



IPCB

Illinois Pollution Control Board

GOVERNOR

JB Pritzker



CHAIR

Barbara Flynn Currie



MEMBERS

Michelle Gibson

Michael D. Mankowski

Angela Tin

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

2520 West Iles Avenue
Springfield, IL
62704

Main: 217-524-8500

FAX: 217-524-8508



WEB SITE

pcb.illinois.gov

July 11, 2025

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

Re: Request for Economic Impact Study of Amendments to 35 Ill. Adm. Code 219, Organic Material Emission Standards for the Metro East Area (Board Docket R25-25).

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 26, 2025, the Illinois Pollution Control Board accepted the proposal. In it, the Illinois Environmental Protection Agency proposed that the Board adopt amendments under Sections 27 and 28 of the Environmental Protection Act and 35 Ill. Adm. Code 102.202 to add an exemption for aerospace facilities. This exemption was inadvertently omitted in a previous rulemaking, Amendments to 35 Ill. Adm. Code 219, Organic Material Emission Standards for the Metro-East Area, and 35 Ill. Adm. Code 211, Definitions and General Provisions, R21-18.

For the reasons below, we would appreciate your response to this request no later than Monday, August 25, 2025.

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).

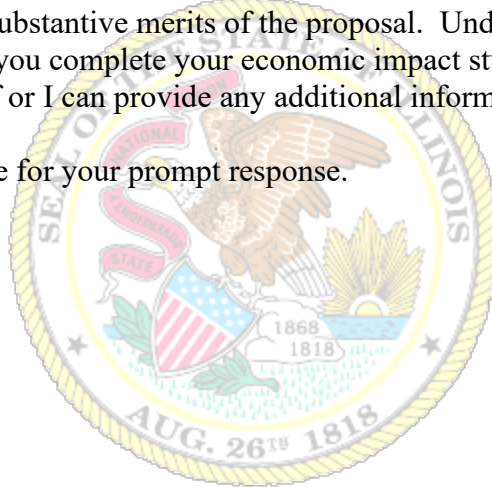
Although there is no statutory decision deadline applicable to this rulemaking, the Board is scheduling public hearings. The Board would like to combine the hearing required by Section 27(b) with a hearing on the substantive merits of the proposal. Under these circumstances, the Board respectfully asks that you complete your economic impact study no later than Monday, August 25, 2025. 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
Garrett Carter; General Counsel, DCEO
Isabel C. Vélez Diaz; Deputy Director, DCEO