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STATE OF ILLINOIS
Pollution Control Board

December 11, 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 # 22

R09-17

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

Dear Mr. Therriault:

Dave Darling from the NPCA called me to inform me that Sika Corporation's purchase of the Valspar Flooring Division did not include a continued membership in the National Paint and Coatings Association. Although I had assumed we continued to be a member of NPCA when I sent my original letter, it appears that I may not be speaking my opinion as a member of NPCA unless Sika Corporation chooses to joining the organization in the next few days. My comments stand as a formulator, producer and marketer of AIM regulated paint and coating products. **I continue to support an Illinois AIM Rule go live date of January 1, 2009.**

To reiterate, Sika Corporation does NOT support a 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,


Lisa Beth Szczupaj
Director of Business Development

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