

BEFORE THE ILLINOIS POLLUTION CONTROL BOARD

| | | |
|---------------------------------------|---|----------------------------------|
| IN THE MATTER OF: |) | |
| |) | |
| REVISION OF THE BOARD'S |) | R00-20 |
| PROCEDURAL RULES: 35 ILL. ADM. |) | (Rulemaking – Procedural) |
| CODE 101-130 |) | |
| |) | |

COMMENTS OF THE CHEMICAL INDUSTRY COUNCIL OF ILLINOIS

NOW COMES the Chemical Industry Council of Illinois (“CICI”) through its Regulatory Affairs Director, Christie Bianco, and hereby submits the following comments relating to the above-referenced matter.

CICI is a not-for-profit, statewide association that represents 189 corporations, over one hundred of which are chemical firms who manufacture, blend, distribute and sell chemicals. The chemical industry in the state of Illinois ranks third in the United States in chemical exports, fourth in value of chemical shipments and maintains more than 62,000 employees.

CICI appreciates the opportunity to comment on proposed Part 130. CICI has reviewed and endorses the comments submitted separately by the Illinois Environmental Regulatory Group (“IERG”).

CICI echoes the intent of IERG in seeking confirmation from the Illinois Pollution Control Board (“Board”) that its proposed Part 130 is not limited to trade secret claims for information submitted to the Board, but also includes claims to the Illinois Environmental Protection Agency (IEPA) and any other agency dealing with trade secret issues.

Preservation of rights and protection of confidentiality, especially when dealing with business information, is of critical importance to the members of CICI. However, we understand that public information needs to be readily available and accessible. CICI believes that the comments and proposed revisions submitted by IERG will address both concerns. CICI

appreciates the work IERG has put forth in these comments and the Board's anticipated consideration.

Respectfully Submitted,
Chemical Industry Council of Illinois

By: _____
Christie Bianco

Dated: June 15, 2000

Christie Bianco
Regulatory Affairs Director
Chemical Industry Council of Illinois
9801 West Higgins Road, Suite 515
Rosemont, IL 60018