

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
NATIONAL AMBIENT AIR QUALITY ) R17-10  
STANDARDS, USEPA AMENDMENTS ) (Identical-in-  
(July 1, 2016 through December 31, 2016, ) Substance  
March 20, 2017, May 11, 2017, and June 16,) Rulemaking – Air)  
2017) )

**NOTICE OF FILING**

To: Don Brown, Clerk  
Michael J. McCambridge, Hearing Officer  
James R. Thompson Center  
Illinois Pollution Control Board  
100 West Randolph Street, Suite 11-500  
Chicago, Illinois 60601  
(VIA electronic mail)

**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have filed electronically today with the hearing officer ILLNOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S QUESTIONS REGARDING THE 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

Dated: October 3, 2017  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
)  
NATIONAL AMBIENT AIR QUALITY ) R17-10  
STANDARDS, USEPA AMENDMENTS ) (Identical-in-  
(July 1, 2016 through December 31, 2016, ) Substance  
March 20, 2017, May 11, 2017, and June 16,) ) Rulemaking – Air  
2017) )

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

The Illinois Environmental Protection Agency (“Agency” or “Illinois EPA”) submits this response for the above-titled matter to the Illinois Pollution Control Board (“Board”). During the hearing held on September 21, 2017, the Board requested that the Agency respond on specific aspects of the amendments in the proposed rulemaking. The Illinois EPA responds as follows:

1. The Board asked the Illinois EPA if the USEPA made a mistake placing language pertaining to the 1997 fine particulate matter (PM<sub>2.5</sub>) National Ambient Air Quality Standard (NAAQS) in 40 CFR 50.13, which is the section concerning the 2006 PM<sub>2.5</sub> NAAQS, instead of placing it in 40 CFR 50.7, the section concerning the 1997 PM<sub>2.5</sub> NAAQS. [page 8 of the hearing transcript].

The Illinois EPA consulted with USEPA, Region V. Region V indicated that the placement of this language in the federal regulations was not in error, as the 2006 PM<sub>2.5</sub> annual standard is the same as the 1997 PM<sub>2.5</sub> annual standard.

Per the organization of Illinois’ regulations, however, discussion of the 1997 PM<sub>2.5</sub> standard is better placed in Section 243.120(b), which pertains to such standard. As previously noted in its September 19, 2017, comments, the Agency recommends that the language used by the Board reflect the language used by USEPA in 40 CFR 50.13(d) without referencing specific nonattainment areas, as those are subject to change.

2. The Board asked whether the Agency was aware of any USEPA intent to correct the placement of the new 1997 PM<sub>2.5</sub> NAAQS language. [page 9 of the hearing transcript]

See the Agency’s response to No. 1 above.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Assistant Counsel

DATED: October 3, 2017  
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: )  
)  
NATIONAL AMBIENT AIR QUALITY ) R17-10  
STANDARDS, USEPA AMENDMENTS ) (Identical-in-  
(July 1, 2016 through December 31, 2016, ) Substance  
March 20, 2017, May 11, 2017, and June 16,) ) Rulemaking – Air  
2017) )

**CERTIFICATE OF SERVICE**

I, the undersigned, an attorney, affirm that I have served the attached ILLNOIS ENVIRONMENTAL PROTECTION AGENCY'S RESPONSE TO THE ILLINOIS POLLUTION CONTROL BOARD'S QUESTIONS REGARDING THE BOARD'S IDENTICAL IN SUBSTANCE RULEMAKING upon the following person(s) by e-mailing it to the e-mail address(es) indicated below:

TO: Michael J. McCambridge  
Hearing Officer  
Illinois Pollution Control Board  
100 W. Randolph Street  
Suite 11-500  
Chicago, Illinois 60601  
[Michael.McCambridge@illinois.gov](mailto:Michael.McCambridge@illinois.gov)

Don Brown  
Clerk of the Board  
Illinois Pollution Control Board  
100 W. Randolph Street  
Suite 11-500  
Chicago, Illinois 60601  
[Don.Brown@illinois.gov](mailto:Don.Brown@illinois.gov)

Mathew Dunn  
Division of Legal Counsel  
Office of the Attorney General  
69 West Washington Street  
Suite 1800  
Chicago Illinois 60602  
[Mdunn@atg.state.il.us](mailto:Mdunn@atg.state.il.us)

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)

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

I affirm that my e-mail address is [annet.godiksen@illinois.gov](mailto:annet.godiksen@illinois.gov); the number of pages in the e-mail transmission is 5; and the e-mail transmission took place today before 5:00 p.m. If you prefer service by mail, please contact me and a copy will be mailed to you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Assistant Counsel

DATED: October 3, 2017  
1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544