



# ILLINOIS POLLUTION CONTROL BOARD

July 11, 2014



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Pollution Control Board

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Adam Pollet, Director  
Department of Commerce and Economic Opportunity  
100 W. Randolph St.  
Suite 3-400  
Chicago, Illinois 60601

Re: Request for Economic Impact Study for: **Proposal of Clifford-Jacobs Forging Company for an Amendment to the Site-Specific Rule at 35 Ill. Adm. Code 901.119 (R 14-22)**

Dear Director Pollet:

On June 2, 2014, Clifford-Jacobs Forging Company (Clifford-Jacobs) filed a rulemaking proposal to amend its site-specific noise regulation at Section 901.119 of the Board's noise regulations. That provision, which applies to Clifford-Jacobs' forging facility in Champaign County, specifies a maximum number of forging hammers that may be operated and permissible hours of operation—6 a.m. to 11 p.m., Monday through Saturday. The proposal would amend Section 901.119 to increase by seven hours a day the permissible hours of operation, allowing for operations up to 24 hours a day, six days a week.

I write to request that the Department of Commerce and Economic Opportunity conduct an economic impact study concerning this proposal. For reasons explained below, we would appreciate your response to this request no later than Friday, August 29, 2014.

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 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) (2012).

Although there is no decision deadline in this rulemaking, the Board intends to proceed promptly and has scheduled the hearing in this matter for September 23, 2014. In the interest of administrative economy, the Board would like to combine the hearing required by Section 27(b) with a hearing on the substantive merits of Clifford-Jacobs' proposal. Under these circumstances, the Board respectfully asks that you determine whether the Department of Commerce and Economic Opportunity will conduct an economic impact study on the proposal and respond no later than Friday, August 29, 2014. If I or my staff can provide any additional information, please let me know.

Thank you in advance for your prompt response.

Sincerely,



Deanna Glosser, Ph.D., Chairman  
Pollution Control Board

cc: John T. Therriault, Clerk of the Board