



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MOBILE SOURCE PROGRAMS

ROD R. BLAGOJEVICH, GOVERNOR

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June 10, 2011

Ms. Cheryl A. Newton, Director
Office of the Air and Radiation Division
U.S. Environmental Protection Agency, Region V (R18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3507

Dear Ms. Newton:

On October 15, 2008, USEPA substantially strengthened the National Ambient Air Quality Standard (NAAQS) for lead, revising the level of the primary (health-based) standard from 1.5 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$), to 0.15 $\mu\text{g}/\text{m}^3$. In conjunction with strengthening the lead NAAQS, USEPA also established new requirements for siting ambient lead monitors, based on a finding that existing monitoring networks were inadequate to determine whether the revised lead NAAQS was being met at all locations. Monitors meeting the new, source-oriented siting requirements were to begin operating by January 1, 2010.

To meet the requirements of USEPA's new network siting requirements, and to address local concerns over lead emissions in the Pilsen neighborhood in Chicago, the Illinois EPA installed and has been operating six source-oriented monitors beginning in January 2010.

- Gunito Corp. in Rockford
- Mueller Co. in Decatur
- Keystone Steel & Wire Co. in Bartonville
- Caterpillar in Mapleton
- Sterling Steel Co. in Sterling
- H Kramer in Chicago

Based on air quality data collected at these sites in 2010, the Illinois EPA has determined that one of these areas does not meet the 2008 lead NAAQS and should be designated as nonattainment. The Illinois EPA has determined that the three-month average concentration of lead as measured by the monitor located at the Manuel Perez Jr. Elementary School (Perez School), 1241 West 19th Street in Chicago, was 0.24 $\mu\text{g}/\text{m}^3$ for the period October through December 2010, which is a violation of the NAAQS for lead.

The Illinois EPA installed and began operating the ambient monitor at the Perez School in January 2010 because of its proximity to the H Kramer facility, which is a secondary copper smelting facility that produces lead-containing metal alloys. The Perez School is located approximately two blocks northeast of the facility. The Illinois EPA has determined that high lead concentrations measured at the Perez School have primarily occurred with southwesterly wind directions, which indicates that emissions from H Kramer are primarily responsible for the elevated lead levels in the area. To confirm this finding, the Illinois EPA installed a second, temporary lead monitor at the Benito Juarez High School, located about 2 blocks southwest of H Kramer to determine the contribution of H Kramer to the monitored violation. This monitor was installed on March 11, 2011. The installation and location of this monitor allowed for an assessment of impacts from other potential lead emission sources. Data collected from these monitors clearly demonstrates that H Kramer is the source causing the high lead levels in the area. Since the other lead monitoring locations in Chicago and Cook County are meeting the 2008 lead NAAQS, the Illinois EPA concludes that elevated lead levels are localized.

The Illinois EPA therefore recommends that the area surrounding the H Kramer facility be designated as nonattainment for the revised lead NAAQS. The attached figure depicts the area that the Illinois EPA recommends be designated as nonattainment. The area, which includes the location of the Perez School and the spatial extent of potential air quality violations, is bounded on the north by Roosevelt Road, on the west by Damen Avenue, on the south by the Stevenson Expressway, and on the east by the Dan Ryan Expressway. The remainder of Cook County is attaining the revised lead standard and should, therefore, continue to be designated as attainment.

If further information is required or should you have any questions, please feel free to contact me at (217) 785-4140.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Kroack', with a long, sweeping horizontal stroke extending to the right.

Laurel L. Kroack
Chief, Bureau of Air

Attachment

Recommended Nonattainment Designation Boundary in Cook County, Illinois for the 208 Revised Primary Lead National Ambient Air Quality Standard

