

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
In the Matter of Amendments to)	
35 Ill. Adm. Code Parts 101, 310, 502, 620,)	R2025-023
704, 721, 733, 739, 742, 807.Illustration E,)	
811.Illustration E, 840.Illustration C, 1010,)	
and 1501)	

To: See attached service list

NOTICE OF FILING

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Control Board the **Illinois Environmental Protection Agency's Responses**, a copy of which is served upon you.

Respectfully submitted,

Dated: April 11, 2025

By: /s/ Sara G. Terranova
Assistant Counsel
Division of Legal Counsel

2520 West Iles Ave.
P.O. Box 19276
Springfield, IL 62794
217-782-5544
sara.terranova@illinois.gov

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)	
)	
In the Matter of Amendments to)	
35 Ill. Adm. Code Parts 101, 310, 502, 620,)	R2025-023
704, 721, 733, 739, 742, 807.Illustration E,)	
811.Illustration E, 840.Illustration C, 1010,)	
and 1501)	

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY’S RESPONSES

NOW COMES the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by and through one of its attorneys, and submits the following responses:

On March 27, 2025, the Illinois Pollution Control Board (“Board”), through a Hearing Officer Order, requested that the Agency respond to the following questions.

Question 1.

Whether the Agency would object to the Board submitting for second-notice review a proposal to replace the Agency’s former street address in the Board’s regulations with either (a) the Agency’s current street address or (b) a reference to the address as listed on the Agency’s website.

Using 35 Ill. Adm. Code 502.202 as an example, the Board offered the following potential amendment:

All permit applications must be mailed or delivered to Illinois Environmental Protection Agency, Bureau of Water, 2520 West Iles Avenue, PO Box 192764021 N. Grand Ave. E., Springfield IL 62794-9276 or at the address of the Illinois EPA's headquarters as designated on the Illinois EPA's website.

Question 2.

Whether the Agency currently anticipates moving its headquarters again, and if so, when.

Agency Response 1.

The Agency does not object to the Board’s suggested revision. However, the Agency

continues to prefer the language it originally proposed, which refers users to the Agency's website rather than listing a specific address. This method is consistent with how the Agency is updating its own administrative rules and provides a more flexible, future-proof approach. Office relocations, while not currently anticipated, do occasionally occur, and requiring regulatory amendments to update addresses each time imposes unnecessary administrative burdens. Even simple rulemakings can involve significant time and effort.

The Agency notes the Board's comment regarding the absence of a specific URL for the Agency's website. The Agency's website is easily found through an internet search, and it prominently displays accurate, up-to-date contact information. That said, the Agency would not object to inclusion of a new provision identifying the Agency's website, as is included for the Board's website at 35 Ill. Adm. Code 101.102, if the Board finds that addition to be beneficial.

While the Joint Committee on Administrative Rules has, at times, raised questions about referencing websites in rule text—particularly regarding potential changes or limited internet access—the Agency has addressed such issues successfully in prior rulemakings. The Agency believes similar concerns can be resolved here, if necessary.

Agency Response 2.

At this time, the Agency does not have any plans to move. Nonetheless, the possibility of future relocation reinforces the utility of referencing the Agency's website, as it ensures the public always has access to current contact information without requiring further amendments to the Board's regulations.

Respectfully submitted,

Dated: April 11, 2025

By: /s/ Sara G. Terranova
Assistant Counsel
Division of Legal Counsel

2520 West Iles Ave.
P.O. Box 19276
Springfield, IL 62794
217-782-5544
sara.terranova@illinois.gov

SERVICE LIST

ILLINOIS POLLUTION CONTROL BOARD

Don Brown, Clerk
60 E. Van Buren St.
Suite 630
Chicago, IL 60605
don.brown@illinois.gov

OFFICE OF THE ATTORNEY GENERAL

69 West Washington Street
Suite 1800
Chicago, IL 60602
enviro@ilag.gov

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

Renee Snow
One Natural Resources Way
Springfield, IL 62702
renee.snow@illinois.gov

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on April 11, 2025, I served true and correct electronic copies of the **Illinois Environmental Protection Agency's Responses** upon the persons listed in the attached service list via email.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Sara G. Terranova
Assistant Counsel
Division of Legal Counsel

DATED: April 11, 2025

2520 West Iles Ave.
P.O. Box 19276
Springfield, IL 62794
217-782-5544
sara.terranoa@illinois.gov