

## Therriault, John

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**From:** McCambridge, Michael  
**Sent:** Monday, June 17, 2013 1:36 PM  
**To:** Matoesian, Charles  
**Cc:** Burke, Jennifer; Robertson, Daniel; Therriault, John  
**Subject:** R13-11  
**Attachments:** R13-11 100.pdf

PC#1

**John Therriault:** Please place in the record for R13-11 as a public comment.

I appreciated the opportunity to answer questions about the R13-11 NAAQS proceeding this morning. I attach a copy of the Board's May 16, 2012 opinion and order in this matter. The opinion segment should explain what the Board seeks to accomplish in this rulemaking.

You voiced concern over citation to the June 2, 2011 letter from Laurel Kroack to USEPA in which the Agency recommended area designations for sulfur oxides. You stated that USEPA may be near finalizing area designations that would differ from those proposed by the State in that letter. You related that IERG and members of the regulated community may show concern over citation to the letter.

As discussed, this proceeding seeks to incorporate the federal NAAQS into the Illinois regulations as they stood on December 31, 2012. The new January 15, 2013 NAAQS for PM are not included in this proceeding. The new NAAQS will be the subject of the R14-6 proceeding, which will consider all federal amendments that occurred from January 1, 2013 through June 30, 2013.

There are limitations in an identical-in-substance proceeding that do not exist in a general rulemaking. The Board cannot review the substance of the underlying federal rules. The object is to make the best fit for the federal requirements into the Illinois regulations.

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