

Air Quality Planning in 2026

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Illinois EPA Air Quality Planning

- ▶ Rory Davis - Manager of the Regulatory Development Unit in the Bureau of Air's Air Quality Planning Section
- ▶ Air Quality Planning Functions
 - ▶ Composing State Implementation Plans (“SIPs”) for meeting the requirements of the federal Clean Air Act
 - ▶ Submitting SIPs to detail how the state plans to attain the National Ambient Air Quality Standards (“NAAQS”)
 - ▶ Conducting modeling to project what may be needed in the future to attain the NAAQS

Illinois EPA Air Quality Planning

- ▶ Air Quality Planning Functions
 - ▶ Developing state regulations to meet CAA requirements and provide emissions reductions necessary for air quality purposes
 - ▶ Maintain a monitoring network across the state to measure air quality and track air quality data
 - ▶ Emissions Inventories
 - ▶ AQPS receives your AERs and submits inventory data to USEPA annually, as required.
 - ▶ AQPS uses inventory data and estimates to inform planning decisions regarding pollution source categories and their locations.

Recent and Ongoing Issues

- ▶ Reclassification or “Bump Up” of the Ozone nonattainment areas in the Chicago and St. Louis Areas
 - ▶ Areas were reclassified from Moderate to Serious in early 2025.
 - ▶ Permitting requirements began upon reclassification.
 - ▶ Illinois EPA preparing Attainment Demonstration for Chicago area.
 - ▶ Illinois EPA has submitted a Redesignation Request and Maintenance Plan for the St. Louis area.
- ▶ Still awaiting actions regarding the 2024 PM_{2.5} NAAQS
- ▶ Potential upcoming regulatory actions
- ▶ Changes with Annual Emissions Reports

Bump Up Impacts

- ▶ Title V permits required for sources emitting greater than 50 TPY of NO_x or VOC
- ▶ New emissions must be offset at a ratio of 1.2 to 1.
- ▶ NO_x and VOC RACT apply at source with potential to emit 50 TPY or greater rather than 100 TPY.
- ▶ **VOC RACT**
 - ▶ In Chicago area, VOC RACT already applied to sources greater than 25 TPY. In St. Louis area additional regulation may be needed.
- ▶ **NO_x RACT**
 - ▶ Recent NO_x RACT rules lowered applicability thresholds for NO_x prior to the bump up.
- ▶ Attainment Demonstration was due to be submitted by January 1, 2026, and will be submitted in the near future.

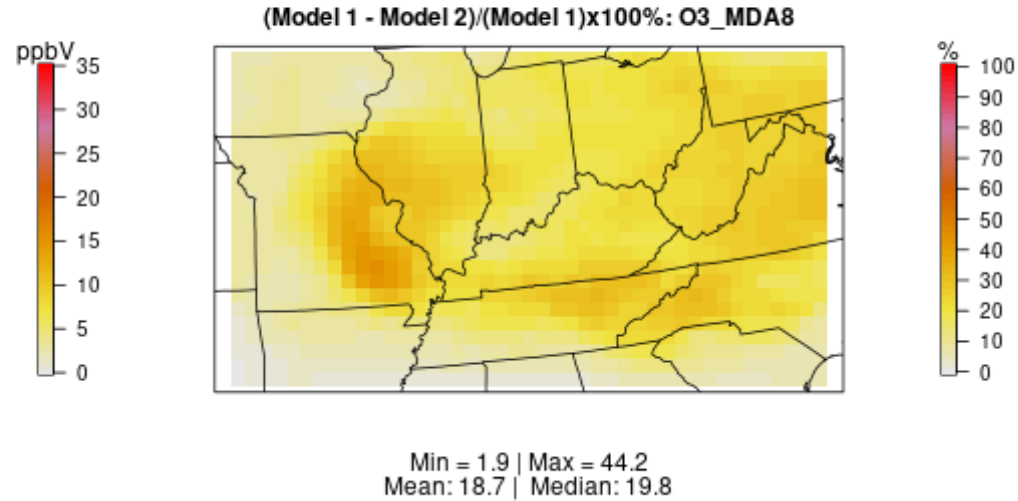
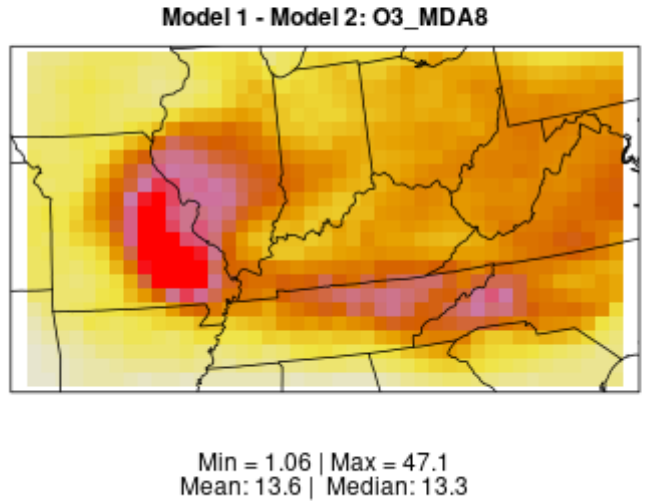
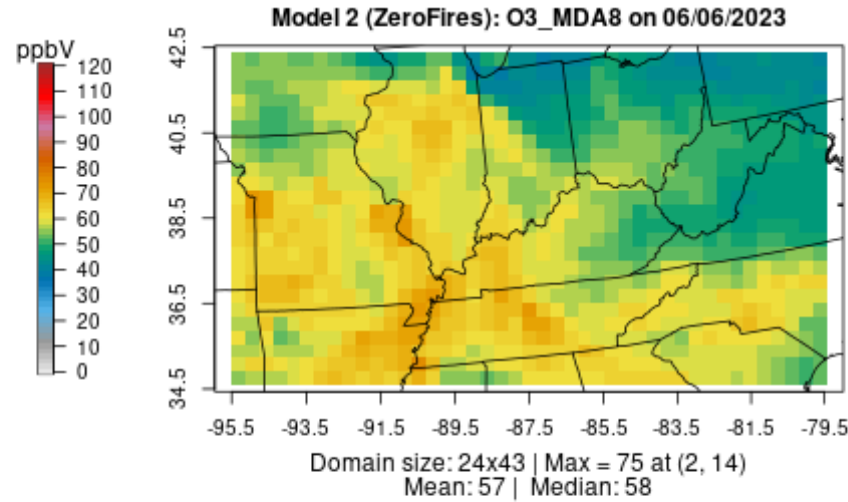
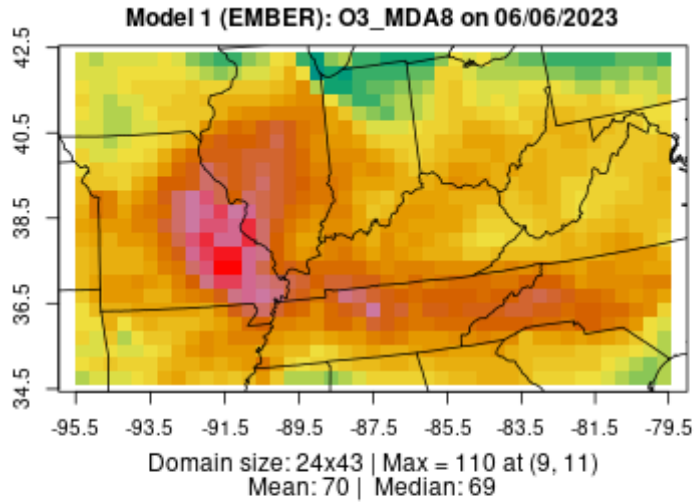
St. Louis Ozone Nonattainment Area

- ▶ Until the middle of September this year ozone monitor readings for St. Louis area were looking very good for having “clean data” for the years 2023 to 2025.
- ▶ The fourth highest daily monitor value is used in a 3-year average to calculate the “design value” for a nonattainment area.
- ▶ The St. Louis area had several readings between September 10th and 19th that elevated the “4th high” reading for monitors in the area. No more “clean data.” Unusual that late.

St. Louis Ozone Nonattainment Area

- ▶ Illinois EPA had begun preparing a Redesignation Request for the area prior to those ozone events.
- ▶ The Agency continued those efforts, along with an Exceptional Events Demonstration to exclude one day of data from 2023 that was impacted by the 2023 Canadian Wildfires.
- ▶ The Agency submitted both the Redesignation Request and Exceptional Events Demonstration prior to December 31 last year. The Exceptional Events demonstration was concurred with, and the redesignation request is pending USEPA approval.
- ▶ The following slide is from USEPA's EMBER tool for the day excluded, June 6, 2023.

St. Louis Ozone Nonattainment Area



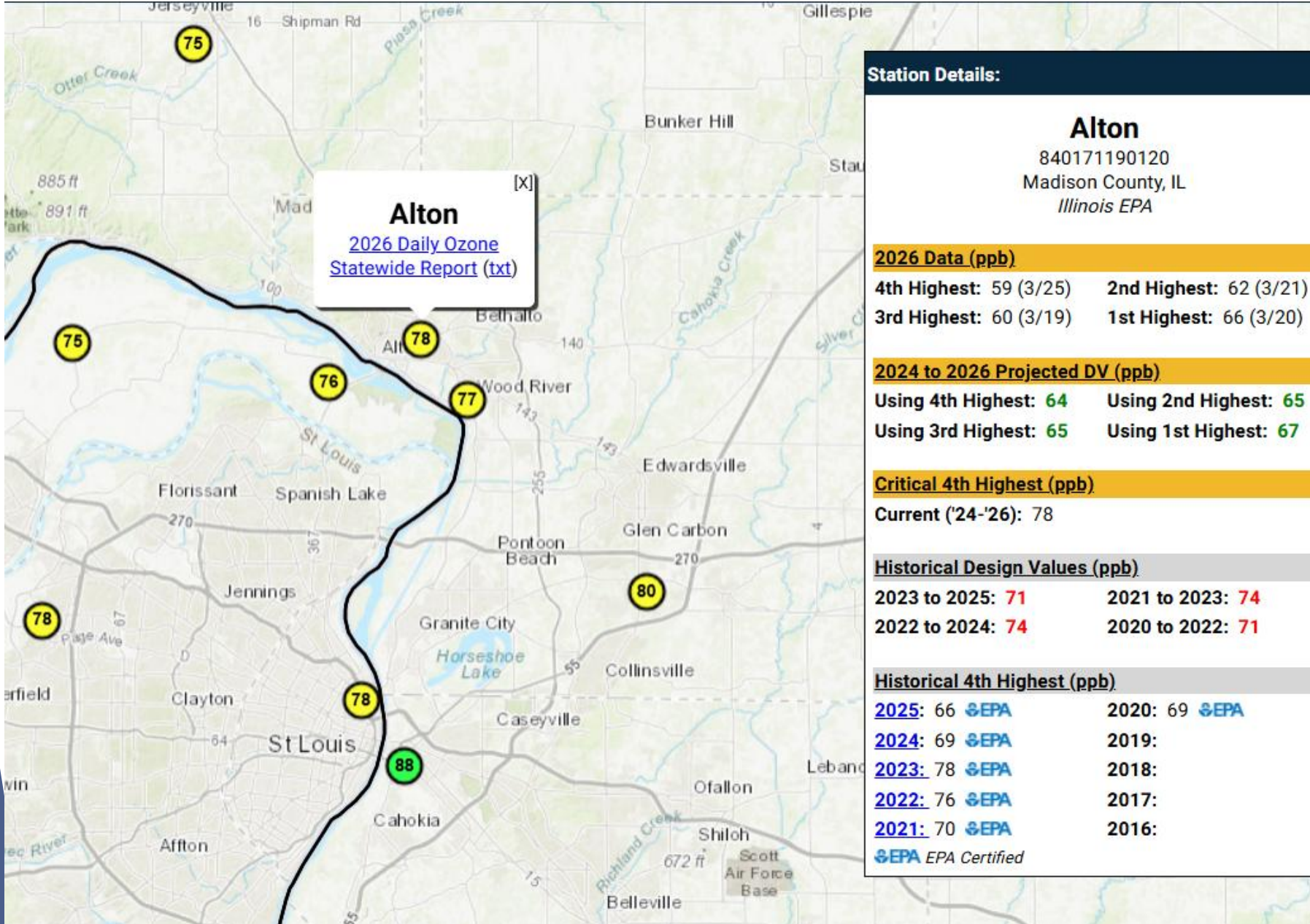
<https://www.epa.gov/air-quality-analysis/expedited-modeling-burn-events-results-ember>



St. Louis Ozone Nonattainment Area

- ▶ “Critical values” for monitors on the Illinois side of the St. Louis nonattainment area are relatively high for the 2026 ozone season.
- ▶ The following slide is a screen capture of a tool provided by North Carolina State University, the Ozone Design Value Predictor.
- ▶ <https://airquality.climate.ncsu.edu/dv/>

St. Louis Ozone Nonattainment Area



PM2.5 Standard

- ▶ In 2024 PM_{2.5} NAAQS was lowered to 9 micrograms per cubic meter (“ug/m³”) on an annual basis from 12 ug/m³ previously.
- ▶ Illinois EPA conducted an outreach period for a recommendation regarding the 2024 PM_{2.5} NAAQS.
- ▶ That recommendation was based on monitoring data for 2021 to 2023 and recommended that the Chicago and St. Louis areas be designated nonattainment.
- ▶ The Agency did not submit that recommendation in light of USEPA announcing that the standard was being reconsidered.
- ▶ USEPA has filed a motion to vacate the standard. It is likely in the event of a loss in that court, USEPA will begin rulemaking to repeal the more conventional way.

Regulatory Actions

- ▶ Illinois EPA is currently in the Illinois Pollution Control Board rulemaking process for minor revisions to the Aerospace Coatings rules for the St. Louis area.
- ▶ The Board rulemaking for clean cars and trucks mirroring California's vehicle standards is on hold indefinitely.
- ▶ The "Big Clean Up" rulemaking from 2018 is still under consideration, and the Pollution Control Board has recently ordered that it would go to first notice of the revisions. Most of this is non-substantive, but could have some impacts in the way Illinois EPA is able to include things correctly in permits.
 - ▶ Updated test methods, units of measurement.

Regulatory Actions

- ▶ Illinois EPA is evaluating revising VOC rules for consumer products and architectural and industrial maintenance (AIM) coatings to mirror the standard in the Ozone Transport Commission (East coast states).
- ▶ VOC RACT rules for the St. Louis NAA (Part 219 rules) may be necessary in the near future, but it is unlikely that the revisions will have substantive impact on any sources in the area.
- ▶ Agency expects to propose an Agency rulemaking to revise the Part 254 Annual Emissions Report rules. These revisions should provide some improvements, though they will not be electronic reporting...yet.

Annual Emissions Reports

- ▶ You may have noticed some additional options with this year's (2025) AER instructions.
- ▶ Sources still have the option of printing and filling out AERs as they have in previous years.
- ▶ Source Inventory Reports (“SIRs”), or the blank AERs that we send sources are now fillable PDFs, which we hope are much better than in previous years.
- ▶ Unfortunately, we still require a signed hard copy to be sent to the Agency.
- ▶ The additional step of emailing the Agency the filled PDF helps us greatly, as it helps us to avoid a lot of data entry.

Annual Emissions Reports

- ▶ These are steps on the way to electronic reporting.
- ▶ We hope to have more helpful features included in future AERs that may disallow common mistakes.
- ▶ The next AER you receive may have a completely overhauled look as it will need to be “accessible” or ADA compliant.
- ▶ Final steps toward electronic reporting will be to get our program compliant with USEPA’s Cross Media Electronic Reporting Rule (“CROMERR”), and deal with a few state record retention practices.

Questions?

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