

January 5, 2021

Don Brown, Clerk of the Board
Illinois Pollution Control Board
James R. Thompson Center
100 West Randolph, Suite 11-500
Chicago, Illinois 60601-3218
Via email: Don.Brown@illinois.gov



RE: Public Comment on Case # R2021-018, Rulemaking Amendments to 35 Ill. Adm. Code 219, Organic Material Emission Standards for the Metro-East Area, and 35 Ill. Adm. Code 211, Definitions and General Provisions

Dear Mr. Brown,

Thank you for the opportunity to comment on the above-referenced rulemaking. Boeing has operations in St. Clair that could be affected by the proposed rule.

Boeing St. Clair was the company's first manufacturing facility in Illinois and offers proximity to key customers. The Boeing Company began aircraft production work at the site in early 2011 as part of the Boeing Defense, Space & Security Fabrication Division. The site is responsible for building major component parts for the F/A-18 Super Hornet, F-15, CH-47 Chinook and commercial 777X programs. In addition, the facility hosts the MQ-25 unmanned aircraft system flight test program. The Boeing Company is proud to work with nearly 500 businesses in Illinois to create jobs and economic opportunity as we work together to provide the world's most advanced aerospace products and services.

We have reviewed the rule language proposed by the Illinois Environmental Protection Agency (IEPA), and we appreciate the agency's attention to how volatile organic materials (VOM) are regulated for the aerospace industry in the Metro-East area. The proposed rule language creates consistency with federal Control Techniques Guidelines on reasonably available control technology for aerospace manufacturing operations in non-attainment areas, providing uniformity with the regulations of numerous other states that host major aerospace manufacturing operations, and consistency with overlapping federal aerospace requirements in 40 CFR 63 for certain sources required to employ the maximum available control technology. By adopting the rule, the State of Illinois is promoting an appropriate approach for aerospace VOM regulation that provides reliable, coherent, and widely accepted requirements for controlling emissions from aerospace coating and cleaning activities.

We submit these comments along with our overall support for the rulemaking. Although we are not asking for any response from the Board or the agency, we are available to answer any questions. We thank the Chair and Members of the Board as well as the IEPA for the carefully drafted rule and for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Verhaar".

Michael L. Verhaar
Environment Manager
Southwest and Central Region
The Boeing Company