

August 1, 2025

Don Brown
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: Rulemaking R25-25, Amendments to 35 IAC 219, Organic Material Emissions Standards for the Metro East Area

Dear Mr. Brown,

Boeing appreciates the opportunity to comment on the above-referenced proposal before the Illinois Pollution Control Board. This proposal would amend 35 IAC 219, which concerns volatile organic material (VOM) emissions for the Metro East area. Boeing has operations in St. Clair that would be affected by the proposed rule.

Boeing St. Clair, the company's first manufacturing facility in Illinois, supports key aerospace programs including the F/A-18 Super Hornet, F-15, CH-47 Chinook, 777X, and MQ-25 uncrewed aircraft system. The facility plays an important role in Illinois' aerospace industry and economy by working with hundreds of the state's businesses to create jobs and economic opportunity.

Boeing agrees with the Illinois Environmental Protection Agency (IEPA) that the proposal would align state VOM rules with the federal guidance for aerospace coatings and maskants published in the Control Techniques Guidelines, "Control of Volatile Organic Compound Emissions from Coating Operations at Aerospace Manufacturing and Rework Facilities" (US EPA-453/R-97-004), which covers reasonably available control technology (RACT) for aerospace manufacturing operations in non-attainment areas. 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 activities and keeps the area competitive for aerospace manufacturing.

Although we are not asking for any response from the Board or the agency in this expression of support for the rulemaking, we are available to answer any questions. We thank the Chair and Members of the Board as well as the IEPA for the opportunity to comment.

Sincerely,



Troy Rutherford
Vice President and Program Manager, MQ-25 Program
Mid-America Airport St. Clair Program Leader
The Boeing Company