



LECET

Laborers-Employers Cooperation and Education Trust

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January 21, 2014

The Honorable Deanna Glosser
Chairperson
Illinois Pollution Control Board
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

Re: R2014-20 - Proposed Illinois EPA "Emergency" Rules Regulating Bulk Storage Terminals for Petroleum Coke (Petcoke) and Coal

Dear Chairperson Glosser:

On behalf of the 20,000 members of Midwest Region of the Laborers' International Union of North America (LIUNA) and our hundreds of signatory contractors represented by the Illinois Laborers'-Employers' Cooperation and Education Trust (IL LECET), I urge the Illinois Pollution Control Board (IPCB) to rethink its use of the emergency rulemaking process in relation to the proposed regulations contained in R2014-20.

While we can certainly appreciate and share the IPCB's concern with protecting air quality, we feel that promulgating the sweeping regulations contained in R2014-20 in such a compressed time frame is not a recipe for producing sound public policy.

Rather than proposing and finalizing these rules over the course of one week (and allowing public comment to occur over the course of the one intervening holiday weekend), the IPCB should consider the proposed regulations allowing for educated public comment and debate that the standard rulemaking process affords.

LIUNA and IL LECET would like to have time to ascertain the impact such rules will have on the refineries and other facilities that produce petroleum coke and the other petroleum by-products that R2014-20 is drafted to regulate.

*The Honorable Deanna Glosser
January 21, 2014*

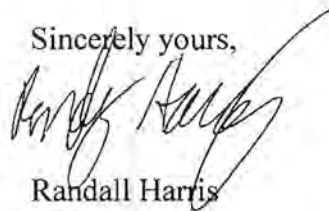
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Many members of our union (and others) work in such facilities, while others have worked a total of hundreds of thousands of hours at them in the past – and hope to do so again in the future on slated future expansions of these facilities. Will these rules impact the present or future jobs of these hard-working men and women? That should be a major consideration of the IPCB and we submit that no one yet knows the answer to that question and others given the incredibly accelerated process of this regulatory undertaking.

We ask that the IPCB take a step back and allow all interested parties – citizens who live near Petcoke storage sites, environmental groups, business and labor, alike – the opportunity to thoroughly review these proposed rules by using the standard process used to promulgate similar regulations.

With kind regards, I am

Sincerely yours,

A handwritten signature in black ink, appearing to read "Randall Harris", written over the typed name.

Randall Harris
Director

RH:pn