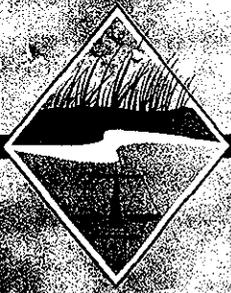


ILLINOIS POLLUTION CONTROL BOARD



GOVERNOR

Rod R. Blagojevich

CHAIRMAN

G. Tanner Guard, Ph.D.

SPRINGFIELD OFFICE

1821 North Grand Ave. East
P.O. Box 19274
Springfield, IL
62791-9274
217-524-8500
FAX 217-524-8508

CHICAGO OFFICE

James R. Thompson Center
100 West Randolph
Suite 11-500
Chicago, IL 60601
312-814-3620
FAX 312-814-3669
TTY 312-814-6032

WEB SITE

www.ipcb.state.il.us



RECYCLED AND RECYCLED PAPER

February 22, 2006

Jack Lavin, Director
Department of Commerce and Economic Opportunity
620 East Adams Street, S-6
Springfield, Illinois 62704

RECEIVED
CLERK'S OFFICE

FEB 27 2006

STATE OF ILLINOIS
Pollution Control Board

Re: Request for Economic Impact Study for: **Organic Material Emission Standards and Limitations for the Chicago and Metro-East Areas: Proposed Amendments to 35 Ill. Code 218 and 219 (R06-21)**

Dear Director Lavin:

The Pollution Control Board (Board) has received a rulemaking proposal, filed by the Illinois Environmental Protection Agency (Agency) on December 22, 2005, which seeks to amend Parts 218 and 219 of the volatile organic material (VOM) rules to allow for the use of add-on controls as a compliance option for printing operations using cold cleaning solvent degreasing. The Agency stated that it is proposing to revise these rules rather than having four Chicago area companies, identified as potentially affected, file site-specific rules or variance requests.

I am writing to request that you determine whether your Department will conduct an economic impact study concerning this proposal.

Since 1998, Section 27 (b) of the Environmental Protection Act has required the Board to:

1) "request that the Department of Commerce and Economic Opportunity (formerly the Department of Commerce and Community Affairs) 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 of company revenues expected to be used to implement the proposed rules; and

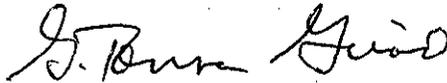
(2) conduct at least one public hearing on the economic impact of those rules. At least 20 days before the hearing, the Board shall notify the public of

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) (2004).

The Board is currently in the process of scheduling hearings in this matter. I would greatly appreciate a response from you concerning DCEO's position on whether it will perform the economic impact study. If I, or my staff, can provide you with any additional information, please let me know. While the Board can proceed to hold hearings while awaiting your decision, the Environmental Protection Act does not allow the Board to complete its rulemaking process without your Department's input.

Thank you for your early response.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Tanner Girard". The signature is fluid and cursive, with the first name "G." and last name "Girard" clearly distinguishable.

G. Tanner Girard
Acting Chairman, Pollution Control Board

Cc: Dorothy M. Gunn, Clerk
Erin Conley, Rules Coordinator