



PPG Architectural Finishes, Inc.
151 Colfax Street, Springdale, PA 15144

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DEC 01 2008
STATE OF ILLINOIS
Pollution Control Board

Robert S. Gross
Manager, Environmental Stewardship
Architectural Finishes
(724) 274-3416

November 25, 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 #15

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

08-17

Dear Mr. Therriault:

PPG Architectural Finishes, Inc. is a wholly owned subsidiary of PPG Industries, Inc., with many manufacturing, distribution, and retail facilities throughout Illinois, including an architectural coatings manufacturing facility located in Batavia, IL.

PPG Industries, Inc. 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, PPG Architectural Finishes, Inc. 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,

A handwritten signature in black ink, appearing to read "Robert S. Gross". The signature is fluid and cursive, with the first name "Robert" and last name "Gross" clearly distinguishable.

Robert S. Gross

November 24, 2008

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

PC #16

08-17

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

Dear Mr. Therriault:

Sika Corporation (formerly Valspar Flooring) has been a presence in the Industrial Coating and Sports Floor Finish market for nearly 100 years. Our production facility was on the near South Side of Chicago for many years and our management and operations had run out of Wheeling, Illinois for years.

Sika Corporation is a member of the National Paint & Coatings Association (NPCA) and **does NOT support** NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009.

Paint and coatings companies have had sufficient time and notice to respond to the rule which was to originally be implemented on January 1st of 2008. It is regrettable that other companies have not taken this opportunity to better themselves and their technology in order to support the impending EPA regulations. It is also regrettable that those of us who took the rulemaking seriously and spent the time, energy and funds necessary to revamp our product lines in order to support the new regulations will suffer for our compliance by not being able to take advantage of the first to market opportunities which we counted on to help to offset the cost of timely compliance. Pushing back this rule is causing us to have to support two duplicate product lines in the field. One of the product lines is a fully compliant line released prior to 2008 and the other is our original non compliant line which needs to be left in place in order to compete with others who continue to offer the noncompliant versions as regulations continue to be pushed back. **We, as industry, HAVE HAD adequate time to make necessary changes in order to comply with the amendments and should not be granted extentions due to lack of effort.**

Further, those of us who are in compliance have already made changes to our products, labels and computer system lock outs in order to comply with the original 2008 and then January, 2009 dates. We have already communicated changes to our customers, distributors and specifiers. Therefore, Sika Corporation strongly believes that the implementation date should be held at January 1st, 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,

David DeLarso
Sr. Sales Representative – NE Market
Sika Industrial Flooring
215-429-2871



November 24, 2008

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

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PC #17

08-17

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

Dear Mr. Therriault:

Sika Corporation (formerly Valspar Flooring) has been a presence in the Industrial Coating and Sports Floor Finish market for nearly 100 years. Our production facility was on the near South Side of Chicago for many years and our management and operations had run out of Wheeling, Illinois for years.

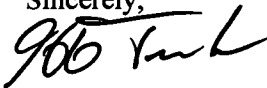
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Further, those of us who are in compliance have already made changes to our products, labels and computer system lockouts in order to comply with the original 2008 and then January 2009 dates. We have already communicated changes to our customers, distributors and specifiers. Therefore, Sika Corporation strongly believes that the implementation date should be held at January 1st, 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,



Jeff Trench
Sports Flooring Manager
trench.jeff@sika-corp.com
210-408-0709
210-415-7687



November 24, 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

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PC #18
08-17

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

Dear Mr. Therriault:

Sika Corporation (formerly Valspar Flooring) has been a presence in the Industrial Coating and Sports Floor Finish market for nearly 100 years. Our production facility was on the near South Side of Chicago for many years and our management and operations had run out of Wheeling, Illinois for years.

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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,



David Orser
Senior Chemist
orser.david@sika-corp.com
201-508-6921

