



ILLINOIS POLLUTION CONTROL BOARD

April 8, 2013

GOVERNOR

Pat Quinn



CHAIRMAN

Thomas Holbrook



MEMBERS

Jennifer Burke

Deanna Glosser

Thomas E. Johnson

Carrie Zalewski



SPRINGFIELD OFFICE

1021 N. Grand Ave. East
P.O. Box 19274
Springfield, IL
62794-9274
217-524-8500
FAX 217-524-8500



CHICAGO OFFICE

James R. Thompson Center
100 West Randolph
Suite 11-500
Chicago, IL
60601-3233
FAX 312-814-3669
TTY 312-814-6032



WEB SITE

www.ipcb.state.il.us

By Hand Delivery

Adam Pollet, Acting Director
Department of Commerce and Economic Opportunity
James R. Thompson Center
100 W. Randolph, Suite 400, 3rd Floor
Chicago, Illinois

Re: Request for Economic Impact Study on: Vapor Recovery Rules:
Amendments to 35 Ill. Adm. Code Parts 201, 218, 219
Board Docket R13-18

Dear Acting Director Pollet:

I am writing to request that your Department conduct an economic impact study concerning the above rulemaking proposal. On March 18, 2013, the Illinois Environmental Protection Agency (IEPA) filed the proposal to amend the Board's air pollution rules at 35 Ill. Adm. Code 201, 218, and 219. The proposal includes the phase out of Stage II vapor recovery systems at gasoline dispensing operations in the Chicago ozone nonattainment area. The phase out is due to the widespread use of on-board refueling vapor recovery throughout the national motor vehicle fleet. IEPA filed the proposal under Sections 10, 27, and 28 of the Environmental Protection Act (Act) (415 ILCS 5/10, 27, 28 (2010)).

Section 27(b) of the Act requires, among other things, that the Board do the following:

- (1) request that the Department of Commerce and Economic Opportunity conduct a study of the economic impact of the proposed rules. The Department may within 30 to 45 days of such request produce a study of the economic impact of the proposed rules. At a minimum, the economic impact study shall address (A) economic, environmental, and public health benefits that may be achieved through compliance with the proposed rules, (B) the effects of the proposed rules on employment levels, commercial productivity, the economic growth of small businesses with 100 or less employees, and the State's overall economy, and (C) the cost per unit of pollution reduced and the variability in cost based on the size of the

Mr. Pollet
Page 2
April 8, 2013

facility and the percentage of company revenues expected to be used to implement the proposed rules; and

- (2) conduct at least one public hearing on the economic impact of those new rules. At least 20 days before the hearing, the Board shall notify the public of the hearing and make the economic impact study, or the Department of Commerce and Economic Opportunity's explanation for not producing an economic impact study, available to the public. Such public hearing may be held simultaneously or as a part of any Board hearing considering such new rules. 415 ILCS 5/27(b) (2010).

If I, or my staff, can provide you with any additional information, please let me know. Thank you in advance for your prompt response.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas Holbrook". The signature is written in a cursive style with a large, sweeping arch over the first part of the name.

Thomas Holbrook,
Chairman
Pollution Control Board

cc: John T. Therriault, Assistant Clerk