



# IPC

## Illinois Pollution Control Board

### GOVERNOR

JB Pritzker



### CHAIR

Barbara Flynn Currie



### MEMBERS

Michelle Gibson

Michael D. Mankowski

Jennifer Van Wie



### CHICAGO OFFICE

60 East Van Buren Street  
Suite 630  
Chicago, IL  
60605

Main: 312-814-3620  
FAX: 312-814-3669  
TTY: 866-323-1677



### SPRINGFIELD OFFICE

1021 N. Grand Ave. East  
Springfield, IL  
62794-9274

Main: 217-524-8500  
FAX: 217-524-8508



### WEB SITE

[pcb.illinois.gov](http://pcb.illinois.gov)

June 6, 2024

Kristin A. Richards, Director  
Department of Commerce and Economic Opportunity  
555 West Monroe Street, 12th Floor  
Chicago, Illinois 60661

Re: Request for Economic Impact Study for Amendments to 35 Ill. Adm. Code Subtitle B, Board Docket R18-21.

Dear Director Richards:

I write to request that the Department of Commerce and Economic Opportunity (DCEO) conduct an economic impact study of the rulemaking proposal cited above. On June 6, 2024, the Illinois Pollution Control Board adopted a proposal for public comment. In it, the Board proposes to amend its air pollution rules by removing redundant or unnecessary language, replacing outdated language, updating statutory references, and making other non-substantive revisions.

For the reasons below, we would appreciate your response to this request no later than Monday, September 30, 2024.

Section 27(b) of the Environmental Protection Act requires the Board to:

- (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 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) (2022).

The Board expects to hold the second hearing in this expedited matter no later than Thursday, November 7, 2024. To meet its rulemaking deadlines, the Board would like to combine the hearing required by Section 27(b) with a hearing on the substantive merits of its proposed revisions. Under these circumstances, the Board respectfully asks that you complete your economic impact study no later than Monday, September 30, 2024. If my staff or I can provide any additional information, please let me know.

Thank you in advance for your prompt response.

Sincerely,

*Barbara Flynn Currie*

Barbara Flynn Currie, Chair  
Pollution Control Board

cc: Don A. Brown, Clerk of the Board

