

November 26, 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 #13

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STATE OF ILLINOIS
Pollution Control Board

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

Dear Mr. Therriault:

The Henry Company 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.

Henry Company produces and sells a wide variety of home and building repair and construction products in the U.S. and Canada. Many of our products are sold in retail stores and to large distributors and contractors in Illinois. Several of these products will be impacted by the pending Illinois AIM rule.

With the new AIM amendments, in addition to changing 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 takes 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, we strongly believe that the implementation date should be moved to July 1, 2009.

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

Sincerely,



John C. Day,
Vice President Environmental Health & Safety

JCD/lh