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June 16, 2022

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

Clerk Brown and Members of the Pollution Control Board:

On behalf of the Illinois Manufacturers' Association (IMA) and our nearly 4,000 member companies and facilities across Illinois, I write you today to request that the Pollution Control Board (Board) not stay the major stationary source construction and modification permitting rulemaking R2022-17 as requested by the Illinois Attorney General's Office. Alternatively, the IMA would request that the Board only stay those aspects of the rule that are alleged by the AGO to be subject to reconsideration.

The changes in the abovementioned rulemaking are widely supported by the business community and 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 The ability to get a permit is an important economic development consideration and Illinois' outdated rules have become an obstacle to attracting investments. Manufacturers across the country are making decisions on where to operate or continue operating, and permitting is always a top consideration in those decisions.

While the IMA believes that the rule should be adopted as originally proposed by the Illinois Environmental Regulatory Group, we see no reason for staying the adoption of the proposed rules any more than necessary.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Griffith', written over a white background.

Donovan Griffith
Senior Director of Government Affairs

From: [Donovan Griffith](#)
To: [Brown, Don](#)
Subject: [External] NRS Rulemaking Public Comment - IMA
Date: Monday, June 20, 2022 11:50:48 AM
Attachments: [IMA NRS Rulemaking Comments.pdf](#)

Hello Mr. Brown,

I hope this email finds you well. Attached you will find comments from the Illinois Manufacturers' Association (IMA) on the NRS rulemaking - docket R2022-17. Could you please have this letter docketed as a public comment in rulemaking docket R2022-17? I appreciate your help and I am happy to chat if you have any questions.

Best,

Donovan

Donovan Griffith
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