CONSERVATION LAW CENTER

116 South Indiana, Bloomington, Indiana 47408
phone: 812-856-0229 | fax: 812.855.1828
admin@conservationlawcenter.org | conservationlawcenter.org

June 18, 2025

Neil Deardorff
IDEM/OAQ/AMB
2525 North Shadeland Avenue, Suite 100
Indianapolis, IN 46219
ndeardor@idem.in.gov

Re: Public comments on IDEM's 2026 Ambient Air Monitoring Network Plan

Dear Mr. Deardorff,

The Conservation Law Center, Environmental Integrity Project, Environmental Law & Policy Center, Gary Advocates for Responsible Development, Just Transition Northwest Indiana, the Northern Lake County Environmental Partnership, Abrams Environmental Law Clinic at the University of Chicago Law School, the Environmental Advocacy Center at Northwestern Pritzker School of Law, and Industrious Labs (collectively "Commenters"), respectfully submit these comments on the Indiana 2026 Ambient Air Monitoring Network Plan ("2026 Network Plan" or "Plan"). The Plan, prepared by the Indiana Department of Environmental Management ("IDEM"), contains the annual review of the ambient air monitoring network that is "the framework for establishment and maintenance of an air quality surveillance system" that will be provided to the U.S. EPA.[1] That system provides the air monitoring data needed to determine compliance with EPA's health-based National Ambient Air Quality Standards ("NAAQS"). In addition, ambient air monitoring data is used to produce "a daily [Air Quality Index] report, daily air quality forecast report, support of short and long-term health risk assessments, identification of a localized health concern, and tracking long-term trends in air quality."[2]

The Commenters are nonprofit organizations that focus most or all of their work regarding Indiana's air quality in the heavily industrialized communities of northwest Indiana, specifically in Lake, Porter, and La Porte Counties. Air quality is a significant concern in these communities which are home to a major oil refinery, three integrated steel mills, and dozens of other major sources of air pollution, three interstate highways, and other major roads and railroads. Lake County alone has over 250 regulated stationary sources of air pollution, including more than 50 major sources with a Title V permit in the northern Lake County cities of Gary, Hammond, Whiting, and East Chicago.[3] Not surprisingly, census tracts in northern Lake County have some of the highest rates of asthma and other respiratory diseases.[4]

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1 *See* 2026 Network Plan, at 9.

2 *Id.*

3 As reported by IDEM, as of June 3, 2025, at: https://www.in.gov/idem/airpermit/

4 *See* Centers for Disease Control and Prevention, PLACES Census Tract Data (2022) (available at: https://data.cdc.gov/500-Cities-Places/PLACES-Census-Tract-Data-GIS-Friendly-Format-2022-/shc3-fzig/about_data).

Lake County is the second largest of Indiana's 92 counties by population and is continuing to grow. As a result of its population density, the number of stationary and mobile sources, and the sensitivity of its residents, IDEM has sited more ambient air monitors in northwest Indiana than in many regions of the State. Our comments focus exclusively on the proposed 2026 ambient air monitoring network for Lake, Porter, and La Porte Counties. In summary, the Commenters request that IDEM (1) not discontinue any monitors and relocate any that are no longer properly sited; (2) evaluate whether the current network satisfies the new design criteria for $PM_{2.5}$ monitoring; (3) utilize all existing monitors for evaluation of the annual $PM_{2.5}$ NAAQS; and (4) add additional air toxics and $PM_{2.5}$ monitors and explore funding opportunities to purchase a mobile air quality monitoring device.

I. Background

A. Ambient Air Monitoring's Role in Determining Attainment of the NAAQS

The Clean Air Act mandates that EPA establish primary and secondary NAAQS for all criteria air pollutants.[5] Primary ambient air quality standards are those requisite to protect the public health.[6] The Clean Air Act "does not require that primary standards be set at a zero-risk level, but rather at a level that avoids unacceptable risks to public health, including the health of sensitive (also referred to as 'at-risk') groups."[7] Secondary ambient air quality standards are those requisite to protect the public welfare.[8] EPA has established primary and secondary NAAQS for all criteria air pollutants and regularly revises those standards based upon the latest understanding of what is necessary to adequately protect human health and welfare.

Under the Clean Air Act and Indiana's State Implementation Plan, many air permitting decisions rely in part on whether a stationary source is located in an area that has attained the NAAQS for each criteria air pollutant. Determining whether an area is in attainment or nonattainment depends on the "Design Value" recorded by valid ambient air quality monitoring. The Design Value is calculated differently for different NAAQS. For example, the Design Value for the annual $PM_{2.5}$ NAAQS is calculated by averaging the weighted arithmetic mean of recorded measurements over the past three years.[9] In comparison, the Design Value for the

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[5] 42 U.S.C. § 7409(a). "Criteria air pollutants" include particulates ("PM"), sulfur dioxide ("SO_2"), carbon monoxide ("CO"), nitrogen oxides ("NOx"), ground-level ozone, and lead.

[6] 42 U.S.C. § 7409(b)(1).

[7] *See* 89 Fed. Reg. 16,202, 16,219 (March 6, 2024). "At-risk groups" include children, older adults, minority populations, and individuals with pre-existing cardiovascular and respiratory disease. *Id.* at 16,242, n.75. Seven percent of Gary residents and 6.1% of East Chicago residents are under the age of 5 (compared with 5.5% in the United States). More than 80% of Gary and East Chicago residents identify as either Black or as Hispanic/Latino. *See* U.S. Census Bureau, Quick Facts.

[8] 42 U.S.C. § 7409(b)(2).

[9] *See* U.S. EPA, "Criteria Air Pollutants NAAQS Table" (available at https://www.epa.gov/criteria-air-pollutants/naaqs-table); 40 C.F.R. Part 50, Appendix N.

8-hour ozone NAAQS, which Lake and Porter Counties have not attained, is the three-year average of the fourth-highest average ozone measurements over an 8-hour period.[10]

Overall, federal regulations for ambient air monitoring establish only minimum design criteria for State and Local Area Monitoring Stations ("SLAMS") to monitor air quality for criteria pollutants, allowing room for states to establish enhanced air monitoring, as required.[11] Furthermore, EPA, which reviews state plans, has authority to require revisions to proposed state monitoring plans to ensure protection of sensitive populations. EPA may "apply greater scrutiny to the network assessments for areas where susceptible and vulnerable populations may be disproportionately affected by air pollution and may recommend network design changes and/or disapprove the submitted network assessments, as appropriate, to ensure that representative air quality data is available for use in air quality planning for such areas."[12]

EPA's guidance discusses the various purposes served by an air monitoring network, including the evaluation of population exposure to air pollutants. EPA's guidance then provides several techniques for assessing the technical qualities of monitoring networks, including techniques that focus on the population served, population density, population change, and suitability models, discussed further in the guidance.[13] As described in the guidance, monitoring networks must allocate its monitoring resources to communities that are disproportionately impacted by air pollution, like Lake, Porter, and La Porte Counties, and to request additional monitoring resources from EPA if necessary.

B. Nonattainment of NAAQS in Lake and Porter Counties

In 2018, EPA designated the Chicago area, which includes the northern half of Lake and Porter Counties, as being in "marginal nonattainment" of the 2015 8-hour ozone NAAQS.[14] The health impacts of ozone exposure are well-documented.[15] EPA gave marginal nonattainment areas until August 3, 2021 to reduce 8-hour average ozone concentrations below 0.070 ppm.[16] Lake County's 8-hour ozone level did not fall below 0.070 ppm by the August 3, 2021 deadline, but continued (and still continues) to exceed this NAAQS limit. As required by the Clean Air Act, U.S. EPA reclassified the northern portion of Lake County from "marginal" to the more

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10 *See* 40 CFR part 50, Appendix U.

11 *See* 40 C.F.R. § 58.1; *see also* 40 C.F.R. Part 58 App. D ¶¶ 4.1-4.8.1 (establishing "Pollutant-Specific Design Criteria" for monitoring networks).

12 U.S. EPA, Legal Tools to Advance Environmental Justice (May 2022), at 19 (available at: https://www.epa.gov/system/files/documents/2022-05/EJ%20Legal%20Tools%20May%202022%20FINAL.pdf).

13 U.S. EPA, Ambient Air Monitoring Network Assessment Guidance (2007) (hereinafter "EPA Network Guidance"), at 2-5, 2-6, *available at* https://www3.epa.gov/ttnamti1/files/ambient/pm25/datamang/network-assessment-guidance.pdf

14 83 Fed. Reg. 25,776, 25,804 (June 4, 2018).

15 *See*: https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution

16 40 C.F.R. § 51.1303(a) (Table 1).

severe "moderate" nonattainment in 2022.[17] EPA has since reclassified Lake and Porter Counties as being in "serious" nonattainment effective January 16, 2025.[18]

Last year, EPA revised the primary annual $PM_{2.5}$ NAAQS to 9.0 $\mu g/m^3$ down from the previous standard of 12.0 $\mu g/m^3$.[19] EPA based its revision on a host of studies showing that the then-current standards were inadequate to protect human health. As EPA explained:

> The health effects evidence newly available in this reconsideration, in conjunction with the full body of evidence critically evaluated in the 2019 [Integrated Science Assessment], supports a causal relationship between long- and short-term exposures and mortality and cardiovascular effects, and the evidence supports a likely to be a causal relationship between long-term exposures and respiratory effects, nervous system effects, and cancer.[20]

Although the new annual $PM_{2.5}$ NAAQS is currently the subject of litigation in the United States Court of Appeals for the District of Columbia Circuit, the 2026 Network Plan acknowledges the new NAAQS of 9.0 $\mu g/m^3$.[21]

EPA has not yet designated which counties (or portions of counties) in Indiana are in nonattainment for the annual $PM_{2.5}$ NAAQS, but northern Lake County is likely to be found in nonattainment. The 2026 Network Plan all but overlooks this likelihood, stating simply that "all counties in Indiana meet the 24-hour, and 2012 annual NAAQS for $PM_{2.5}$. Designations are pending for the 2024 annual NAAQS for $PM_{2.5}$."[22] The 2026 Network Plan fails to acknowledge that the annual $PM_{2.5}$ Design Value for Lake County has <u>never</u> been below 9.0 $\mu g/m^3$. And the Plan's Figure 9 ignores that the Gary – Madison Street monitor (AQS Site ID #18-089-0031) exceeds the new annual $PM_{2.5}$ NAAQS, as do the Gary – Burr Street (AQS Site ID #18-089-0026) and Gary – IITRI (AQS Site ID #18-089-0022) monitors.

II. Comments on the Indiana 2026 Ambient Air Monitoring Network Plan

In general, the Commenters urge IDEM to add, not subtract, monitors from its network in Lake, Porter, and La Porte Counties. Any monitor that is found to be inappropriately sited should be relocated rather than discontinued. This region's population and economy are growing. Considering the time it takes to establish and build a base of sensor recordings, now is not the time to be reducing IDEM's monitoring network in northwest Indiana or excluding valid data from NAAQS determinations when its attainment designations are under consideration. Commenters point out that IDEM has previously reduced the number of NO_2 monitors in Lake County and ozone monitors in Lake and Porter Counties – at a time when these counties are in

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17 *See* 87 Fed. Reg. 60,897, 60,918 (Oct. 7, 2022).

18 *See* 89 Fed. Reg. 101,901 (Dec. 17, 2024).

19 *See* 89 Fed. Reg. 16,202 (March 6, 2024). EPA made no changes to the primary and secondary NAAQS for PM_{10} and made no changes to the secondary NAAQS for $PM_{2.5}$.

20 *Id. at* 16,203.

21 *See* 2026 Network Plan at 48.

22 *Id.*

nonattainment. IDEM has also reduced the number of PM_{10}, $PM_{2.5}$, and SO_2 monitors in all three counties of the Region over the past 25 years.

In particular, given the potential for northern Lake County to be designated in nonattainment for the annual $PM_{2.5}$ NAAQS, IDEM should not be reducing the number of $PM_{2.5}$ monitors in the county as proposed in the 2026 Network Plan. IDEM currently has six $PM_{2.5}$ monitors in Lake County and only one each in Porter and La Porte Counties. IDEM should not reduce the number of $PM_{2.5}$ monitors, as proposed, when there is an increasing need for comprehensive $PM_{2.5}$ air monitoring in Lake County. Although not slated to be discontinued, the Commenters are also concerned about the status of the $PM_{2.5}$ monitor at the former Franklin School in East Chicago (AQS Site ID #18-089-0006). The 2026 Network Plan states that its "move from the rooftop has been delayed by communication issues with the school." Local residents have expressed concern over this move, when it will occur, and what it means for ambient air monitoring in their community. We ask that IDEM clarify the status of and its plans for this monitor.

A. IDEM Should Not Discontinue the Burr Street $PM_{2.5}$ Monitor

IDEM's 2026 Network Plan proposes to shut down the Gary – Burr Street monitor because the "site does not meet siting criteria for the $PM_{2.5}$ NAAQS annual average and the source-oriented designation no longer applies."[23] The Plan does not explain what siting criteria the Burr Street monitor does not meet or why any source-oriented designation no longer applies. Last year, IDEM requested that the Burr Street monitor be excluded from the annual $PM_{2.5}$ NAAQS because it "is located within 30 meters of a major truck stop."[24]

The Burr Street monitor is located on the south side of 25th Avenue in Gary, just west of the TA Travel Center – a truck stop next to the Burr Street exit off of I-80/94 (commonly referred to as the Borman Expressway). Both the Interstate highway and the TA Travel Center long pre-date the siting of the Burr Street monitor. The Burr Street monitor is upwind of the TA Travel Center under the prevailing westerly winds. The monitor is in the midst of Gary's Black Oak neighborhood, which is less densely populated than some nearby Gary neighborhoods, such as Midtown and Tolleston. The Burr Street monitor is more likely impacted by its proximity to the Borman Expressway than the truck stop.

The following graph of the Burr Street monitor's 3-year average weighted arithmetic mean shows a consistent drop in $PM_{2.5}$ readings after 2007 when diesel particulate filters became mandatory on new heavy-duty diesel trucks. Since 2017, the Burr Street monitor has recorded weighted arithmetic means of between 9.59 and 10.33 $\mu g/m^3$. These readings are above the new annual $PM_{2.5}$ NAAQS of 9.0 $\mu g/m^3$, but below the former standard of 12.0 $\mu g/m^3$.

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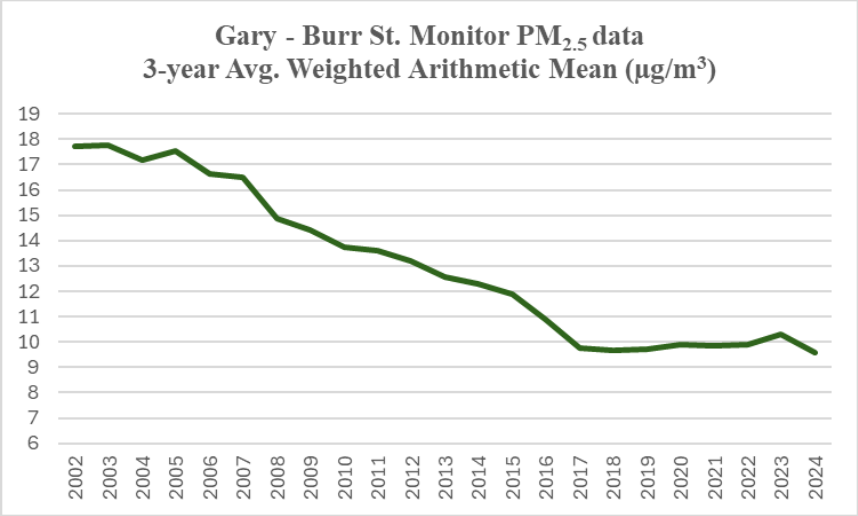
23 *See* 2026 Network Plan at 48.

24 *See* Indiana 2025 Ambient Air Monitoring Network Plan (IDEM), at 48 (available at: https://www.in.gov/idem/airmonitoring/files/monitoring_network_plan_2025.pdf).



EPA's ambient air monitoring network guidance does not support removal of the Burr Street monitor. EPA recommends that state agencies like IDEM should focus "monitoring resources on pollutants that are new or persistent challenges, such as $PM_{2.5}$, air toxics, and ground-level ozone and precursors."[25] None of the reasons for removing a monitor in EPA's guidance appears to apply to the Burr Street monitor.[26] Although Lake, Porter, and La Porte Counties are in attainment for the old 12.0 µg/m^3 annual $PM_{2.5}$ NAAQS, the Burr Street monitor routinely has a weighted arithmetic mean in excess of the new NAAQS and in excess of 80% of the old NAAQS.[27] Nor is the Burr Street monitor consistently recording lower concentrations relative to other monitors.[28]

As for monitor siting, the documents available on Indiana's Ambient Air Monitoring Network page do not indicate why IDEM sited a $PM_{2.5}$ monitor on 25th Avenue west of Burr Street on February 12, 2000. Nor does it appear that conditions have changed since then such that the monitor siting determination no longer applies. If, however, factors not evident from the 2026 Network Plan make the 25th Avenue location no longer appropriate, Commenters recommend that the monitor be moved to an appropriate nearby location rather than be discontinued.

B. The Plan Must Evaluate Whether Monitoring Satisfies All Design Criteria

The same 2024 final rule that lowered the annual $PM_{2.5}$ NAAQS to 9.0 µg/m^3 also added a specific design criteria for $PM_{2.5}$. For areas with additional required monitoring stations, "a monitoring station is to be sited in an at-risk community with poor air quality, particularly where there are anticipated effects from sources in the area (e.g., a major industrial area, point source(s), port, rail yard, airport, or other transportation facility or corridor)."[29] This new design criteria clearly applies to Lake County, a major industrial area with numerous large point

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25 *See* EPA Network Guidance at 1-2; *see also* Table of Annual $PM_{2.5}$ Design Values, *infra*.
26 *Id.* at 4-1.
27 *Id.*
28 *Id.* at 4-4.
29 40 C.F.R. Part 58, Appendix D § 4.7.1(b)(3); 89 Fed. Reg. at 16,396.

sources, a port, a rail yard, an airport, and miles of busy highways. The 2026 Network Plan does not acknowledge this new monitoring criteria and, as such, fails to analyze whether the current monitoring network in Lake County satisfies all requirements of 40 C.F.R. Part 58, Appendix D. The Commenters urge IDEM to include such an evaluation in its monitoring plan to determine whether it complies with the new design criteria.

C. The Annual $PM_{2.5}$ NAAQS Should Include All Valid Monitoring

IDEM's 2026 Network Plan requests that the Gary - IITRI $PM_{2.5}$ monitor be excluded from the annual $PM_{2.5}$ NAAQS "due to source-oriented location of this site."[30] To qualify for such an exclusion under EPA regulations, IDEM must demonstrate that a monitor is not representative of area-wide air quality due to a "localized hot spot."[31] IDEM's request to exclude the Gary – IITRI monitoring data fails to demonstrate that the monitor's site is not representative of area-wide air quality, but instead states only that the monitor is "sited less than 250 meters south of the Gary Works Industrial area."

Considering that U.S. Steel's Gary Works' complex covers approximately 4,000 acres stretching along nearly seven miles of Lake Michigan shoreline, IDEM's rationale would exclude a large swath of the City of Gary from monitoring despite the thousands of people who live there. Although Gary Works reported emitting nearly 800 tons of $PM_{2.5}$ in 2023, those emissions came from at least ten separate sources scattered throughout the sprawling facility, none of which were "less than 250 meters" from the Gary – ITRI monitor.[32] In fact, the IITRI bunker where the monitor is located is east of much of Gary Works' active operations and over a mile from its blast furnaces, flares, and basic oxygen furnaces that emit more than half of its fine particulates.

Determining whether a monitor is recording a "localized hot spot" requires some actual data analysis, such as comparing it against other area monitors, reviewing pollution roses, or other assessment of spatial patterns. IDEM's 2026 Network Plan exhibits no such analysis to justify the exclusion of the Gary – IITRI monitor. Such an analysis would show that during the past ten years the Design Value of the Gary – IITRI monitor has consistently been comparable with, but often lower than, the Design Value of some of the other Lake County monitors used to determine attainment with the annual $PM_{2.5}$ NAAQS, as shown in the table below.[33]

30 *See* 2026 Network Plan at 48.
31 40 C.F.R. § 58.30(a).
32 *See* U.S. Steel Gary Works 2023 Annual Emissions Statement (VFC No. 83667420).
33 Data taken from U.S. EPA, Air Quality Design Values (available at: https://www.epa.gov/air-trends/air-quality-design-values#previous).

Annual $PM_{2.5}$ Design Values of Lake County Monitors (2015-2024) (in µg/m3)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
East Chicago - Franklin School	Inv.	10	9.3	8.9	9	9	9.1	8.9	9.2	8.4
Gary - IITRI	11.2	10.3	9.4	9.1	9.1	Inv	8.9	9	8.7	9
Gary - Burr Street	11.9	10.9	9.8	9.7	9.7	Inv	9.8	9.9	10.3	9.6
Gary Madison Street	11	10.1	9.2	9.4	9.6	9.6	9.6	9.7	10.5	9.7
East Chicago - Marina	(Started Nov. 2019)				Inv.	Inv.	Inv.	9.8	9.6	9
Hammond - 167th Street	(Started Feb 2018)			Inv.	Inv.	9.8	9.7	9.2	8.9	8.5
Hammond - PU/Powers Bldg	10.6	9.8	8.7	(Discontinuned March 2018)						
LAKE COUNTY	**11**	**10.1**	**9.3**	**9.4**	**9.6**	**9.8**	**9.7**	**9.8**	**10.5**	**9.7**

#: Data excluded from annual $PM_{2.5}$ NAAQS

Inv.: Invalid data

In contrast, the data from the Gary – Burr Street monitor has consistently been among the highest recorded annual $PM_{2.5}$ measurements in the County. Data from the Burr Street monitor has been excluded from the annual $PM_{2.5}$ NAAQS during each of the same years in which the Gary – IITRI monitor has been excluded over the past ten years. As shown above, the only year in which data from both monitors were included in the annual $PM_{2.5}$ NAAQS, 2023, the Gary Madison Street monitor recorded the highest measurement.

In short, IDEM's statement that the Gary – IITRI monitor is 250 meters south of Gary Works is an insufficient basis to exclude its data from the annual $PM_{2.5}$ NAAQS. The Gary – IITRI $PM_{2.5}$ monitor has been in place since 1995, and the Gary Works complex existed well before that time.[34] The Plan does not explain what conditions changed that would warrant excluding the IITRI's data now. Because IDEM fails to provide any analysis that would demonstrate that the IITRI monitor is recording a localized hot spot, the data from that monitor should not be excluded.

D. Additional Monitoring Needs

The Commenters recognize that there is a cost for establishing, operating, and maintaining ambient air quality monitors that satisfy EPA requirements. At current budget levels, IDEM does not appear to have the resources to site monitors everywhere they are needed. The Commenters limit their request for additional monitoring to the following three:

1. Hazardous Air Pollutants

The Commenters urge IDEM to install additional monitors for air toxics in northern Lake County. Due to the numerous industrial sources of air pollution in Lake County, each with its own mixture of harmful emissions, IDEM should provide additional monitoring of hazardous air pollutants. The 2026 Network Plan identifies five air toxics monitors in Lake County and one in Porter County.[35] There are no NAAQS established for air toxics and EPA regulations have no

[34] *See* 2026 Network Plan at 34.

[35] EPA's AirData website only provides air toxics data on two of the monitors in Lake County – the East Chicago Marina (AQS Site ID #18-089-0034) and the Gary – IITRI monitors.

requirements for toxics monitoring.[36] Nonetheless, air toxics can present a significant risk to human health. The 2026 Network Plan does not expressly demonstrate how its present monitoring of air toxics adequately evaluates these risks in relation to the sources of air toxics and the local population. Air toxics present a continuing and growing concern to residents in northern Lake County. By expanding the monitoring network for air toxics, IDEM could provide these residents with information that could benefit their health and welfare.

2. Additional $PM_{2.5}$ Monitoring in La Porte County

The Commenters recommend that IDEM consider adding a $PM_{2.5}$ monitor in La Porte County closer to the Michigan City Generating Station. That stationary source, situated on Lake Michigan and adjacent to downtown Michigan City, reported emissions of 23 tons of $PM_{2.5}$ in 2023. The only $PM_{2.5}$ monitor in La Porte County (AQS Site ID #18-091-0011) is well over a mile from the Generating Station and likely fails to capture the maximum concentration of pollutants to which the denser urban core and Third Ward of Michigan City is exposed. The Commenters ask IDEM to consider adding a monitor closer to the Generating Station that will capture the higher concentration of $PM_{2.5}$ to which residents in the western neighborhoods are likely exposed.

3. A Mobile Monitoring Device

The Commenters urge IDEM to explore funding opportunities to acquire a mobile air monitoring unit. These units, sometimes referred to as Geospatial Measurement of Air Pollution (GMAP) air monitoring vehicles, are "equipped with several air pollutant analyzers and technology that utilizes fast-response instruments and a global positioning system (GPS) to map air pollution around emission sources."[37] These GMAP units can provide real-time mobile air monitoring data, helping identify contributing emission sources and potential violations.[38] For example, Fairbanks, Alaska used a mobile PM monitor to better understand the pollution causing its nonattainment status.[39]

These units have multiple uses that could support IDEM's efforts to monitor air quality. First, these units can be deployed in fence-line communities to provide an accurate picture of air quality in communities where there are no permanent air monitors. This could help IDEM respond to citizen complaints and accurately determine whether there are any potential violations based on such complaints. Additionally, these units can help identify unknown or underestimated

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[36] However, the revised Integrated Iron and Steel Manufacturing NESHAP rule calls for fenceline monitoring along the property boundary of the steel mills in East Chicago, Gary, and Portage. 89 Fed. Reg. 23,294, 23,320 (April 3, 2024) (amending 40 C.F.R. § 63.7792).

[37] U.S. EPA, *AltEN Facility, Mead, Nebraska – Fact Sheet* (Sept. 2021), https://www.epa.gov/ne/alten-facility-mead-nebraska-fact-sheet-september-2021 (last visited June 18, 2025).

[38] Tricord, *GMAP – Real Time Air Monitoring*, https://tricordconsulting.com/index.php/gmap-mobile-air-monitoring/ (last visited June 18, 2025).

[39] Fairbanks, North Star Borough, Alaska, *Mobile Monitoring (AKA Sniffer Study)*, https://www.fnsb.gov/388/Mobile-Monitoring-AKA-Sniffer-Study (last visited June 18, 2025).

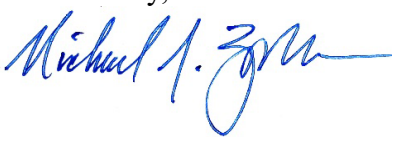
emission sources.[40] Thus, Commenters urge IDEM to explore funding opportunities from EPA and elsewhere to support acquiring such a unit.

III. Conclusion

Commenters ask that IDEM continue to operate the Gary – Burr Street monitor either at its present or a new location and utilize all valid monitoring in calculation of the Design Value for the annual $PM_{2.5}$ NAAQS, including the Burr Street and IITRI monitors in Gary. The 2026 Network Plan must also evaluate whether the current network satisfies the new design criteria for $PM_{2.5}$ monitoring. Finally, IDEM should consider adding additional air toxics and $PM_{2.5}$ monitoring and explore funding opportunities to purchase a mobile air quality monitoring device.

Thank you for considering our comments on IDEM's 2026 Ambient Air Monitoring Network Plan.

Sincerely,



Michael J. Zoeller
Senior Attorney
Conservation Law Center
mjzoelle@iu.edu

cc: Zac Adelman, Exec. Dir., Lake Michigan Air Directors Consortium (adelman@ladco.org)
Krista Bizzotto, U.S. EPA Region 5 (bizzotto.krista@epa.gov)

[40] Tricord, *GMAP – Real Time Air Monitoring*.