July 20, 2015

Illinois Pollution Control Board

**Re: Petition of Variance for Chlorides** 

Dear Board Members,

The Chemical Industry Council of Illinois (CICI) is a statewide trade association representing the chemical industry in Illinois. CICI represents 207 member companies employing more than 44,000 workers at an average annual wage of \$97,000 in 726 manufacturing facilities and 877 wholesale and distribution facilities in Illinois.

CICI represents several chemical business along the Chicago Area Waterway System (CAWS) and the Lower Des Plaines River (LDPR) and has been intimately involved in the Use Attainability Analysis of the Chicago Area Waterways System and the Lower Des Plaines River rulemaking since the beginning. It has come to our attention that there is a need for some clarification regarding the "effective date" of the new chlorides standard. As a result, CICI supports those affected facilities who have submitted a request of a stay of the rulemaking until the clarification can be ferreted out, and it be determined whether or not that more time is needed to ensure a variance can be proposed and approved.

CICI appreciates the opportunity to offer these comments.

Sincerely,

Lisa Frede

CICI

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