

**From:** [McGill, Richard](#)  
**To:** [Brown, Don](#)  
**Cc:** [Tipsord, Marie](#); [Powell, Mark](#)  
**Subject:** FW: Questions regarding 35 IAC 225 rulemaking (R18-20)  
**Date:** Thursday, November 2, 2017 3:59:17 PM

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Mr. Clerk:

I'm forwarding here an 11/2/17 email from Jonathan Eastvold of JCAR and my 11/2/17 email responding to him. As discussed, please docket these emails as a single public comment in R18-20, replacing the public comment that consisted of only Mr. Eastvold's email.

If you have any questions, please let me know. Thank you.

Richard R. McGill, Jr.  
Illinois Pollution Control Board  
Senior Attorney  
312-814-6983  
[richard.mcgill@illinois.gov](mailto:richard.mcgill@illinois.gov)

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**From:** McGill, Richard  
**Sent:** Thursday, November 2, 2017 3:55 PM  
**To:** 'Eastvold, Jonathan C.' <JonathanE@ilga.gov>  
**Subject:** RE: Questions regarding 35 IAC 225 rulemaking (R18-20)

Good afternoon, Jonathan:

Our responses appear below in bold font, preceded by your questions for convenience:

1. **Would it be possible to get more data explaining how much of an increase in emissions each facility could have as a result of this rulemaking? (The emissions limits being replaced are expressed in lb/MMBtu, and the new ones are expressed in tons. An apples-to-apples comparison for each facility would be extremely helpful.) Also, would it be possible (using EPA's BenMAP or some other application) to estimate the economic impact of these additional emissions (contrasted, if at all possible, with hard estimates for the economic benefits to affected communities from the looser**

requirements)? **We will ask that IEPA answer these questions at the hearings being scheduled for January and March 2018.**

2. Will relaxing the SO<sub>2</sub> and NO<sub>x</sub> restrictions result in any change in CO<sub>2</sub> emissions? **We will ask that IEPA answer this question at the hearings being scheduled for January and March 2018.**
3. Should there be a period at the end of subsection (c)(2)(D)? **Yes. Also, it appears that “ )” should be inserted after “Rankine” and before the period.**
4. In the last line of (c)(5)(A), should "cubic feet of flue" be "cubic feet of flue gas"? **Yes.**
5. In (e)(1)(E)(ii), should it be from 5/1 **to** 9/30 or from 5/1 **through** 9/30? Same question in (f)(1)(B)(ii), (f)(2) (column B header), (f)(3)(A)(iii), and (f)(3)(B)(iv). **This date range spans the ozone season, which includes 9/30; so yes, in all instances “through” may be used (and may be more precise).**
6. In (f)(1)(B)(ii) and (iii), there was a question raised about the construction "must not cause or allow to be discharged into the atmosphere combined...emissions". What is the difference between a scenario in which the emissions are caused vs. allowed to be discharged? **We will ask that IEPA answer this question at the hearings being scheduled for January and March 2018.**

I will timely pass along to you any information we receive that is responsive to your question Nos. 1, 2, and 6.

If you have any other questions, please let me know. Thank you.

Best regards,

Richard

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**From:** Eastvold, Jonathan C. [<mailto:JonathanE@ilga.gov>]  
**Sent:** Thursday, November 2, 2017 10:41 AM  
**To:** McGill, Richard <[Richard.McGill@illinois.gov](mailto:Richard.McGill@illinois.gov)>  
**Subject:** [External] Questions regarding 35 IAC 225 rulemaking (R18-20)

We've got a few questions at this stage of the process:

1. Would it be possible to get more data explaining how much of an increase in emissions each facility could have as a result of this rulemaking? (The emissions limits being replaced are expressed in lb/MMBtu, and the new ones are expressed in tons. An apples-to-apples comparison for each facility would be extremely helpful.) Also, would it be possible (using EPA's BenMAP or some other application) to estimate the economic impact of these additional emissions (contrasted, if at all possible, with hard estimates for the economic benefits to affected communities from the looser requirements)?
2. Will relaxing the SO<sub>2</sub> and NO<sub>x</sub> restrictions result in any change in CO<sub>2</sub> emissions?
3. Should there be a period at the end of subsection (c)(2)(D)?
4. In the last line of (c)(5)(A), should "cubic feet of flue" be "cubic feet of flue gas"?
5. In (e)(1)(E)(ii), should it be from 5/1 **to** 9/30 or from 5/1 **through** 9/30? Same question in (f)(1)(B)(ii), (f)(2) (column B header), (f)(3)(A)(iii), and (f)(3)(B)(iv).
6. In (f)(1)(B)(ii) and (iii), there was a question raised about the construction "must not cause or allow to be discharged into the atmosphere combined...emissions". What is the difference between a scenario in which the emissions are caused vs. allowed to be discharged?

Thanks so much for your help.

Sincerely,

Jonathan Eastvold

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