



SHERWIN-WILLIAMS.

Environmental, Occupational Health & Regulatory Services
101 Prospect Avenue NW
Cleveland, Ohio 44115-1075
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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

PC #14

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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 Sherwin-Williams Company is one of the largest coating manufacturers in the world, with 2007 sales of about 8 billion dollars. We maintain manufacturing facilities and company-owned and operated Stores throughout the country and employ about 26,000 people. In addition to our company-owned stores, we own and operate a major manufacturing facility and a large distribution center within the State of Illinois. Our stores are the exclusive distributors / retailers for the Sherwin-Williams brand. In addition to this distribution, our products, under a variety of additional brand names, are distributed through mass merchandisers, do-it-yourself outlets, hardware stores, and by independent distributors. Our product lines include some of the brands best known to the American people, including – but not limited to – Minwax®, Thompsons®, Pratt & Lambert®, Martin-Senour®, Dutch Boy®, Rust Tough®, Cuprinol®, and H&C®. In the architectural and industrial maintenance product areas these coatings are used for their decorative and protective properties.

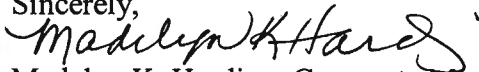
The Sherwin-Williams Company is a member of the National Paint & Coatings Association (NPCA) and supports NPCA's request to extend the implementation date of the AIM rulemaking from January 1, 2009 to July 1, 2009 to allow IL adequate time to finalize and adopt the amendments to the AIM rule. More importantly, this will provide adequate time for our company and customers to make necessary changes in order to comply with the amendments. Normally, we expect a time period of no less than one year from the final adoption of a rule to the effective date of the rule, in order to insure that all customers understand their requirements. Thus, we believe our request for a 5-6 month time period to be very reasonable.

With this new AIM rule, 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. Even more important, it is impossible for us to properly communicate the details of the IL AIM rule without a final adopted rule! This is especially an issue since additional changes may occur between now and the final adoption. Therefore, The Sherwin-Williams Company strongly believes that the implementation date must be moved to July 1, 2009 or later.

Thank you for your consideration of our request. If you have any questions or need additional information, please do not hesitate to contact me by telephone at 216-566-2630 or by email at mkharding@sherwin.com.

Sincerely,



Madelyn K. Harding, Corporate Manager
Regulatory Affairs