

CICI / **Chemical Industry Council of Illinois**
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PC #1

July 14, 2005

Dorothy Gunn, Clerk
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph Street, Suite 11-500
Chicago, Illinois 60601

**Re: R 05-19, PROPOSED AMENDMENTS TO EXEMPTIONS FROM STATE PERMITTING REQUIREMENTS (35 ILL. ADM. CODE 201.146);
COMMENTS OF THE CHEMICAL INDUSTRY COUNCIL OF ILLINOIS**

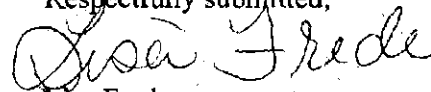
Dear Ms. Gunn:

The Chemical Industry Council of Illinois ("CICI") would like to register its voice in support of the amendment to the Board's regulations which is proposed in this proceeding. CICI is a statewide trade association representing the chemical industry in Illinois. CICI has 198 member companies employing over 54,000 workers in 745 manufacturing facilities and 975 wholesale and distribution facilities in Illinois.

The record in this proceeding demonstrates that a *de minimis* exemption from state permitting requirements will relieve many Illinois businesses of an unnecessary paperwork burden and conserve state permitting resources for larger emissions sources. Furthermore, it will do so without increasing emissions or otherwise adversely impacting Illinois EPA's ability to assure protection of the environment. This more efficient and targeted use of state resources is both consistent with the approach taken by our neighboring other Region 5 states and consistent with sound management of state resources.

We applaud the Illinois Environmental Regulatory Group, the Illinois EPA and the Board for their efforts in this proceeding.

Respectfully submitted,



Lisa Frede
Regulatory Affairs Director
Chemical Industry Council of Illinois

Headquarters

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