



**Illinois**  
**Department of Commerce**  
& Economic Opportunity  
**OFFICE OF ENTREPRENEURSHIP,  
INNOVATION & TECHNOLOGY**  
JB Pritzker, Governor

TO: Kim Schultz, Executive Director  
Joint Committee on Administrative Rules

FROM: Jonathan Eastvold  
Office of Small Business Regulatory Flexibility

DATE: August 27, 2025

RE: Pollution Control Board – Organic Material Emission Standards and Limitations for the Metro-East Area (35 Ill. Adm. Code 219; [49 Ill. Reg. 8883](#); 7/11/25)

In response to the JCAR request for a Small Business Impact Analysis on the above-mentioned rulemaking, we provide the following:

To quote the [Flinn Report](#), "The Pollution Control Board proposed an amendment to the Part titled Organic Material Emission Standards and Limitations for the Metro-East Area (35 IAC 219; [49 Ill Reg 8883](#)) to correct an inadvertent omission in a previous rulemaking. The rulemaking extends an exemption to volatile organic material (VOM) emissions limits for specialty coatings used at aerospace manufacturing and rework operations in the Metro East area to include primers, topcoats, and chemical milling maskants used for the same purpose, consistent with federal Environmental Protection Agency guidelines."

The Illinois Environmental Protection Agency [identifies three companies](#) in the Metro East (defined in [Sec. 219.103](#) as Madison, Monroe, and St. Clair Counties) that emit sufficient levels of VOMs in the regulated processes to meet the regulatory threshold. None of these companies qualify as small businesses: Gulfstream Aerospace Services (Cahokia), Premiere Air Center (East Alton), and Boeing (Mascoutah).

To verify the absence of affected small businesses, DCEO staff reviewed federal aviation-related contracts and subcontracts associated with the three counties and found no small businesses likely to be impacted by this rule change. A separate search using Dun & Bradstreet Market Insight identified three aviation-related small businesses within the region. However, none advertise the services regulated in this Section and are therefore unlikely to exceed the regulatory threshold.

This proposed rulemaking will not have an economic impact on small businesses.

If you have any questions, please contact me at [Jonathan.Eastvold@illinois.gov](mailto:Jonathan.Eastvold@illinois.gov).

cc: Don Brown, PCB ([don.brown@illinois.gov](mailto:don.brown@illinois.gov))