USEPA designated 8-hour NAA.

It is also interesting that traffic volume, an indicator of population growth on the urban fringe, in Grundy and Kendall is greater than Monroe County. Population in Grundy County also grew 3.5% (1,304) more than double the statewide average 2000-2002 and DeKalb County rose at nearly twice statewide rate. Areas that IEPA is proposing to exclude have a total population of nearly 250,000, larger than the City of Madison, Wisconsin.

**Monitoring Ozone Levels**

As there is no ozone monitoring equipment in these excluded areas, unlike the rest of the Chicago region, IEPA cannot answer whether unhealthy ozone smog levels are actually occurring in these areas. It is unclear what the air quality is in Kankakee, DeKalb, Morris or other communities is. Even so, IEPA states that a "nonattinment area" should include areas that contribute to an area that does not meet air quality standards.

There is significant variation in ozone levels measured at monitors only a few miles from each other in the Chicago region. One monitor in south Cook County has a design value of 72ppb, while a nearby monitor in Lake County, IN has a design value of 92ppb – a 20 ppb spread. Likewise, one monitor in northern Lake County, IL on the Illinois side of the border has a design value of 84ppb, while a nearby monitor in Kenosha County, WI on the other side has a design value of 100ppb – a 16 ppb spread.

In 2002 alone, both the Braidwood and south Lockport ozone air quality monitors in far western Will County each exceeded the 8-hour ozone standards six times over the course of the summer months. 2002 was the worst year in the last three for ozone smog across

entire southern Lake Michigan region. As the Braidwood monitor has a design value of 80ppb and since nearby ozone levels could vary by as much as 16-20ppb, ozone levels could be above the acceptable health standard in nearby areas of Grundy and Kankakee Counties.

NOx emissions from Kankakee County are higher than three counties now in the one-hour ozone NAA, McHenry, Grundy and Kendall. Kankakee County point and area sources also contribute more VOCs than those in McHenry County. Prevailing summer wind directions from the south to southwest predicate that VOCs emitted by Kankakee County sources would have a bigger impact on the areas in downwind southern Cook County where 8-hour ozone levels are exceeding federal health standards. Regardless of whether ozone levels in Kankakee and Grundy Counties are exceeding the 8-hour ozone standard, emissions from these counties would also appear to be contributing to ozone exceedences in southern Cook County and Lake County, IN.

**NOx SIP Call Issues**

Even with the NOx SIP call going into effect in 2004, there is no guarantee that NOx emissions in Illinois will be limited to the amount postulated by the NOx SIP call modeling, particularly for large point sources. Illinois EPA cannot guarantee against the distinct possibility that more NOx will be emitted here than Illinois has NOx credits to award. If emissions over and above this amount occur they must be covered by credits bought in states other than Illinois. If there is a net import of NOx credits into Illinois, the modeling would likely show an increase in ozone levels in Illinois.

One coal-fired power plant proposed for the western Will County town of Elwood by the Indeck Corporation has just gained a construction permit from IEPA. If built it would be allowed to increase ozone-forming emissions by 9,600 tons annually. Illinois admitted in 2001 that development of multiple new "peaker" power generating stations would increase the severity of ozone exceedences, raising them by several parts per billion. As Illinois has permitted or is in the process of permitting approximately 5500MW of *baseload* coal-fired generation, which would be expected to operate continuously during the Summer ozone season, it would appear this issue is still of concern. Illinois should include the four counties it is excluding from the 8-hr NAA proposal to U.S. EPA in the NAA, as emissions controls and programs in these areas would lessen the risk of higher ozone levels due to higher NOx emissions from additional base load coal-fired power plants.

**Townships**

Considering that IEPA has previously included individual townships in a nonattainment area, it seems odd that the Agency did not consider how the population is distributed in the counties it excludes. In Grundy County, seven contiguous townships that abut the existing one hour ozone NAA contain nearly 80 percent of the population of the county while occupying less that half the surface area of the county. This would indicate that the population is an extension of growth in the existing NAA and not a pattern of unrelated

rural development. These seven townships include Goose Lake and Aux Sable, already included in the existing NAA. The additional five all have population totals higher than Goose Lake – Felix, Braceville, Wauponsee, Morris and Saratoga. A similar pattern exists in Kendall County at the present time. There, only three townships contain 80 percent of the County population while taking up only a third the land area of the county. This block of three townships – Oswego, Bristol and Little Rock - abuts the City of Aurora, Illinois. (2000 census population of 142,990)

Unfortunately, pollution generated by these growing areas will increasingly worsen both ozone and particulate soot levels and have a detrimental impact on the health of over 8 million people who live in Chicago area. Requiring these areas and the entire Chicago CMSA to adopt programs to reduce emissions will improve health in those counties not now part of the one-hour ozone NAA, as well as the entire Chicagoland and southern Lake Michigan region.

Thank you for the opportunity to submit written comments on this issue.

Sincerely,

Brian Urbaszewski
Director of Environmental Health Programs