



**Chemical Industry
Council of Illinois**

June 21, 2022

Mr. Don Brown
Clerk of the Board
Illinois Pollution Control Board
60 E. Van Buren St., Ste. 630
Chicago, IL 60605

Re: Comment of CICI requesting the Board not stay major stationary source construction and modification permitting rulemaking R2022-17

Clerk Brown and Members of the Pollution Control Board:

The Chemical Industry Council of Illinois (CICI) is a state-wide business trade group that represents the interests of the chemical industry in the state of Illinois. CICI has 215 members representing over 656 facilities in Illinois. CICI members employ over 46,300 people in Illinois with an average annual wage of \$114,083.

On behalf of the many member companies that would benefit from the rule amendments proposed by the Illinois Environmental Regulatory Group (IERG) in this matter, CICI writes to ask that the Board not grant the stay requested by the Illinois Attorney General's Office (AGO), or in the alternative, that the Board only stay those aspects of the rule that are alleged by the AGO to be subject to reconsideration.

The rule changes sought by the Illinois Environmental Regulatory Group (IERG) are widely supported by the business community, would help bring Illinois' permitting rules up to date with the current federal rules. The ability to get a permit is an important economic development consideration and Illinois' outdated rules have become an obstacle to attracting investments.

The potential issues identified as concerning to the AGO make up less than 1% of the proposed rule amendments, and both IERG and the AGO have suggested that the Board consider limiting its stay to only the contested language. While we believe that the rule should be adopted as proposed by IERG, we see no reason for staying the adoption of the proposed rules any more than absolutely necessary.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads 'Mark A. Biel'.

Mark Biel, CEO
Chemical Industry Council of Illinois