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From: [McGill, Richard](#)
To: [Brown, Don](#)
Cc: [Paruchuri, Anupama](#); [Bilbruck, Shannon O.](#)
Subject: FW: Pre-review follow-up
Date: Tuesday, April 7, 2026 8:07:33 AM

Good morning, Mr. Clerk,

Please docket this forwarded email from JCAR staff as a public comment in R18-21.

Thank you.

Richard R. McGill, Jr.

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From: Rivas, Tobias <TobiasR@ilga.gov>
Sent: Monday, April 6, 2026 12:45 PM
To: McGill, Richard <Richard.McGill@illinois.gov>
Subject: [External] Pre-review follow-up

Hi Richard,

SOS asked us to do a pre-filing review on these 14 rulemakings so that they can avoid a high

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volume of replacement page requests after filing, apparently without informing you. This is not something we do automatically on all rulemakings; we offer it upon request.

We looked into the two examples you gave me regarding changing the subscript for nitrogen oxides and changing “unit” to “source”. Both items seem to be mistakes on our part, which we apologize for. Technical pre-review is handled by our support staff, so I can’t comment on why or how those particular errors occurred.

Incidentally, though, shouldn’t the first instance of “NO_x” in the paragraph in 35.201 beginning with “Nitric acid plants” actually be “NO₂” since it’s replacing the term “nitrogen dioxide” and not “nitrogen oxide”?

We still ask that you review the discrepancies in the redline documents and make changes where appropriate. Otherwise, SOS will end up needing replacement pages to correct many of these items, which they are hoping to avoid. For example, in line 179 of the redline document for 35-201, our page number (11965) in the source note is correct. Also, remember that your rulemaking documents should be written with track changes turned on, including for the table of contents (Kim thinks some of the issues are due to track changes being turned off).

However, none of the items in the redline documents require a written (or otherwise) response to us, and you are welcome to ignore any changes that are due to mistakes on our part or that are substantive.

I would also note that we can’t force you to do anything with your rule text pre-filing. If PCB is under a statutory deadline to file these rulemakings (or it decides that it would rather file and then address mistakes through replacement pages), we can’t stop it. But our request is that you review the redline documents and make changes to the text you file as appropriate.

Let me know if you have any other questions.

Best,

Toby Armas-Rivas

Joint Committee on Administrative Rules

(217) 785-2254

TobiasR@ilga.gov

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