



May 19, 2008

Clerk's Office
Attention Docket #2008-017
Illinois Pollution Control Board
James R. Thompson Center
100 W. Randolph, Suite 11-500
Chicago, Illinois 60601

**RE: Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;
Docket #2008-017; Final Draft; NPCA Comments**

To Whom it May Concern:

The National Paint and Coatings Association (NPCA)¹ submits the following comments on the final draft amendments to the Illinois EPA (ILEPA) AIM rulemaking. NPCA appreciates the changes that ILEPA has made to the AIM rulemaking in response to our comments to date.

NPCA sent a letter to Illinois Environmental Protection Agency (EPA) on October 23, 2007 to request among other things, that ILEPA include additional definitions and limits for specific specialty coatings (i.e., Conversion varnish, Calcimine recoaters, Impacted Immersion coating, Nuclear coating, Thermoplastic Rubber coating and Mastics) in the IL AIM rule in order to be consistent with the Ozone Transport Commission (OTC) states as well as the national AIM rule. Subsequently, IL EPA made the suggested changes. Unfortunately, NPCA inadvertently neglected to request the addition of another specialty category and limit – "Concrete surface retarder" at 780 g/l.

Again, for consistency with the OTC states, NPCA respectfully requests that the following definition be added to Section 223.307 Definitions for Subpart C; the following limit of 780 g/l be added to Section 223.310 Standards (Subsection (a) VOM Content Limits); and Concrete surface retarder be added to Section 223.310 Standards (Subsection (c) Most Restrictive Limit):

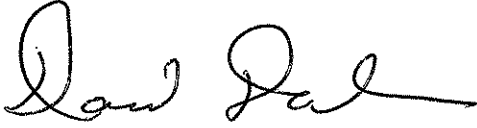
"Concrete surface retarder means a mixture of retarding ingredients such as extender pigments, primary pigments, resin, and solvent that interact chemically with the cement to prevent hardening on the surface where the retarder is applied, allowing the retarded mix of cement and sand at the surface to be washed away to create an exposed aggregate finish."

¹ NPCA is a voluntary, nonprofit trade association representing some 350 manufacturers of paints, coatings, adhesives, sealants, and caulks, raw materials suppliers to the industry, and product distributors. As the preeminent organization representing the coatings industry in the United States, NPCA's primary role is to serve as ally and advocate on legislative, regulatory and judicial issues at the federal, state, and local levels. In addition, NPCA provides members with such services as research and technical information, statistical management information, legal guidance, and community service project support.



Thank you for your consideration of our request. Please do not hesitate to contact us if you have any questions or need additional information.

Sincerely,



David F. Darling, P.E.,
Director, Environmental Affairs



Alison Keane
Counsel, Government Affairs

*** Sent via email and in hard-copy ***