

**BEFORE THE ILLINOIS POLLUTION CONTROL BOARD**

IN THE MATTER OF: )  
 )  
AMENDMENTS TO 35 ILL. ADM. CODE 219, ) R21-18  
ORGANIC MATERIAL EMISSION ) (Rulemaking-Air)  
STANDARDS FOR THE METRO EAST AREA, )  
AND 35 ILL. ADM. CODE 211, DEFINITIONS )  
AND GENERAL PROVISIONS )

**NOTICE**

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

**SEE ATTACHED SERVICE LIST**

PLEASE TAKE NOTICE that I have today filed with the Office of the Pollution Control Board the TESTIMONY OF RORY DAVIS, a copy of which is herewith served upon you.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Charles E. Matoesian  
Charles E. Matoesian  
Assistant Counsel

DATED: November 18, 2020

1021 N. Grand Ave. East  
P.O. Box 19276  
Springfield, IL 62794-9276  
(217) 782-5544

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**TESTIMONY OF RORY DAVIS**

My name is Rory Davis. I am the manager of the Regulatory Development Unit in the Air Quality Planning Section of Illinois EPA's Bureau of Air. I became the manager of that unit in March of this year, but have been an Environmental Protection Engineer in the Air Quality Planning Section since 2005.

I have Bachelor of Science degrees in Computational Physics and Mathematics from Illinois State University, and I have a Master's degree in Engineering from the University of Illinois at Chicago with a concentration on Environmental Engineering. I have been a licensed Professional Engineer in Illinois in the environmental discipline since 2010.

In my current position with the Agency, my duties include providing technical support for regulatory proposals, and I was responsible for assembling the Technical Support Document or "TSD" for this rulemaking. I will be providing testimony regarding the proposed regulations and will answer any questions that the hearing participants may have.

The proposed amendments limit coating and cleaning emissions from aerospace manufacturing and rework facilities located in the Metro-East St. Louis area, consistent with USEPA's Control Techniques Guidelines ("CTG") for the industry. The aerospace industry has

unique requirements for coatings that are reflected in the CTG. The CTG was published in 1997, and affected sources nationwide have been complying with limitations consistent with the guidelines since. The proposed amendments are both technically feasible and economically reasonable for the affected sources in Illinois.

I would like to take the opportunity in this testimony to direct the Board's attention to the compliance date in the proposed amendments, January 1, 2021. The Agency acknowledges that any amendments adopted as a result of this rulemaking will not be adopted by January 1, 2021, and that this compliance deadline will therefore need to change. The Agency intends to propose a more appropriate compliance deadline when the likely date of adoption of the amendments becomes more apparent.

I look forward to assisting the Board in gaining a full understanding of the proposed amendments and being able to provide a complete record for the public.

**CERTIFICATE OF E-MAIL SERVICE**

I, the undersigned, on affirmation, state the following:

That I have served the attached Testimony of Rory Davis by e-mail upon:

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That my e-mail address is [charles.matoesian@illinois.gov](mailto:charles.matoesian@illinois.gov).

That the number of pages in this e-mail transmission is 5.

That the e-mail transmission took place before 5:00 p.m. on the date of November 18, 2020.

Respectfully submitted,

ILLINOIS ENVIRONMENTAL  
PROTECTION AGENCY

By: /s/ Charles E. Matoesian  
Charles E. Matoesian  
Assistant Counsel

DATED: November 18, 2020

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