

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

IN THE MATTER OF:)
)
PROPOSED NEW 35 ILL. ADM. CODE 249) R20-18
ETHYLENE OXIDE AMBIENT AIR) (Rulemaking – Air)
MONITORING)

NOTICE

TO: Don Brown
Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph Street, Suite 11-500
Chicago, IL 60601-3218

SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I have today filed with the Office of the Clerk of the Illinois Pollution Board the TESTIMONY OF DAVID BLOOMBERG, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Antonette R. Palumbo
Antonette R. Palumbo
Assistant Counsel
Division of Legal Counsel

DATED: February 27, 2020

1021 N. Grand Ave. East
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TESTIMONY OF DAVID BLOOMBERG

My name is David Bloomberg. I am the manager of the Air Quality Planning Section within the Bureau of Air at Illinois EPA. I have been in this position since November 2012. Starting in 2014, the former Air Monitoring Section was also placed under my supervision and merged into Air Quality Planning. Prior to that position, I was the manager of the Compliance Unit in the Bureau of Air for almost eight and a half years. And before that, I worked as an environmental protection engineer in the Regulatory Unit within the Air Quality Planning Section for approximately 12 and a half years. I have a Bachelor of Science degree in Ceramic Engineering from the University of Illinois in Urbana-Champaign.

In my current position, I oversee all the air technical staff tasked with regulations and State Implementation Plan work, modeling, inventory development and maintenance, air monitoring, and related tasks. In all of my positions, I have coauthored rules and Technical Support Documents, as is the case for this proposed rule. Since monitoring duties are contained within the Air Quality Planning Section, my staff will be responsible for carrying out the ethylene oxide monitoring proposed in this rulemaking, and I will be providing testimony regarding this proposal.

Proposed Amendments to 35 Ill. Adm. Code, Adding Part 250: Air Monitoring of Ethylene Oxide

On June 21, 2019, a new section of the Environmental Protection Act, Section 9.16(n), was signed into law requiring the Illinois EPA to “conduct air testing to determine the ambient levels of ethylene oxide throughout the State.” The Agency has proposed amendments to Title 35 of the Illinois Administrative Code, adding a new Part 250: Air Monitoring of Ethylene Oxide.

The proposed new Part 250 requires the Illinois EPA to conduct air monitoring to determine the ambient levels of ethylene oxide in Illinois by collecting air samples at five selected monitoring locations in Illinois. The sampling locations would be in Northbrook, Schiller Park, Alton, Nilwood, and Bondville. These sites are currently in use by the Air Quality Planning Section for the purposes of ambient air monitoring and are adequate to provide the Illinois EPA and the public with information about ambient levels of ethylene oxide throughout the State. The monitoring locations were selected to provide ethylene oxide concentration data from a diverse cross section of locations in Illinois. Monitoring locations would sample both densely populated urban areas and rural areas. The monitoring locations are also spread out geographically consistent with the Section 9.16(n) requirement to “determine the ambient levels of ethylene oxide throughout the State.” A map showing the locations has been included in the Technical Support Document (“TSD”).

Sampling would be conducted every 12 days for the period of six months and consist of a 24-hour sample for each monitoring day. This sampling frequency ensures that samples would be taken on different days of the week, and that at least two samples would be taken on each day of the week during the sampling period. The six-month duration of sampling would result in approximately 15 samples taken at each monitoring location. Samples collected from all sites

would be analyzed to determine ethylene oxide concentrations, and the Agency will make test results publicly available within 30 days of receipt of a quality assured data set.

The test method that would be used to analyze the air monitoring samples collected pursuant to the proposed regulation is USEPA Method TO-15, Determination of Volatile Organic Compounds in Air Collected in Specially-Prepared Canisters and Analyzed by Gas Chromatography/ Mass Spectrometry. According to USEPA, Method TO-15 is currently the only viable method for testing air samples for ethylene oxide concentrations, though there are acknowledged sensitivity challenges discussed in the TSD.

The proposed amendments at 35 Ill. Adm. Code Part 250 address the requirements of the Act regarding ethylene oxide monitoring by the Illinois EPA, and their implementation is both technically feasible and economically reasonable. The rule as proposed can be implemented without economic burden to any entity in the State except for the Illinois EPA, and the Agency considers the costs associated with the monitoring requirements as proposed to be reasonable to meet the requirements set forth in the Act.

CERTIFICATE OF E-MAIL SERVICE

I, the undersigned, on affirmation, state the following:

That I have served the attached Testimony of David Bloomberg by e-mail upon:

Illinois Pollution Control Board
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That my e-mail address is antonette.palumbo@illinois.gov.

That the number of pages in this e-mail transmission is 6.

That the e-mail transmission took place before 5:00 p.m. on the date of February 27, 2020.

ILLINOIS ENVIRONMENTAL
PROTECTION AGENCY

By: /s/ Antonette R. Palumbo
Antonette R. Palumbo
Assistant Counsel
Division of Legal Counsel

DATED: February 27, 2020

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