

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	
DEFINITION OF VOM UPDATE, USEPA	)	R19-15
REGULATIONS (July 1, 2018 through	)	(Identical-in-Substance
December 31, 2018)	)	Rulemaking – Air)

**NOTICE**

To: Michael J. McCambridge	Division Chief of Environmental
Hearing Officer	Enforcement
Illinois Pollution Control Board	Office of the Illinois Attorney General
James R. Thompson Center	100 West Randolph Street
100 West Randolph	Suite 1200
Suite 11-500	Chicago Illinois 60601
Chicago, Illinois 60601-3218	<a href="mailto:enviro@atg.state.il.us">enviro@atg.state.il.us</a>
<a href="mailto:Michael.McCambridge@illinois.gov">Michael.McCambridge@illinois.gov</a>	<a href="mailto:mdunn@atg.state.il.us">mdunn@atg.state.il.us</a>

Alec Davis	Jonathon C. Eastvold
Illinois Environmental Regulatory Group	Joint Committee on Administrative Rules
215 East Adams Street	Wm.G Stratton Office Building
Springfield, Illinois 62701	Room 700
<a href="mailto:Adavis@ierg.org">Adavis@ierg.org</a>	Springfield, Illinois 62706-4700
	<a href="mailto:JonathanE@ilga.gov">JonathanE@ilga.gov</a>

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Pollution Control Board the ILLNOIS ENVIRONMENTAL PROTECTION AGENCY'S COMMENTS REGARDING THE ILLINOIS POLLUTION CONTROL BOARD'S IDENTICAL IN SUBSTANCE RULEMAKING, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Annet Godiksen  
Assistant Counsel  
Division of Legal Counsel

DATED: July 8, 2020

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	
DEFINITION OF VOM UPDATE, USEPA	)	R19-15
REGULATIONS (July 1, 2018 through	)	(Identical-in-Substance
December 31, 2018)	)	Rulemaking – Air)

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY’S COMMENTS REGARDING  
THE ILLINOIS POLLUTION CONTROL BOARD’S IDENTICAL IN SUBSTANCE  
RULEMAKING**

The Illinois Environmental Protection Agency (“Agency” or “Illinois EPA”) submits these comments for the above-titled matter to the Illinois Pollution Control Board (“Board”). The Board invited public comment on its proposed amendments in this rulemaking. The Illinois EPA’s comments are as follows:

In response to all of the Board’s questions, the Agency recommends that the Board adopt language that mirrors the text of USEPA’s regulations as closely as possible in identical in substance rulemakings, per Section 7.2(a) of the Illinois Environmental Protection Act. As such, the Illinois EPA recommends that the Board eliminate CAS numbers and the IUPAC references, and return to maintaining the VOM exclusions as they appear in 40 CFR 51.100(s) to avoid further confusion from USEPA and the general public.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Assistant Counsel

DATED: July 8, 2020  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF:	)	
	)	
DEFINITION OF VOM UPDATE, USEPA	)	R19-15
REGULATIONS (July 1, 2018 through	)	(Identical-in-Substance
December 31, 2018)	)	Rulemaking – Air)

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, affirm that I have served the attached ILLNOIS ENVIRONMENTAL PROTECTION AGENCY’S COMMENTS REGARDING THE ILLINOIS POLLUTION CONTROL BOARD’S IDENTICAL IN SUBSTANCE RULEMAKING upon the person to whom it is directed, by the following means:

By emailing the comments, numbering 3 pages, from [annet.godiksen@illinois.gov](mailto:annet.godiksen@illinois.gov), on July 8, 2020, by 6:00 PM to the following persons:

To: Michael J. McCambridge  
Hearing Officer  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph  
Suite 11-500  
Chicago, Illinois 60601-3218  
[Michael.McCambridge@illinois.gov](mailto:Michael.McCambridge@illinois.gov)

Division Chief of Environmental  
Enforcement  
Office of the Illinois Attorney General  
100 West Randolph Street  
Suite 1200  
Chicago Illinois 60601  
[enviro@atg.state.il.us](mailto:enviro@atg.state.il.us)  
[mdunn@atg.state.il.us](mailto:mdunn@atg.state.il.us)

Alec Davis  
Illinois Environmental Regulatory Group  
215 East Adams Street  
Springfield, Illinois 62701  
[Adavis@ierg.org](mailto:Adavis@ierg.org)

Jonathon C. Eastvold  
Joint Committee on Administrative Rules  
Wm.G Stratton Office Building  
Room 700  
Springfield, Illinois 62706-4700  
[JonathanE@ilga.gov](mailto:JonathanE@ilga.gov)

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY  
By: /s/ Annet Godiksen  
Annet Godiksen  
Assistant Counsel  
Division of Legal Counsel

DATED: July 8, 2020  
  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544