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STATE OF ILLINOIS  
Pollution Control Board

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 #20*

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

*R08-17*

Dear Mr. Therriault:

We are True Value Manufacturing, a division of True Value Company and employ 130 at our paint manufacturing facility located in Cary, IL. We have been an active entity in our local community and plan to continue that in the future.

True Value Manufacturing 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, True Value Manufacturing 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,

Marcella G. Nichols, CHMM  
Regulatory Compliance Manager

cc: Gene Brickhouse

cc: Señ. Pamela Althoff