

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
)  
DEFINITION OF VOM UPDATE, USEPA ) R17-11  
REGULATIONS (July 1, 2016 through ) (Identical-in-  
December 31, 2016) ) Substance  
) Rulemaking – Air)

**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 ILLINOIS 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

Dated: September 19, 2017  
1021 North Grand Avenue East  
P.O. Box 19276  
Springfield, Illinois 62794-9276  
(217) 782-5544

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**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 specific aspects of the proposed amendments in this rulemaking. The Illinois EPA’s responses are as follows:

1. Should the Board include the alternative designation “HFE-347pcf2” and CAS number for the newly excluded compound?

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.

2. Do the corrections prompted by USEPA questions fully address the concerns that underlie those questions?

The Illinois EPA believes that USEPA will likely approve the identical in substance rulemakings previously submitted to it, but Illinois EPA cannot respond for USEPA as to whether its concerns have been fully addressed. Further, it is likely that USEPA concerns and questions will continue to arise each time the Board alters the federal provisions; the Agency therefore 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).

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Annet Godiksen  
Assistant Counsel

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**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 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  
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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: September 19, 2017  
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