

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
AMENDMENTS TO ) R18-20  
35 ILL. ADM. CODE 225.233, ) (Rulemaking – Air)  
MULTI-POLLUTANT STANDARDS (MPS) )

**NOTICE**

TO: Don Brown  
Clerk  
Illinois Pollution Control Board  
James R. Thompson Center  
100 West Randolph St., Suite 11-500  
Chicago, IL 60601-3218

**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have today electronically filed with the Office of the Clerk of the Illinois Pollution Control Board the ILLINOIS ENVIRONMENTAL PROTECTION AGENCY’S PREFILED QUESTIONS FOR BRIAN P. URBASZEWSKI, a copy of which is herewith served upon you.

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Antonette R. Palumbo  
Antonette R. Palumbo  
Assistant Counsel  
Division of Legal Counsel

DATED: March 2, 2018

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**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY'S  
PREFILED QUESTIONS FOR BRIAN P. URBASZEWSKI**

NOW COMES the Illinois Environmental Protection Agency (“Illinois EPA” or “Agency”), by one of its attorneys, and hereby submits prefiled questions for Brian P. Urbaszewski.

1. Before submitting your prefiled testimony to the Illinois Pollution Control Board (“Board”), did you read the entirety of your submittal, including all of the attachments?
2. You state on page 3 of your testimony that, “*there is no safe threshold level of fine particle pollution below which there is no risk to human health from exposure.*” You attribute your quote to a letter from Gina McCarthy, Assistant Administrator, United States Environmental Protection Agency (“USEPA”), to Fred Upton, Chairman, House Committee on Energy and Commerce, attached to your testimony as Exhibit 3. Is that an exact quote from the letter itself? If so, could you please cite the page number and paragraph?
3. That letter is an explanation of how rulemaking benefits were monetized by USEPA in performing cost-benefit analyses, correct?
4. In the letter Ms. McCarthy states, in part, “...there is no threshold level of fine particle pollution below which health risk reductions are not achieved by reduced exposure.” The purpose of this statement is simply to defend monetizing reductions below the National Ambient Air Quality Standard (“NAAQS”) levels in USEPA’s cost benefit analysis, correct?
5. This letter was not sent to that Committee to suggest that a different standard be set by that Committee or any other legislative or administrative body that there be zero particulate pollution in populated areas, correct?

6. In your testimony, you state that in setting a NAAQS, “*An adequate margin of safety’ obviously still requires a judgment call by the United States Environmental Protection Agency (U.S. EPA) and does not mean that U.S. EPA picks a threshold below which no health harms occur.*” Are you suggesting that the Board make a different judgment call and attempt to set its own standard below the NAAQS in this rulemaking?
7. Exhibit 4, attached to your testimony, *Risk and Exposure Assessment to Support the Review of the SO<sub>2</sub> Primary NAAQS: Final Report* is 895 pages of your 1003-page testimony package. How many studies did the USEPA conduct and review before setting the SO<sub>2</sub> NAAQS?
8. In this Assessment, did USEPA analyze the evidence of health effects of SO<sub>2</sub>, potential alternative standards, exposure assessments, health risk characterizations for peak SO<sub>2</sub> exposures, exposure analyses and health risk assessments for at-risk populations, and risk-based considerations related to the SO<sub>2</sub> NAAQS?
9. Are you suggesting that USEPA did not conduct a thorough review in 2009 before promulgating that standard in 2010?
10. Also in your testimony, you assert, “For SO<sub>2</sub>, it is short term spikes that trigger measurable health harms.” The Agency is unaware of any definition of “spikes” under Illinois laws or regulations. Could you quantify what you consider a “spike” in SO<sub>2</sub> concentrations? In other words, what concentration of SO<sub>2</sub> in ambient air do you consider a “spike”? Over what time interval would you consider that concentration to be a “spike”?
11. In your conclusion, you claim, “*The current rule, by imposing a fleet wide average, has prevented SO<sub>2</sub> ‘hot spots’ and prevented many short term spikes in SO<sub>2</sub> that have been tied to health effects.*” The Agency is unaware of any definition of “hot spot” under Illinois laws or regulations. Please explain what you mean by “hot spots.” In other words, what pollutant concentrations or emissions levels, over what interval of time, do you consider a “hot spot”?
12. Please detail specific instances where the current Multi-Pollutant Standards (“MPS”) prevented short-term increases that you would consider “spikes” in SO<sub>2</sub>.
13. In any instances detailed in response to Question 12, please explain how the current *annual* fleet-wide average prevented any short-term increases that you would consider “spikes.”
14. Please detail specific instances where the current MPS prevented SO<sub>2</sub> hot spots.

15. In any instances detailed in response to Question 14, please explain how the current *annual* fleet-wide average prevented any annual localized mass emission increases that you would consider “hot spots.”

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY,

/s/ Antonette R. Palumbo  
Antonette R. Palumbo  
Assistant Counsel  
Division of Legal Counsel

Dated: March 2, 2018

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