



Ace Hardware Corporation

Paint Division  
21901 South Central Avenue  
Matteson, Illinois 60443  
1-708-720-0600  
Fax 1-708-720-1967

November 13, 2008

John Therriault, Chief Clerk  
Clerk's Office  
Attention Docket #R09-08  
Illinois Pollution Control Board  
100 W. Randolph, Suite 11-500  
Chicago, Illinois 60601

PC #8

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STATE OF ILLINOIS  
Pollution Control Board

RE: **Illinois EPA Architectural and Industrial Maintenance (AIM) Coatings;**  
**Docket #R09-08** *R08-17*

Dear Mr. Therriault:

The Ace Hardware Paint Division produces the Ace brand paint for over 4,500 Ace Hardware stores in all 50 states and in 50 countries worldwide from our two plants in Matteson, IL and Chicago Heights, IL. We produce over 9,000,000 gallons of Ace brand paint per year.

Ace Paint is a member of the National Paint & Coatings Association (NPCA) and supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009 to allow IL adequate time to finalize and adopt the amendments to the AIM rule, and more importantly, provide adequate time for industry to make necessary changes in order to comply with the amendments.

With the new AIM amendments, in addition to changing thousands of formulations, paint manufacturers need to develop and print new labels for the reformulated products. Further, computer systems and other "lock-out" systems need to be upgraded to prevent shipment of "non-compliant" products into IL. In addition, it will take significant time for manufacturers to properly communicate the new VOC limit changes to all distributors, customers and specifiers in order to ensure their compliance with the new products. It is impossible for manufacturers to make these necessary changes and properly communicate the details of the IL AIM rule without having a final adopted rule in hand, particularly, as additional changes may occur between now and the final adoption. Therefore, Ace Paint strongly believes that the implementation date must be moved to July 1, 2009.

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,

Jack Wickham  
Director