

From: [McGill, Richard](#)
To: [Brown, Don](#)
Subject: docket PC in R21-18; FW: FAA fireworthiness requirements
Date: Friday, January 29, 2021 10:30:54 AM

Good morning, Mr. Clerk:

Please docket—as a public comment in R21-18—this forwarded email exchange with JCAR staff.

Thank you.

Richard R. McGill, Jr.
Illinois Pollution Control Board
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From: McGill, Richard
Sent: Friday, January 29, 2021 10:25 AM
To: Eastvold, Jonathan C. <JonathanE@ilga.gov>; Fox, Tim <Tim.Fox@illinois.gov>
Cc: Matoesian, Charles <Charles.Matoesian@Illinois.gov>; Vetterhoffer, Dana <Dana.Vetterhoffer@Illinois.gov>
Subject: RE: FAA fireworthiness requirements

Good morning, Jonathan:

Thank you for identifying this problem with the proposed definition “commercial interior adhesive.”

In this rulemaking, the Board is imposing a VOM-content limit (219.204(r)(2)(N)) on commercial interior adhesives, *i.e.*, the materials used in bonding passenger cabin interior components. However, this rulemaking is not imposing any requirement—of fireworthiness or otherwise—on the cabin components themselves. Your question revealed that the definition of “commercial interior adhesive,” as it currently reads, incorrectly suggests that the Board’s emission limits would require that the cabin components comply with FAA fireworthiness requirements. Those FAA requirements stand on their own and are not intended to be incorporated by reference into these Board rules.

To clarify the definition, we suggest the following changes to 211.1327:

“Commercial interior adhesive” means materials used in the bonding of passenger cabin interior components **that are subject to** . ~~These components must meet~~ the Federal Aviation Administration fireworthiness requirements.

Thank you again and please let me know if you have any other questions.

Best regards,

Richard

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From: Eastvold, Jonathan C. <JonathanE@ilga.gov>
Sent: Wednesday, January 27, 2021 2:27 PM
To: McGill, Richard <Richard.McGill@illinois.gov>; Fox, Tim <Tim.Fox@illinois.gov>
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Subject: [External] RE: FAA fireworthiness requirements

In 211.1327, what is the citation for the FAA fireworthiness requirements that are being applied? As it stands, the rule is incorporating these requirements by reference but isn't following the IAPA's requirements for doing so (fully identifying the incorporated material and including a version date).

Thanks so much for your assistance.

Sincerely,

Jonathan C. Eastvold, Ph.D.
Rules Analyst III

Illinois General Assembly
Joint Committee on Administrative Rules
700 Stratton Building

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During the COVID-19 emergency, please call or text my mobile at 217-816-9481

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