

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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DEC 10 2008

STATE OF ILLINOIS
Pollution Control Board

R08-17

PC #21

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.

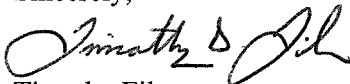
Paint and coatings companies have had sufficient time and notice to respond to the rule that was to originally be implemented on January 1st of 2008. It is regrettable that other companies have not taken this opportunity to better themselves and their technology in order to support the impending EPA 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 extensions due to lack of effort.

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,



Timothy Filas
Senior Production Planner
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